Office of the
Comptroller of the Currency
Washington, DC 20219

SMALL BANK

PUBLIC DISCLOSURE

September 30, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Midwest National Bank
Charter Number 9786

302 North Main Street
Sandoval, IL 62882

Office of the Comptroller of the Currency

500 North Broadway, Suite 1700
St. Louis, MO 63102

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Overall CRA Rating

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

The lending test is rated: Outstanding.

The Lending Test rating is based on Midwest National Bank's (Midwest NB or bank) performance in the state of Illinois. The major factors that support this rating include:

- Midwest NB's average loan-to-deposit (LTD) ratio is more than 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 distribution of loans amongst different income tracts in the AA is excellent.
- The distribution of loans to borrowers of different income levels is excellent.
- The bank received no CRA-related complaints during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD is more than reasonable. Midwest NB's quarterly LTD ratio averaged 85.6 percent over the 20-quarter evaluation period since the prior CRA evaluation ending December 31, 2023. Over the same period, the LTD ratio ranged from a low of 77.4 percent to a high of 92.2 percent.

To assess the bank's performance, we compared the bank's average LTD ratio to local Federal Deposit Insurance Corporation (FDIC) insured financial institutions, which included five banks with branches in the local area. The five banks had total assets ranging from $66.1 million to $295.8 million, with a combined average LTD ratio of 69.4 percent over the same evaluation period. The lowest individual quarterly average was 47.6 percent, while the highest individual average was 91.2 percent. Midwest NB ranked second out of six when comparing the average ratios. The table below lists similarly situated institutions, including Midwest NB, with the corresponding average LTD ratios.

Institution	Average Quarterly LTD Ratio	Total Assets ($000s) as of 12/31/2023
The Iuka State Bank	91.2%	$144,457
Midwest National Bank	85.6%	$93,795
Kinmundy Bank	73.2%	$66,068
Community Partners Savings Bank	68.6%	$247,317
1nb Bank	66.3%	$295,806
Farmers State Bank of Hoffman	47.6%	$222,073
Source: Quarterly FFIEC Call Reports 01/01/2019 – 12/31/2023		

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA. The bank originated 75 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Table D - Lending Inside and Outside of the Assessment Area

Loan Category	Number of Loans				Total	Dollar Amount of Loans ($000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	$	%	$	%	$000s
Home Mortgage	14	70.0	6	30.0	20	1,438	69.6	627	30.4	2,065
Consumer	16	80.0	4	20.0	20	216	72.7	81	27.3	297
Total	**30**	**75.0**	**10**	**25.0**	**40**	**1,654**	**70.0**	**708**	**30.0**	**2,362**

Source: Bank Data
Due to rounding, totals may not equal 100.0%

Description of Institution

Midwest NB, formerly known as First National Bank of Sandoval, is an intrastate financial institution headquartered in Sandoval, a small rural town in southern Illinois. The bank is wholly owned by First Sandoval Bancorp, Inc., a one-bank holding company. The revised bank name became effective October 3, 2023, as the board was looking to expand operations outside of Sandoval, Illinois. Midwest NB opened one branch location in Aviston, Illinois since the prior performance evaluation. Midwest NB has three cash-dispensing automated teller machines (ATM): one at the main office in Sandoval, one at the Aviston branch, and a standalone ATM located in the neighboring town of Odin, Illinois. None of the bank's ATMs have deposit-taking capabilities. There were no affiliate or subsidiary activities considered in this evaluation. There have been no major changes in the bank's corporate structure, including merger or acquisition activities.

As of December 31, 2023, Midwest NB had total assets of $93.8 million, total deposits of $77.1 million, and tier 1 capital of $9.1 million or 14.8 percent of total risk-weighted assets. The bank's total loans were $69.3 million or 73.9 percent of total assets. The loan portfolio includes $36.8 million (53.1 percent) in residential loans, $16.6 million (24 percent) in commercial loans, $7.7 million (11.1 percent) in consumer loans, and $8.2 million (11.8 percent) in agricultural loans.

