

PUBLIC DISCLOSURE

September 27, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Town & County Bank
RSSD# 590248

1925 South MacArthur Boulevard
Springfield, Illinois 62704

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604-1413

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S CRA RATING

Town and Country Bank is rated: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

Town and Country Bank is meeting the credit needs of its assessment area based on an analysis of lending and community development activities. Town and Country Bank's loan-to-deposit ratio is more than reasonable given the bank's size, financial condition, and assessment area credit needs. A majority of loans and other lending-related activities are in the assessment area. The geographic distribution of loans reflects excellent dispersion throughout the assessment area, and loan distribution reflects excellent penetration among individuals of different income levels, including low- and moderate-income, and businesses of different sizes. Neither Town and Country Bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

The bank's community development performance demonstrates excellent responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities in each of the assessment areas.

SCOPE OF EXAMINATION

Town and Country Bank's CRA performance was evaluated using the Intermediate Small Institution Examination Procedures issued by the Federal Financial Institutions Examination Council (FFIEC). The evaluation was performed within the context of information about the institution and its assessment areas such as asset size, financial condition, competition, and economic and demographic characteristics.

The bank maintains six delineated assessment areas: Springfield, Illinois Metropolitan Statistical Area (MSA) #44100; Adams County, Illinois Non-MSA; Decatur, Illinois MSA #19500; Logan County, Illinois Non-MSA; Morgan County, Illinois Non-MSA; and St. Louis, Missouri-Illinois (MO-IL) MSA #41180. For this evaluation, the Springfield, Illinois MSA #44100; Adams County, Illinois Non-MSA; and St. Louis, MO-IL MSA #41180 were selected for full-scope reviews based on lending volume, the bank's retail network, and analysis at previous evaluations. The remaining assessment areas, Decatur, Illinois MSA #19500; Logan County, Illinois Non-MSA; and Morgan County, Illinois Non MSA, were evaluated as limited scope reviews and were evaluated for consistency with the bank's performance in the full review assessment areas. The bank's performance in the limited review assessment areas did not affect the overall rating. The bank added McLean County as a new assessment area in March 2021 due to the conversion of a loan production office to a full-service branch in the Bloomington, Illinois MSA #14010; however, this assessment area was not considered in this performance evaluation. The Springfield, Illinois MSA #44100 was given the most weight due to the bank's market share in the assessment area.

Loan products reviewed include Home Mortgage Disclosure Act (HMDA)-reportable loans originated by both the bank and its subsidiary, Town and Country Banc Mortgage Services, and small business loans. These products are considered the bank's primary business lines based on volume by number and dollar amount. The bank's level of community development activity was also evaluated.

Performance within the designated assessment areas was evaluated using intermediate-small bank examination procedures based on the following performance criteria:

- ***Loan-to-Deposit Ratio*** – A 14-quarter average loan-to-deposit ratio was calculated for the bank and compared to a sample of local competitors.
- ***Lending in the Assessment Area*** – The bank's HMDA-reportable and small business loans originated from January 1, 2019 through December 31, 2020, were reviewed to determine the percentage of loans originated within the assessment area.
- ***Geographic Distribution of Lending in the Assessment Area*** – The bank's HMDA-reportable and small business loans originated within the assessment area, from January 1, 2019 through December 31, 2020, were analyzed to determine the extent to which the bank is making loans in geographies of different income levels, particularly those designated as low- and moderate-income.
- ***Lending to Borrowers of Different Income and to Businesses of Different Sizes*** – The bank's HMDA-reportable and small business loans originated within the assessment area, from January 1, 2019 through December 31, 2020, were reviewed to determine the distribution among borrowers of different income levels, particularly those considered low- or moderate-income, and to businesses with different revenue sizes.
- ***Response to Substantiated Complaints*** – Complaints were reviewed to determine if any were related to the bank's record of helping to meet community credit needs and its responses to any received were evaluated for appropriateness.
- ***Community Development Activities*** – The bank's responsiveness to community development needs through community development loans, qualified investments, and community development services, from July 17, 2018 through September 27, 2021, were reviewed considering the capacity, need, and availability of such opportunities within the assessment area.

In addition, five community representatives were contacted in connection with this examination to provide information regarding local economic and socio-economic conditions in the assessment area. Contacts represented organizations involved with economic development and affordable housing.

DESCRIPTION OF INSTITUTION

Town and Country Bank (TCB) is a wholly-owned subsidiary of Town and Country Financial Corporation, a one-bank holding company, headquartered in Springfield, Illinois. The bank has one subsidiary, a mortgage company, Town and Country Banc Mortgage Services, through which the majority of mortgage loans are originated. The bank operates a network of 12 branches with 15 ATMs located throughout central and southern Illinois; all branches have ATMs with the exception of one branch in Bloomington. Two of the ATMs are full service attached to a branch, nine are cash-only attached to a branch, and four are stand-alone cash only ATMs. The main office and two additional offices are located in Springfield. Since the previous evaluation the bank converted a loan production office located in Bloomington to a full-service branch effective March 1, 2021.

As of June 30, 2021, the bank reported total assets of \$878.3 million based on the Uniform Banking Performance Report (UBPR), representing 18.2 percent growth since the previous examination. Town and Country Bank is primarily a commercial and residential real estate lender, as represented in the bank's loan portfolio table below. The bank offers a full range of traditional deposit and credit products to meet the banking needs of its assessment areas. Loan products offered include home mortgage, secured and unsecured commercial, secured and unsecured consumer loans, and home equity lines of credit. Products offered include traditional checking, NOW accounts, gift cards, overdraft protection, money market and savings accounts, as well as a variety of certificates of deposit. The most notable increase in the bank's asset size since the previous evaluation is within the commercial portfolio. In response to the COVID-19 pandemic, the bank participated in government-sponsored loan programs, including the Small Business Administration's (SBA) Payment Protection Program (PPP), and the growth within the commercial lending portfolio can be partially attributed to this program. Details of the allocation of the bank's loan portfolio are provided in the following table.

Composition of Loan Portfolio as of June 30, 2021 (000's)		
Type	\$	%
Commercial	466,229	75.0
Residential Real Estate	132,526	21.3
Agriculture	15,037	2.4
Consumer	2,818	0.5
Other	4,778	0.8
Total	621,388	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

The bank was rated satisfactory under the CRA at its previous evaluation conducted on July 16, 2018.

