# **PUBLIC DISCLOSURE**

April 29, 2019

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Bradford National Bank of Greenville Charter Number 9734

> 100 East College Avenue Greenville, IL 62246

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

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

## **Table of Contents**

OVERALL CRA RATING	1
SCOPE OF THE EVALUATION	3
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	4
STATE RATING	5
STATE OF ILLINOIS	
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: SUMMARY OF MMSA AND STATE RATINGS	B-1
APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS	C-1
APPENDIX D: TABLES OF PERFORMANCE DATA	<b>D-</b> 1

## **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 Bradford National Bank of Greenville's ("BNB" or "bank"), performance in the state of Illinois. The major factors that support this rating include:

- BNB's loan-to-deposit ratio (LTD) is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of the bank's loans are inside its assessment area (AA).
- The bank has an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes throughout its AA.
- The bank has an excellent distribution of loans across geographies of different income levels throughout its AA.

### Loan-to-Deposit Ratio

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

As of December 31, 2017, BNB's LTD ratio was 57.9 percent. The bank's average LTD ratio over the evaluation period of 23 quarters was 60.4 percent. Over the same evaluation period, the bank's LTD ratio ranged from a low of 57.1 percent to a high of 64.7 percent. When reviewing BNB's LTD ratio over the evaluation period, we considered the number of fixed-rate home mortgage loans originated and subsequently sold out of the bank's loan portfolio into the secondary loan market.

We analyzed the LTD ratio of four similarly situated institutions based on a combination of their size, location, and lending opportunities. These institutions ranged in size from \$66.1 million to \$543 million, with a combined average LTD ratio of 65.4 percent over the same evaluation period. The lowest individual average was 48.1 percent while the highest individual average was 77.9 percent. BNB ranked fourth out of five when comparing the average LTD ratios. The table below lists the similarly situated institutions (including BNB) with the corresponding average LTD ratios.

Institution	Total Assets (\$000s) as of 12/31/2017	Average Quarterly LTD Ratio
The First National Bank in Staunton	\$543,007	77.9%
Bank of Hillsboro, National Association	\$355,568	73.4%
The First National Bank (Vandalia)	\$342,032	62.3%
The Bradford National Bank of Greenville	\$299,791	60.4%
State Bank of St. Jacob	\$66,117	48.1%
Source: Quarterly Call Reports from June 30, 2012 to D Note: The loan-to-deposit ratio is calculated on a bank-w		

#### Lending in Assessment Area

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

Lending Inside and Outside of the Assessment Area													
	Γ	Number (	of Loans			Dollar A	mount	of Loans \$(	000s)				
Loan Category	Inside		Outside		Total	Insic	Inside		Outside				
	#	%	#	%	#	\$	%	\$	%	\$(000s)			
Home Mortgage	260	78.3	72	21.7	332	33,477	79.0	8,926	21.0	42,403			
Small Business	30	75.0	10	25.0	40	6,008	37.9	9,865	62.1	15,873			
Small Farm	33	82.5	7	17.5	40	3,631	91.1	353	8.9	3,984			
Total	323	78.4	89	21.6	412	43,116	69.2	19,144	30.8	62,260			
Source: Evaluation Period: 1 Due to rounding, totals may 1			ık Data										

The bank originated 78 percent of its total loans inside the bank's AA during the evaluation period. This ratio is a bank-wide calculation, and not calculated by individual rating area or AA.

### **Description of Institution**

BNB is an intrastate financial institution headquartered in Greenville, Illinois. The bank operates as a wholly owned subsidiary of Bradford Bancorp, Inc., also located in Greenville. As of December 31, 2018, holding company assets totaled approximately \$35.6 million. There were no affiliate or subsidiary activities considered in this evaluation.

