PUBLIC DISCLOSURE

May 13, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Sandoval Charter Number: 9786

302 N. Main Street Sandoval, IL 62882

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

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

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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 Sandoval's (FNB or bank) performance in the state of Illinois. The major factors that support this rating include:

- FNB's loan-to-deposit (LTD) ratio is reasonable given the bank's size and consideration to factors from the performance context.
- A majority of FNB's loans are located inside its assessment area (AA).
- FNB has an excellent distribution to borrowers of various income levels.
- FNB's distribution of loans across geographies of different income levels is excellent throughout its AA.

Loan-to-Deposit Ratio

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

FNB's average quarterly LTD ratio during the evaluation period was 58.3 percent. The bank's LTD ratio ranged from a low of 49 percent at March 31, 2017 to a high of 79.2 at December 31, 2018. Changes in FNB's balance sheet and increased lending opportunities beginning in early 2017 have been the primary drivers for the quarter over quarter improvement in the bank's LTD ratio. We compared FNB's LTD ratio with three comparable institutions within the same AA. These institutions ranged in size from \$47.6 million to \$203.3 million with a combined average LTD ratio of 90.9 percent over the same evaluation period.

In evaluating FNB's LTD ratio, we also took into account the bank's deposit market share and level of competition for loans in the AA. During the evaluation period, FNB has maintained an approximate deposit market share of five percent. According to 2016 Home Mortgage Disclosure Act (HMDA) peer data, 64 lenders accounted for 391 originated or purchased loans in the AA. The 2017 HMDA peer data indicates there were 67 lenders that accounted for 368 originated or purchased loans in the AA. The level of competition for lending in the AA is significant based on the 2016 and 2017 HMDA peer data alone; however, when including the lenders in the AA that are exempt from the reporting requirements of the HMDA, the level of competition is substantial.

Lending in Assessment Area

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

The bank originated 60 percent of the total number and 47 percent of the total dollar volume of its loans within the AA during the evaluation period. These ratios are based on a bank-wide calculation, and not calculated by individual rating area or AA.

		Lending	Inside an	d Outsic	le of the As	ssessment	Area			
	I	Number (of Loans			Dollar A	Amount o	of Loans \$	(000s)	
Loan Category	Insi	de	Outs	ide	Total	Insi	de	Outsi	ide	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	11	55.0	9	45.0	20	531	46.1	621	53.9	1,152
Consumer	13	65.0	7	35.0	20	98	52.7	88	47.3	186
Total	24	60.0	16	40.0	40	629	47.0	709	53.0	1,338
Source: Evaluation Period: 1 Due to rounding, totals may 1			k Data	-		•			•	

Description of Institution

FNB is a nationally chartered, intrastate bank located in Sandoval, Illinois. First Sandoval Bancorp, Inc., a one-bank holding company, that wholly owns FNB. FNB was located in a middle-income geography as of 2016; however, this changed to moderate in 2017. The bank does not have any branches or affiliates. The bank has two cash-withdrawal-only automated teller machines (ATMs), one on its premises and one in Odin, Illinois, which is in a middle-income census tract. There has been no merger or acquisition activity since the prior CRA evaluation.

As of December 31, 2018, FNB reported total assets of \$49.1 million and common equity Tier 1 Capital of \$5.9 million. FNB's business strategy focuses on the origination of consumer and home mortgage loans. As of December 31, 2018, net loans and leases represented 69.1 percent of total assets (\$33.9 million) and consisted of residential real estate loans (52 percent), non-agricultural commercial and commercial real estate loans (17.6 percent), agriculture production and agriculture real estate loans (16.1 percent), and consumer loans (14.4 percent).

There are no legal, financial, or other factors impeding FNB's ability to help meet the credit needs of the AA it serves. The OCC concluded FNB's performance was "Satisfactory" at its last CRA evaluation dated March 20, 2014.

For CRA purposes, FNB has identified one AA in the state of Illinois. The AA includes the western portion of Marion County, which is a Non-Metropolitan Statistical Area (Non-MSA), and the same AA utilized during the previous CRA evaluation. The AA conforms to regulatory requirements and does not arbitrarily exclude any low- and moderate-income geographies. Refer to Appendix A for further details on the bank's AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of FNB under the Small Bank performance criteria, which consists 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 is from March 21, 2014 through December 31, 2018. For the lending test, we determined loan data from January 1, 2016 to December 31, 2018 was representative of the evaluation period. FNB is not required nor does it opt to collect and report HMDA data on residential or consumer loans; therefore, lending performance was evaluated using data collected during our review of bank loan files.

