



PUBLIC DISCLOSURE

July 1, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Collinsville Building and Loan Association
Charter Number: 700904

701 Belt Line Road
Collinsville, IL 62234-4412

Office of the Comptroller of the Currency
500 North 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.

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Overall CRA Rating

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

The Lending Test is rated: Outstanding

Collinsville Building and Loan Association, a Federal Savings Association (CBLA or FSA), demonstrates an outstanding record in meeting the credit needs of its community. The major factors that support this rating include:

- The FSA's average loan-to-deposit (LTD) ratio is more than reasonable.
- A substantial majority of the FSA's home loans are inside its assessment area (AA).
- The FSA's geographic distribution of home loans reflects excellent dispersion throughout the AA.
- The FSA's overall borrower distribution of loans to borrowers of different income levels is reasonable given the FSA's size, product offerings and market share, combined with the local demographic and economic conditions.
- There were no complaints with respect to the FSA's CRA performance during the evaluation period.

Loan-to-Deposit Ratio

Considering CBLA's size, financial condition, and credit needs of the AA, the FSA's LTD ratio is more than reasonable.

CBLA's quarterly LTD ratio, as calculated on an institution-wide basis, averaged 94.3 percent over the 25 quarters since the last CRA evaluation. During this timeframe, the LTD ratio ranged from a low of 89.6 percent to a high of 98.2 percent.

CBLA's average quarterly LTD ratio compares favorably with other community institutions of similar size, location, and product offerings. CBLA ranks first among nine similarly situated institutions between \$40 million and \$395 million in total assets serving the AA. The other eight institutions had quarterly LTD ratios ranging from 33.2 percent to 99.9 percent, and averaging 64.5 percent.

Lending in Assessment Area

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

CBLA originated and purchased 83.6 percent of its total loans by number and 85.2 percent by dollar inside its AA during the evaluation period. These ratios are bank-wide calculations, and not calculated by individual rating area or AA. The table below illustrates the number and dollar volume of loans the FSA originated inside and outside its AA.

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										
2016	77	82.8	16	17.2	93	11,379	85.6	1,919	14.4	13,298
2017	74	81.3	17	18.7	91	11,246	80.1	2,798	19.9	14,044
2018	93	86.1	15	13.9	108	15,782	89.1	1,933	10.9	17,715
Total	244	83.6	48	16.4	292	38,407	85.2	6,650	14.8	45,057
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data Due to rounding, totals may not equal 100.0</i>										

Description of Institution

CBLA is a federally chartered mutual savings association headquartered in Collinsville, Illinois (IL). As of December 31, 2018, CBLA had total assets of \$117.8 million, and total equity capital of \$33 million. CBLA operates two locations in Madison County: its main office in Collinsville, IL and its branch office in Troy, IL. The FSA has not opened or closed any branches since the last CRA evaluation. There have not been any major changes in CBLA's corporate structure, including merger or acquisition activities. The FSA has no affiliates or subsidiaries.

CBLA's business strategy is to operate as a traditional thrift through the solicitation of deposits from the local community and the origination of one-to-four family mortgage loans. The institution offers a wide range of deposit products including checking accounts, statement savings accounts and certificates of deposit. As of December 31, 2018, the institution reported \$83 million in outstanding loans and had a net loans and leases to total assets ratio of 70 percent. One-to-four family home mortgages loans make up over 99 percent of the loan portfolio.

There are no legal, financial, or other factors impeding the FSA's ability to help meet the credit needs in its AA. The OCC concluded the FSA's performance was "Satisfactory" at the last CRA evaluation dated December 17, 2012.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of the FSA under the Small Bank performance criteria, which consists only of a Lending Test. The Lending Test evaluates the FSA's record of meeting the credit needs of its AA through its lending activities. The scope of the CRA evaluation period is December 16, 2012 through December 31, 2018. The lending test analysis includes loan originations and purchases from January 1, 2016 through December 31, 2018.

To evaluate lending performance, we reviewed the bank submitted Home Mortgage Disclosure Act (HMDA) data from 2016, 2017 and 2018 for home mortgage loans, the FSA's primary product.

We completed two separate analyses of the FSA's lending performance. For the FSA's 2016 lending performance, we used the comparators of demographic data from the 2010 United States (U.S.) Census. For the FSA's 2017 and 2018 lending performance, we used the comparators of demographic data from the 2015 American Community Survey (ACS).