DESCRIPTION OF ASSESSMENT AREA

The bank’s combined assessment area includes six individual assessment areas throughout central and southern Illinois. Details on the bank’s assessment areas are included in the table below. In March 2021, the bank added the Bloomington, Illinois MSA #14010 assessment area, but for the purpose of this evaluation, this assessment area will not be included in the evaluation due to its recent conversion from a Loan Production Office to a full service branch.

Description of Town and Country Bank’s Individual Assessment Areas		
Scope	Assessment Area	Description
Full	Adams County, Illinois Non-MSA	Adams County
Limited	Decatur, Illinois MSA #19500	Macon County
Limited	Logan County, Illinois Non-MSA	Logan County
Limited	Morgan County, Illinois Non-MSA	Morgan County
Full	Springfield, Illinois MSA #44100	Sangamon County
Full	St. Louis, MO-IL MSA #41180	Madison & St. Clair Counties

According to the 2020 FFIEC Census data, the combined assessment area consists of 244 census tracts. Of those 244 census tracts, 91 are designated as low- or moderate-income (41 low- and 50 moderate-income), representing 37.3 percent of all tracts in the combined assessment area. These low- and moderate-income census tracts are home to 65,473 families, representing 26.2 percent of all families in the assessment area. According to the FFIEC, there are no distressed or underserved middle-income census tracts with the combined assessment area.

A total of 433,839 housing units are located in the combined assessment area, of which 140,261 (32.3 percent) are located in low- and moderate-income census tracts. In the low-income tracts, 36.3 percent of housing units are owner-occupied, while 49.4 percent are owner-occupied in moderate-income tracts. This indicates there are ample opportunities for home ownership in these tracts. Community contacts stated a need for affordable housing throughout the assessment area.

A total of 33,747 businesses are located in the combined assessment area, of which 10,351 (30.7 percent) are located in low- and moderate-income census tracts. Businesses with revenues under \$1.0 million represent 89.8 percent of total business, evidencing ample lending opportunities to small businesses within the assessment area.

Assessment Area: 2020 Combined Assessment Area								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	41	16.8	25,964	10.4	9,954	38.3	58,297	23.4
Moderate-income	50	20.5	39,509	15.8	7,644	19.3	43,017	17.2
Middle-income	99	40.6	111,393	44.7	9,279	8.3	50,163	20.1
Upper-income	54	22.1	72,590	29.1	2,448	3.4	97,979	39.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	244	100.0	249,456	100.0	29,325	11.8	249,456	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	57,677	20,913	7.8	36.3	26,485	45.9	10,279	17.8
Moderate-income	82,584	40,803	15.2	49.4	29,309	35.5	12,472	15.1
Middle-income	185,998	124,071	46.3	66.7	46,156	24.8	15,771	8.5
Upper-income	107,580	82,428	30.7	76.6	18,432	17.1	6,720	6.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	433,839	268,215	100.0	61.8	120,382	27.7	45,242	10.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	3,751	11.1	3,192	10.5	488	16.5	71	14.1
Moderate-income	6,600	19.6	5,847	19.3	686	23.2	67	13.3
Middle-income	14,360	42.6	12,902	42.6	1,206	40.8	252	50.2
Upper-income	9,036	26.8	8,351	27.6	573	19.4	112	22.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	33,747	100.0	30,292	100.0	2,953	100.0	502	100.0
Percentage of Total Businesses:			89.8		8.8		1.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	13	0.9	12	0.9	1	6.3	0	0.0
Moderate-income	37	2.6	36	2.6	1	6.3	0	0.0
Middle-income	892	63.4	883	63.7	7	43.8	2	66.7
Upper-income	464	33.0	456	32.9	7	43.8	1	33.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,406	100.0	1,387	100.0	16	100.0	3	100.0
Percentage of Total Farms:			98.6		1.1		0.2	

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Town and Country Bank’s performance relative to the lending test is Outstanding. This is based on a loan-to-deposit ratio that is more than reasonable given the bank’s size, financial condition, and assessment area credit needs, as well as the majority of loans and other lending-related activities occurring in the assessment area. Additionally, the geographic distribution of loans reflects excellent dispersion throughout the assessment area, and the loan distribution reflects excellent penetration among individuals of different income levels, including low- and moderate-income, and businesses of different sizes.

Loan-to-Deposit Ratio

The bank had a more than reasonable loan-to-deposit (LTD) ratio given the bank's size, financial condition, and the credit needs of its assessment areas. As of June 30, 2021, the bank’s 14-quarter average LTD was 88.6 percent, which was above the average of local competitors. The bank’s LTD ratio increased since the previous evaluation in 2018, where the LTD ratio over 16 quarters was 83.2 percent. The table below compares the bank’s LTD ratio to that of its local competitors.

Comparative Loan-to-Deposit Ratios as of June 30, 2021	
Comparative Data	14 - Quarter Average (%)
Town and Country	88.6
Competitor Avg	79.1
Competitors	
Bank of Springfield	96.5
CIBM Bank	95.7
Marine Bank	87.9
Bank of Pontiac	84.8
Prairie State Bank and Trust Co.	80.6
INB NA	77.5
FNB Community Bank	65.8
Lindell Bank and Trust Co.	61.6
First Bankers Trust Co., NA	61.4

Assessment Area Concentration

Town and Country Bank made a majority of its loans in the bank’s assessment area. During the review period, TCB originated 80.6 percent of all loans by number and 72.6 percent of all loans by dollar amount within its assessment area. The bank originated 76.6 percent by number and 68.6 percent by dollar of its HMDA-reportable loans inside its assessment area. The bank originated 81.8 percent by number and 74.9 percent by dollar amount of its small business loans inside its assessment area. Ultimately, the percentage of HMDA-reportable and small business originations within the assessment area indicates the bank is actively serving the credit needs of the community.

The following table summarizes TCB's lending inside and outside its assessment area for HMDA-reportable and small business loans from January 1, 2019 to December 31, 2020.

