



PUBLIC DISCLOSURE

June 06, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Schaumburg Bank & Trust Company, National Association
Charter Number 24150

1180 East Higgins Road
Schaumburg, IL 60173

Office of the Comptroller of the Currency

Midsized Bank Supervision
425 South Financial Place, Suite 2700
Chicago, Illinois 60605

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

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Overall CRA Rating

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

The following table indicates the performance level of **Schaumburg Bank & Trust Company, National Association** (SBT) with respect to the Lending, Investment, and Service Tests:

Performance Levels	SBT Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Based on the data in the Tables and applicable performance context discussed in this evaluation, the overall geographic distribution of loans was good and overall borrower distribution of loans was excellent.
- Community development (CD) loans offered were effective in helping the bank address community credit needs and had a significantly positive impact on the bank’s lending test rating. The bank is a leader in CD loans. SBT originated a significant volume of CD loans under various programs. In addition, the bank uses innovative or flexible loan programs to effectively serve additional community credit needs.
- Qualified investments were effective and very responsive in helping the bank address CD needs. The bank made a significant level of qualified investments, grants, donations and contributions to many local as well as regional qualified CD groups and programs.
- The bank’s retail locations and alternative delivery systems are readily accessible and responsive in helping the bank provide meaningful financial services across the community.
- The bank is a leader in providing CD services. CD services were effective and responsive in helping the bank address CD needs. The significant number of financial services serving CD needs provided a significantly positive impact in the community and were consistent with the bank’s capacity and financial expertise.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

Description of Institution

SBT, is a \$1 billion intra-state financial institution headquartered in Schaumburg, Illinois (IL). The bank was chartered in 2001 and currently operates seven branches. SBT is a wholly-owned subsidiary of Wintrust Financial Corporation (Wintrust), headquartered in Rosemont, IL. During the evaluation period, the bank opened one branch in the Friendship Village senior housing complex in Schaumburg and closed a branch location. Both of these branches were in middle-income census tracts.

Wintrust is a financial services holding company with total assets of approximately \$30 billion. Wintrust's footprint is centered in the Chicago metropolitan area extending into southern Wisconsin and northwest Indiana. Wintrust operations consist of three primary segments: community banking; specialty financing; and wealth management. Under community banking, Wintrust has 15 wholly-owned-banking subsidiaries and operates a national mortgage operation to originate and sell residential mortgages into the secondary market. This nationwide mortgage operation is conducted through a division of one of its banking subsidiaries. The community banking group accounts for 81.7 percent of Wintrust's total assets and operates 157 banking locations. Specialty finance services include commercial insurance premium financing First Insurance Funding (FIFCO); commercial lease financing and short-term accounts receivable financing offered through other Wintrust subsidiaries. Wintrust also offers a full range of wealth management services primarily to community banking customers through three separate subsidiaries. All products and services discussed are available to SBT's customers.

As of December 31, 2017, SBT reported total assets of \$1 billion and Tier One Capital of \$106 million. The bank is primarily a commercial lender focusing on small-to-medium size businesses with commercial and industrial loans representing 39.4 percent of the bank's total loan portfolio and an additional 24.8 percent in non-farm non-residential real estate loans. Consumer loans represent 14.5 percent and multi-family residential represents 5.8 percent of the bank's loan portfolio. One-to-four family residential lending represents 6.3 percent of the bank's loan portfolio. While residential lending represents a small portion of the bank's loan portfolio, it is noted that a full array of residential mortgage products and services are readily available to all consumers through referrals to the bank's affiliated full service mortgage originator. Wintrust has mortgage originators available to meet with any potential applicant at any office. With commercial lending being the bank's primary business strategy our review of the bank's lending performance weighted small business lending performance more than home mortgage and consumer lending.