Selection of Areas for Full-Scope Review

In each state where the FSA has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, FSA delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, FSA 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 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

The FSA's overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from the FSA's performance under the CRA Small Bank Lending Test as well as related performance context information from the FSA's St. Louis MO-IL MSA. With the exception of the FSA's LTD ratio (based on the FSA's entire lending portfolio), all weight for performance under the CRA Small Bank Lending Test was based on the FSA'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: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The average loan-to-deposit (LTD) ratio is more than reasonable.
- A substantial majority of home loans are inside the assessment area (AA).
- The geographic distribution of home loans reflects excellent dispersion throughout the AA.
- The overall borrower distribution of loans to borrowers of different income levels is reasonable.
- There were no complaints with respect to the FSA's CRA performance during the evaluation period.

Description of Institution's Operations in Illinois

CBLA's primary business focus is on home mortgage lending. All of the bank's operations are within the state of Illinois. The FSA has one contiguous AA located within a portion of the St. Louis MO-IL MSA #41180. The AA includes 12 CTs in northern St. Clair County and 20 CTs in the central and southern portions of Madison County. Boundary changes based on the 2010 census resulted in the total number of CTs increasing from 27 at the last CRA evaluation to 32 at this evaluation; however, the AA did not change. The AA meets regulatory requirements and does not arbitrarily exclude and low- and moderate-income geographies.

The AA is highly competitive with 37 other deposit-taking institutions operating 175 branches. Competitors in the AA include several larger regional banks and credit unions, four large national banks and several smaller community banks and local credit unions. The top three institutions by deposit market share (The Bank of Edwardsville, Regions Bank and FCB Banks) account for 40.8 percent of the overall market share. As of June 30, 2018, the FSA reported \$85.6 million in deposits in the IL Madison-St Clair County subsection of the St. Louis MO-IL MSA. This represents 100 percent of the FSA's total deposits as of that date and 0.95 percent of the total market share. According to FDIC market share information, this ranked 19th in deposit market share in the AA.

Competition for home mortgage loans was strong during the evaluation period. Based on aggregate Home Mortgage Disclosure Act (HMDA) data compiled between January 1, 2016 and December 31, 2017, on average, 327 lenders originated or purchased over 20,000 home mortgage loans in the AA. The top five lenders accounted for, on average, 27.8 percent of the total loans originated per year. CBLA ranked 29th in 2016 originating 95 home mortgage loans and 31st in 2017 originating 81 home mortgage loans. This represents market shares of 0.85 percent and 0.83 percent, respectively.

Community Contacts

We reviewed two community contacts, conducted in January and July 2019. Both contacts serve the AA and were able to provide insight on potential credit and community development needs. They identified similar unmet community development needs in CBLA's AA. These include affordable home mortgages and home buyer programs, pay-day loan repayment programs, financial literacy training, as well as support for families of public housing. Neither contact was aware of any discriminatory behavior by any area financial institutions.

St. Louis MO-IL MSA (Madison and St. Clair Counties)

Table A – Demographic Information of the Assessment Area						
Assessment Area: St. Louis MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	6.3	53.1	40.6	0.0
Population by Geography	175,292	0.0	5.2	52.9	41.8	0.0
Housing Units by Geography	70,409	0.0	6.6	56.4	37.0	0.0
Owner-Occupied Units by Geography	48,599	0.0	4.7	52.9	42.4	0.0
Occupied Rental Units by Geography	17,026	0.0	10.4	66.0	23.6	0.0
Vacant Units by Geography	4,784	0.0	12.9	58.2	28.9	0.0
Businesses by Geography	9,385	0.0	5.0	55.8	39.2	0.0
Farms by Geography	430	0.0	3.0	39.3	57.7	0.0
Family Distribution by Income Level	45,116	15.0	14.1	22.7	48.2	0.0
Household Distribution by Income Level	65,625	18.6	14.6	16.8	50.0	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$66,798	Median Housing Value			\$163,682
			Median Gross Rent			\$793
			Families Below Poverty Level			5.8%

Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: St. Louis MSA 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	12.5	43.8	43.8	0.0
Population by Geography	175,527	0.0	10.0	43.4	46.7	0.0
Housing Units by Geography	72,847	0.0	12.2	46.0	41.8	0.0
Owner-Occupied Units by Geography	48,328	0.0	9.5	43.2	47.3	0.0
Occupied Rental Units by Geography	18,840	0.0	16.5	52.8	30.7	0.0
Vacant Units by Geography	5,679	0.0	20.3	47.5	32.2	0.0
Businesses by Geography	9,660	0.0	9.1	51.1	39.8	0.0
Farms by Geography	410	0.0	6.3	37.6	56.1	0.0
Family Distribution by Income Level	46,183	15.2	15.7	20.1	48.9	0.0
Household Distribution by Income Level	67,168	18.7	14.2	16.7	50.4	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$70,718	Median Housing Value			\$165,650
			Median Gross Rent			\$887
			Families Below Poverty Level			5.9%

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.