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	10	76.9	313	80.5	3	23.1	76	19.5
Home Purchase - Conventional	129	79.6	14,218	70.4	33	20.4	5,990	29.6
Home Purchase - FHA	12	63.2	1,827	70.5	7	36.8	766	29.5
Home Purchase - VA	2	50.0	223	55.5	2	50.0	179	44.5
Multi-Family Housing	9	64.3	776	51.8	5	35.7	722	48.2
Other Purpose Closed-End	38	82.6	28,753	70.6	8	17.4	11,996	29.4
Refinancing	82	74.5	8,967	62.3	28	25.5	5,426	37.7
Total HMDA related	282	76.6	55,077	68.6	86	23.4	25,155	31.4
Small Business related	996	81.8	103,720	74.9	221	18.2	34,753	25.1
Total Loans	1,278	80.6	158,797	72.6	307	19.4	59,908	27.4
<i>Note: Percentages may not total 100.0 percent due to rounding Town and Country Banc Mortgage Services loans not included</i>								

Geographic and Borrower Distribution

The bank demonstrated an excellent geographic distribution of loans given the bank's assessment areas. The bank's geographic distribution of loans reflects excellent dispersion in the Springfield, Illinois MSA #44100 and St. Louis, MO-IL MSA #41180, while the geographic distribution of loans reflects reasonable dispersion in the Adams County, Illinois Non-MSA assessment area. The bank's distribution of loans to individuals of different income levels (including low- and moderate-income individuals) and businesses of different sizes is excellent given the demographics of the bank's assessment areas. The bank's penetration among individuals of different income levels and businesses of different sizes is excellent in the Springfield, Illinois MSA#44100, the St. Louis, MO-IL MSA #41180, and the Adams County, Illinois Non-MSA. The specifics of the bank's lending in each assessment area and relevant demographics are discussed in the individual assessment area sections.

Response to Complaints

Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous examination.

COMMUNITY DEVELOPMENT TEST

Town and Country Bank's performance relative to the community development test is Outstanding. The bank's community development activities demonstrate excellent responsiveness to identified community development needs. The bank engaged in community development lending, provided community development services, and made qualified investments in the form of securities and donations.

Lending, Investment, and Services Activities

During the evaluation period, TCB originated 155 qualified loans for a total of \$111.4 million toward community services, affordable housing, and revitalization and stabilization activities within its assessment area over a 38-month period. Community development greatly increased since the previous evaluation where the bank originated 67 community development loans totaling \$61.6 million over a 64-month period.

During the evaluation period, the bank made 11 new investments totaling \$10,061,291 and had six investments from the prior evaluation period with an outstanding balance of \$645,118. This was an increase over previous evaluation when the bank made \$1,221,000 qualified investments in the assessment area and \$250,000 in the broader statewide and regional area. The bank provided contributions to organizations which support affordable housing, small business and economic development, revitalization and stabilization of low- or moderate-income geographies, and community services tailored to meet the needs of low- and moderate-income individuals and households in the bank's assessment areas. The bank's donations totaled \$190,775, which was an increase from the previous evaluation level of \$89,061.

During the evaluation period bank staff provided approximately 1,095 hours of community development services over a 38-month period. A majority of the total number of service hours were dedicated to organizations with a community service focus. Benefitting from these services were organizations that received financial planning or resource allocation services, as well as programs that target low- and moderate-income individuals throughout the bank's assessment areas. Bank employees served as board members or committee members for several of these organizations. During the prior evaluation period, the bank's qualified community development service hours totaled 1,256.5 hours over a 64-month time period.

Additional details of community development performance can be found in the individual assessment area discussions.

Summary of CD Activities, Review Period July 17, 2018 – September 27, 2021								
Assessment Area	Loans		Investments		Donations		Services	
	#	\$	#	\$	#	\$	#	Hours
Full Review								
Adams County, Illinois Non-MSA	9	12,299,000	3	8,375,800	17	12,888	56	153
Springfield, Illinois MSA #44100	62	42,582,000	3	471,604	41	60,950	128	461
St. Louis, MO-IL MSA #41180	46	40,767,456	8	1,416,446	42	48,707	91	278
Limited Review								
Decatur, IL MSA #19500	27	13,425,000	1	96,280	16	16,750	75	94
Logan County, Illinois Non-MSA	9	2,069,000	0	0	5	23,000	7	12
Morgan County, Illinois Non-MSA	2	265,000	1	96,280	32	28,480	43	97
Regional Impact								
Broader Statewide and Regional Area	0	0	1	250,000	0	0	0	0
Total Qualified	155	111,407,456	17	10,706,409	162	190,775	400	1,095

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

SPRINGFIELD, ILLINOIS MSA #44100 - FULL REVIEW

SCOPE OF EXAMINATION

A full review was conducted to evaluate the Springfield, Illinois MSA #44100 assessment area. The scope was consistent with the overall scope of the examination described within the institution summary. For further information, refer to the "Scope of Examination" section for details.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SPRINGFIELD, ILLINOIS MSA #44100

The Springfield, Illinois MSA #44100 consists of two counties: Sangamon and Menard. The bank's Springfield, Illinois MSA #44100 assessment area consists of Sangamon County in its entirety and excludes Menard in its entirety. The bank operates four offices, including its main office, along with two full-service ATMs and two cash-only ATMs in the assessment area. Three of the four offices are located in Springfield with the fourth located in Buffalo, Illinois. Two of the offices are located in middle-income census tracts, including the main office, and two are located in upper-income tracts. The assessment area has not changed since the previous examination and consists of 53 census tracts, including 11 low-income, 10 moderate-income, 21 middle-income, and 11 upper-income census tracts.

In 2020, Town and Country Banc Mortgage Services ranked fifth and TCB ranked 30th among 232 institutions that originated or purchased HMDA-reportable loans, originating 757 and 47 HMDA-reportable loans, respectively. By comparison, the first ranked organization by HMDA-reportable loans is United Community Bank with 1,533 originated or purchased home mortgage loans.

According to the June 30, 2020, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Town and Country Bank ranked ninth among 24 FDIC-insured financial institutions operating in the assessment area with 4.6 percent of the market share. Leaders in market share include INB, National Association (14.9 percent), United Community Bank (13.8 percent), and JP Morgan Chase Bank (13.6 percent). The 24 banks competing for deposits and loans with TCB have 77 offices in the assessment area.

Additional assessment area demographic information is provided in the following table. Please refer to Appendix C for 2019 demographic information.

