



PUBLIC DISCLOSURE

March 4, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Steeleville
Charter Number 14437

400 West Broadway
Steeleville IL, 62288

Office of the Comptroller of the Currency

3001 Research Rd., Suite E2
Champaign IL, 61822

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

Table of Contents

OVERALL CRA RATING	3
DEFINITIONS AND COMMON ABBREVIATIONS	4
DESCRIPTION OF INSTITUTION	8
SCOPE OF THE EVALUATION.....	9
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	11
LENDING TEST	11
Appendix A: SCOPE OF EXAMINATION.....	A-1
APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA.....	C-1

Overall CRA Rating

The Lending Test is rated: Satisfactory.

- Lending to borrowers of different incomes is reasonable.
- The loan-to-deposit ratio is reasonable based on the bank's size, financial condition, assessment area (AA) credit needs, and local competition.
- A majority of loans are originated within the AA.

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

First National Bank of Steeleville (FNB) is a \$195.9 million, intrastate bank headquartered in Steeleville, Illinois. The bank is wholly owned by Steeleville Bancshares Inc., a one-bank holding company. FNB does not have an affiliate. There have been no mergers or acquisitions affecting the bank's CRA performance since the last evaluation.

FNB operates three offices within Randolph County, Illinois, including Steeleville, Percy, and Sparta. All offices have automated teller machines (ATMs) for cash withdrawals and balance inquiries outside of bank hours. FNB is a full-service bank that offers conventional deposit and loan products. In addition, the bank offers online and mobile banking. The bank's mission statement includes serving the financial needs of its communities. Management indicated that residential real estate loans is one of the primary community credit needs. In 2017, FNB began to originate fixed rate 10- to 30-year mortgage loans that are sold in the secondary market, with servicing retained locally to serve the community. These fixed rate loans include United States Department of Agriculture Rural Development loans with a lower down payment requirement.

As of December 31, 2018, FNB's gross loan and lease portfolio totaled \$96.6 million, or 49.3 percent of total assets. Tier 1 capital is \$28.9 million. The following table represents the loan portfolio mix

Loan Portfolio Summary by Loan Product	
Loan Category	% of Outstanding Dollars
Home loans, including Multi-Family	48.3%
Business loans, including Commercial RE	32.6%
Farm loans, including Farm Land	10.4%
Consumer loans	8.2%
Other loans	0.5%

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

FNB's AA consists of five CTs in eastern Randolph County (CTs 9505, 9506, 9507, 9510, 9511) and one contiguous CT in south Perry County (CT 303). There are no known impediments limiting FNB's ability to help meet the credit needs of its local community, including those of low- and moderate-income families and neighborhoods. FNB's deposit market share in the Randolph and Perry County AA is 14.5 percent and ranks first out of 13 banks in the AA. FNB received a "Satisfactory" rating during the October 21, 2014 evaluation.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB's CRA performance using interagency Small Bank procedures, consistent with the provisions set forth in 12 CFR 25, Appendix A. The evaluation period was from January 1, 2018 to December 31, 2018. We analyzed loan originations during this period and identified home loans and commercial loans as FNB's primary loan products.

We compared the bank's lending performance with demographic data from the 2010 United States (US) Census, the 2015 American Community Survey (ACS) US Census, 2016 and 2018 Dun and Bradstreet (D & B) Business Geodemographic data, and 2016 and 2017 aggregate HMDA and small business data. With the changes between the 2010 US Census and 2015 ACS US Census data, we performed two separate analyses for the borrower distribution criteria. Because 2017 was the first year where 2015 ACS US Census data could be used, we reviewed 2016 separately from 2017 and 2018.

To evaluate FNB's performance with respect to the lending test, examiners sampled 91 loans originated during the evaluation period. We started with 20 home loans and 20 business loans to determine lending within the assessment area. After calculating the in/out ratio, we kept the loans in the assessment area in the sample and reviewed additional loans until we had 20 home loans and 20 business loans within the assessment area for both analyses.

Data Integrity

FNB does not report HMDA data, so a data integrity review was not conducted. We conducted this evaluation with loan samples as described above.

Selection of Areas for Full-Scope Review

We performed a full-scope review of FNB's only AA. See **Appendix B: Community Profiles for Full-Scope Areas** for more information on the AA.

Ratings

The bank's overall rating is based on the full-scope review of FNB's only AA.

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

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

FNB’s performance under the lending test is satisfactory. The bank’s loan-to-deposit ratio is reasonable based on its size, financial condition, AA credit needs, local competition, and other performance context data. The bank originated a majority of its primary loan products within the AA. Additionally, borrower distribution is reasonable.

Loan-to-Deposit Ratio

The loan-to-deposit ratio is reasonable given the bank’s size, financial condition, AA credit needs, and performance context data. The loan-to-deposit ratio averaged 54.3 percent over the past 17 quarters. The timeframe used for this calculation represents the first quarter-end after the start of the last evaluation through the most recent quarter-end.