Conclusions regarding FNB's lending performance are based on their primary loan products consisting of home mortgage and consumer loans. Home mortgage loans comprise 58.8 percent of loans originated or purchased by dollar amount from January 1, 2016 through December 31, 2018. During the same period, consumer loans comprised 60.4 percent of the total number of loans originated or purchased. Our review included a random sample of:

- 20 home mortgage loans originated or purchased in 2016;
- 20 consumer loans originated or purchased in 2016;
- 20 home mortgage loans originated or purchased in 2017 and 2018; and,
- 20 consumer loans originated or purchased in 2017 and 2018.

We completed two separate analyses of the bank's lending performance. For FNB's lending performance in 2016, we used the comparators of demographic data from the 2010 United States (U.S.) Census and 2016 HMDA Aggregate Data. For the bank's lending performance in 2017 and 2018, we used the comparators of demographic data from the 2015 American Community Survey (ACS) U.S. Census and 2017 HMDA Aggregate Data. The 2015 ACS provided an update to median family income, changing the income designation of some census tracts (CTs) in the AA in 2017.

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 were 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 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 and consumer 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:

- FNB's loan-to-deposit (LTD) ratio is reasonable given the bank's size and consideration to factors from the performance context.
- A majority of FNB's loans are located inside its assessment area (AA).
- FNB has an excellent distribution to borrowers of various income levels.
- FNB's distribution of loans across geographies of different income levels is excellent throughout its AA.

Description of Institution's Operations in Illinois

FNB's AA includes CTs 9517-9519 and 9523-9527 in the western portion of Marion County. The bank's primary business focus is originating loans and obtaining deposits from local customers in the bank's AA. The bank has no branches outside of its main office and two ATMs. The main office and ATMs are within the bank's AA.

Based on the FDIC Summary of Deposits Report as of June 30, 2018, FNB ranks seventh in market share in the county, with deposits totaling \$40.2 million, representing 5.3 percent of the market. All of FNB's deposits are located within Marion County. Major competitors include institutions in the neighboring towns of Salem and Centralia. There have been no material changes in local competitors in the area.

Community Contacts

We contacted a community action agency located in Marion County, Illinois. The contact identified 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) as the primary need in the local community.

Table A – Dem	ographic Ii		of the Assessm	ient Area		
Demographic Characteristics	#	2016 Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	25.0	75.0	0.0	0.0
Population by Geography	23,952	0.0	24.7	75.3	0.0	0.0
Housing Units by Geography	11,502	0.0	26.7	73.3	0.0	0.0
Owner-Occupied Units by Geography	7,508	0.0	19.0	81.0	0.0	0.0
Occupied Rental Units by Geography	2,510	0.0	41.0	59.0	0.0	0.0
Vacant Units by Geography	1,484	0.0	41.1	58.9	0.0	0.0
Businesses by Geography	1,185	0.0	40.2	59.8	0.0	0.0
Farms by Geography	77	0.0	9.1	90.9	0.0	0.0
Family Distribution by Income Level	6,837	23.5	19.2	22.4	34.9	0.0
Household Distribution by Income Level	10,018	28.0	17.1	17.1	37.8	0.0
Median Family Income Non-MSAs - IL		\$54,499	Median Housi	ng Value		\$67,743
			Median Gross	Rent		\$604
			Families Belov	w Poverty Lev	vel	12.6%

Illinois Non-MSA

(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demo	• •	017-2018				
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	1,108	0.0	57.3	42.7	0.0	0.0
Farms by Geography	71	0.0	22.5	77.5	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		\$59,121	Median Housi	ng Value		\$66,055
			Median Gross	Rent		\$655
			Families Below	w Poverty Lev	rel	17.2%

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.

The 2010 U.S. Census recorded eight CTs in the AA, consisting of two (25 percent) moderate-income tracts and six (75 percent) middle-income tracts. According to the 2010 census data, the area population was 23,952, with 5,916 (24.7 percent) residing in moderate-income CTs and the other 18,036 (75.3 percent) residing across the middle-income CTs of the AA.