The bank is primarily a consumer and home mortgage lender, but also offers traditional loan products for agricultural and commercial purposes in the bank's AA. Retail loan products include various home mortgage options (conventional, Veterans Affairs, Federal Housing Administration, United States Department of Agriculture rural development, and closed end second mortgages), personal loans, and automobile loans. To facilitate the credit needs of the local community, Midwest NB participates in the Federal Home Loan Bank's Down Payment Plus program to provide down payment assistance to qualified borrowers. The bank's business/agricultural loan products include term loans (including commercial and farm real estate), lines of credit, and machinery/equipment loans. Midwest NB offers a variety of deposit products to businesses and consumers. Deposit products consist of checking, savings, money market accounts, certificate of deposits, and safe deposit boxes.

For CRA purposes, Midwest NB identified one AA in the state of Illinois during this evaluation period (2021-2023), which is not part of a metropolitan statistical area (Non-MSA). The AA consists of eight census tracts (CT) located within the western portion of Marion County. CTs 9518, 9525, 9526, and 9527 are classified moderate-income geographies while CTs 9517, 9519, 9523, and 9524 are classified middle-income geographies during both evaluation periods [2021 utilizing 2015 American Community Survey (ACS) data and 2022-2023 utilizing 2020 U.S. Census data]. There are no low-income geographies within the AA. There are no majority minority geographies within the AA nor CTs considered distressed or underserved. Although the bank's AA represents only a portion of Marion County, it is reasonable due to the bank's size and only office located in Sandoval, IL. The AA conforms to regulatory requirements and does not arbitrarily exclude any low- or moderate- income (LMI) geographies.

On July 22, 2024, Midwest NB opened a second branch location at 490 Page Street in Aviston, IL (CT 9001), creating a second AA for the bank, as Aviston is located within the eastern portion of the St. Louis MO-IL MSA #41180. This AA includes all nine CTs within Clinton County, Illinois. Given the branch opened after the current CRA evaluation period, we did not assess lending performance within this AA during this evaluation.

The bank’s last CRA performance evaluation was dated May 13, 2019. Utilizing Small Bank CRA examination procedures, the OCC concluded the bank’s performance was rated “Outstanding.” There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs of its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of Midwest NB under the Small Bank performance criteria, which consists of the Lending Test. The Lending Test evaluates the bank’s record of meeting the credit needs of its AA through lending activities. The evaluation period for this evaluation covers January 1, 2021 to December 31, 2023. Examiners determined Midwest NB’s primary loan products by reviewing the number and dollar volume of loan originations during the evaluation period. Home mortgage loans and consumer loans are the bank’s primary products. The bank originated 458 home mortgage loans totaling $52.3 million (23.2 percent by number of loans and 61.7 percent by dollar volume of the total portfolio) and 959 consumer loans totaling $13.3 million (48.7 percent by number of loans and 15.6 percent by dollar volume of the total portfolio) between January 1, 2021 and December 31, 2023. Examiners selected initial samples of 20 home mortgage and 20 consumer loans. Additional loans were selected as needed to have sufficient information to analyze borrower and geographic distributions within the AA.

To evaluate lending performance, we used demographic information from the 2015 ACS to analyze performance during the 2021 evaluation period and demographic information from the 2020 U.S. Census to analyze performance during the 2022-2023 evaluation period.

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, bank 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, 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, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

Midwest NB's overall rating is based solely on performance in the state of Illinois. The state of Illinois rating is derived from the bank's observed 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 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 products of home mortgage and consumer loans.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) 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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

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 LTD ratio is more than 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 distribution of loans amongst different income tracts in the bank's AA is excellent.
- The distribution of loans to borrowers of different income levels is excellent.

