



PUBLIC DISCLOSURE

November 18, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

United Trust Bank
Charter Number 716310

12330 S. Harlem Avenue
Palos Heights, IL 60463

Chicago Field Office
Office of the Comptroller of the Currency
2001 Butterfield Road, Suite 400
Downers Grove, IL 60515

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors supporting this rating include:

- United Trust Bank's (UTB or Bank) loan-to-deposit (LTD) ratio is reasonable;
- UTB originates a substantial majority of its primary loan products within its Assessment Area (AA); and
- The geographic distribution of small business loans originated or purchased by the Bank in low- and moderate-income census tracts is reasonable.

Loan-to-Deposit Ratio

Considering the Bank's size, financial condition, and credit needs of its AA, the Bank's LTD ratio is reasonable.

Since the previous Community Reinvestment Act (CRA) examination in May 2012, the Bank has had an average LTD ratio of 67.7 percent. While slightly below the peer average of 73.3 percent, the Bank's ratio reflects a reasonable effort to lend to the community. Deterioration of the Bank's asset quality and deposit runoff since May 2012 has materially affected the Bank's ability to lend. Despite this, the LTD ratio remains close to peer levels.

Lending in Assessment Area

A **substantial majority** of the number and dollar amount of the Bank's loans are inside its AA.

As shown in the table below, the Bank originated or purchased 87.5 percent of its total loans inside its AA during the evaluation period. In total dollar terms, the Bank originated or purchased 88.4 percent of its total loans inside the Bank's AA. This analysis is performed at the Bank, rather than the AA, level. Based on this analysis, we used the total number of loans originated inside the AA for each year to determine the reasonability of the geographic distribution of lending and the distribution of lending to low- and moderate-income borrowers.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	7	100	0	0	7	2,998	100	0	0	2,998
Small Business	35	85.4	6	14.6	41	6,613	84	1,260	16	7,873
Total	42	87.5	6	12.5	48	9,611	88.4	1,260	11.6	10,871

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

Description of Institution

United Trust Bank is a \$26.3 million federally chartered stock institution, which is wholly owned by United Bancorp, Inc. The Bank does not have any other affiliates. UTB currently operates one branch from its main office located in Palos Heights, IL. The branch has a drive-up facility and an automated teller machine (ATM) onsite. The office is located in an upper-income census tract. There have been no mergers or acquisitions since the last CRA performance evaluation completed on May 29, 2012, where we assigned the Bank an overall rating of “Satisfactory.”

UTB operated under a Consent Order since August 2012 due to elevated credit losses and low capital levels. These weaknesses restricted loan origination growth and caused a financial impediment limiting the Bank’s ability to help meet the credit needs of its AA. The Bank offers standard loan and deposit products. UTB’s primary lending focuses on commercial real estate and residential mortgage lending products. As of September 30, 2019, the Bank’s balance sheet consisted of \$7.8 million in commercial real estate loans and \$7.5 million in 1-4 family residential mortgage loans. These two products totaled 87.4 percent of net loans and leases, with the other 12.6 percent primarily composed of home equity lines of credit and multifamily loans. Total loans accounted for 66.4 percent of total assets as of September 30, 2019.

Competition within the Bank’s assessment area is high. The most recent Federal Deposit Insurance Corporation (FDIC) Market Share Report, as of June 30, 2019, reported UTB has approximately 0.01 percent deposit market share, ranking 112th out of 121 banks in the AA (\$18.9 million in deposits). UTB’s competitors include large and midsize banks with high market share such as BMO Harris, JP Morgan Chase, Bank of America, and Northern Trust.

The last performance evaluation under the CRA was dated May 29, 2012. The Bank was evaluated under Small Bank performance standards and received an overall performance of “Satisfactory.”

Scope of the Evaluation

The Office of the Comptroller of the Currency (OCC) evaluated UTB's performance under the Small Bank CRA examination procedures. This includes evaluation of the Bank's record of meeting the credit needs of its AA based on the following five criteria:

- Loan-to-deposit ratio;
- Lending inside the AA;
- Lending to borrowers of different incomes;
- Geographic distribution of lending; and
- Responsiveness to complaints.

Evaluation Period/Products Evaluated

For the performance evaluation, we reviewed loan data from January 1, 2016 through December 31, 2018. We performed full-scope evaluation procedures for the Bank's AA, which consists of the entireties of Cook County and Will County in the Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area (MSA). We determined through review of new origination reports that commercial real estate (small business lending) was the primary lending product by number of loans and dollar amount of loans originated. The other primary product is 1-4 family residential mortgage loans. The loan data was captured on Bank reports that were validated during our examination.