Based on 2010 U.S. Census data, there were 32 CTs in the AA, consisting of two moderate-income CTs (4034.02 and 4033), 17 middle-income CTs, and 13 upper-income CTs. According to the 2015 ACS, the same 32 CTs remained; however, with some income-level changes. CT 4031.22 changed from middle- to upper-income and CTs 4029 and 4032 changed from middle-income to moderate-income. As of 2018, the AA contained 14 upper; 14 middle; 4 moderate and 0 low-income CTs.

The distribution of families by income level was 15.2 percent low-income, 15.7 percent moderate-income, 20.1 percent middle-income, and 48.9 percent upper-income. The percentage of families in the AA living below the poverty level was 5.9 percent. The FFIEC adjusted median family income for the St. Louis, MO-IL MSA increased from \$70,000 in 2016 to \$76,600 in 2018. In 2018, low-income families earned annual income of \$38,300 or less, moderate-income families earned annual income of \$38,300 to \$61,280, and upper income families earned annual income in excess of \$91,920.

Table B – Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
St. Louis, MO-IL MSA Median Family Income (41180)				
2016 (\$70,000)	<\$35,000	\$35,000 to <\$56,000	\$56,000 to <\$84,000	≥\$84,000
2017 (\$74,300)	<\$37,150	\$37,150 to <\$59,440	\$59,440 to <\$89,160	≥\$89,160
2018 (\$76,600)	<\$38,300	\$38,300 to <\$61,280	\$61,280 to <\$91,920	≥\$91,920
<i>Source FFIEC</i>				

Population and Employment

According to the 2015 ACS Census data, the total population in the AA has not changed significantly since 2010. The population was slightly up from the 2010 Census from 175,292 to 175,527.

The number of households increased 2.6 percent to 67,332 and the number of families grew 2.6 percent to 46,214. Households below poverty increased from 8.54 percent to 9.45 percent and families below poverty increased slightly from 5.8 percent to 5.9 percent. According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, the unemployment rate as of December 2016 and 2018 was 6.1 percent and 5.0 percent, respectively, for St. Clair County and 5.9 percent and 4.5 percent, respectively, for Madison County.

Unemployment Rates 2016-2018			
Area	2016	2017	2018
St. Clair County	6.1%	5.1%	5.0%
Madison County	5.9%	4.8%	4.5%
State of Illinois	5.8%	4.9%	4.3%
<i>Source: U.S. Department of Labor; Bureau of Labor Statistics</i>			

Housing and Affordability

The 2015 ACS Census reported total housing units increased 3.6 percent to 72,822 in the AA. Of the total number of housing units in the AA, 48,360 or 66.4 percent are owner occupied, 18,972 or 26.0 percent are renter occupied, and 5,490 or 7.5 percent are vacant.

Home ownership affordability was an issue that limited mortgage demand, particularly among low-income borrowers. Based on the 2018 FFIEC median family income of \$76,600, low income families made less than \$38,300. The weighted average median housing value for the AA was \$165,650 or 4.3 times the annual income of a low-income family. Low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

Scope of Evaluation in Illinois

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

LENDING TEST

The FSA's performance under the Lending Test in Illinois is rated Outstanding.

Based on a full-scope review, the FSA's lending performance in the State of Illinois is excellent.

Distribution of Loans by Income Level of the Geography

The FSA exhibits excellent geographic distribution of loans in the AA. There are no low-income CTs in the AA; therefore, our analysis focused on lending in the moderate-income CTs.

Home Mortgage Loans

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

2016

The geographic distribution of home mortgage loans in 2016 is excellent. CBLA originated 7.8 percent of its home mortgage loans in moderate-income CTs, which exceeds the percentage of owner-occupied housing units located in moderate-income CTs (4.7 percent) and significantly exceeds the 2016 HMDA aggregate data for lending in the same moderate-income CTs (3.3 percent).

2017-2018

The geographic distribution of home mortgage loans in 2017-2018 is excellent. CBLA originated 12 percent of its home mortgage loans in moderate-income CTs, which exceeds the percentage of owner-occupied housing units located in moderate-income CTs (9.5 percent) and the 2018 HMDA aggregate data for lending in the same moderate-income CTs (9.0 percent).