FNB’s loan-to-deposit ratio ranged from 47.1 to 64.1 percent. The high ratio was the last quarter’s ratio. FNB’s ratio was compared to the seven other banks headquartered in Randolph or Perry Counties with total assets ranging from \$50.0 million to \$200.4 million. FNB ranked fourth out of the eight similarly situated banks and was in line with the average of 53.7 percent.

Lending in Assessment Area

FNB originated a majority of its primary loan products within the AA. For home mortgage loans, our sample showed 70.0 percent of the total number and 65.9 percent of the total dollar volume were originated within the AA. For small business loans, our sample showed 75.0 percent of the total number and 87.0 percent of the total dollar volume were originated within the AA.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	14	70.0	6	30.0	20	\$1,320	65.9	\$684	34.1	\$2,005
Small Business	15	75.0	5	25.0	20	\$1,822	87.0	\$271	13.0	\$2,093
Total	29	72.5	11	27.5	40	\$3,142	76.7	\$956	23.3	\$4,098

*Source: 01/01/2016 – 12/31/2018 loan originations – sample of 20 home mortgage and 20 business loans
Due to rounding, totals may not equal 100.0*

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Borrower distribution to both primary loan products is reasonable.

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's origination of home mortgage loans reflects reasonable distribution among households of different income levels. While the 2017 and 2018 analysis indicated excellent distribution, we did weigh the fact that proxy information was needed in the 2016 analysis to determine the home loan distribution conclusion.

FNBs distribution of home mortgage loans to borrowers of different incomes in 2016 is reasonable. The proportion of loans to both low- and moderate-income borrowers was weaker than the proportion of low- and moderate-income families, and weaker than the aggregate distribution of loans to those borrowers. While this analysis indicates poor distribution, we noted the analysis was complicated by 35 percent of the sample being balloon renewals where the bank did not collect current income information. We performed an additional analysis as a proxy by determining the borrowers' income level at the time when income information was last obtained. Using this proxy, we determined the income distribution for low-income borrowers was comparable to the proportion of low-income families, and stronger than the aggregate distribution of loans to those borrowers. The distribution for moderate-income borrowers remained unchanged.

FNB's distribution of home mortgage loans to borrowers of different incomes in 2017 through 2018 is excellent. The proportion of loans to both low- and moderate-income borrowers was significantly stronger than both the proportion of low- and moderate-income families and the aggregate distribution of loans to those borrowers.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the distribution of the bank's origination of small loans to businesses by revenue is reasonable.

FNB's distribution of small loans to business by revenue in 2016 was reasonable. The bank's proportion of loans was weaker than the percentage of small businesses in the AA, but significantly stronger than the aggregate distribution of loans to those businesses. As 25 percent of the loan sample did not have gross annual revenue information available, we also reviewed the distribution of loans by their size. Based on loan size, 90 percent of the loans originated were for less than \$100,000. As small businesses are more likely to need loans of this size, it further supports that the distribution of loans to small businesses is reasonable.

FNB's distribution of small loans to business by revenue in 2017 through 2018 was reasonable. The bank's proportion of loans was weaker than the percentage of small businesses in the AA, but significantly stronger than the aggregate distribution of loans to those businesses. As 40 percent of the loan sample did not have gross annual revenue information available, we also reviewed the distribution of loans by their size. Based on loan size, 65 percent of the loans originated were for less than \$100,000. Another 20 percent were loans between \$100,000 and \$250,000. This further supports that the distribution of loans to small businesses is reasonable.

Geographic Distribution of Loans

We did not perform a geographic distribution of loans analysis. We determined it would not be meaningful as all six census tracts in the AA are designated middle-income.

Responses to Complaints

FNB did not receive any complaints regarding its CRA performance during the assessment period.

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 - (01/01/2016 to 12/31/2018)	
Financial Institution		Products Reviewed
First National Bank of Steeleville (FNB) Steeleville, Illinois		Home Mortgage Loans Business Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Steeleville AA	Full-Scope	Portions of Randolph County (CTs 9505, 9506, 9507, 9510, 9511). 1 CT from Perry County (CT 303)

Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: Steeleville						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0	0	100.0	0	0
Population by Geography	17,340	0	0	100.0	0	0
Housing Units by Geography	8,079	0	0	100.0	0	0
Owner-Occupied Units by Geography	5357	0	0	100.0	0	0
Occupied Rental Units by Geography	1,593	0	0	100.0	0	0
Vacant Units by Geography	1,129	0	0	100.0	0	0
Businesses by Geography	792	0	0	100.0	0	0
Farms by Geography	97	0	0	100.0	0	0
Family Distribution by Income Level	4,590	18.8	20.8	22.8	37.6	0.0
Household Distribution by Income Level	6,950	22.8	18.2	17.7	41.3	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housing Value			\$92,922
			Median Gross Rent			\$631
			Families Below Poverty Level			8.8%

Source: 2015 ACS Census and June 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.