The current assessment area (AA) for SBT consists of 124 census tracts with 60 in Cook County, IL and 64 in DuPage County, IL. The AA has not changed since the bank's last CRA evaluation; however, CT income designations changed slightly as a result of the census changes that became effective in 2017. The bank's AA continues to consist of no low-income CTs and now has 15.3 percent (19) moderate-income CTs. There was a net loss of three moderate-income CTs, a net loss of one middle-income CT, and a net gain of four upper-income CTs. The AA encompasses a portion of the Chicago-Naperville-Arlington Heights, IL Metropolitan Division (Chicago MD). The Chicago MD is part of the Chicago-Naperville-Elgin, IL-IN-WI MSA (Chicago MSA) and our data presentation in Appendix C is reflected on the MSA level. It is noted that aggregate lending as shown in the tables for small business lending

is skewed as the data is run on a county level and the bank has delineated only 5 percent of the CTs in Cook County (60 out of 1,320 CTs) and in DuPage County the bank delineated only 30 percent of the CTs (64 out of 216 CTs.) As such, actual bank small business lending performance to the relative AA demographics was given a higher weight factor than the bank's Chicago MSA aggregate small business lending performance.

Federal Deposit Insurance Corporation (FDIC) deposit market share data dated June 30, 2017, for Cook County and DuPage County shows SBT had a 0.3 percent deposit market share making it the 34th largest deposit holder out of 129 FDIC insured financial institutions. JP Morgan Chase, Bank of America, and BMO Harris Bank had the three top deposit market share positions with a combined market share of 47.7 percent. Numerous national and regional banks were also present in the market place making financial services competition very high.

There were no known financial hardships or legal restrictions on SBT that would negatively impact or impede its CRA performance during this evaluation period. The bank was rated OUTSTANDING at the prior CRA evaluation, dated June 30, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for this CRA assessment is June 1, 2014, through December 31, 2017. All CD activities and transactions between those dates were taken into consideration. SBT's performance under the lending test covers the time period January 1, 2014, through December 31, 2017. The bank's lending test performance for the years 2014, 2015 and 2016 was evaluated on a combined basis. Due to changes in census data effective in 2017, the 2017 lending performance was evaluated separately. As stated above, the bank's primary loan category is small business lending. In addition, the bank provided sufficient loan data on consumer lending to warrant analysis. With the low volume of reported home mortgage lending, we combined loan types (home purchase, home improvement and refinancing) together making the geographic and borrower home mortgage lending analysis more meaningful.

During a community tour of the bank's AA, we visited with seven different community representatives. Our contacts included two representatives from an Economic Development Business Association; a representative from a Hospital Foundation that serves low- and moderate-income individuals; a Property Manager of a senior affordable housing complex; an Executive Director of the Park District that provides programs supporting low- and moderate-income families; a representative from a non-profit organization that provides services to low- and moderate-income seniors, and an Accounting Manager of the city of Wood Dale. These community representatives noted there are many credit needs and opportunities within the community, such as small business development and job training, health care and human services, and affordable housing.

Selection of Areas for Full-Scope Review

The Chicago MSA was evaluated as a full-scope review.

Ratings

The bank's overall rating was based primarily on those areas that received full-scope reviews.

Discriminatory or Other Illegal Credit Practices Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated Outstanding. Based on a full-scope review, SBT's overall lending test performance in the Chicago MSA was excellent.

Lending Activity

Refer to Table 1 Lending Volume and Table 1 Other Products in appendix C, along with the bank's deposit, home mortgage and small business lending market share data. SBT originated a significant volume of loans in the AA relative to its capacity and business strategy. SBT demonstrated a high response level to community needs.