Lending Gap Analysis

We reviewed summary reports and maps and analyzed the FSA'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

CBLA's level of lending to borrowers of different income levels is reasonable given the FSA's size, share of market and product offerings combined with the local demographic and economic conditions. CBLA's percentage of home mortgage loans originated to low-income borrowers is above the HMDA peer average of the 2016 review period; in the 2017-18 review period it dropped slightly below the peer average.

In evaluating the reasonableness of the borrower distribution of home mortgage loans, we noted the number of families with incomes below the poverty level increased during the evaluation period from 8.5 percent in 2016 to 9.4 percent in 2018. Borrowers living in poverty, including LMI families, often have difficulty qualifying for conventional mortgage products without flexible terms or some other form of financial assistance. Additionally, the FSA's AA contains 175 financial institution branch locations and over 300 mortgage lenders competing for lending opportunities in the AA.

Home Mortgage Loans

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

2016

The borrower distribution of CBLA's home mortgage loans for the 2016 evaluation period is reasonable. The FSA originated 6.5 percent of its home mortgage loans to low-income borrowers. This is well below the percentage of low-income families (15.0 percent) in the AA; however, it exceeds the 2016 HMDA aggregate data for home mortgage lending to low-income families in the same AA (4.6 percent).

CBLA originated 11.7 percent of its home mortgage loans to moderate-income borrowers. This is under, but within a reasonable range of both the percentage of moderate-income families (14.1 percent) in the AA and the 2016 HMDA aggregate data for home mortgage lending to moderate-income families in the same AA (13.7 percent).

2017-2018

The borrower distribution of CBLA's home mortgage loans for the 2017-18 evaluation period is reasonable. The FSA originated 5.4 percent of its home mortgage loans to low-income borrowers. While this is well below the percentage of low-income families (15.2 percent) in the AA, it is within a reasonable range of the HMDA aggregate data for home mortgage lending to low-income families in the same AA (6.4 percent).

CBLA originated 15 percent of its home mortgage loans to moderate-income borrowers. This is in line with the percentage of moderate-income families (15.7 percent) in the AA and the HMDA aggregate data for home mortgage lending to moderate-income families in the same AA (15.5 percent).

Responses to Complaints

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

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:	12/16/12 to 12/31/18	
Bank Products Reviewed:	Home Mortgage	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Illinois		
St. Louis, MO-IL MSA #41180	Full Scope	AA consists of 32 CT in Madison County and St. Clair County, Illinois

Appendix B: Summary of MMSA and State Ratings

RATINGS: Collinsville Building and Loan Association	
Overall Bank:	Lending Test Rating:
Collinsville Building and Loan Association	Outstanding
State:	Lending Test Rating:
Illinois	Outstanding

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 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

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 30th of each year. Tables without data are not included in this PE.

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

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

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

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

Table 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	
St. Louis MSA	77	11,379	100.0	8,238	0.0	0.0	0.0	4.7	7.8	3.3	52.9	36.4	47.6	42.4	55.8	49.1	0.0	0.0	0.0	
Total	77	11,379	100.0	8,238	0.0	0.0	0.0	4.7	7.8	3.3	52.9	36.4	47.6	42.4	55.8	49.1	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																				2017-18
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	
St. Louis MSA	167	27,028	100.0	7,167	0.0	0.0	0.0	9.5	12.0	9.0	43.2	28.7	40.5	47.3	59.3	50.5	0.0	0.0	0.0	
Total	167	27,028	100.0	7,167	0.0	0.0	0.0	9.5	12.0	9.0	43.2	28.7	40.5	47.3	59.3	50.5	0.0	0.0	0.0	

*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*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2016
		Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
St. Louis MSA	77	11,379	100.0	8,238	15.0	6.5	4.6	14.1	11.7	13.7	22.7	24.7	20.3	48.2	55.8	39.8	0.0	1.3	21.6	
Total	77	11,379	100.0	8,238	15.0	6.5	4.6	14.1	11.7	13.7	22.7	24.7	20.3	48.2	55.8	39.8	0.0	1.3	21.6	

*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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-18
		Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
St. Louis MSA	167	27,028	179.6	7,167	15.2	5.4	6.4	15.7	15.0	15.5	20.1	25.2	21.7	48.9	53.9	37.6	0.0	0.6	18.7	
Total	167	27,028	179.6	7,167	15.2	5.4	6.4	15.7	15.0	15.5	20.1	25.2	21.7	48.9	53.9	37.6	0.0	0.6	18.7	

*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*