UTB originated 41 Home Mortgage Disclosure Act (HMDA)-reportable small business loans totaling \$7.9 million and seven home mortgage loans totaling \$3 million during the evaluation period. Because 1-4 family residential mortgage loans did not reach an origination threshold to meaningfully analyze performance, we did not include 1-4 family loans in the performance analysis when determining geographic and borrower dispersion and penetration.

The evaluation of data was completed using two separate analysis periods based on two years of Dun & Bradstreet (D&B) small business lending data. For 2016, the geographic distribution of the Bank's data was compared to peer using both 2016 D&B and AA specific data. For 2017 and 2018, the geographic distribution of the Bank's data was compared to peer using both 2017-2018 D&B and AA specific data.

To assess the Bank's LTD ratio, we generated a quarterly average bank LTD ratio since the prior May 29, 2012 CRA evaluation. The average spanned 30 quarters from June 2012 through September 2019. We gave weight to recent LTD performance, as the Bank has experienced an upward trend. We used the most recent annual FDIC deposit market share report, as of June 30, 2019, to determine the Bank's presence in the AA.

Data Integrity

The Bank does not meet the HMDA-eligible asset threshold, and thus, is not a HMDA filer. The Bank does not utilize a HMDA-Loan Application Register due to this fact. We reviewed 100 percent of HMDA-eligible loan originations during the evaluation period to perform lending analysis and ensure accurate data.

Selection of Areas for Full-Scope Review

The Bank has one AA, which received a full-scope review.

Ratings

The Bank's overall rating is based primarily on the AA that received a full-scope review.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

The OCC will consider any information that UTB engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the Bank'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.

Description of AA

The Bank has one designated, contiguous AA comprised of all census tracts in Cook County and Will County, located within the Chicago-Naperville-Elgin, IL-IN-WI MSA. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income census tracts or reflect any illegal discrimination. The table below provides demographic data for the Bank's AA.

Chicago-Naperville-Elgin, IL-IN-WI MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: UTB - Chicago MSA 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,749	15.2	23.8	28.1	32.2	0.8
Population by Geography	7,278,193	11.0	23.3	30.6	34.8	0.3
Housing Units by Geography	2,930,499	11.3	22.3	30.4	35.7	0.4
Owner-Occupied Units by Geography	1,658,304	4.9	17.6	34.4	42.9	0.2
Occupied Rental Units by Geography	994,385	18.3	28.8	25.4	26.7	0.7
Vacant Units by Geography	277,810	23.9	27.0	23.8	24.7	0.5
Businesses by Geography	412,912	5.2	15.5	29.4	49.3	0.6
Farms by Geography	6,254	3.2	13.7	38.9	44.0	0.1
Family Distribution by Income Level	1,707,827	23.8	16.2	18.4	41.5	0.0
Household Distribution by Income Level	2,652,689	25.7	15.2	16.9	42.2	0.0
Median Family Income MSA - 16974 Chicago-Naperville-Arlington Heights, IL MD		\$75,350	Median Housing Value			\$246,817
			Median Gross Rent			\$1,053
			Families Below Poverty Level			10.9%
Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (* The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: UTB - Chicago MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,748	13.8	22.9	31.7	31.4	0.3
Population by Geography	7,212,655	9.6	22.5	34.0	33.9	0.0
Housing Units by Geography	2,915,771	10.2	21.7	34.1	33.9	0.0
Owner-Occupied Units by Geography	1,734,014	4.2	16.9	37.7	41.1	0.0
Occupied Rental Units by Geography	901,848	18.1	29.3	29.7	22.8	0.0
Vacant Units by Geography	279,909	22.1	27.1	25.9	24.9	0.0
Businesses by Geography	391,920	4.7	15.1	32.0	48.1	0.1
Farms by Geography	5,909	2.8	11.9	39.5	45.8	0.0
Family Distribution by Income Level	1,721,828	22.8	16.7	19.3	41.3	0.0
Household Distribution by Income Level	2,635,862	24.8	15.7	17.8	41.7	0.0
Median Family Income MSA - 16974 Chicago-Naperville-Arlington Heights, IL MD		\$72,196	Median Housing Value			\$291,356
			Median Gross Rent			\$948
			Families Below Poverty Level			9.6%
Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0 (* The NA category consists of geographies that have not been assigned an income classification.						

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

The Bank's performance under the Lending Test in the AA is rated **Satisfactory**.

Based on a full-scope review, the Bank's performance in the AA is **reasonable**.

Distribution of Loans by Income Level of the Geography

The Bank exhibits reasonable geographic distribution of loans in the Multistate Metropolitan Statistical Area (MMSA).