Assessment Area: 2020 Springfield, Illinois MSA #44100								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	11	20.8	6,991	13.7	2,426	34.7	11,624	22.8
Moderate-income	10	18.9	6,285	12.3	1,138	18.1	8,264	16.2
Middle-income	21	39.6	20,952	41.1	1,631	7.8	10,411	20.4
Upper-income	11	20.8	16,700	32.8	290	1.7	20,629	40.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	53	100.0	50,928	100.0	5,485	10.8	50,928	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	14,732	5,695	9.9	38.7	7,211	48.9	1,826	12.4
Moderate-income	15,315	7,663	13.3	50.0	5,482	35.8	2,170	14.2
Middle-income	36,183	24,329	42.2	67.2	9,297	25.7	2,557	7.1
Upper-income	24,203	19,967	34.6	82.5	3,241	13.4	995	4.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	90,433	57,654	100.0	63.8	25,231	27.9	7,548	8.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	1,172	14.6	988	13.8	153	20.5	31	22.8
Moderate-income	1,469	18.3	1,289	18.0	159	21.3	21	15.4
Middle-income	2,988	37.2	2,653	37.1	278	37.2	57	41.9
Upper-income	2,405	29.9	2,220	31.0	158	21.1	27	19.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8,034	100.0	7,150	100.0	748	100.0	136	100.0
Percentage of Total Businesses:			89.0		9.3		1.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	4	1.6	4	1.7	0	0.0	0	0.0
Moderate-income	5	2.0	5	2.1	0	0.0	0	0.0
Middle-income	143	58.1	139	57.7	3	75.0	1	100.0
Upper-income	94	38.2	93	38.6	1	25.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	246	100.0	241	100.0	4	100.0	1	100.0
Percentage of Total Farms:			98.0		1.6		.4	
2020 FFIEC Census Data and 2020 D&B Information								
<i>Note Percentages may not add to 100.0 percent due to rounding</i>								

Population Change

The table below presents population changes in the assessment area from 2010 to 2015. The 2010 census reported a population of 197,465 in Sangamon County. From 2010 to 2015 the assessment area's population increased slightly faster than the state with a 0.8 percent increase. Community representatives indicated that this trend may have shifted since 2015, with population in the county leveling off. Community representatives attributed this to residents moving either out of state or to larger metropolitan areas within the state.

Population Change			
Area	2010 Population	2015 Population	Percent Change (%)
Sangamon County	197,465	199,016	0.8
Springfield, IL MSA	210,170	211,627	0.7
Illinois	12,830,632	12,873,761	0.3

*Source: 2010 U.S. Census Bureau Decennial Census
2011 - 2015 U.S. Census Bureau American Community Survey*

Income Characteristics

According to 2020 FFIEC Census Data, the assessment area is comprised of 50,928 families, of which 22.8 percent are low-income, 16.2 percent moderate-income, 20.4 percent middle-income, and 40.5 percent upper-income. Approximately 10.8 percent of families residing within the assessment area live below the poverty line, which is slightly below the 13.4 percent in the state of Illinois.

The following table compares the median family income (MFI) for the assessment area and the state of Illinois. According to the 2011-2015 American Community Survey (ACS), the MFI growth in the assessment area, at 0.3 percent, was above the state of Illinois, at -3.7 percent. The income level itself was similar to the rest of the state. A community representative indicated that in the western portion of the county, the medical industry is attracting high-income workers that may be helping boost the income levels above the rest of the state.

Median Family Income Change			
Area	2010 Median Family Income (\$)	2015 Median Family Income (\$)	Percent Change (%)
Sangamon County	72,869	73,074	0.3
Springfield, IL MSA	72,767	73,402	0.9
Illinois	74,306	71,546	-3.7

*Source: 2006 - 2010 U.S. Census Bureau American Community Survey
2011 - 2015 U.S. Census Bureau American Community Survey
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.*

Housing Characteristics

There are 90,433 housing units within the assessment area, the majority of which are owner-occupied at 63.8 percent. The remaining portion is comprised of 27.9 percent rental and 8.3 percent vacant units.

Renters and homeowners are considered overburdened when housing costs equal 30.0 percent or more of household income. The table below shows the percentage of renters and owners spending more than 30.0 percent of household income on housing costs. Sangamon County is generally in line with the rest of the state with 76.6 percent of low-income and 44.6 percent of all renters facing a housing cost burden. Moderate-income renters in the county are less likely than in the rest of the state to face a housing cost burden with 23.9 percent of renters above the threshold. For homeowners, the county is below the state with 61.2 percent of low-income, 24.3 percent of moderate-income, and 16.2 percent of all owners facing a high housing cost burden. Overall, there is a need for more low-income rental options, which community representatives confirmed. However, one representative indicated the supply of new single-family housing has allowed for more stable housing prices for home buyers.

Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Sangamon County	76.6	23.9	44.6	61.2	24.3	16.2
Springfield, IL MSA	75.8	22.7	44.0	60.9	24.1	16.1
Illinois	75.2	35.0	44.9	69.7	42.9	26.1

*Cost Burden is housing cost that equals 30.0 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy*

Employment Characteristics

The following table presents the unemployment trends for the assessment area and the state of Illinois from 2015-2020. Though the assessment area and state experienced declining unemployment rates between 2015-2019, rates increased in 2020. Community representatives confirmed this was as a result of the COVID-19 pandemic. Representatives indicated that this has begun to turnaround, with many businesses having trouble filling job openings and a general need for more workers.

Unemployment Rates (%)						
Area	2015	2016	2017	2018	2019	2020
Sangamon County	5.3	5.0	4.4	4.4	3.9	8.2
Springfield, IL MSA	5.3	5.0	4.4	4.4	3.9	8.1
Illinois	6.0	5.9	5.0	4.4	4.0	9.5

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

Industry Characteristics

The assessment area has a large percentage of government workers since Springfield is the state capital. Additionally, there is a large number of retail and health care employers throughout the assessment area. Community representatives confirmed that health care and medical workers comprise a large percentage of the private sector work force. This industry saw a significant decrease between the first and second quarter in 2020. A representative indicated that the COVID-19 pandemic impacted this sector especially, as many hospitals were forced to furlough or lay off employees due to the decrease in elective procedures.