BNB operates four branches that offer a full range of banking products and services to its customers. This includes traditional deposit products (checking, savings, money market, and certificates of deposit); individual retirement accounts (IRA) and health savings accounts (HSA). Lending products include agriculture, commercial, consumer, and home mortgage loans. BNB works with Freedom Mortgage to offer Rural Development Loans, the Federal Home Loan Bank (FHLB) of Chicago for low- and moderate-income homebuyers that qualify<sup>1</sup> for the Downpayment Plus Program (DPP), and Illinois Hardest Hit for homebuyers with qualifying hardship events. BNB services include debit-check cards, internet and mobile banking (both include bill pay), and overdraft protection, remote deposit capture, and telephone banking.

The bank has not opened or closed any branches since the last performance evaluation. Additionally, there have been no major changes in BNB's corporate structure, including merger or acquisition activities. As of December 31, 2017, BNB had total assets of \$288.3 million, total loans of \$145 million, total deposits of \$246.4 million, and Tier 1 Capital of \$30.4 million, or 16.8 percent of total risk weighted assets. BNB's net loans and leases totaled \$142.6 million and represented 49.5 percent of total assets. Loan portfolio composition as of December 31, 2017, includes the following:

<sup>&</sup>lt;sup>1</sup> Homebuyers cannot have received DPP assistance within the previous five years.

Loan Type	Dollars (000)	Percentage of Loan Portfolio
Commercial Loans	\$57,818	39.9%
Residential Loans	\$46,335	31.9%
Agriculture Loans	\$35,149	24.2%
Consumer Loans	\$4,313	3.0%
Other Loans	\$1,419	1.0%
Total Loans	\$145,034	100%
Source: 12/31/2017 FFIEC Call Report		

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AA. BNB's last CRA performance evaluation was on August 15, 2012. Utilizing Small Bank CRA examination procedures, the OCC concluded that BNB's performance was "Outstanding."

For CRA purposes, BNB has identified one AA that includes portions of the St. Louis, MO-IL Metropolitan Statistical Area (MSA) #41180. The AA conforms to regulatory requirements and does not arbitrarily exclude any low- and moderate-income geographies.

## Scope of the Evaluation

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

The scope of this evaluation includes an assessment of BNB under the Small Bank performance criteria, which consists only of a Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AA through its lending activities.

The evaluation period for this examination is from August 16, 2012 to December 31, 2017. We determined that loan data from January 1, 2015 to December 31, 2017 was representative of the evaluation period and we sampled loans from this period for the Lending Test.

Based on discussions with bank management and our review of all loan originations and purchases from January 1, 2015 to December 31, 2017, we determined BNB's primary lending products are home mortgage loans, business loans, and farm loans. 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, 2015 through December 31, 2017										
Loan Category	Dollars (000s)	% of Dollars	Number of Loans	% of Number of Loans						
Business Loans	\$67,128	43.7%	302	15.1%						
Home Mortgage Loans	\$44,234	28.8%	438	21.8%						
Farm Loans	\$33,546	21.8%	326	16.3%						
Consumer Loans	\$8,641	5.6%	940	46.9%						
Total Originations	\$153,550	100%	2,006	100%						
Source: Bank Records January 1, 2	015 – December 31, 2017	,								

To evaluate lending performance, we reviewed the bank submitted Home Mortgage Disclosure Act (HMDA) data from 2015, 2016, and 2017 for home mortgage loans. Additionally, we selected a random

sample of business and farm loans originated during the same period (20 loans originated during the period of 2015-2016 and 20 loans originated in 2017).