Description of Institution's Operations in Illinois

Midwest NB has one AA that consists of eight CTs (9517, 9518, 9519, 9523, 9524, 9525, 9526, 9527) in the western portion of Marion County, Illinois within the IL Non-MSA. There are no low-income CTs in the AA. There are four moderate-income CTs (9518, 9525, 9526, and 9527) and four middle-income CTs (9517, 9519, 9523, and 9524) for both the 2021 and 2022-2023 evaluation periods. During the evaluation period, the bank operated one full-service location in Sandoval, Illinois with an onsite ATM and a standalone ATM in the neighboring town of Odin, Illinois; neither ATM is deposit-taking.

Competition

Competition for deposits is moderate amongst financial institutions within the area. According to the June 30, 2023 FDIC Deposit Market Share Report, the bank's deposits in the AA totaled $75.2 million, representing 100 percent of the bank's total deposits. Marion County has a total of 13 deposit-taking institutions operating 19 branches. Midwest NB ranked sixth in the AA with a deposit market share of 6.9 percent. Peoples National Bank, Community Partners Savings Bank, and The Iuka State Bank lead with deposit shares of 26.7 percent, 12.7 percent, 9.7 percent, respectively. While Midwest NB is sixth in the list by deposit market share, unlike its major competitors, it only operates with one location in Marion County. Additionally, one of Midwest NB's primary products is consumer loans, placing the bank in direct competition with local payday lenders.

Employment and Economic Factors

According to the Bureau of Labor Statistics report, the average unemployment rate for Marion County has remained stable since improving between 2021 and 2022. The state of Illinois and national averages noted similar trends.

Annual Unemployment Rates			
Area	**2021**	**2022**	**2023**
Marion County	6.0%	4.8%	4.9%
State of Illinois	6.1%	4.6%	4.5%
National	5.4%	3.6%	3.6%
Source: US Department of Labor; Bureau of Labor Statistic. Rates are not seasonally adjusted.			

Based on the information in the table below, low-income families in the AA earned less than $33,350 (2021) and up to $41,149 (2023), and moderate-income families earned from $33,350 (2021) to $65,839 (2022).

Table B – Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
IL NA Median Family Income (99999)				
2021 ($66,700)	<$33,350	$33,350 to <$53,360	$53,360 to <$80,040	≥$80,040
2022 ($76,100)	<$38,050	$38,050 to <$60,880	$60,880 to <$91,320	≥$91,320
2023 ($82,300)	<$41,150	$41,150 to <$65,840	$65,840 to <$98,760	≥$98,760
Source: FFIEC				

The AA economy is diverse and not heavily dependent on one major industry. Based on 2020 U.S. Census business demographic data, the primary industries in the area are manufacturing (19.1 percent), health care and social assistance (17.8 percent), and retail trade (11.3 percent). Major employers in the area include Saint Mary’s Hospital, Warren G Murray Developmental Center, and Graphic Packaging International in Centralia, IL.

Community Contacts

We received two community contacts within the AA. The contacts identified affordable housing (including first time homebuyer programs and down payment and closing assistance), small dollar consumer loans, and financial education as the primary needs of the community.

Demographics

The following tables provide a summary of the demographics, including housing and business information, for the AA for both evaluation periods.

2021

Table A – Demographic Information of the Assessment Area

Assessment Area: Illinois Non-MSA Marion County

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	50.0	50.0	0.0	0.0
Population by Geography	23,768	0.0	45.5	54.5	0.0	0.0
Housing Units by Geography	11,352	0.0	48.0	52.0	0.0	0.0
Owner-Occupied Units by Geography	7,184	0.0	38.6	61.4	0.0	0.0
Occupied Rental Units by Geography	2,534	0.0	66.9	33.1	0.0	0.0
Vacant Units by Geography	1,634	0.0	60.0	40.0	0.0	0.0
Businesses by Geography	1,273	0.0	56.8	43.2	0.0	0.0
Farms by Geography	71	0.0	25.4	74.6	0.0	0.0
Family Distribution by Income Level	6,399	28.3	17.3	19.6	34.8	0.0
Household Distribution by Income Level	9,718	29.9	15.8	16.4	38.0	0.0
Median Family Income Non-MSAs - IL		$59,323	Median Housing Value			$66,055
			Median Gross Rent			$655
			Families Below Poverty Level			17.2%

Source: 2015 ACS and 2021 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.