Small Loans to Businesses – 2017 & 2018

The Bank's small business lending to geographies of different income levels in years 2017 and 2018 in the AA was reasonable. Bank lending in moderate-income census tracts at 45.5 percent greatly exceeded both the percentage of small businesses in moderate-income census tracts at 15.6 percent and aggregate peer bank performance at 16.6 percent. Bank lending in low-income census tracts at zero percent was below both the percentage of small businesses in low-income census tracts at 5.3 percent and aggregate peer bank performance at 4.3 percent. The excellent coverage in moderate-income census tracts mitigates the poor performance in low-income census tracts.

Please refer to Table Q (for years 2017 & 2018) in Appendix D for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of small loans to businesses.

Small Loans to Businesses – 2016

The geographic distribution of small business loans in the AA in 2016 was reasonable. The Bank's small business lending in moderate-income census tracts at 37.5 percent of total loans greatly exceeded both the percentage of small businesses in moderate-income census tracts at 15.1 percent and aggregate peer bank performance at 14.8 percent. Small business lending in low-income census tracts at 4.2 percent was slightly below the percentage of small businesses in low-income census tracts at 4.7 percent but slightly exceeded aggregate peer bank performance of 3.6 percent. Overall, moderate-income small business lending was excellent, and low-income small business lending was reasonable.

Please refer to Table Q (for year 2016) in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Lending Gap Analysis

Reports detailing UTB's lending activity over the evaluation period for small business loans were reviewed to identify gaps in the geographic distribution of the loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

We were unable to determine the distribution level of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the Bank.

Small Loans to Businesses

The Bank does not compile and retain revenue information on small business borrowers. To attempt to compile this information, we reviewed the physical loan files for each small business origination during the assessment period. We reviewed tax returns to determine the gross annual income for each borrower. However, we were unable to compile enough revenue information to conduct a meaningful analysis. Out of 35 small business loans in the AA, only 19 had determinable revenue information. Please see Table R in Appendix D for information on business revenues over the evaluation period.

Responses to Complaints

The Bank has not received any complaints related to CRA since the last evaluation.

Appendix A: Scope of Examination

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

Time Period Reviewed:	(01/01/16 to 12/31/18)	
Bank Products Reviewed:	Small Business	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Chicago-Naperville-Elgin, IL-IN-WI MSA	Full-scope	AA is Cook County and Will County

Appendix B: Summary of MMSA and State Ratings

RATINGS	United Trust Bank
Overall Bank:	Lending Test Rating
United Trust Bank	Satisfactory
MMSA or State:	
Naperville-Chicago-Elgin	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

Geography: A census tract delineated by the U.S. Census Bureau in the most recent decennial census.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All MMSAs, if applicable, are presented in one set of tables. References to the “Bank” include activities of any affiliates that the Bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this evaluation.

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 Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare Bank loan data to aggregate data from geographic areas larger than the Bank’s AA.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the Bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 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			
	#	\$	% 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	
UTB AA	5	2,688	100.0	247,552	4.2	0.0	2.8	16.9	20.0	12.1	37.7	60.0	34.7	41.1	20.0	50.4	0.0	0.0	0.0	
Total		2,688	100.0	247,552	4.2	0.0	2.8	16.9	20.0	12.1	37.7	60.0	34.7	41.1	20.0	50.4	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 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				
	#	\$	% 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		
UTB Chic ago MSA	2	310	100.0	210,265	4.9	0.0	3.7	17.6	50.0	14.9	34.4	0.0	33.6	42.9	50.0	47.7	0.2	0.0	0.1		
Total	2	310	100.0	210,265	4.9	0.0	3.7	17.6	50.0	14.9	34.4	0.0	33.6	42.9	50.0	47.7	0.2	0.0	0.1		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
UTB AA	24	4,247	100.0	183,376	4.7	4.2	3.6	15.1	37.5	14.8	32.0	41.7	33.0	48.1	16.7	48.5	0.1	0.0	0.1
Total	24	4,247	100.0	183,376	4.7	8.3	3.6	15.1	37.5	14.8	32.0	50.0	33.0	48.1	25.0	48.5	0.1	0.0	0.1

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

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
UTB Chicago MSA	11	2,367	100.0	162,930	5.3	0.0	4.3	15.6	45.5	16.6	29.5	18.2	31.3	49.1	36.4	47.5	0.6	0.0	0.3
Total	11	2,367	100.0	162,930	5.3	0.0	4.3	15.6	45.5	16.6	29.5	18.2	31.3	49.1	36.4	47.5	0.6	0.0	0.3

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
UTB AA	24	4247	100.0	183,376	80.6	58.3	39.4	8.3	4.2	11.0	37.5
Total	24	4247	100.0	183,376	80.6	58.3	39.4	8.3	4.2	11.0	37.5
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

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			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
UTB AA	11	2,367	100.0	162,930	80.7	36.4	48.4	8.4	0.0	11.0	63.6		
Total	11	2,367	100.0	162,930	80.7	36.4	48.4	8.4	0.0	11.0	63.6		
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>													