We completed two separate analyses of the bank's lending performance. For BNB's performance in 2015 and 2016, we used the comparators of demographic data from the 2010 United States (U.S.) Census and 2016 HMDA peer aggregate data. For the lending performance in 2017, we used the comparators of demographic data from the 2015 American Community Survey (ACS) U.S. Census and 2017 HMDA peer aggregate Data. The 2015 ACS provided an update to median family income, changing the income designation of some census tracts (CTs) in the AAs in 2017.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a fullscope 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 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

BNB's overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from the bank's performance under the CRA Small Bank Lending Test as well as related performance context information from the bank's St. Louis MO-IL MSA. With the exception of the bank's LTD ratio (based on the bank's entire lending portfolio), all weight for performance under the CRA Small Bank Lending Test was based on the bank's lending performance in relation to its primary products of home mortgage loans, business loans, and farm 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:

- BNB's loan-to-deposit ratio (LTD) is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of the bank's loans are inside its assessment area (AA).
- The bank has an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes throughout its AA.
- The bank has an excellent distribution of loans across geographies of different income levels throughout its AA.

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

BNB's operations in the state of Illinois are located within its St. Louis MO-IL MSA. The AA includes all of Bond County (CTs 9512-9515) and the eastern portion of Madison County (CTs 4036.01, 4036.03-4036.04, 4037.01-4037.02, and 4038.02). The bank operates four branches and six cash-dispensing ATMs in the AA. Two branches, including the main office, are located in Greenville. BNB operates one branch in each of the following towns: Highland and Marine. Two cash-dispensing ATMs are located at the main office (one in the lobby and one drive-up) and there is one each at the Highland and Marine branch locations. Other cash-dispensing ATM locations include the Capri IGA and Buchheit Store located in Greenville. As of June 30, 2017, BNB reported \$235.7 million in deposits in the AA. This represents 100 percent of the bank's total deposits as of that date. According to FDIC market share information as of June 30, 2017, BNB ranked 7<sup>th</sup> in deposit market share in the AA with a market share of 4.4 percent. The AA is highly competitive with 26 other deposit-taking institutions operating 98 branches. Competitors in the AA include many local community banks and credit unions, numerous regional banks, and three large national banks (U.S. Bank, Bank of America, and PNC Bank). The top three institutions in deposit market share (The Bank of Edwardsville, First Mid-Illinois Bank & Trust, and First Collinsville Bank) make up nearly 48 percent of the overall market share.

### **Community Contacts**

We contacted one new community contact and reviewed a recent contact from within the same period of this evaluation. Contacts included a community action agency located in Bond County, Illinois and an economic development agency located in Madison County, Illinois. The contacts identified many of the same types of needs for their respective areas, including affordable housing (including first time homebuyer programs and down payment and closing assistance), financial education and literacy programming in order to address the needs of the unbanked population, and small business development and lending.

Table A – Dem	ographic I	nformation	of the Assessn	nent Area							
2015-2016											
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #					
Geographies (Census Tracts)	10	0.0	0.0	70.0	30.0	0.0					
Population by Geography	46,068	0.0	0.0	70.0	30.0	0.0					
Housing Units by Geography	18,421	0.0	0.0	71.8	28.2	0.0					
Owner-Occupied Units by Geography	14,247	0.0	0.0	67.3	32.7	0.0					
Occupied Rental Units by Geography	2,634	0.0	0.0	89.6	10.4	0.0					
Vacant Units by Geography	1,540	0.0	0.0	83.9	16.1	0.0					
Businesses by Geography	2,331	0.0	0.0	72.6	27.4	0.0					
Farms by Geography	360	0.0	0.0	61.9	38.1	0.0					
Family Distribution by Income Level	12,381	15.8	16.2	25.7	42.3	0.0					
Household Distribution by Income Level	16,881	19.9	14.9	18.2	46.9	0.0					
FFIEC Updated Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$70,000	Median Housi		\$144,349						
			Median Gross	Rent		\$675					
			Families Belov	w Poverty Lev	/el	4.8%					