- The proportion of small business loans was greater than the proportion of bank deposits for DuPage and Cook Counties, IL. SBT was ranked 34th out of 129 or the top 26 percent of financial institutions for market share for deposits and for small business loans the bank was ranked 13th out of 142 or the top 9 percent of small business lenders. The top five market share small business lenders were predominately credit card lenders with a combined total market share of 78.4 percent and an average loan size of \$11 thousand. SBT had a small business market share of 0.6 percent and an average loan size of \$44 thousand.
- The bank's volume of consumer and home mortgage lending was adequate during this evaluation period. It was also noted that the bank's affiliated mortgage lending financial institution was listed in the top ten of mortgage lenders for market share in SBT's AA for both home purchase and home refinance lending.
- The bank's volume of CD lending was significant in the AA and represented 66.4 percent of Tier One Capital. The majority (51.6 percent) of the CD loans in the AA were for economic development, a known credit need in the AA.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Tables 2, 3, 4 and 5 in appendix C, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation period was adequate.

- For 2014, 2015, and 2016, the proportion of home mortgage loans in moderate-income geographies was significantly weaker than the percentage of owner-occupied housing units in the moderate-income geographies.

- The bank's overall home mortgage geographic distribution performance in the moderate-income geographies was poor and weaker than the aggregate distribution of mortgage loans in the moderate-income geographies.
- Even on a combined basis, the volume of 2017 reported home mortgage lending for SBT was insufficient to perform a meaningful distribution analysis.
- We noted that the bank made four CD loans with the primary purpose of affordable housing in the moderate-income geographies during the evaluation period. These loans totaled \$3.8 million or 3.6 percent of Tier One Capital and demonstrated positive action in regards to addressing affordable housing credit needs in the bank's AA and particularly in the moderate-income geographies.

Small Loans to Businesses

Based on the data in Table 6 in appendix C, the bank's overall geographic distribution of small business loan originations and purchases for this evaluation period was excellent.

- For 2014, 2015 and 2016 overall the distribution of the bank's small business loans in the moderate-income geographies was excellent. The proportion of small business loans in the moderate-income geographies was very near to the percentage of AA businesses located in the moderate-income census tracts.
- Even with the skewed demographics on the small business aggregate lending, the bank's overall performance for small business lending in the moderate-income geographies was significantly stronger than the shown aggregate distribution of loans in DuPage and Cook counties.
- The bank's small business lending in 2017 was consistent with the bank's performance in 2014 through 2016.

Consumer Loans

Based on the data in Table 13 in appendix C, the bank's overall geographic distribution of consumer loan originations and purchases for this evaluation period was good.

- For 2014, 2015 and 2016 overall the distribution of the bank's consumer loans in the moderate-income geographies was excellent. The proportion of consumer loans in the moderate-income geographies was significantly stronger than the percentage of AA households located in those moderate-income census tracts.
- The bank's consumer lending in 2017 was weaker than SBT's consumer lending performance noted above for the years 2014 through 2016. This was primarily due to the shift of census tract income designations effective in 2017. Nine formerly designated moderate-income tracts became middle-income tracts and six middle-income census tracts became designated moderate-income tracts in 2017. The percentage of AA households in

moderate-income census tracts decreased by 15.7 percent with these changes in tract income designation thus reducing lending opportunities.

Lending Gap Analysis

We performed a lending gap analysis that included a review of reports and maps showing the distribution of branches, applications and loans. We did not identify any unexplained conspicuous gaps in the bank's AA.

Inside/Outside Ratio

An adequate percentage of SBT's home mortgage loans were originated in the AA (56.0 percent) and a substantial majority of the bank's consumer loans originated in the AA (77.5 percent.) For small business lending, excluding specialty commercial niche lending described above (Description of the Institution), the bank reports a substantial majority of small business loans originated during this evaluation period inside the AA (77.3 percent.)

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Tables 8, 9, and 10 in appendix C and the following performance context considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation period was excellent.