The 2015 ACS Census recorded eight CTs in the AA, consisting of four (50 percent) moderate-income tracts and four (50 percent) middle-income tracts. The population was slightly down from the 2010 census at 23,768 with 10,814 or 45.5 percent residing in moderate-income census tracts.

There were 6,399 families in the AA. The distribution of families by income level was 1,811 (28.3 percent) low-income, 1,107 (17.3 percent) moderate-income, 1,254 (19.6 percent) middle-income, and 2,227 (34.8 percent) upper-income. The percentage of households in the AA living below the poverty level was 17.2 percent.

The 2018 FFIEC adjusted median family income for the AA was \$63,900, up from \$58,000 in 2016. Low-income families earned annual income of \$31,949 or less, and moderate-income families earned annual income of \$31,950 to \$51,120.

	Table B – I	Median Family Income I	Ranges	
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
	MO Non-MS	SA Median Family Income	(99999)	
2016 (\$58,000)	<\$29,000	\$29,000 to <\$46,400	\$46,400 to <\$69,600	≥\$69,600
2017 (\$60,400)	<\$30,200	\$30,200 to <\$48,320	\$48,320 to <\$72,480	≥\$72,480
2018 (\$63,900)	<\$31,950	\$31,950 to <\$51,120	\$51,120 to <\$76,680	≥\$76,680
Source FFIEC	•	•	•	•

Employment Factors

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, the unemployment rate in Marion County ranged from a high of 6.4 percent in 2016 to a low of 4.9 percent in 2018. The unemployment rate for the state of Illinois ranged from a high of 5.8 percent in 2016 to a low of 4.3 percent in 2018, slightly worse than the national unemployment rate over the same period.

Aı	nual Unemployment R	ates 2016-2018	
Area	2016	2017	2018
Marion County	6.4%	5.3%	4.9%
State of Illinois	5.8%	4.9%	4.3%
National	4.9%	4.4%	3.9%
National Source: U.S. Department of Labor; Bureau of Labo		,.	3.9%

Housing Characteristics

The 2010 U.S. Census reported total housing units of 11,502 in the AA. Of the total number of housing units, 7,508 or 65.3 percent were owner-occupied, 2,510 or 21.8 percent were renter-occupied and 1,484

or 12.9 percent were vacant. There were no housing units located in low-income CTs. Nineteen percent (1,427) of owner-occupied units, 41 percent (1,029) of occupied rental units, and 41.1 percent (610) of vacant units, were located in moderate-income CTs, respectively. Additionally, 2,518 or 27.2 percent of all single family (1-4 units) homes and 196 or 39.4 percent of all multifamily housing units were located in moderate-income CTs. The 2010 U.S. Census indicates that the weighted average median housing value was \$67,743 and the weighted average monthly gross rent was \$604.

The 2015 ACS Census reported total housing units of 11,352 in the AA. Of the total number of housing units, 7,184 or 63.3 percent were owner-occupied, 2,534 or 22.3 percent were renter-occupied and 1,634 or 14.4 percent were vacant. There were no housing units located in low-income CTs. 38.6 percent (2,773) of owner-occupied units, 66.9 percent (1,695) of occupied rental units, and 60 percent (980) of vacant units, were located in moderate-income CTs, respectively. Additionally, 4,038 or 47 percent of all single family (1-4 units) homes and 326 or 51 percent of all multifamily housing units were located in moderate-income CTs. The 2015 U.S. Census indicates that the weighted average median housing value was \$66,055 and the weighted average monthly gross rent was \$655.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$31,950 per year (or less than 50 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$148,792 mortgage with a payment of \$799 per month. A moderate-income borrower making \$51,120 per year (or less than 80 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$238,068 mortgage with a payment of \$1,278 per month. The median housing value in the AA was \$95,400 and \$89,700 in 2016 and 2018 reflecting a percent change of negative six percent from 2016 to 2018 according to Realtor.com data. This illustrates that low- and moderate-income borrowers could potentially qualify for a mortgage loan in the AA with an estimated payment of \$482.

Economic Conditions

Moody's Analytics project both short- and long-term underperformance by Illinois, one of the drivers being population outmigration. According to the February 2019 report, Moody's also notes one of the main drivers for this assessment is "few growth drivers downstate," which is where FNB and its AA are located. Major employers in the area include the Warren G Murray Development Center, Graphic Packaging, St. Mary's Hospital in Centralia, North American Lighting and the local school districts.