Community Representatives

Two community representatives were contacted to provide information regarding local economic and demographic conditions. The representatives provided information on affordable housing, employment, and economic development needs within the assessment area. The representatives indicated that unemployment was falling until the COVID pandemic, at which point it spiked before falling in 2021. Community representatives stated that health care and medical workers comprise a large sector of the work force, and the medical industry, particularly on the west side of the county, is attracting high income workers that may be helping boost the income levels above the rest of the state. Both representatives indicated a need for more affordable rental units in the assessment area. In addition, the representatives noted the area experienced an economic hit from the pandemic; however, the assessment area now faces a need for more workers, as businesses are desperate to fill job openings.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SPRINGFIELD, ILLINOIS MSA #44100

LENDING TEST

Geographic Distribution of Loans

The bank demonstrates excellent geographic distribution of loans throughout the Springfield, Illinois MSA #44100 assessment area. In 2020, Town and Country Bank originated loans in all 53 census tracts in the assessment area. HMDA-reportable loans were originated in 52 of 53 census tracts and 20 of the 21 low- and moderate-income tracts. Similarly, small business loans were originated in 50 of 53 census tracts and 19 out of the 21 low- and moderate-income tracts. In 2019, the bank originated loans in 96.2 percent of the census tracts. Based upon this analysis, there are no conspicuous geographic lending gaps.

HMDA-Reportable Loans

Geographic distribution of 2020 HMDA-reportable loans reflects reasonable dispersion throughout the assessment area. Geographic dispersion of 2019 HMDA-reportable loans are comparable, as shown in Appendix C. The bank's primary HMDA-reportable products during the review period were home purchase and refinance loans. The remaining HMDA-reportable products will not be evaluated due to low volumes of originations.

Home Purchase

In 2020, home purchase loans accounted for 45.0 percent of the bank's total HMDA-reportable loans. Town and Country Bank originated 5.0 percent of its home purchase loans in the low-income census tracts by number, which is comparable to aggregate lenders (5.5 percent), but below owner-occupied units (9.9 percent). The bank originated 13.6 percent of home purchase loans in moderate-income census tracts, which was also comparable to aggregate lenders (13.9 percent) and owner-occupied units (13.3 percent).

The geographic distribution of HMDA-reportable home purchase loans in 2019 was consistent with the pattern of lending in 2020.

Refinance

In 2020, refinance loans accounted for 53.7 percent of the bank's total HMDA-reportable loans. Town and Country Bank originated 1.6 percent of its refinance loans by number, which was similar to the number of aggregate of lenders (2.1 percent), but below the owner-occupied units of 9.9 percent. In moderate-income tracts, the bank originated 6.5 percent by number. This was also comparable to the aggregate of lenders percentage of 6.2 percent. However, this too was below the percentage of owner-occupied units at 13.3 percent.

The geographic distribution of HMDA-reportable refinance loans in 2019 was consistent with the pattern of lending in 2020.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Springfield, IL MSA 44100								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	18	5.0	5.5	953	1.8	2.2	9.9
	Moderate	49	13.6	13.9	4,044	7.5	7.7	13.3
	Middle	168	46.5	44.2	21,963	40.5	39.5	42.2
	Upper	126	34.9	36.5	27,264	50.3	50.6	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		361	100.0	100.0	54,224	100.0	100.0
Refinance	Low	7	1.6	2.1	397	0.6	0.7	9.9
	Moderate	28	6.5	6.2	2,343	3.5	2.9	13.3
	Middle	172	39.9	37.2	21,661	31.9	31.0	42.2
	Upper	224	52.0	54.4	43,406	64.0	65.3	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		431	100.0	100.0	67,807	100.0	100.0
Home Improvement	Low	0	0.0	4.6	0	0.0	2.2	9.9
	Moderate	0	0.0	9.7	0	0.0	7.3	13.3
	Middle	0	0.0	44.6	0	0.0	46.2	42.2
	Upper	2	100.0	41.0	70	100.0	44.4	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		2	100.0	100.0	70	100.0	100.0
Multi-Family	Low	1	12.5	21.0	150	1.2	8.1	Multi-Family 25.8
	Moderate	3	37.5	33.3	636	5.1	8.5	20.5
	Middle	3	37.5	33.3	3,709	29.7	58.5	40.2
	Upper	1	12.5	12.3	8,000	64.0	24.9	13.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		8	100.0	100.0	12,495	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	9.9
	Moderate	0	0.0	11.1	0	0.0	9.1	13.3
	Middle	0	0.0	29.6	0	0.0	24.1	42.2
	Upper	0	0.0	59.3	0	0.0	66.8	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	5.6	0	0.0	5.1	9.9
	Moderate	0	0.0	7.0	0	0.0	3.1	13.3
	Middle	0	0.0	29.6	0	0.0	23.6	42.2
	Upper	0	0.0	57.7	0	0.0	68.1	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	11.9	0	0.0	6.4	9.9
	Moderate	0	0.0	19.5	0	0.0	13.6	13.3
	Middle	0	0.0	49.1	0	0.0	49.0	42.2
	Upper	1	100.0	19.5	198	100.0	30.9	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	198	100.0	100.0
HMDA Totals	Low	26	3.2	3.7	1,500	1.1	1.7	9.9
	Moderate	80	10.0	9.5	7,023	5.2	5.0	13.3
	Middle	343	42.7	40.0	47,333	35.1	35.6	42.2
	Upper	354	44.1	46.8	78,938	58.6	57.8	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		803	100.0	100.0	134,794	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Loans

Geographic distribution of small business loans reflects excellent dispersion throughout the assessment area. The bank originated 10.3 percent of its small business loans in low-income tracts, which was below the percentage of businesses located in the tracts (14.6 percent). In moderate-income census tracts, however, the bank originated 18.3 percent of its small business loans by number, which aligned with the total business percentage of 18.3.

The following table presents the geographic distribution of small business loans in 2020 in this assessment area. The institution’s small business lending for 2019 was consistent with the pattern of lending in 2020 and can be found in Appendix C.

Geographic Distribution of Small Business Loans						
Assessment Area: 2020 Springfield, IL MSA 44100						
	Tract Income Levels	Bank & Demographic Comparison				
				2020		Total Businesses
		Count Bank		Dollar Bank		
		#	%	\$ 000s	\$ %	%
Small Business	Low	27	10.3	3,628	15.0	14.6
	Moderate	48	18.3	4,867	20.2	18.3
	Middle	103	39.3	6,603	27.4	37.2
	Upper	84	32.1	9,016	37.4	29.9
	Unknown	0	0.0	0	0.0	0.0
	Total		262	100.0	24,114	100.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The bank’s distribution of loans reflects excellent penetration among individuals of different income levels, including low- and moderate-income, and businesses of different sizes.