- High home costs in the bank's AA raises homeownership affordability hurdles, especially for low- and moderate-income borrowers. The AA's median housing value was approximately \$273 thousand. The maximum income level for low-income borrowers was under \$37 thousand making the median housing value 7.3 times greater than the maximum low-income level. The maximum income level for moderate-income borrowers was under \$60 thousand making the median housing value 4.6 times greater than the maximum moderate-income level. Please refer to the AA Market Profile Table for further details.
- Despite the affordability challenges, the bank's overall home mortgage lending to low- and moderate-income borrowers exceeded both the percentage of families and aggregate lending reported for both low- and moderate-income borrowers.
- Even on a combined basis, the volume of 2017 reported home mortgage lending for SBT was insufficient to perform a meaningful distribution analysis.

Small Loans to Businesses

Based on the data in Table 11 in appendix C, the bank's overall borrower distribution of small business loan originations and purchases for this evaluation period was excellent.

- For 2014, 2015, and 2016, the bank's distribution of small loans to businesses with revenues of \$1 million or less was excellent. The percentage of small loans to businesses

originated or purchased at 79.1 percent exceeded both the percentage of small businesses located in the AA and aggregate small business lending data for businesses with revenues of \$1 million or less. In addition, a substantial majority of the bank's loans to businesses were small business loans with 88.8 percent originated in amounts less than \$100,000.

- The bank's small business lending in 2017 was comparable to the bank's performance in 2014 through 2016.

Consumer Loans

Based on the data in Table 13 in appendix C, the bank's overall borrower distribution of consumer loan originations and purchases for this evaluation period was excellent.

- For 2014, 2015, and 2016, the bank's distribution of reported consumer loans to both low- and moderate-income borrowers was excellent. The percentage of loans made to both low- and moderate-income borrowers exceeded the number of low- and moderate-income households in the bank's AA.
- The bank's consumer lending in 2017 was consistent with the bank's performance in 2014 through 2016.

Community Development Lending

Based on the data in Table 1 Lending Volume in appendix C, CD lending had a significantly positive impact on the lending test conclusion in the AA.

- The bank is a leader in making CD loans. The level of CD lending in the AA was excellent. SBT made 33 CD loans in its AA for a total of \$70.2 million which represented over 66 percent of Tier One Capital. Eight of these loans (24.2 percent) for a total of \$8.6 million were for the primary purpose of affordable housing. Affordable housing is a critical CD need in the bank's AA. Additionally, the bank extended six CD loans for \$36.3 million for the primary purpose of economic development, as well as three CD loans totaling \$6.4 million for revitalization and stabilization of the AA.
- In addition, due to the excellent responsiveness to CD needs within the bank's AA, we took into consideration an additional 24 CD loans extended by SBT in a broader statewide or regional area. These supplementary loans totaled an additional \$44 million lent by the bank for qualified CD purposes. The CD loans outside of the AA that were taken into consideration were primarily centered in affordable housing for low- or moderate-income families in the state or regional area of the bank. Sixteen of the 24 loans (66.7 percent) for \$24 million had a primary purpose of affordable housing.

Examples of CD loans in the AA include:

- The bank purchased a \$3.5 million participation loan in March 2015 as part of an overall \$12 million non-revolving line of credit with an affiliated financial institution. The loan was used to refinance debt and provided renovations of a 249-unit, 3 building apartment

complex located in Hoffman Estates. Although, the subject property was located in an upper-income census tract, the rents were affordable and well below the Fair Market Rents for Cook County as established by the US Department of Housing and Urban Development (HUD). The target market for renters was families with combined household income \$40,000-\$60,000 per year which was comparable to the median family income for low- and moderate-income borrowers.

- The bank provided a \$10 million line of credit to fund costs associated with a recently established Tax Increment Financing (TIF) district in the bank's AA. The proceeds were used for various purposes, such as purchasing properties, expansion or relocation of tenants, and overall redevelopment of the area. This line of credit provided funds for the economic development and revitalization and stabilization of the moderate-income area centered in the TIF district.

Product Innovation and Flexibility

SBT used innovative and flexible lending programs in order to further serve AA credit needs. Under each of the programs discussed below the bank originated a significant number of loans during this evaluation period.