### St. Louis MO-IL MSA

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 Assessn	nent Area		
		2017				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	10.0	60.0	30.0	0.0
Population by Geography	45,596	0.0	14.9	54.1	31.0	0.0
Housing Units by Geography	18,515	0.0	12.7	58.3	29.0	0.0
Owner-Occupied Units by Geography	13,164	0.0	8.7	57.1	34.1	0.0
Occupied Rental Units by Geography	3,664	0.0	22.6	62.8	14.6	0.0
Vacant Units by Geography	1,687	0.0	22.1	58.3	19.6	0.0
Businesses by Geography	2,286	0.0	15.9	56.6	27.5	0.0
Farms by Geography	361	0.0	2.5	61.5	36.0	0.0
Family Distribution by Income Level	12,198	16.5	18.2	21.3	44.0	0.0
Household Distribution by Income Level	16,828	21.0	16.1	16.7	46.2	0.0
FFIEC Updated Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$74,300	Median Housi	ng Value		\$149,371
			Median Gross	Rent		\$690
			Families Belo	w Poverty Lev	vel	6.4%

Source: 2015 ACS Census and 2017 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.

The 2010 U.S. Census recorded ten CTs in the AA, consisting of seven (70 percent) middle-income tracts and three (30 percent) upper-income tracts. According to the 2010 census data, the area population was 46,068, with 32,248 (70 percent) and 13,820 (30 percent) residing in the middle- and upper-income CTs, respectively.

According to the 2015 ACS Census, the total number of CTs remained the same. The 2015 ACS Census recorded ten CTs in the AA, consisting of one (10 percent) moderate-income tract, six (60 percent) middle-income tracts, and three (30 percent) upper-income tracts. The population was slightly down from the 2010 census at 45,596, with 6,794 or 14.9 percent residing in moderate-income census tracts.

The distribution of families by income level was 16.5 percent low-income, 18.2 percent moderateincome, 21.3 percent middle-income, and 44 percent upper-income. The percentage of households in the AA living below the poverty level was 6.4 percent. The 2017 FFIEC adjusted median family income for the AA was \$74,300, up from \$70,000 in 2016. Low-income families earned annual income of \$37,150 or less, and moderate-income families earned annual income of \$37,150 to \$59,439.

Table B – Median Family Income Ranges											
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%							
	St. Louis, MO-II	MSA Median Family Inc	ome (41180)								
2015 (\$72,200)	<\$36,100	\$36,100 to <\$57,760	\$57,760 to <\$86,640	≥\$86,640							
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							
Source: FFIEC Due to rounding, totals may not equal 1	100.0	·									

### **Employment Factors**

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, the unemployment rate as of December 2015 and 2017 was 5.3 percent and 4.5 percent, respectively, for Bond County and 6 percent and 4.8 percent, respectively, for Madison County.

Unemployment Rates 2015-2017								
Area	2015	2016	2017					
Bond County	5.3%	5.1%	4.5%					
Madison County	6.0%	5.9%	4.8%					
State of Illinois	6.0%	5.8%	4.9%					
National	5.0%	4.7%	4.1%					

#### **Housing Characteristics**

The 2010 U.S. Census reported total housing units of 18,421 in the AA. Of the total number of housing units, 14,247 or 77.3 percent were owner occupied, 2,634 or 14.3 percent were renter occupied and 1,540 or 8.4 percent were vacant. There were no housing units located in low- or moderate-income CTs.

The 2010 U.S. Census indicates that the weighted average median housing value was \$144,349 and the weighted average monthly gross rent was \$675.

The 2015 ACS Census reported total housing units of 18,515 in the AA. Of the total number of housing units, 13,164 or 71.1 percent were owner occupied, 3,664 or 19.8 percent were renter occupied and 1,687 or 9.1 percent were vacant. Of all owner occupied units, 1,145 or 8.7 percent were located in moderate-income CTs. Of all occupied rental units, 828 or 22.6 percent were located in moderate-income CTs. Of all vacant units, 373 or 22.1 percent were located in moderate-income CTs. Additionally, 1,833 or 11.4 percent of all single family (1-4 units) homes and 372 or 29.4 percent of multifamily housing units were located in moderate-income CTs. The 2015 ACS Census indicates that the weighted average median housing value was \$149,371 and the weighted average monthly gross rent was \$690.