HMDA-Reportable Loans

The distribution of 2020 HMDA-reportable loans reflects excellent penetration among individuals of different income levels. In 2019, Town and Country’s borrower distribution of HMDA-reportable loans was generally comparable to its lending in 2020, as shown in Appendix C. The bank’s primary HMDA-reportable products during the review period were home purchase and refinance loans. The remaining HMDA-reportable products will not be evaluated due to low volumes of originations. Loans to borrowers of unknown income are loans originated to businesses, and while they are HMDA-reportable loans, they are not required to report income.

Home Purchase

In 2020, Town and Country Bank originated 20.2 percent of its home purchase loans to low-income borrowers, by number. The bank's performance is above the aggregate of lenders at 15.2 percent, but below the percentage of low-income families located in the assessment area of 22.8 percent. The bank originated 23.8 percent of its home purchase loans to moderate-income borrowers, which was above both the aggregate of lenders in the assessment area and the percentage of moderate-income families at 22.0 percent and 16.2 percent, respectively.

The borrower distribution of HMDA-reportable home purchase loans in 2019 was consistent with the bank's performance in 2020.

Refinance

In 2020, Town and Country Bank originated 6.3 percent of refinance loans to low-income borrowers. This was slightly above the aggregate of lenders (5.4 percent), but well below the percentage of low-income families at 22.8 percent. The bank originated 19.3 percent by number to moderate-income borrowers. As with home purchase loans, this was above the aggregate of lenders (16.2 percent), and the percentage by number outperformed the percentage of moderate-income families (16.2 percent).

The borrower distribution of HMDA-reportable refinance loans in 2019 was consistent with the pattern of lending in 2020.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Springfield, IL MSA 44100								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	73	20.2	15.2	5,450	10.1	8.2	22.8
	Moderate	86	23.8	22.0	9,885	18.2	16.8	16.2
	Middle	95	26.3	21.6	15,442	28.5	23.3	20.4
	Upper	93	25.8	27.9	22,395	41.3	39.7	40.5
	Unknown	14	3.9	13.2	1,052	1.9	12.0	0.0
	Total		361	100.0	100.0	54,224	100.0	100.0
Refinance	Low	27	6.3	5.4	2,421	3.6	2.6	22.8
	Moderate	83	19.3	16.2	9,297	13.7	10.8	16.2
	Middle	112	26.0	22.2	16,712	24.6	18.6	20.4
	Upper	191	44.3	43.5	36,972	54.5	54.7	40.5
	Unknown	18	4.2	12.7	2,405	3.5	13.3	0.0
	Total		431	100.0	100.0	67,807	100.0	100.0
Home Improvement	Low	0	0.0	5.1	0	0.0	4.5	22.8
	Moderate	0	0.0	15.4	0	0.0	13.6	16.2
	Middle	0	0.0	19.5	0	0.0	18.4	20.4
	Upper	1	50.0	35.9	30	42.9	40.7	40.5
	Unknown	1	50.0	24.1	40	57.1	22.9	0.0
	Total		2	100.0	100.0	70	100.0	100.0
Multi-Family	Low	0	0.0	1.2	0	0.0	0.2	22.8
	Moderate	1	12.5	4.9	125	1.0	0.8	16.2
	Middle	0	0.0	4.9	0	0.0	0.6	20.4
	Upper	2	25.0	9.9	9,643	77.2	11.0	40.5
	Unknown	5	62.5	79.0	2,727	21.8	87.3	0.0
	Total		8	100.0	100.0	12,495	100.0	100.0
Other Purpose LOC	Low	0	0.0	3.7	0	0.0	6.5	22.8
	Moderate	0	0.0	14.8	0	0.0	13.8	16.2
	Middle	0	0.0	3.7	0	0.0	1.1	20.4
	Upper	0	0.0	29.6	0	0.0	48.0	40.5
	Unknown	0	0.0	48.1	0	0.0	30.7	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	7.0	0	0.0	4.0	22.8
	Moderate	0	0.0	25.4	0	0.0	28.8	16.2
	Middle	0	0.0	29.6	0	0.0	23.3	20.4
	Upper	0	0.0	33.8	0	0.0	41.0	40.5
	Unknown	0	0.0	4.2	0	0.0	2.9	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	1	100.0	0.9	198	100.0	1.1	22.8
	Moderate	0	0.0	0.0	0	0.0	0.0	16.2
	Middle	0	0.0	0.0	0	0.0	0.0	20.4
	Upper	0	0.0	0.0	0	0.0	0.0	40.5
	Unknown	0	0.0	99.1	0	0.0	98.9	0.0
	Total		1	100.0	100.0	198	100.0	100.0
HMDA Totals	Low	101	12.6	8.8	8,069	6.0	4.3	22.8
	Moderate	170	21.2	17.9	19,307	14.3	12.2	16.2
	Middle	207	25.8	21.3	32,154	23.9	18.9	20.4
	Upper	287	35.7	36.6	69,040	51.2	46.6	40.5
	Unknown	38	4.7	15.4	6,224	4.6	18.0	0.0
	Total		803	100.0	100.0	134,794	100.0	100.0

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Small Business Loans

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. The implementation of the Small Business Administration’s Paycheck Protection Program (PPP) did not require banks to obtain proof of annual revenue prior to extending credit through the program. Therefore, the bank’s 2020 lending reflects an abnormally high number of loans with unknown revenues. As a result, an increased emphasis was placed on the loan size instead of revenue as loans in amounts of \$100,000 or less are considered most beneficial to the financing needs of small business borrowers and are considered particularly responsive to the challenges of small businesses from the COVID-19 pandemic. In 2020, 205 of the bank’s 262 loan originations, or 78.2 percent of loans, were in amounts of \$100,000 or less.

While an increased emphasis was placed on the loan size, of loans to businesses with recorded revenue, the bank originated 79.2 percent of loans to business with \$1.0 million or less in revenue. All 185 loans with unknown revenue were PPP loans, thus in total, 93.9 percent of small business loans were either PPP or made to small businesses with revenue of \$1.0 million or less, demonstrating the bank’s responsiveness to the COVID-19 pandemic and the willingness to meet the credit needs of small businesses in the community.