- SBT offered financing for the U.S. Small Business Administration (SBA.) Wintrust established a specialty SBA lending department within one of its financial subsidiaries. These specialized lending officers were shared with SBT and other lending affiliates. The SBA products offered included: 7A Program; 504 Program; Express Program; and SBA CAP Lines. SBT also offered in-house Small Business Micro Loans and Small Business Overdraft Protection Lines. These specific products were tailored to effectively meet the credit needs of small businesses with annual revenues of less than \$1 million.
- A full array of mortgage products, including Federal Housing Administration and Veterans Affairs loans, are available through the mortgage origination operations of the bank's financial affiliate. In 2017, an innovative program to provide down payment, closing costs or escrow assistance to low- and moderate-income borrowers was implemented (Wintrust Community Bank Down Payment Program). For 2017, the maximum grant was \$2,000 per household. Funds were made available through multiple Housing and Urban Development-approved non-profit agencies across the Wintrust footprint. The assistance provided was in the form of a grant paid on behalf of the borrower at the time the borrower closed on a first mortgage for a home purchase and was fully forgiven at closing. The innovative segment of this grant program was that Wintrust did not mandate the borrower to use a Wintrust mortgage loan product to qualify for the grant.
- Wintrust group developed two flexible small dollar fixed rate consumer loan programs in amounts up to \$2,500 with rates lower than most credit cards and other fast cash loans. The Everyday Loan programs were designed specifically for low- and moderate-income individuals in the bank's AA. The Everyday Small Dollar Loan product was an unsecured consumer installment loan for any personal purpose. The Certificate of Deposit Secured Loan product was set for individuals looking to establish or improve their credit reporting data.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated Outstanding. Based on full-scope reviews, the bank's performance in the Chicago MSA was excellent.

Based on the data in Table 14 in appendix C and the following performance context considerations, the bank's level of qualified CD investments, contributions and grants was excellent.

- While CD investment opportunities were available within the bank's AA, the market for qualified CD investments was very competitive and crowded with a high number of financial institutions all vying for qualified investments.
- Over the CD evaluation period of 43 months the bank's dollar amount of the investments in the AA represented 10 percent of the bank's Tier One Capital. SBT had an additional 14 investments representing 0.6 percent of Tier One Capital in unfunded commitments.
- The bank exhibited an excellent level of responsiveness to the CD needs in the AA. SBT had 130 current- and prior-period investments totaling \$10.5 million. These investments met community needs by investing in organizations that provided needed CD services to low- and moderate-income persons. These services included providing health care and educational opportunities, as well as job and financial training to low- and moderate-income persons. The bank was especially active in supporting local school districts that predominately served low- and moderate-income families as well as investing in local Small Business Investment Corporations (SBIC) and Community Development Financial Institutions (CDFI). Additional investments and donations supported affordable housing, medical and health care services, and local food pantries, all predominately serving low- and moderate-income persons.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated Outstanding. Based on full-scope reviews, the bank's performance in the Chicago MSA was excellent.

Retail Banking Services

Based on the data in Table 15 in appendix C, the bank's delivery systems were excellent.

- SBT's delivery systems were readily accessible throughout the AA. The bank operated seven branch offices and seven ATMs in the AA. There were no low-income census tracts in the bank's AA. The bank operated one branch in a moderate-income census tract. As of

2017, the bank's distribution of branches in moderate-income geographies exceeded the percentage of the AA's population living in moderate-income geographies.

- The bank made good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. The bank had 7 ATMs in the AA and all were deposit-taking. The bank's ATM distribution in moderate-income geographies was comparable to the percentage of the AA population living in those geographies. These systems provided additional delivery availability and access to banking services to both retail and business customers.
- SBT's record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly moderate-income geographies or low- and moderate-income individuals as the bank opened one branch in a middle-income tract and closed just one branch in a middle-income tract (see Description of Institution for further details).
- The bank's hours and services did not vary in a way that inconvenienced portions of the AA, particularly low- and moderate-income individuals or moderate-income geographies. SBT maintains standard business hours and offers traditional banking products, mortgage, consumer and small business lending and services at all branch locations in the AA.