We utilized a scenario assuming a 30-year mortgage with a five percent interest rate, which does not account for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, to determine home affordability for low- and moderate-income borrowers. A low-income borrower making \$37,150 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$173,009 mortgage with a payment of \$929 per month. A moderate-income borrower making \$59,440 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$276,814 mortgage with a payment of \$1,486 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$993. The median housing value in the AA is \$149,950 and \$185,050 in 2015 and 2017, respectively, reflecting a 23 percent change from January 1, 2015 to December 31, 2017, according to Realtor.com data.

#### **Economic Conditions**

According to Moody's Analytics, *St. Louis is primed to add more jobs in 2019 than last year, but the metro area is still set to underperform the nation in job and income growth. Longer term, below-average population growth will be an impediment to economic growth and cause St. Louis to trail most large metro areas.* The top five employment sectors in the St. Louis MSA are Education and Health Services, Professional and Business Services, Leisure and Hospitality Services, Government, and Retail Trade. The top five employers in St. Louis are BJC Healthcare, Wal-Mart Stores Inc., SSM Health Care System, Washington University in St. Louis, and Boeing Defense, Space and Security.

### **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 bank exhibits excellent geographic distribution of loans in the AA for 2017. There were no low- or moderate-income CTs during the 2015-2016 evaluation period; therefore, an analysis of the bank's geographic distribution of loans during this period would not be meaningful.

### Home Mortgage Loans

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

Geographic distribution of home mortgage loans in 2017 is excellent. BNB originated 28.7 percent of its home mortgage loans in moderate-income CTs, which is significantly above the percentage of owner-occupied housing units located in moderate-income CTs (8.7 percent) and the 2017 HMDA aggregate data for lending in the same moderate-income CTs (8.3 percent).

#### **Business Loans**

Refer to Table Q in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of business loans.

Geographic distribution of business loans in 2017 is excellent. BNB originated 15 percent of its business loans in moderate-income CTs, which is in line with the percentage of businesses located in moderate-income CTs (15.9 percent) and significantly above the 2017 CRA aggregate data for lending in the same moderate-income CTs (8.2 percent).

### Farm Loans

Refer to Table S in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Geographic distribution of farm loans reflects poor performance in 2017. The bank did not have any farm loans in moderate-income CTs compared to the 2017 CRA aggregate data for lending in the same moderate-income CTs (0.7 percent); however, this is not unreasonable, given the level of competition for the nine (2.5 percent) out of 361 farms reported in the AA that are located in the single moderate-income CT.

### Lending Gap Analysis

We reviewed summary reports and maps and analyzed BNB's home mortgage, small business, and small farm 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 and businesses and farms of different sizes, given the product lines offered by the bank.

### Home Mortgage Loans

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

### 2015-2016

The borrower distribution of BNB's home mortgage loans for the 2015-2016 evaluation period is excellent. The bank originated 13.9 percent of its home mortgage loans to low-income borrowers. This is within a reasonable level below the percentage of low-income families (15.8 percent) in the AA and significantly exceeds the 2016 HMDA aggregate data for home mortgage lending to low-income families in the same AA (7.1 percent).

The bank originated 21.4 percent of its home mortgage loans to moderate-income borrowers. This exceeds both the percentage of moderate-income families (16.2 percent) in the AA and the 2016 HMDA aggregate data for home mortgage lending to moderate-income families in the same AA (16 percent).

### <u>2017</u>

The borrower distribution of BNB's home mortgage loans for the 2017 evaluation period is excellent. The bank originated 28.7 percent of its home mortgage loans to low-income borrowers. This significantly exceeds both the percentage of low-income families (16.5 percent) in the AA and the 2017 HMDA aggregate data for home mortgage lending to low-income families in the same AA (9.2 percent).