2022-2023

Table A – Demographic Information of the Assessment Area

Assessment Area: Illinois Non-MSA Marion County

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	50.0	50.0	0.0	0.0
Population by Geography	22,785	0.0	45.3	54.7	0.0	0.0
Housing Units by Geography	11,340	0.0	44.5	55.5	0.0	0.0
Owner-Occupied Units by Geography	7,204	0.0	35.9	64.1	0.0	0.0
Occupied Rental Units by Geography	2,552	0.0	63.5	36.5	0.0	0.0
Vacant Units by Geography	1,584	0.0	53.0	47.0	0.0	0.0
Businesses by Geography	1,501	0.0	54.2	45.8	0.0	0.0
Farms by Geography	95	0.0	26.3	73.7	0.0	0.0
Family Distribution by Income Level	5,842	23.6	18.9	22.2	35.3	0.0
Household Distribution by Income Level	9,756	26.6	19.3	16.8	37.3	0.0
Median Family Income Non-MSAs - IL		$68,958	Median Housing Value			$76,776
			Median Gross Rent			$642
			Families Below Poverty Level			11.7%

Source: 2020 U.S. Census and 2023 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.

Geographic Distribution of the Population

According to the 2015 ACS U.S. Census data, the population in the bank's AA was 23,768 with 45.5 percent of the population residing in moderate-income CTs, and 54.5 percent of the population residing in middle-income CTs. Marion County did not have any low-income CTs during this evaluation period. According to the 2020 U.S. Census data, the population in the bank's AA was 22,785 with 45.3 percent of the population residing in moderate-income CTs and 54.7 percent residing in middle-income CTs.

Household Distribution by Income Level

According to the same data, there were 9,718 households in the bank's AA. Approximately 2,905 (29.9 percent) of those households were low income, 1,535 (15.8 percent) were moderate income, 1,593 (16.4 percent) were middle income, and 3,692 (38 percent) were upper income. The percentage of households in the AA living below the poverty level was 17.7 percent, totaling approximately 1,720 households. According to the 2020 U.S. Census data, there were 9,756 households in the AA. Approximately 2,595 (26.6 percent) of those households were low income, 1,883 (19.3 percent) were moderate income, 1,639 (16.8 percent) were middle income, and 3,639 (37.3 percent) were upper income. The percentage of households in the AA living below the poverty level was 15 percent, totaling approximately 1,466 households.

Family Distribution by Income Level

According to the 2015 ACS Census data, there were 6,399 families in the AA. The distribution of families by income level was 1,808 (28.3 percent) low income, 1,110 (17.3 percent) moderate income, 1,256 (19.6 percent) middle income, and 2,225 (34.8 percent) upper income. There were 1,100 (17.2 percent) of families living below the poverty level. Of the total number of families residing in moderate-income CTs, 31.1 percent are classified as living below the poverty level. According to the 2020 U.S. Census data, there were 5,842 families in the AA. The distribution of families by income level was 1,376 (23.6 percent) low income, 1,104 (18.9 percent) moderate income, 1,297 (22.2 percent) middle income, and 2,065 (35.3 percent) upper income. There were 683 (11.7 percent) of families living below the poverty level. Of the total number of families residing in moderate-income CTs, 21.7 percent are classified as living below the poverty level.

Housing Characteristics and Home Affordability

The 2015 ACS Census reported total housing units of 11,352 in the AA. Of the total number of housing units, 7,184 (63.3 percent) were owner-occupied, 2,534 (22.3 percent) were renter occupied, and 1,634 (14.4 percent) were vacant. The 2020 U.S. Census data reported total housing units of 11,340 in the AA. Of the total number of housing units, 7,204 (63.5 percent) were owner-occupied, 2,552 (22.5 percent) were renter occupied, and 1,584 (14 percent) were vacant.