Community Development Services

Based on the level of CD services, the bank's provision of CD services was excellent.

- SBT's level of community development services was excellent as bank personnel demonstrated leadership in many community development service organizations. These CD services were very responsive to the known credit needs of the community. During the evaluation period, 79 bank representatives participated in 20 different CD organizations in its AA, providing over 1,600 hours of CD services. Leadership roles totaled 1,515 hours from 69 bank representatives. Services in moderate- income geographies totaled 784 hours from 24 bank representatives.

Notable examples included:

- Money Smart was a comprehensive financial education curriculum designed to help low- and moderate-income individuals outside the financial mainstream enhance their financial skills and create positive banking relationships. Money Smart reached over 3 million consumers since 2001. Financial education fosters financial stability for individuals, families, and entire communities. The bank provided the Money Smart curriculum to consumers free of charge in several versions over the evaluation period. Additionally, Wintrust is a FDIC Money Smart Alliance member and works diligently to ensure clients receive the most current training and materials to the Money Smart curriculum. Over 30 bank officers conducted numerous free sessions over the evaluation period.
- As the only affordable health care hospital in DuPage County, Glen Oaks Hospital Foundation is committed to serving the poor and vulnerable. The hospital is not-for-profit and its goal is to ensure that all residents have access to the most advanced health care treatments and services available, regardless of their ability to pay. The primary goal of the

foundation is to serve the hospital in all its financial needs, such as improving programs, patient care, and patient quality. The foundation is surrounded by three moderate-income tracts and the majority of their services are targeted to low- and moderate-income individuals. Two bank officers serve on the board of the foundation as financial advisors.

- Over 10 bank employees serve as Financial Advisors in a senior living facility that is 78 percent low-income. Bank employees provide weekly on-site assistance to the residents with their banking needs. Employees provide check cashing services, deposits, withdrawals, balance statements and assist with bill paying.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/2014 to 12/31/2017 Investment and Service Tests and CD Loans: 06/01/2014 to 12/31/2017	
Financial Institution		Products Reviewed
Schaumburg Bank and Trust, NA (SBT) Schaumburg, Illinois		HMDA Small Business Consumer
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Chicago MSA	Full Scope	

Appendix B: Community Profiles for Full-Scope Areas

Chicago MSA

Demographic Information for Full-Scope Area: Chicago MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	124	0.00	15.32	52.42	32.26	0.00
Population by Geography	590,824	0.00	14.99	50.96	34.05	0.00
Owner-Occupied Housing by Geography	160,229	0.00	11.22	50.85	37.93	0.00
Businesses by Geography	37,597	0.00	24.39	45.71	29.90	0.00
Farms by Geography	492	0.00	16.46	48.78	34.76	0.00
Family Distribution by Income Level	149,443	16.01	17.22	22.03	44.75	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	49,654	0.00	24.12	53.95	21.93	0.00
Median Family Income	= \$72,196					
FFIEC Adjusted Median Family Income for 2017	= \$74,700					
Households Below the Poverty Level	= 6%					
				Median Housing Value	= \$273,641	
				Unemployment Rate	= 4.12%	

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

Source: 2010 U.S. Census, and 2017 Federal Financial Institutions Examination Council (FFIEC) updated MFI.

SBT's AA consists of 60 census tracts in northwestern Cook County, IL, and 64 contiguous census tracts in northeastern DuPage County, IL. The AA consists of 5 percent of all the tracts in Cook County and 30 percent of all the census tracts in DuPage County. Cook and DuPage Counties are part of the Chicago-Naperville-Arlington Heights, IL MD. The AA meets regulatory requirements.

