

## PUBLIC DISCLOSURE

May 13, 2019

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Sparta Charter Number 7015

> 101 West Broadway Sparta, IL 62286

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

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

- A substantial majority of the bank's loans are inside its assessment area (AA).
- The bank's distribution of loans reflects excellent penetration among borrowers of different income levels.
- FNB's loan-to-deposit ratio (LTD) is reasonable given the bank's size, financial condition, and level of local competition.

#### Loan-to-Deposit Ratio

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

The LTD ratio averaged 53.5 percent over the 19 quarters in the evaluation period. The timeframe used for this calculation represents the first quarter-end after the start of the last CRA evaluation, through December 31, 2018.

Over the evaluation period, FNB's highest LTD ratio was 60.7 percent, and the lowest was 45 percent. FNB's average LTD ratio was higher than one and lower than three similarly situated banks serving Randolph County. The comparative banks ranged in asset size from \$53.6 million to \$201.5 million, placing FNB third in terms of total assets. The similarly situated banks had average LTD ratios ranging from 49.9 percent to 60.7 percent. FNB is the only comparative bank operating with only one branch, giving competitors in the market a slight advantage.

## Lending in Assessment Area

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

The bank originated 85 percent of its total loans inside its AA during the evaluation period. This ratio is a bank-wide calculation, and not calculated by individual rating area or AA. The following table shows the number and dollar volume of loans that FNB originated inside and outside its AA.

	Lending Inside and Outside of the Assessment Area											
	N	lumber	of Loans			Dollar Amount of Loans \$(000s)						
Loan Category	Inside C		Outsi	de	Total	Inside		Outsi	Total			
	#	%	#	%	#	\$	%	\$	%	\$(000s)		
Consumer	17	85.0	3	15.0	20	75	83.3	15	16.7	90		
Total	17	85.0	3	15.0	20	75	83.3	15	16.7	90		

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data

Due to rounding, totals may not equal 100.0

#### **Description of Institution**

The First National Bank of Sparta is an intrastate bank with one main office located in Sparta, Illinois. The office is located in a middle-income census tract (CT 9506). FNB is wholly owned by First Bancorp of Sparta, Ltd.; a one-bank holding company with additional assets totaling approximately \$11 million. The bank has two automated teller machines (ATMs), a deposit taking ATM located at the main office, and a standalone non-deposit taking ATM at a separate location in Sparta. FNB has not opened or closed any branches since the last performance evaluation. Additionally, there have been no major changes in the bank's corporate structure, including merger or acquisition activities.

FNB offers customers a full range of deposit and loan products, with consumer loans being the primary business focus. As of December 31, 2018, FNB had total assets of \$79.5 million, total deposits of \$65.4 million, and tier 1 capital of \$10.3 million. Net loans and leases totaled \$38.8 million, representing 48.6 percent of total assets. The following table represents the loan portfolio mix as of December 31, 2018:

Loan Type	Dollars (000)	Percentage of Loan Portfolio
Residential Loans	\$17,406	44.2%
Commercial Loans	\$11,515	29.3%
Consumer Loans	\$6,887	17.5%
Agricultural Loans	\$3,437	8.7%
Other Loans	\$96	<1%
<b>Total Loans</b>	\$39,341	100%
Source: 12/31/2018 FFIEC Call Report		

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the local community, including those of low- and moderate-income families and neighborhoods. FNB received a "Satisfactory" rating during the April 22, 2014 performance evaluation.

#### **Scope of the Evaluation**

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

This performance evaluation is an assessment of the bank's record of meeting the credit needs of the communities in which it operates. We evaluated FNB using the Small Bank performance criteria, which includes 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's AA consists of three census tracts (CTs) within Randolph County. The AA received a full-scope review. The scope of the CRA evaluation period is April 22, 2014 through December 31, 2018. For the Lending Test, we determined that loan data from January 1, 2016 to December 31, 2018 was representative of the entire CRA evaluation period.