The bank originated 13.8 percent of its home mortgage loans to moderate-income borrowers. This falls below both the percentage of moderate-income families (18.2 percent) in the AA and the 2017 HMDA aggregate data for home mortgage lending to moderate-income families in the same AA (17 percent). Given the high level of performance in lending to low-income borrowers, the bank's performance in lending to moderate-income borrowers, the bank's performance in lending to moderate-income borrowers.

#### Loans to Small Businesses

Refer to Table R in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of loans to small businesses.

### <u>2015-2016</u>

The borrower distribution of BNB's loans to small businesses for the 2015-2016 evaluation period is excellent. The bank originated 95 percent of its business loans to small businesses. This significantly exceeds the percentage of small businesses (81.9 percent) in the AA and the 2016 CRA aggregate data for business lending to small businesses in the same AA (50.1 percent).

### <u>2017</u>

The borrower distribution of BNB's loans to small businesses for the 2017 evaluation period is excellent. The bank originated 90 percent of its loans to small businesses. This exceeds the percentage of small businesses (80.7 percent) in the AA and significantly exceeds the 2017 CRA aggregate data for lending to small businesses in the same AA (56.2 percent).

### Loans to Small Farms

Refer to Table T in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of loans to small farms.

### 2015-2016

The borrower distribution of BNB's loans to small farms for the 2015-2016 evaluation period is excellent. The bank originated 90 percent of its farm loans to small farms. This is within a more than reasonable level below the percentage of small farms (98.9 percent) in the AA and is significantly above the 2017 CRA aggregate data for lending to small farms in the same AA (72.5 percent).

### <u>2017</u>

The borrower distribution of BNB's loans to small farms for the 2017 evaluation period is excellent. The bank originated 100 percent of its farm loans to small farms. This exceeds the percentage of small farms (98.6 percent) in the AA and significantly exceeds the 2017 CRA aggregate data for farm lending to small farms in the same AA (65.7 percent).

#### **Responses to Complaints**

BNB did not receive any complaints regarding its CRA performance during the evaluation period of this PE.

### **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:	01/01/15 to 12/31/17						
<b>Bank Products Reviewed:</b>	Home Mortgage, Small Business, Small Farm						
Affiliate(s)	Affiliate Relationship	Products Reviewed					
Not Applicable	Not Applicable	Not Applicable					
List of Assessment Among and Turner	f Enomination						
List of Assessment Areas and Type							
Rating and Assessment Areas	Type of Exam	Other Information					
Illinois							
St. Louis MO-IL MSA	Full-scope	All of Bond County – CTs 9512-9515; and Eastern portion of Madison County – CTs 4036.01, 4036.03, 4036.04, 4037.01, 4037.02, and 4038.02					

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

RATINGS THE BRADFOR	D NATIONAL BANK OF GREENVILLE
Overall Bank:	Lending Test Rating:
The Bradford 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.

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

- Table S.Assessment Area Distribution of Loans to Farms by Income Category of the<br/>Geography The percentage distribution of the number of small loans (less than or equal<br/>to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,<br/>and upper-income geographies compared to the percentage distribution of farms (regardless<br/>of revenue size) throughout those geographies. The table also presents aggregate peer data<br/>for the years the data is available. Because aggregate small farm data are not available for<br/>geographic areas smaller than counties, it may be necessary to use geographic areas larger<br/>than the bank's assessment area.
- Table T.Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -<br/>Compares the percentage distribution of the number of small loans (loans less than or equal<br/>to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1<br/>million or less to: 1) the percentage distribution of farms with revenues of greater than \$1<br/>million; and, 2) the percentage distribution of farms for which revenues are not available.<br/>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<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of households in those geographies.
- Table V.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of households by income level in each MMSA/assessment area.