SBT's AA is part of the suburban region that lies northwest of the city of Chicago, in the vicinity of Chicago O'Hare International Airport. The population of SBT's AA is 596,664, 55 percent of which is in Cook County and 45 percent of which is in DuPage County. Cook County, with a population of more than 5 million, is the largest county in the Chicago MSA and in IL. DuPage County, with a population of more than 930,000, is the second most populous county in the Chicago MSA and in IL. The FFIEC 2017 estimated median family income (MFI) in the Chicago MSA was \$77,500. Of the 16 moderate-income census tracts in the SBT AA, nine are in Cook County and seven are in DuPage County.

As of June 30, 2017, SBT had a deposit market share in Cook and DuPage Counties of 0.3 percent, which ranked 34th out of 129 financial institutions gathering deposits in both counties. JP Morgan Chase Bank, Bank of America and BMO Harris Bank held the top three market shares, which together constituted 48 percent of the deposit market in the two counties. Of the 33 banks with larger deposit market shares than SBT, ten are large banks with operations in many states. In addition, five of SBT's competitors are regional banks comparable in size to the combined banks owned by Wintrust Financial Corporation. Fifty-eight percent of the deposits that SBT holds are from three branches in Cook County, one of which is the bank's headquarters office. Forty-two percent of the bank's deposits are from the four branches in DuPage County.

SBT's AA is west and northwest of Chicago O'Hare International Airport in suburban communities where many industrial parks, shopping centers, offices, factories, and warehouse and distribution businesses are located, including many that would qualify as small businesses for the loan programs of the U.S. Small Business Administration. Datausa.com reports that the largest employment sectors in Cook and DuPage Counties are Healthcare & Social Assistance; Retail Trade; Professional, Scientific and Technical Services; and Manufacturing. Also according to Datausa.com, residents of Cook and DuPage Counties are more likely than residents of similar locations to be employed in Management of Companies & Enterprises; Transportation & Warehousing; Finance & Insurance; and Professional, Scientific and Technical Services. Two of these fields – Management of Companies and Professional, Scientific and Technical Services – are among the highest paying industries in the Chicago metropolitan region.

SBT's AA is a built-up suburban region, featuring predominantly lower-density, single-family housing. According to housing market information published by the Metropolitan Planning Council, the communities where SBT's branches are primarily located are in areas populated by middle- and upper-income families, but SBT's AA also includes pockets of moderate-income residents. Most of the communities contain smaller areas with moderately-priced homes, lower levels of homeownership and higher levels of rental housing, some which are subsidized. While the private market continues to operate well throughout the AA, there are pockets where foreclosures and distressed home sales have depressed home values. Incomes in these pockets have declined as well, which increased the proportion of the population burdened by high housing costs as a percentage of income.

AA economic and housing conditions give rise to the need for interventions in the housing market to address troubled properties, preserve affordable housing and increase the number of affordable units available. Other responses to the housing market conditions in SBT's AA include financing for home renovations and improvements, including in conjunction with public sector support for such lending; homeowner and homebuyer counseling; down payment and closing cost assistance; flexible home mortgage products; and banks willing to help refinance underwater homeowners, often with assistance from the public sector. Other responses to conditions in the AA include donations of money and expertise for workforce development initiatives and to organizations that provide business planning and development services as well as financing for smaller businesses. Initiatives that increase the liquidity of small business micro loan organizations and enable them to produce more small business loans also would be responsive.

While qualified investments might be limited, opportunities and partners for responding to credit needs in SBT's AA are available. They include many social service organizations; nonprofit, municipal and county-level business development and workforce training initiatives; active SBA 504 certified development companies; nonprofit regional micro lenders to small businesses; multiple nonprofit organizations devoted to affordable housing development in the region as a whole and in suburban parts of the region; organizations engaged in housing counseling and financial education; multiple regional community development financial institutions that meet a wide range of community development financing needs in conjunction with banks; and many nonprofit social service organizations.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - 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 market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and

purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Chicago MSA	100.00	48	10,092	1,084	70,981	0	0	33	70,225	1,165	151,298	100
Regional Area								24	44,080			

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from June 01, 2014 to December 31, 2017.