The AA is consistent with the requirements of the regulation and does not arbitrarily exclude low- and moderate-income areas. The AA consists of six CTs in southern Illinois, 60 miles from St. Louis, Missouri. The AA includes five CTs in eastern Randolph County and one contiguous CT in southwestern Perry County. Two of the branches are located in Randolph County CT 9511, which is contiguous with the CT in Perry County. With all three branches in the eastern portion of Randolph County, it would be difficult for FNB to serve all of Randolph County. The adjustment down from the complete subdivision of Randolph County and the addition of the census tract in Perry County are reasonable due to branch locations.

In addition to branches, FNB has three ATMs. These are located on bank facilities and do not accept deposits. There are 13 FDIC-insured institutions that have at least one branch in Randolph or Perry County. FNB ranks first out of these institutions with 14.5 percent of deposit market share. Buena Vista National Bank is second with 14.3 percent of the deposit market share. These are the only two institutions with over 10 percent of the market share.

Employment and Economic Factors

Randolph County unemployment numbers (4.8 percent) for December 2018 are slightly higher than the state (4.4 percent) and national (3.9 percent) unemployment ratios. Perry County is higher at 6.4 percent for December 2018. The high unemployment rate in Randolph County during the evaluation period was 5.9 percent in January 2016. The high unemployment rate in Perry County was 8.3 percent in January 2017. Many of the jobs in Randolph County are in private label food manufacturing and tend to pay lower wages. The state operates two correctional facilities in the county that pay well. Hospitals located in Red Bud, Chester, and Sparta are independent hospitals offering a source of employment.

Small businesses make up 72.7 percent of the 792 businesses in the AA. Small businesses are businesses with annual gross revenues of \$1 million or less. Additionally, 20.7 percent of the businesses did not report revenues. These businesses are generally smaller businesses. A majority of the employers employ four or less employees and have only one location.

Community Contact

We contacted one affordable housing organization located in Randolph County. This contact indicated there was a need for low-income homeownership housing and community services for low- and moderate-income families.

Appendix C: Tables of Performance Data

Content of Standardized Tables

For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables are identified by letters, which results from how they are generated in supervisory analytical systems.

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 MA/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 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. Because small business data is 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 Revenues – 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. The table also presents aggregate peer data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000's)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Steeleville AA	20	1,625	100	354	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	1,625	100	354	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0

*Source: 2010 U.S Census, sample of twenty loans originated in 2016 within the AA, and 2016 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-2018**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000's)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Steeleville AA	20	1,487	100	277	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	1,487	100	277	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0

*Source: 2015 ACS Census, sample of twenty loans originated in 2017 or 2018, and 2017 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000's)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Steeleville AA	20	1,625	100.0	354	17.6	5.0	9.0	21.2	15.0	19.8	25.4	20.0	25.7	35.8	25.0	35.3	0.0	35.0	10.2
Total	20	1,625	100.0	354	17.6	5.0	9.0	21.2	15.0	19.8	25.4	20.0	25.7	35.8	25.0	35.3	0.0	35.0	10.2

Source: 2010 U.S Census, sample of twenty loans originated in 2016 within the AA, and 2016 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-2018**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000's)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Steeleville AA	20	1,487	100.0	277	18.8	25.0	5.8	20.8	25.0	18.4	22.8	30.0	26.7	37.6	10.0	35.7	0.0	10.0	13.4
Total	20	1,487	100.0	277	18.8	25.0	5.8	20.8	25.0	18.4	22.8	30.0	26.7	37.6	10.0	35.7	0.0	10.0	13.4

Source: 2015 ACS Census, sample of twenty loans originated in 2017 or 2018, and 2017 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000's)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Steeleville AA	20	1,153	100.0	116	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	1,153	100.0	116	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2016 D&B Data, sample of twenty loans from 2016, and 2016 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000's)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Steeleville AA	20	2,702	100.0	136	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	2,702	100.0	136	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2017 D&B Data, sample of twenty loans from 2017 or 2018, and 2017 CRA Aggregate 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:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000's)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Steeleville AA	20	1,153	100.0	116	74.3	55.0	40.5	5.8	20.0	19.9	25.0
Total	20	1,153	100.0	116	74.3	55.0	40.5	5.8	20.0	19.9	25.0

*Source: 2016 D&B Data, sample of twenty loans from 2016, and 2016 CRA Aggregate Data.
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:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000's)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Steeleville AA	20	2,702	100.0	136	74.4	50.0	31.6	6.2	10.0	19.4	40.0
Total	20	2,702	100.0	136	74.4	50.0	31.6	6.2	10.0	19.4	40.0

*Source: 2017 D&B Data, sample of twenty loans from 2017 or 2018, and 2017 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0*