



## **PUBLIC DISCLOSURE**

07/16/2019

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First National Bank in Pinckneyville  
Charter Number 13975

210 S. Main St.  
Pinckneyville, IL 62274

Office of the Comptroller of the Currency  
500 N Broadway, Suite 1700  
St. Louis, MO 63102

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 ..... 1**

**SCOPE OF THE EVALUATION ..... 3**

**DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW ..... 4**

**STATE RATING ..... 5**

    STATE OF ILLINOIS.....5

**APPENDIX A: SCOPE OF EXAMINATION ..... A-1**

**APPENDIX B: SUMMARY OF MMSA AND STATE RATINGS ..... B-1**

**APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS ..... C-1**

**APPENDIX D: TABLES OF PERFORMANCE DATA ..... D-1**

## Overall CRA Rating

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

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

The First National Bank in Pinckneyville (FNB or bank) demonstrates a satisfactory record in meeting the needs of its community. The major factors that support this rating include:

- FNB's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and level of local competition.
- A substantial majority of the bank's loans are inside its assessment area (AA).
- The bank has a reasonable distribution of loans to individuals of different income levels throughout its AA. In arriving at our overall rating, this factor received more weight than the geographic distribution due to the bank having only one low- or moderate-income CT in its AA during 2016 and none in 2017-2018.
- The bank's geographic distribution of home loans reflects reasonable dispersion throughout its AA.

## Loan-to-Deposit Ratio

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

FNB's LTD ratio averaged 48.67 percent over the 19 quarters since the last CRA evaluation. During this timeframe, the LTD ranged from a low of 43 percent to a high of 53.7 percent. This is comparable to the ratios of two other banks of similar asset size and location whose quarterly averages ranged from 62.5 percent to 41.9 percent for the same period.

## Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA.

The bank originated and purchased 85 percent of its total loans by number and 80.8 percent by dollar inside the AA during the evaluation period. These ratios are bank-wide calculations, and not calculated by individual rating area or AA. The lending activity outside the bank's AA is largely concentrated in the greater Perry County area. The table below illustrates the number and dollar volume of loans that FNB originated inside and outside its AA.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage	17	85.0	3	15.0	20	910	80.8	216	19.2	1,126
<b>Subtotal</b>	<b>17</b>	<b>85.0</b>	<b>3</b>	<b>15.0</b>	<b>20</b>	<b>910</b>	<b>80.8</b>	<b>216</b>	<b>19.2</b>	<b>1,126</b>

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

## Description of Institution

FNB is an intrastate bank headquartered in Pinckneyville, Illinois (IL). FNB is wholly owned by First Perry Bancorp, Inc., a one bank holding company also located in Pinckneyville. In addition to FNB, First Perry Bancorp, Inc. owns an FNB affiliate, First National Insurance Services, Inc., also located in Pinckneyville. The bank does not have any branches at this time. FNB has two automated teller machines (ATMs), one located at the main office and the other located in the insurance office. Both are cash-dispensing-only ATMs. There have been no changes in the bank's corporate structure, including merger or acquisition activities, since the last CRA examination.

FNB offers traditional bank services and loan products normally associated with a community bank. The bank is primarily a home mortgage lender. As of December 31, 2018, FNB had total assets of over \$101 million, tier 1 capital of \$15 million, and total deposits of \$80 million. Net loans totaled \$40.9 million and represented 40 percent of total assets. The outstanding portfolio consisted of home mortgage loans (82.9 percent), loans to individuals (12.2 percent), business loans (3.0 percent), other loans (1.5 percent), and farm loans (0.4 percent).

There are no legal, financial, or other factors impeding FNB's ability to help meet the credit needs in its AA. FNB was rated "Satisfactory" at its last CRA evaluation dated April 14, 2014.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The scope of this evaluation includes an assessment of FNB under the Small Bank performance criteria, which consists of a Lending Test. The Lending Test evaluates FNB's record of helping to meet the credit needs of its AA through its lending activities. FNB has one AA located in Perry County IL, which is not part of a metropolitan statistical area (MSA). The AA received a full-scope review. The evaluation period was from April 15, 2014 through December 31, 2018. The lending test analysis includes loan originations and purchases from January 1, 2016 through December 31, 2018. We based our conclusions regarding the bank's lending performance on FNB's primary loan product: home mortgage loans.