Throughout the evaluation period, the weighted average of median year build for houses was 1968, approximately 55 years. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. These factors add to the overall cost of homeownership and can have a negative impact on home affordability for LMI individuals.

According to Realtor.com data, the median housing list price in the AA ranged from $79,500 in January 2021 to $135,000 in December 2023, an increase of 69.8 percent. This is a significantly higher increase than the increase in income for LMI families of 23.4 percent.

Scope of Evaluation in Illinois

We performed a full-scope review 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 Outstanding.

Based on a full-scope review, the bank's lending performance in the IL Non-MSA AA is excellent. Throughout the lending test we placed more weight on the bank's performance in consumer lending, given a vast majority of the bank's primary product lending by number of loans originated were consumer loans.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of home mortgage and consumer loans among different income tracts in the bank's AA. There were no low-income CTs in the AA during either evaluation period.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is excellent.

<u>2021</u>

The geographic distribution of home mortgage loans in the 2021 evaluation period was excellent. The proportion of the bank's home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units and significantly exceeded the aggregate industry distribution of home mortgage loans in those geographies.

<u>2022-2023</u>

The geographic distribution of home mortgage loans in the 2022-2023 evaluation period was excellent. The proportion of the bank's home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units and the aggregate industry distribution of home mortgage loans in those geographies.

Consumer Loans

Refer to Table U in the state of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

The overall geographic distribution of consumer loans is excellent.

2021

The geographic distribution of consumer loans in the 2021 evaluation period was reasonable. The proportion of the bank's consumer loans originated in moderate-income geographies was below the percentage of households in those geographies.

2022-2023

The geographic distribution of consumer loans in the 2022-2023 evaluation period was excellent. The proportion of the bank's consumer loans originated in moderate-income geographies significantly exceeded the percentage of households in those geographies.

Lending Gap Analysis

We performed a lending gap analysis that included a review of sampled loans compared to AA maps and the location of branches. We did not identify any unexplained, conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The borrower distribution of home mortgage loans is reasonable.

2021

The borrower distribution of home mortgage loans in the 2021 evaluation period was reasonable. The proportion of the bank's home mortgage loans to low-income borrowers was well below the percentage of low-income families and the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those borrowers.

2022-2023

The borrower distribution of home mortgage loans in the 2022-2023 evaluation period was excellent. The proportion of the bank's home mortgage loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those borrowers.

Consumer Loans

Refer to Table V in the state of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of consumer loans to LMI borrowers is excellent.

2021

The borrower distribution of consumer loans in the 2021 evaluation period was reasonable. The proportion of the bank's consumer loans to low-income borrowers was below the percentage of low-income households. The proportion of the bank's consumer loans to moderate-income borrowers significantly exceeded the percentage of moderate-income households.

2022-2023

The borrower distribution of consumer loans to borrowers in the 2022-2023 evaluation period was excellent. The proportion of the bank's consumer loans to low-income borrowers significantly exceeded the percentage of low-income households. The proportion of the bank's consumer loans to moderate-income borrowers exceeded the percentage of moderate-income households.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Home mortgage and consumer loans	
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**
State of Illinois		
Illinois Non-MSA	Full-Scope	AA consists of the western portion of Marion County – CTs 9517, 9518, 9519, 9523, 9524, 9525, 9526, and 9527

Appendix B: Summary of MMSA and State Ratings

RATINGS	Midwest National Bank
Overall Bank:	**Lending Test Rating**
Midwest National Bank	Outstanding
State:	
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 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 — 2021