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 Non-MSA.

The bank's overall geographic distribution of home and consumer loans reflects excellent dispersion among different income tracts in the bank's AA. Refer to Tables O and U in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations. There were no low-income CTs in the AA.

Home Mortgage Loans

<u>2016</u>

The geographic distribution of home loans in 2016 is excellent. The bank originated 20 percent of its home mortgage loans in moderate-income CTs, which exceeds the level of owner-occupied housing units located in moderate-income CTs (19 percent).

2017-2018

The geographic distribution of home mortgage loans in 2017-2018 is excellent. The bank originated 45 percent of its home mortgage loans in moderate-income CTs, which exceeds the level of owner-occupied housing units located in moderate-income CTs (38.6 percent).

Consumer Loans

2016

The geographic distribution of consumer loans in 2016 is poor. The bank originated 10 percent of its consumer loans in moderate-income CTs, which is below the percentage of households in moderate-income CTs (24.5 percent).

2017-2018

The geographic distribution of consumer loans in 2017-2018 is excellent. The bank originated 65 percent of its consumer loans in moderate-income CTs, which exceeds the percentage of households in moderate-income CTs (46 percent).

Lending Gap Analysis

We reviewed summary reports and maps and analyzed FNB's home mortgage and 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 in the Illinois Non-MSA.

The bank's overall distribution of home and consumer loans reflects excellent dispersion among loans made to low- and moderate-income borrowers, performance context information, and demographic comparators. Refer to Tables P and V in Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's loan originations.

Home Mortgage Loans

<u>2016</u>

The borrower distribution of home mortgage loans in 2016 was excellent. The bank originated 30 percent of its home mortgage loans to low-income borrowers, which exceeds the percentage of low-income families (23.5 percent) in its AA. The bank originated 20 percent of its home mortgage loans to moderate-income borrowers, which exceeds the percentage of moderate-income families (19.2 percent) in its AA.

2017-2018

The borrower distribution of home loans in 2017-2018 was reasonable. The bank originated 30 percent of its home mortgage loans to low-income borrowers, which exceeds the percentage of low-income families (28.3 percent) in its AA. The bank originated 15 percent of its home mortgage loans to moderate-income borrowers, which is less than the percentage of moderate-income families (17.3 percent) in its AA.

Consumer Loans

2016

Borrower distribution of consumer loans in 2016 was excellent. The bank originated 45 percent of its consumer loans to low-income borrowers, which significantly exceeds the percentage of low-income households (28 percent) in its AA. The bank originated 35 percent of its consumer loans to moderate-income borrowers, which significantly exceeds the percentage of moderate-income households (17.1 percent) in its AA.

2017-2018

Borrower distribution of consumer loans in 2017-2018 was excellent. The bank originated 50 percent of its consumer loans to low-income borrowers, which significantly exceeds the percentage of low-income households (29.9 percent) in its AA. The bank originated 30 percent of its consumer loans to moderate-income borrowers, which significantly exceeds the percentage of moderate-income households (15.8 percent) in its AA.

Responses to Complaints

The bank or the OCC has received no CRA-related complaints since the prior CRA evaluation.

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:	03/21/14 to 12/31/2018	
Bank Products Reviewed:	Home mortgage loans; Con	nsumer loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
No affiliates	NA	NA
List of Assessment Areas and Typ	e of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
Illinois		
Illinois Non-MSA	Full Scope	Western portion of Marion County – CTs 9517- 9519 and 9523-9527

Appendix B: Summary of MMSA and State Ratings

RATINGS The F	irst National Bank of Sandoval
Overall Bank:	Lending Test Rating
The First National Bank of Sandoval	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 30th of each year. Tables without data are not included in this PE.

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

- Table O.Assessment Area Distribution of Home Mortgage Loans by Income Category of the
Geography Compares the percentage distribution of the number of loans originated and
purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the
percentage distribution of owner-occupied housing units throughout those geographies. The
table also presents aggregate peer data for the years the data is available.
- Table P.Assessment Area Distribution of Home Mortgage Loans by Income Category of the
Borrower Compares the percentage distribution of the number of loans originated and
purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the
percentage distribution of families by income level in each MMSA/assessment area. The
table also presents aggregate peer data for the years the data is available.
- Table Q.Assessment Area Distribution of Loans to Small Businesses by Income Category of
the Geography The percentage distribution of the number of small loans (less than or
equal to \$1 million) to businesses that were originated and purchased by the bank in low-,
moderate-, middle-, and upper-income geographies compared to the percentage distribution
of businesses (regardless of revenue size) in those geographies. Because 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.