*** Deposit Data as of July 11, 2018. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: ILLINOIS										Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA [*]	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA ^{***}	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full Review:															
Chicago MSA	100.00	156	4,319	0	0	0	0	8	131	0	0	85	3,699	0.00	

^{*} Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2016.

^{***} Deposit Data as of July 11, 2018. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016	
Assessment Area (2016):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
Chicago MSA	63	489	0	0	

* The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2016.

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ILLINOIS								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MSA	29	100.00	0.00	0.00	11.22	3.45	50.85	79.31	37.93	17.24	0.00	10.01	52.63	37.36

* Based on 2016 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016								
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	%BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MSA	2	100.00	0.00	0.00	11.22	0.00	50.85	50.00	37.93	50.00	0.00	9.32	50.76	39.92

* Based on 2016 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*						
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp			
Full Review:																	
Chicago MSA	10	100.00	0.00	0.00	11.22	10.00	50.85	90.00	37.93	0.00	0.00	8.06	46.33	45.61			

* Based on 2016 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MSA	7	100.00	0.00	0.00	29.23	14.29	54.00	85.71	16.76	0.00	0.00	33.33	61.11	5.56

* Based on 2016 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*								
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
Chicago MSA	1,084	100.00	0.00	0.00	24.39	23.71	45.71	52.40	29.90	23.89	4.07	16.39	33.26	46.29					

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 7a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income [*]								
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
Chicago MSA	0	0.00	0.00	0.00	16.46	0.00	48.78	0.00	34.76	0.00	3.60	16.55	23.74	56.12					

^{*} Based on 2016 Peer Small Business Data -- US and PR

^{**} Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2016).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Chicago-Naperville-Arlington Heights IL	29	100.00	16.01	22.22	17.22	33.33	22.03	22.22	44.75	22.22	7.46	26.35	29.92	36.27

* Based on 2016 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 27.3% of loans originated and purchased by BANK.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016								
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data [*]			
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Low	Mod	Mid	Upp
Full Review:														
Chicago MSA	2	100.00	16.01	0.00	17.22	0.00	22.03	0.00	44.75	100.00	6.21	14.03	25.45	54.31

^{*} Based on 2016 Peer Mortgage Data -- US and PR

^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Chicago MSA	10	100.00	16.01	12.50	17.22	37.50	22.03	0.00	44.75	50.00	4.98	15.89	25.54	53.60

* Based on 2016 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 31.3% of loans originated and purchased by BANK.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago MSA	1,084	100.00	74.43	79.06	88.75	3.69	7.56	160,132	62,734

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.90% of small loans to businesses originated and purchased by the bank.

Table 12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ILLINOIS			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago MSA	0	0.00	92.89	0.00	0.00	0.00	0.00	142	49

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 13. Geographic and Borrower Distribution of Consumer Loans

Geographic and Borrower Distribution: CONSUMER LOANS										Geography: ILLINOIS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds* *	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds* *	% of BANK Loans	% of Hhlds**	% of BANK Loans	
Full Review:																			
Chicago MSA	156	100.00	0.00	0.00	14.89	19.87	51.83	56.41	33.28	23.72	16.50	37.82	16.12	25.00	20.02	14.74	47.37	16.03	

* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

** Percentage of households is based on 2010 Census information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ILLINOIS				Evaluation Period: JUNE 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago MSA	6	1,072	124	9,447	130	10,519	100.00	4	631

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings / Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS / CLOSINGS																	
Geography: ILLINOIS																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Chicago MSA	100.00	7	100.00	0.00	14.29	57.14	28.57	1	1	0	0	0	0	0.00	12.74	50.76	36.50