Please refer to Appendix C for the 2019 borrower distribution of small business loans. Lending in 2019 was pre-pandemic but showed similar levels of lending to small businesses.

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2020 Springfield, IL MSA 44100							
Product Type		Bank & Demographic Comparison					
		2020		2020		Total Businesses	
#	%	Dollar Bank	\$ %	\$ 000s	%		
						Small Business	Revenue
Over \$1 Million	16	6.1	3,389	14.1	9.3		
Unknown	185	70.6	12,009	49.8	1.7		
Total	262	100.0	24,114	100.0	100.0		
Loan Size	\$100,000 or Less	205	78.2	6,370	26.4		
	\$100,001 - \$250,000	30	11.5	5,067	21.0		
	\$250,001 - \$1 Million	27	10.3	12,677	52.6		
	Total	262	100.0	24,114	100.0		
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	36	59.0	1,749	20.1		
	\$100,001 - \$250,000	16	26.2	2,861	32.8		
	\$250,001 - \$1 Million	9	14.8	4,106	47.1		
	Total	61	100.0	8,716	100.0		

Originations & Purchases
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

COMMUNITY DEVELOPMENT TEST

The bank demonstrates excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services as appropriate, considering the bank's capacity and the need and the availability of such opportunities for community development in the bank's assessment area.

Lending

During the evaluation period, the bank originated 62 qualified loans totaling approximately \$42.6 million toward community services, economic development, revitalization and stabilizing, and affordable housing within the assessment area. In comparison to the prior evaluation when the bank originated 42 qualified loans totaling \$46.5 million, this is a significant increase when considering the review period for the previous evaluation was 26 months longer than this evaluation. Lending related to affordable housing was particularly responsive, as community representatives noted a need for more affordable housing in the assessment area.

Investments

The bank made two new qualified investments for \$461,604 in the assessment area. The bank also had one qualified investment from the previous evaluation with an outstanding balance of \$10,000 for a total qualified of \$471,604. This was an increase from the one qualified investment for \$10,000 at the previous evaluation. Two of the bank's new investments were affordable housing investments, which as previously stated, was particularly responsive to the community needs. Town and Country Bank made 41 donations for \$60,950 in the assessment area. Approximately 83.0 percent of the donations were to provide vital community services to low- and moderate-income individuals and families. At the previous evaluation, the bank made donations totaling \$67,300 over a 64-month time period.

Services

During the evaluation period bank staff provided 460.5 hours of community development services. Of the total number of service hours, 416 were dedicated to organizations with a community service focus, and 43 service hours were dedicated to organizations with an affordable housing focus. During the prior evaluation, the bank's qualified community development service hours in this assessment area totaled 540.5. On a per month basis, the bank had 8.4 hours at the previous evaluation compared to 12.1 during this evaluation.

The table below presents the bank’s community development activities during the evaluation period.

Community Development Activities July 17, 2018 – September 27, 2021										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	35	12,823,000	7	6,995,000	16	10,508,000	4	12,256,000	62	42,582,000
Investment	2	461,604	0	0	0	0	1	10,000	3	471,604
Donations	1	1,000	6	31,000	0	0	34	28,950	41	60,950
Services	19	43	1	1	1	1	107	416	128	460.5

ST. LOUIS, MO-IL MSA #41180 - FULL REVIEW

SCOPE OF EXAMINATION

Full scope examination procedures were used to evaluate the bank's performance in the St. Louis, MO-IL MSA #44100 assessment area. The scope is consistent with the scope of the examination described within the institution summary. For further information, refer to the "Scope of Examination" section for details.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ST. LOUIS, MO-IL MSA #41180

The St. Louis MO-IL MSA #41180 is comprised of eight counties in Illinois and seven counties in Missouri. However, Town and Country Bank's delineated assessment area is comprised of only two counties in Illinois: Madison and St. Clair Counties. It operates two branch offices, one in Madison and one in St. Clair County. The Madison County office is located in a middle-income census tract in Edwardsville, Illinois. The St. Clair County office is located in an upper-income census tract in Fairview Heights, Illinois. Both offices are equipped with drive-thru facilities and cash-only ATMs. The assessment area remains unchanged since the previous evaluation and consists of 121 census tracts, including 22 low-income, 28 moderate-income, 46 middle-income, and 25 upper-income census tracts.

In 2020, Town and Country Banc Mortgage Services ranked 12th and TCB ranked 88th among 422 institutions that originated or purchased HMDA-reportable loans, originating 623 and 25 HMDA-reportable loans, respectively. By comparison, the first ranked organization by HMDA-reportable loans is U.S. Bank, N.A., with 1,395 originated or purchased home mortgage loans.

The June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report ranks Town and Country Bank 27th of 37 FDIC-insured depository institutions operating in the bank's assessment area with a market share of 0.8 percent. Leaders in market share include Busey Bank (13.6 percent), Regions Bank (12.4 percent), and FCB Banks (12.3 percent). The 36 banks competing for deposits and loans with Town Country Bank have 167 offices in the assessment area.

The 2020 assessment area demographics are provided in the following table. Please refer to Appendix C for 2019 demographic information.

Assessment Area: 2020 St. Louis, MO-IL MSA 41180								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	22	18.2	14,956	10.9	5,930	39.6	33,825	24.6
Moderate-income	28	23.1	26,581	19.3	4,728	17.8	24,250	17.6
Middle-income	46	38.0	59,782	43.4	4,539	7.6	27,233	19.8
Upper-income	25	20.7	36,272	26.4	1,422	3.9	52,283	38.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	121	100.0	137,591	100.0	16,619	12.1	137,591	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	32,684	12,315	8.6	37.7	13,775	42.1	6,594	20.2
Moderate-income	51,855	26,702	18.6	51.5	17,444	33.6	7,709	14.9
Middle-income	98,407	65,210	45.4	66.3	24,442	24.8	8,755	8.9
Upper-income	52,922	39,492	27.5	74.6	9,998	18.9	3,432	6.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	235,868	143,719	100.0	60.9	65,659	27.8	26,490	11.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,608	9.2	1,379	8.7	195	13.5	34	15.0
Moderate-income	3,704	21.2	3,299	20.9	370	25.6	35	15.4
Middle-income	7,718	44.2	7,016	44.5	594	41.1	108	47.6
Upper-income	4,426	25.4	4,089	25.9	287	19.8	50	22.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	17,456	100.0	15,783	100.0	1,446	100.0	227	100.0
	Percentage of Total Businesses:			90.4		8.3		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5	1.0	4	0.8	1	16.7	0	0.0
Moderate-income	25	5.1	24	4.9	1	16.7	0	0.0
Middle-income	270	54.7	268	55.1	1	16.7	1	50.0
Upper-income	194	39.3	190	39.1	3	50.0	1	50.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	494	100.0	486	100.0	6	100.0	2	100.0
	Percentage of Total Farms:			98.4		1.2		0.4
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