Based on discussions with bank management and our review of all loan originations and purchases from January 1, 2016 to December 31, 2018, we determined FNB's primary lending product is consumer loans. To evaluate lending performance, we reviewed a random sample of 20 consumer loans originated

in 2016 and 20 loans originated in 2017-2018. Please refer to the following table for a summary of loan originations by loan type during the evaluation period:

Loan Originations by Loan Type from January 1, 2016 through December 31, 2018											
Loan Category	Dollars (000s)	% of Dollars	Number of Loans	% of Number of Loans							
Consumer Loans	\$18,264	36.2%	2,869	86.8%							
Business Loans	\$16,578	32.9%	232	7.0%							
Home Mortgage Loans	\$9,221	18.3%	139	4.2%							
Farm Loans	\$6,337	12.6%	67	2.0%							
<b>Total Originations</b>	\$50,401	100%	3,307	100%							
Source: Bank Records January 1, 20	016 – December 31, 2018										

We completed two separate analyses of the bank's lending performance. For FNB's 2016 lending performance, we used the comparators of demographic data from the 2010 United States (U.S.) Census. For FNB'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 bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs 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 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**

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 observed performance under the CRA Small Bank Lending Test, as well as related performance context information from the bank's Illinois Non-MSA. With the exception of the loan-to-deposit 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 consumer loans. Consumer loans made up the largest volume of the bank's lending activity over the evaluation period, representing 86.8 percent of the number and 36.2 percent of the dollar value of loans originated.

## **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 bank originated a substantial majority of loans inside its designated AA.
- The bank's distribution of loans reflects excellent penetration among borrowers of different income levels.
- The average LTD ratio is reasonable given the bank's size, financial condition, and level of local competition.

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

FNB's AA includes CTs 9505, 9506, and 9507 in northeast Randolph County, Illinois. This AA is a Non-Metropolitan Statistical Area (Non-MSA). The bank operates one full-service branch and two ATMs. This includes a deposit taking ATM at the main location and a standalone non-deposit taking ATM located in a separate location in Sparta. Randolph County is generally rural and entirely comprised of middle-income census tracts. There were no geographical income level changes during the 2016 (2010 United States Census data) or 2017-2018 (2015 American Community Survey data) periods. FNB's AA meets the regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

#### **Population and Employment**

The population in the bank's AA totaled approximately nine thousand from 2016-2018. While the entire AA is comprised of middle-income CTs, according to the 2015 ACS, 16.7 percent of households within the AA were below poverty level.

The unemployment rate in Randolph County improved since the beginning of the evaluation period and compared favorably to the state of Illinois's unemployment rate for most of the same timeframe. The following table summarizes the annual unemployment rates for Randolph County and the state of Illinois:

Unemployment Rates 2016-2018											
Area 2016 2017 2018											
Randolph County	5.0%	4.5%	4.4%								
State of Illinois	5.8%	4.9%	4.3%								
National	4.7%	4.1%	3.9%								
Source: U.S. Department of Labor; Bureau of Labo	or Statistics										

The AA economy is diverse and not heavily dependent on one major industry. Based on ACS business demographic data, the primary industries in the area are services (36.2 percent), retail trade (16.8 percent), and agriculture, forestry, and fishing (9.1 percent). Major employers in the area include Gateway FS, Spartan Light Metal Products, Knight Hawk Coal Company, Menard State Correctional Facility, and Gilster-Mary Lee Corporation.

#### Competition

Competition for deposits is high due to the number and size of the financial institutions within the AA. The FDIC Market Share Report as of June 30, 2018, showed FNB and eight other financial institutions had 21 branches inside FNB's AA. FNB's \$64.1 million in deposits represented a market share of 8.1 percent, which ranked sixth overall. Unlike the competitor banks, FNB operates with only one branch, resulting in a potential obstacle toward reaching a broader customer base. Additionally, FNB's primary product offering of consumer loans places the bank in direct competition with local payday lenders.

#### **Community Contact**

As part of the evaluation process, we contacted a third party active in the AA to assist in identifying credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs and shows what credit and community development opportunities are available.

A community contact from a not-for-profit organization that serves FNB's AA provided insight on potential community needs. The contact stated the community would benefit from banks providing a form of pre-purchase financial counseling for lower-income borrowers to ensure there is an understanding around the type of budgeting required for larger purchases (house, car, etc.). This contact also noted their clients often face issues related to poor credit scores, due to past delinquency issues, and stated there are community development opportunities to provide financial education around underlying credit issues.