	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle	-Income	Tracts	<b>Upper-Income Tracts</b>			Not Available-Income Tract			
Assessment Area:	#	\$	% 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 MO-IL MSA	173	22,452	100.0	1,736	0.0	0.0	0.0	0.0	0.0	0.0	67.3	81.5	57.6	32.7	18.5	42.4	0.0	0.0	0.0
Total	173	22,452	100.0	1,736	0.0	0.0	0.0	0.0	0.0	0.0	67.3	81.5	57.6	32.7	18.5	42.4	0.0	0.0	0.0

Table O : As	sessme	nt Area l	Distribı	ition of I	Iome Mor	tgage I	Loans by I	ncome Ca	ategor	y of the G	eography								2017
	Tot	al Home M	ortgage	Loans	Low-I	ncome T	racts	Moderat	te-Incon	ne Tracts	Middle	e-Income	Tracts	Upper-	Income	Fracts	Not Availa	able-Incor	ne Tracts
Assessment Area:	#	\$	% 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	Aggregat e	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate
St. Louis MO-IL MSA	87	11,025	100.0	1,377	0.0	0.0	0.0	8.7	28.7	8.3	57.1	63.2	51.0	34.1	8.0	40.7	0.0	0.0	0.0
Total	87	11,025	100.0	1,377	0.0	0.0	0.0	8.7	28.7	8.3	57.1	63.2	51.0	34.1	8.0	40.7	0.0	0.0	0.0

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

	To	tal Home N	lortgage l	Loans	Low-In	come Boi	rrowers	Moderate-	Income	Borrowers	Middle-I	ncome B	orrowers	Upper-I	ncome Boi	rrowers	Not Availa	ble-Incor	ne Borrower
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregat e	% Families	% Bank Loans	Aggregate
St. Louis MO-IL MSA	173	22,452	100.0	1,736	15.8	13.9	7.1	16.2	21.4	16.0	25.7	25.4	23.3	42.3	32.4	38.6	0.0	6.9	15.0
Total	173	22,452	100.0	1,736	15.8	13.9	7.1	16.2	21.4	16.0	25.7	25.4	23.3	42.3	32.4	38.6	0.0	6.9	15.0

Table P: Asse	essment	t Area Di	stributi	on of Ho	me Mortg	age Lo	ans by Ind	come Cate	egory o	f the Borr	ower								2017
	Tot	al Home M	ortgage I	Loans	Low-In	come Bor	rowers	Moderate-	Income l	Borrowers	Middle-I	ncome Bo	orrowers	Upper-In	icome Bo	orrowers		vailable-I Borrower	
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	Aggregat
St. Louis MO-IL MSA	87	11,025	100.0	1,377	16.5	28.7	9.2	18.2	13.8	17.0	21.3	21.8	23.2	44.0	23.0	34.9	0.0	12.6	15.6
Total	87	11,025	100.0	1,377	16.5	28.7	9.2	18.2	13.8	17.0	21.3	21.8	23.2	44.0	23.0	34.9	0.0	12.6	15.6

	Total	Loans to	Small B	usinesses	Low-	Income T	Fracts	Modera	te-Incom	e Tracts	Middle	e-Income	Tracts	Upper	-Income	Tracts	Not Availa	ble-Incor	me Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate												
St. Louis MO-IL MSA	20	2,303	100.0	707	0.0	0.0	0.0	0.0	0.0	0.0	72.2	90.0	65.8	27.8	10.0	34.2	0.0	0.0	0.0
Total	20	2,303	100.0	707	0.0	0.0	0.0	0.0	0.0	0.0	72.2	90.0	65.8	27.8	10.0	34.2	0.0	0.0	0.0

Table Q: Ass	essmer	nt Area	Distrik	oution of 1	Loans to S	Small B	usinesses	by Incom	e Categ	ory of the	Geograph	У							2017
	Total	Loans to	Small B	usinesses	Low-	Income T	[racts	Modera	te-Incom	e Tracts	Middle-	Income	Tracts	Upper	-Income	Tracts	Not Availa	ble-Inco	ne Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
St. Louis MO-IL MSA	20	4,081	100.0	648	0.0	0.0	0.0	15.9	15.0	8.2	56.6	80.0	58.8	27.5	5.0	33.0	0.0	0.0	0.0
Total	20	4,081	100.0	648	0.0	0.0	0.0	15.9	15.0	8.2	56.6	80.0	58.8	27.5	5.0	33.0	0.0	0.0	0.0