	Total	Home I	Mortgag	e Loans	Low-l	ncome	Fracts	Moderat	te-Incon	ne Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	able-Inco	me Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate												
Illinois Non-MSA	20	929	100.0	391	0.0	0.0	0.0	19.0	20.0	14.1	81.0	80.0	85.9	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	929	100.0	391	0.0	0.0	0.0	19.0	20.0	14.1	81.0	80.0	85.9	0.0	0.0	0.0	0.0	0.0	0.0

Table O: Assess	smen	t Area	ı Distr	ributio	n of Hom	e Moi	rtgage Lo	oans by I	ncom	e Catego	ry of the	Geog	raphy						2017-18
	Total	Home	Mortgag	e Loans	Low-l	ncome	Fracts	Moderat	te-Incon	ne Tracts	Middle	-Income	e Tracts	Upper-	Income	Tracts	Not Avail	able-Inco	me Tracts
Assessment Area:	#	\$		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	88 8	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate
Illinois Non-MSA	20	1,145	100.0	251	0.0	0.0	0.0	38.6	45.0	24.7	61.4	55.0	75.3	0.0	0.0	0.0	0.0	0.0	0.0
Total	20	1,145	100.0	251	0.0	0.0	0.0	38.6	45.0	24.7	61.4	55.0	75.3	0.0	0.0	0.0	0.0	0.0	0.0
Source: 2015 ACS Cens Due to rounding, totals	· ·			2018 Ban	k Data, 2018	HMDA	Aggregate D	ata, "" date	a not ava	uilable.			1		1	I			

	Tota	Home	Mortgag	ge Loans	Low-Inc	come Bor	rowers	Moderate-	Income	Borrowers	Middle-I	ncome B	Borrowers	Upper-II	icome B	orrowers		vailable- Borrowei	
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregat e	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Illinois Non-MSA	20	929	100.0	391	23.5	30.0	6.4	19.2	20.0	21.5	22.4	20.0	21.7	34.9	30.0	36.6	0.0	0.0	13.8
Total	20	929	100.0	391	23.5	30.0	6.4	19.2	20.0	21.5	22.4	20.0	21.7	34.9	30.0	36.6	0.0	0.0	13.8

	Tota	Home	Mortgag	e Loans	Low-Ind	come Bor	rowers	Moderate-	Income	Borrowers	Middle-I	ncome B	orrowers	Upper-Iı	icome B	orrowers		vailable- Borrowei	
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregat e	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Illinois Non-MSA	20	1,145	100.0	251	28.3	30.0	8.0	17.3	15.0	29.5	19.6	30.0	22.3	34.8	25.0	31.1	0.0	0.0	9.2
Total	20	1,145	100.0	251	28.3	30.0	8.0	17.3	15.0	29.5	19.6	30.0	22.3	34.8	25.0	31.1	0.0	0.0	9.2

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	138	0.0	0.0	0.0	24.5	10.0	75.5	90.0	0.0	0.0	0.0	0.0
Total	20	138	0.0	0.0	0.0	24.5	10.0	75.5	90.0	0.0	0.0	0.0	0.0

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	179	100.0	0.0	0.0	46.0	65.0	54.0	35.0	0.0	0.0	0.0	0.0
Total	20	179	100.0	0.0	0.0	46.0	65.0	54.0	35.0	0.0	0.0	0.0	0.0

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% 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	138	100.0	28.0	45.0	17.1	35.0	17.1	5.0	37.8	15.0	0.0	0.0
Total	20	138	100.0	28.0	45.0	17.1	35.0	17.1	5.0	37.8	15.0	0.0	0.0

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% 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	179	100.0	29.9	50.0	15.8	30.0	16.4	20.0	38.0	0.0	0.0	0.0
Total	20	179	100.0	29.9	50.0	15.8	30.0	16.4	20.0	38.0	0.0	0.0	0.0