Assessment Area:	Total Home Mortgage Loans #	$	% of Total	Overall Market	Low-Income Tracts % of Owner-Occupied Housing Units	% Bank Loans	Aggregate	Moderate-Income Tracts % of Owner-Occupied Housing Units	% Bank Loans	Aggregate	Middle-Income Tracts % of Owner-Occupied Housing Units	% Bank Loans	Aggregate	Upper-Income Tracts % of Owner-Occupied Housing Units	% Bank Loans	Aggregate	Not Available-Income Tracts % of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Illinois Non-MSA	20	2,029.6	100.0	571	0.0	0.0	0.0	38.6	40.0	22.9	61.4	60.0	77.1	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	2,029.6	100.0	**571**	**0.0**	0.0	**0.0**	**38.6**	40.0	**22.9**	**61.4**	60.0	**77.1**	**0.0**	0.0	**0.0**	**0.0**	0.0	**0.0**

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 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 — 2022-2023

Assessment Area:	Total Home Mortgage Loans #	$	% of Total	Overall Market	Low-Income Tracts % of Owner-Occupied Housing Units	% Bank Loans	Aggregate	Moderate-Income Tracts % of Owner-Occupied Housing Units	% Bank Loans	Aggregate	Middle-Income Tracts % of Owner-Occupied Housing Units	% Bank Loans	Aggregate	Upper-Income Tracts % of Owner-Occupied Housing Units	% Bank Loans	Aggregate	Not Available-Income Tracts % of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Illinois Non-MSA	20	2,168.2	100.0	427	0.0	0.0	0.0	35.9	40.0	30.0	64.1	60.0	70.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	2,168.2	100.0	**427**	**0.0**	0.0	**0.0**	**35.9**	40.0	**30.0**	**64.1**	60.0	**70.0**	**0.0**	0.0	**0.0**	**0.0**	0.0	**0.0**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2021**

	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
Illinois Non-MSA	20	2,029.6	100.0	571	28.3	0.0	10.5	17.3	35.0	19.3	19.6	25.0	19.1	34.8	40.0	32.0	0.0	0.0	19.1
Total	20	2,029.6	100.0	**571**	**28.3**	0.0	**10.5**	**17.3**	35.0	**19.3**	**19.6**	25.0	**19.1**	**34.8**	40.0	**32.0**	**0.0**	0.0	**19.1**

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 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 **2022-2023**

	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
Illinois Non-MSA	20	2,168.2	100.0	427	23.6	5.0	10.3	18.9	25.0	22.7	22.2	15.0	21.3	35.3	55.0	24.6	0.0	0.0	21.1
Total	20	2,0168.2	100.0	**427**	**23.6**	5.0	**10.3**	**18.9**	25.0	**22.7**	**22.2**	15.0	**21.3**	**35.3**	55.0	**24.6**	**0.0**	0.0	**21.1**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2021
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Illinois Non-MSA	20	406.2	100.0	0.0	0.0	46.0	35.0	54.0	65.0	0.0	0.0	0.0	0.0
Total	**20**	**406.2**	**1000**	**0.0**	**0.0**	**46.0**	**35.0**	**54.0**	**65.0**	**0.0**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022-2023
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Illinois Non-MSA	20	258.5	100.0	0.0	0.0	43.1	70.0	56.9	30.0	0.0	0.0	0.0	0.0
Total	**20**	**258.5**	**100.0**	**0.0**	**0.0**	**43.1**	**70.0**	**56.9**	**30.0**	**0.0**	**0.0**	**0.0**	**0.0**

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2021
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Illinois Non-MSA	20	406.2	100.0	29.9	20.0	15.8	40.0	16.4	20.0	38.0	20.0	0.0	0.0
Total	20	406.2	100.0	**29.9**	20.0	**15.8**	40.0	**16.4**	20.0	**38.0**	20.0	**0.0**	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022-2023
	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Illinois Non-MSA	20	258.5	100.0	26.6	40.0	19.3	25.0	16.8	25.0	37.3	10.0	0.0	0.0
Total	20	258.5	100.0	**26.6**	40.0	**19.3**	25.0	**16.8**	25.0	**37.3**	10.0	**0.0**	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.