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

2017

Table R: Assessment Area	Distribution	n of Loans to	) Small Busir	iesses by Gi	ross Annual F	Revenues					2015-1
		Total Loans to	Small Businesse	25	Businesses	with Revenue	s <= 1MM		vith Revenues MM	Businesses with Rev	enues Not Available
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
St. Louis MO-IL MSA	20	2,303	100.0	707	81.9	95.0	50.1	5.5	5.0	12.6	0.0
Total	20	2,303	100.0	707	81.9	95.0	50.1	5.5	5.0	12.6	0.0

Due to rounding, totals may not equal 100.0

	Tot	al Loans to Sn	nall Businesses		Businesses	with Revenues	<= 1MM		ith Revenues MM	Businesses with Revo	enues Not Available
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
St. Louis MO-IL MSA	20	4,081	100.0	648	80.7	90.0	56.2	5.9	10.0	13.3	0.0
Total	20	4,081	100.0	648	80.7	90.0	56.2	5.9	10.0	13.3	0.0

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

Table S - Asso	essment	Area Dis	stributio	n of Loan	s to Fai	ms by l	ncome Ca	tegory (	of the G	eography									2015-16
		Total Loa	ns to Farm	18	Lo	w-Income	Tracts	Mode	rate-Inco	me Tracts	Mide	lle-Incom	e Tracts	Upp	oer-Incom	e Tracts	Not Ava	ailable-Inc	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
St. Louis MO-IL MSA	20	2,378	100.0	167	0.0	0.0	0.0	0.0	0.0	0.0	63.5	86.4	59.3	36.5	13.6	40.7	0.0	0.0	0.0
Total	20	2,378	100.0	167	0.0	0.0	0.0	0.0	0.0	0.0	63.5	86.4	59.3	36.5	13.6	40.7	0.0	0.0	0.0
Source: 2016 D& Due to rounding,				6 Bank Data;	2016 CR	A Aggrega	te Data, "" d	lata not a	vailable.										

		Total Loa	ns to Farn	15	Lo	w-Income	Tracts	Mode	rate-Inco	me Tracts	Mide	ile-Incom	e Tracts	Upp	er-Incom	e Tracts	Not Ava	ailable-Inc	ome Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate												
St. Louis MO-IL MSA	20	2,617	100.0	143	0.0	0.0	0.0	2.5	0.0	0.7	61.5	95.0	55.2	36.0	5.0	44.1	0.0	0.0	0.0
Total	20	2,617	100.0	143	0.0	0.0	0.0	2.5	0.0	0.7	61.5	95.0	55.2	36.0	5.0	44.1	0.0	0.0	0.0

2017

Table T: Assessment Area	Distribution	n of Loans t	o Farms by	Gross Ann	ual Revenues						2015-16
		Total Loa	ns to Farms		Farms	with Revenues <=	1MM	Farms with R	evenues > 1MM	Farms with Reven	ies Not Available
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
St. Louis MO-IL MSA	20	2,378	100.0	167	98.9	90.0	72.5	0.3	10.0	0.8	0.0
Total	20	2,378	100.0	167	98.9	90.0	72.5	0.3	10.0	0.8	0.0
Source: 2016 D&B Data; 01/01/20	15 - 12/31/2016	Bank Data; 20	16 CRA Aggrega	ate Data, "" d	data not available.						

Due to rounding, totals may not equal 100.0

	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
St. Louis MO-IL MSA	20	2,617	100.0	143	98.6	100.0	65.7	0.3	0.0	1.1	0.0
Total	20	2,617	100.0	143	98.6	100.0	65.7	0.3	0.0	1.1	0.0

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