A recent community contact from a similarly situated bank within FNB's AA could not identify any unmet credit needs, but would like to see more involvement from financial institutions in small-dollar lending.

## **Illinois Non-MSA**

Table A – Dem	ographic I	nformation	of the Assessn	nent Area		
		2016				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	100.0	0.0	0.0
Population by Geography	9,336	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	4,622	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,226	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	931	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	465	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	501	0.0	0.0	100.0	0.0	0.0
Farms by Geography	46	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,697	15.9	24.2	24.5	35.4	0.0
Household Distribution by Income Level	4,157	23.2	16.2	22.8	37.8	0.0
Median Family Income Non-MSAs - IL	_	\$54,499	Median Housi	ng Value	_	\$76,550
			Median Gross	\$530		
			Families Belo	w Poverty Le	vel	8.5%

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 – Den	nographic I	nformation	of the Assessr	nent Area		
	2	2017-2018				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	100.0	0.0	0.0
Population by Geography	8,870	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	4,275	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	2,713	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	965	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	597	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	477	0.0	0.0	100.0	0.0	0.0
Farms by Geography	48	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,315	21.9	21.9	18.9	37.2	0.0
Household Distribution by Income Level	3,678	26.5	17.1	17.9	38.5	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housi	\$81,504		
			Median Gross	\$638		
			Families Belo	w Poverty Le	vel	11.7%

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.

#### **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 state of Illinois is excellent.

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

The geographic distribution of loans analysis is not meaningful as FNB's entire AA consists of middle-income census tracts.

#### Lending Gap Analysis

We reviewed summary reports and maps and analyzed FNB's consumer 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 an excellent distribution of loans to individuals of different income levels.

#### Consumer Loans

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

FNB's borrower distribution of consumer loans in 2016 is reasonable. The percentage of loans to low-income borrowers (65 percent) is well above the percentage of low-income households in the AA (23.2 percent). The percentage of loans to moderate-income borrowers (15 percent) is near the percentage of moderate-income households in the AA (16.2 percent).

FNB's borrower distribution of consumer loans in the evaluation period 2017 through 2018 is excellent. The percentage of loans to low-income borrowers (45 percent) and moderate-income borrowers (35 percent) are both well above the percentage of low-income (26.5 percent) and moderate-income (17.1 percent) households in the AA, respectively.

#### **Responses to Complaints**

FNB has not received any complaints regarding the bank's performance in helping to meet community credit needs since the last CRA evaluation.

## **Appendix A: Scope of Examination**

The following table identifies the time period covered in this evaluation, affiliate activities 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:	04/23/14 to 12/31/18					
Bank Products Reviewed:	Consumer Loans					
Affiliate(s)	Affiliate Relationship	Products Reviewed				
Not Applicable	Not Applicable	Not Applicable				
List of Assessment Areas and Type o	f Examination					
Rating and Assessment Areas	Type of Exam	Other Information				
Illinois						
TH' '. N MCA	E 11	AA consists of northeastern portion of				
Illinois Non-MSA	Full-scope	Randolph County – CTs 9505, 9506, 9507				

## **Appendix B: Summary of State Ratings**

RATINGS: The	First National Bank of Sparta
Overall Bank:	Lending Test Rating:
The First National Bank of Greenville	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 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.
- 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 arrogate 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 U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography

2016

	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
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	143	100.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
Total	20	143	100.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 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

2017-18

	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
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	67	100.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
Total	20	67	100.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 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

2016

	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	143	100.0	23.2	65.0	16.2	15.0	22.8	10.0	37.8	10.0	0.0	0.0
Total	20	143	100.0	23.2	65.0	16.2	15.0	22.8	10.0	37.8	10.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 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

2017-18

	<b>Total Consumer Loans</b>			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	67	100.0	26.5	45.0	17.1	35.0	17.9	10.0	38.5	10.0	0.0	0.0
Total	20	67	100.0	26.5	45.0	17.1	35.0	17.9	10.0	38.5	10.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.

Due to rounding, totals may not equal 100.0