To evaluate lending performance, we selected a random sample of 20 home mortgage loans originated in 2016 and 20 home mortgage loans originated in 2017-2018.

We completed two separate analyses of the bank's lending performance. For FNB's performance in 2016, we used the comparators of demographic data from the 2010 United States (U.S.) Census and 2016 peer mortgage data. For the lending performance in 2017-2018, we used the comparators of demographic data from the 2015 American Community Survey (ACS) and 2017 peer mortgage data. The 2015 ACS provided an update to median family income, changing the income designation of one of the CT's in 2017.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, the bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, the bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A for a list of full- and limited-scope AAs.

### **Ratings**

FNB's overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from the bank's performance under the CRA Small Bank Lending Test as well as related performance context information from the bank's AA. With the exception of the bank's LTD ratio (based on the bank's entire lending portfolio), all weight for performance under the CRA Small Bank Lending Test was based on the bank's lending performance in relation to its primary product of home mortgage loans.

## **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

## **State Rating**

### **State of Illinois**

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

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

The major factors that support this rating include:

- FNB's loan-to-deposit ratio (LTD) is reasonable given the bank's size, financial condition, and level of local competition.
- A substantial majority of the bank's loans are inside its AA.
- The bank has a reasonable distribution of loans to individuals of different income levels throughout its AA. In arriving at our overall rating, this factor received more weight than the geographic distribution due to the bank having only one low- or moderate-income CT in its AA during 2016 and none in 2017-2018.
- The bank's geographic distribution of home loans reflects reasonable dispersion throughout its AA.

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

FNB's AA includes census tracts (CT) 301, 302, 303, and 304 covering all but the south east corner of Perry County. This AA is a Non-MSA. According to the 2015 ACS data all CTs in the bank's AA were classified as middle-income. Prior to 2015 data, CT 304 had been classified as moderate-income. Although FNB's AA represents only a portion of Perry County, it is reasonable due to the bank's size and its only office being located in the small, rural town of Pinckneyville, IL. The AA meets regulatory requirements and does not arbitrarily exclude any low- and moderate-income geographies.

FNB's primary business focus is on home mortgage lending, small business lending, and small farm lending. The bank has no branches outside its location in Pinckneyville, IL.

As of June 30, 2018, five financial institutions operate seven offices in Perry County. FNB ranks first with a 25.5 percent deposit market share totaling \$83.2.

### **Community Contacts**

We reviewed one community contact conducted in May 2019. The contact identified unmet community development needs in the bank's AA. These needs included helping area residents with financial literacy, and providing greater access to financial services targeted to low-income borrowers and those with poor credit scores. Our contact was unaware of any discriminatory behavior by any area financial institutions.

**Perry County, IL (Non-MSA)**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	4	0.0	25.0	75.0	0.0	0.0
Population by Geography	15,809	0.0	16.8	83.2	0.0	0.0
Housing Units by Geography	6,448	0.0	20.7	79.3	0.0	0.0
Owner-Occupied Units by Geography	4,355	0.0	15.3	84.7	0.0	0.0
Occupied Rental Units by Geography	1,174	0.0	40.0	60.0	0.0	0.0
Vacant Units by Geography	919	0.0	21.4	78.6	0.0	0.0
Businesses by Geography	641	0.0	27.5	72.5	0.0	0.0
Farms by Geography	88	0.0	6.8	93.2	0.0	0.0
Family Distribution by Income Level	3,508	21.9	20.0	24.8	33.4	0.0
Household Distribution by Income Level	5,529	26.2	16.0	20.9	36.9	0.0
Median Family Income Non-MSAs - IL		\$54,499	Median Housing Value			\$74,760
			Median Gross Rent			\$522
			Families Below Poverty Level			12.2%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>2017-2018</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	4	0.0	0.0	100.0	0.0	0.0
Population by Geography	15,313	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	6,421	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	4,010	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,280	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,131	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	620	0.0	0.0	100.0	0.0	0.0
Farms by Geography	64	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,377	18.4	17.2	26.7	37.8	0.0
Household Distribution by Income Level	5,290	28.3	14.9	17.7	39.1	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housing Value			\$78,845
			Median Gross Rent			\$497
			Families Below Poverty Level			11.3%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						



The 2010 U.S. Census recorded four CTs in the AA, three were middle-income, and one was moderate-income. According to the 2010 census data, the area population was 15,809.

According to the 2015 ACS Census, the total number of CTs remained the same. The 2015 ACS Census listed all four CTs as middle-income. The population decreased slightly from 2010 census at 15,313.

The distribution of families by income level was 18.4 percent low-income, 17.2 percent moderate-income, 26.7 percent middle-income, and 37.8 percent upper-income. The percentage of families in the AA living below the poverty level was 11.3 percent. The 2018 FFIEC adjusted median family income for the AA was \$63,900, up from \$58,000 in 2016. Low-income families earned an annual income of \$31,950 or less, and moderate-income families earned annual income of \$31,950 to \$51,120.

<b>Table B – Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>IL Non-MSA Median Family Income</b>				
2016 (\$58,000)	<\$29,000	\$29,000 to <\$46,400	\$46,400 to <\$69,600	≥\$69,600
2017 (\$60,400)	<\$30,200	\$30,200 to <\$48,320	\$48,320 to <\$72,480	≥\$72,480
2018 (\$63,900)	<\$31,950	\$31,950 to <\$51,120	\$51,120 to <\$76,680	≥\$76,680
<i>Source: FFIEC Due to rounding, totals may not equal 100.0</i>				

### Employment Factors

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, the unemployment rate in Perry County as of December 2016 and 2018 was 7.1 and 6.0 percent, respectively, compared to 5.8 percent and 4.3 percent, respectively, for IL.

<b>Unemployment Rates 2016-2018</b>			
<b>Area</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Perry County	7.1	6.1	6.0
State of Illinois	5.8	4.9	4.3
National	4.9	4.4	3.9

### Housing Characteristics

The 2010 Census reported total housing units of 6,448 in the AA. Of the total number of housing units, 4,355 or 67.5 percent were owner occupied, 1,174 or 18.2 percent were renter occupied and 919 or 14.3 percent were vacant. Of all occupied units, 1,136 or 20.6 percent were located in the moderate-income CT. Of all occupied rental units, 470 or 38.0 percent were located in the moderate-income CT. Additionally, 949 or 71.2 percent of all single family (1-4 units) homes and 117 or 8.8 percent of all multifamily housing units were located in the moderate-income CT. The 2010 Census indicates that the weighted average median housing value was \$74,760 and the weighted average monthly gross rent was \$522.

The 2015 ACS Census reported total housing units of 6,421 in the AA. Of the total number of housing units, 4,010 or 62.5 percent were owner occupied, 1,280 or 19.9 percent were renter occupied, and 1,131 or 17.61 percent were vacant. There were no housing units located in moderate- or low-income CTs.

The ACS Census indicates that the weighted average median housing value was \$78,845 and the weighted average monthly rent was \$497.

### **Economic Conditions**

The local economy has improved over the past few years; however, lags both the state and the nation in metrics such as unemployment rates. Major employers in the area are Pinckneyville Correctional Center, Pinckneyville Community Hospital, and the school district. During the evaluation period, there have been no major new businesses opened in the area. Large retailers in nearby towns continue to add competitive pressure on Pinckneyville's smaller retail operators. According to Moody's Analytics, *Illinois will sustain some of its recent momentum in the near term while trailing the rest of the country in most gauges of economic performance. Private service-providing industries will power growth as manufacturing's resurgence ebbs. The state's financial pressures present serious challenges and demographic headwinds will be even stiffer than previously believed, limiting Illinois's long-term potential.*

## **Scope of Evaluation in Illinois**

We performed a full-scope evaluation of the bank's only AA. Refer to Appendix A for more information.

## **LENDING TEST**

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

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

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

The bank exhibits reasonable geographic distribution of loans in the AA. Our analysis for geographic distribution was limited to home mortgage lending activity in 2016. An analysis of activity for 2017-2018 would not be meaningful as there were no low- or moderate-income CTs in the AA.

### ***Home Mortgage Loans***

Refer to Table O of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

#### **2016**

The geographic distribution of home mortgage loans in 2016 is reasonable given FNB's location and competition. FNB originated five percent of its home mortgage loans in the only moderate-income CT located in the AA. This is well below both the percentage of owner-occupied housing units located within the CT (15.3 percent) and the aggregate level of lending in the same CT (14.5 percent).

In evaluating the reasonableness of the geographic distribution of home mortgage loans, we noted the bank's ability to lend in the moderate-income CT is hindered due to strip-cut lakes left behind from aboveground mining, separating the institution from the majority of the population located in CT 304. In addition, on the eastern half of the CT, closer to the populated area, are three other financial institutions.

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

We reviewed summary reports and maps and analyzed FNB's home mortgage lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

The bank exhibits reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### 2016

The borrower distribution of FNB's home mortgage loans for the 2016 evaluation period is reasonable. FNB originated 20 percent of its home mortgage loans to low-income borrowers. The percentage of loans to low-income borrowers was within a reasonable range of the percentage of low-income families (21.9 percent) and significantly above aggregate lending to low-income borrowers (10 percent).

FNB originated 10 percent of its home mortgage loans to moderate-income borrowers. The percentage of loans to moderate-income borrowers was well below both the percentage of moderate-income families (20 percent) and aggregate lending (18.5 percent). We concluded the bank's lending to moderate-income borrowers is reasonable given the competitive market environment in which the bank operates.

#### 2017-2018

The borrower distribution of FNB's home mortgage loans for the 2017-2018 evaluation period is reasonable. FNB originated 15 percent of its home mortgage loans to low-income borrowers. The percentage of loans to low-income borrowers was within a reasonable range of the percentage of low-income families in the AA (18.4 percent) and significantly above aggregate lending to low-income borrowers (5.1 percent).

FNB originated 25 percent of its home mortgage loans to moderate-income borrowers. The percentage of loans to moderate-income borrowers was above both the percentage of moderate-income families in the AA (17.2 percent) and the aggregate lending to moderate-income borrowers (23 percent).

### **Responses to Complaints**

During the evaluation period, FNB did not receive any complaints in regards to its CRA performance within the AA.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	04/15/2014 to 12/31/2018	
<b>Bank Products Reviewed:</b>	Home Mortgage Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable	Not Applicable	Not Applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Illinois</b>		
Illinois Non-MSA	Full Scope	AA consists of CT 301, 302, 303, and 304 in Perry County, IL

## Appendix B: Summary of MMSA and State Ratings

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RATINGS: The First National Bank in Pinckneyville	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
First National Bank in Pinckneyville	Satisfactory
<b>State:</b>	<b>Lending Test Rating</b>
Illinois	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified

into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

The following is a listing and brief description of the tables included in each set:

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

to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

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

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2016</b>
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
Illinois Non-MSA	20	799	100.0	200	0.0	0.0	0.0	15.3	5.0	14.5	84.7	95.0	85.5	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>799</b>	<b>100.0</b>	<b>200</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>15.3</b>	<b>5.0</b>	<b>14.5</b>	<b>84.7</b>	<b>95.0</b>	<b>85.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

*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*

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2017-18</b>
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
Illinois Non-MSA	20	1,521	100.0	178	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
<b>Total</b>	<b>20</b>	<b>1,521</b>	<b>100.0</b>	<b>178</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2016</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Illinois Non-MSA	20	799	100.0	200	21.9	20.0	10.0	20.0	10.0	18.5	24.8	25.0	26.5	33.4	45.0	37.5	0.0	0.0	7.5	
<b>Total</b>	<b>20</b>	<b>799</b>	<b>100.0</b>	<b>200</b>	<b>21.9</b>	<b>20.0</b>	<b>10.0</b>	<b>20.0</b>	<b>10.0</b>	<b>18.5</b>	<b>24.8</b>	<b>25.0</b>	<b>26.5</b>	<b>33.4</b>	<b>45.0</b>	<b>37.5</b>	<b>0.0</b>	<b>0.0</b>	<b>7.5</b>	

*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*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2017-18</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Illinois Non-MSA	20	1,521	133.3	178	18.4	15.0	5.1	17.2	25.0	23.0	26.7	15.0	28.7	37.8	45.0	28.1	0.0	0.0	15.2	
<b>Total</b>	<b>20</b>	<b>1,521</b>	<b>133.3</b>	<b>178</b>	<b>18.4</b>	<b>15.0</b>	<b>5.1</b>	<b>17.2</b>	<b>25.0</b>	<b>23.0</b>	<b>26.7</b>	<b>15.0</b>	<b>28.7</b>	<b>37.8</b>	<b>45.0</b>	<b>28.1</b>	<b>0.0</b>	<b>0.0</b>	<b>15.2</b>	

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