Population Change

The table below presents population trends for the assessment area; Madison County; St. Clair County; the St. Louis, MO-IL MSA; and the state of Illinois. According to the U.S. Census Bureau Demographic data, the assessment area’s population declined by 0.9 percent between 2010 and 2015, although the St. Louis MSA and the state of Illinois’s population increased slightly over the same period. A community representative attributed the population decline to crime and economic conditions in the area.

Population Change			
Area	2010 Population	2015 Population	Percent Change(%)
Assessment Area	539,338	534,385	-0.9
Madison County, IL	269,282	267,356	-0.7
St. Clair County, IL	270,056	267,029	-1.1
St. Louis, MO-IL MSA	2,787,701	2,801,914	0.5
Illinois	12,830,632	12,873,761	0.3

*Source: 2010 U.S. Census Bureau Decennial Census
2011 - 2015 U.S. Census Bureau American Community Survey*

Income Characteristics

According to 2020 FFIEC Census Data, the assessment area is comprised of 137,591 families, of which 24.6 percent are designated as low-income, 17.6 percent are moderate-income, 19.8 percent are middle-income, and 38.0 percent are upper-income. Approximately 12.1 percent of the families residing within the assessment area live below the poverty line, which is slightly higher than the state of Illinois, at 10.5 percent.

The following table compares the MFI for the assessment area; Madison County; St. Clair County; St. Louis, MO-IL MSA; and the state of Illinois. According to the 2011-2015 American Community Survey (ACS), the MFI in the assessment area is \$66,134, which represents a decrease of 2.5 percent from 2006-2010 Census Bureau data. Overall, MFI is slightly lower than the rest of the St. Louis MO-IL MSA and the state of Illinois. However, all areas saw a decline in MFI over the time period. According to community representatives, employers are currently raising wages to attract more workers. One representative believed that while MFI was low in 2015, it may have increased in the subsequent years.

Median Family Income Change			
Area	2010 Median Family Income (\$)	2015 Median Family Income (\$)	Percent Change (%)
Assessment Area	67,818	66,134	-2.5
Madison County, IL	70,379	67,860	-3.6
St. Clair County, IL	66,472	64,168	-3.5
St. Louis, MO-IL MSA	72,740	70,718	-2.8
Illinois	74,306	71,546	-3.7

*Source: 2006 - 2010 U.S. Census Bureau American Community Survey
2011 - 2015 U.S. Census Bureau American Community Survey
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.*

Housing Characteristics

There are 235,868 housing units with the assessment area, the majority of which are owner-occupied at 60.9 percent. The remaining units are comprised of 27.8 percent rental and 11.2 percent vacant.

Renters and homeowners are considered overburdened when housing costs equal 30.0 percent or more of household income. The table below shows the percentage of renters and owners spending more than 30.0 percent of household income on housing costs. The assessment area rental market is generally in line with the state of Illinois, with 71.5 percent of low-income, 29.3 percent of moderate-income, and 44.8 percent of all renters facing a housing cost burden. For homeowners, the assessment area is more affordable than the rest of the state of Illinois, with 57.5 percent of low-income, 28.9 percent of moderate-income, and 19.3 percent of all owners facing a cost burden. A community representative confirmed that affordable rental units are a need for low-income individuals. Also, representatives indicated that the owners' market is currently very competitive, with sales going for above asking in most cases.

Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	71.5	29.3	44.8	57.5	28.9	19.3
Madison County, IL	74.5	23.0	43.7	57.0	28.1	18.1
St. Clair County, IL	69.0	34.9	45.8	58.0	30.0	20.6
St. Louis, MO-IL MSA	75.1	30.4	43.9	63.4	34.5	20.8
Illinois	75.2	35.0	44.9	69.7	42.9	26.1

*Cost Burden is housing cost that equals 30.0 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy*

Employment Characteristics

The following table presents the unemployment trends for the assessment area; Madison County; St. Clair County; St. Louis, MO-IL MSA; and the state of Illinois from 2015-2020. The assessment area and the state both saw declining unemployment until 2020, where there was a sharp increase following the COVID-19 pandemic. A community representative indicated that unemployment has started to fall from the higher rate in 2020. A representative stated that now the area faces a shortage of workers, with employers needing to look outside of the area for potential employees. Finally, over the last several years several large employers have moved to the area, with several Amazon fulfillment centers and Worldwide Technology employing thousands.

Unemployment Rates (%)						
Area	2015	2016	2017	2018	2019	2020
Assessment Area	6.3	6.0	4.9	4.7	4.0	8.4
Madison County, IL	6.0	5.9	4.8	4.5	3.7	7.7
St. Clair County, IL	6.6	6.1	5.1	5.0	4.2	9.0
St. Louis, MO-IL MSA	5.1	4.6	3.8	3.4	3.2	6.7
Illinois	6.0	5.9	5.0	4.4	4.0	9.5

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

Industry Characteristics

The primary industries within the assessment area with the most employees include health care, retail trade, and transportation and warehousing. Employment within the transportation and warehousing industry saw significant growth within the previous few years, increasing 44.0 percent since the fourth quarter of 2017. As previously noted, community representatives confirmed that this was due to major employers, such as Amazon, opening distribution centers in the area.

Community Representatives

Two community representatives were contacted to provide information regarding local economic and demographic conditions. The representatives provided information on housing, employment, and economic development needs within the assessment area. A community representative stated that currently there is a shortage of qualified workers in the assessment area, which is limiting some businesses' ability to stay open or expand. A representative stated there is a need for affordable housing, both in terms of rental units and for more affordable options to own a home. The representative also stated there has been a decline in population attributed to crime and economic conditions in the area. The contacts stated that there are opportunities for more participation in this assessment area by local financial institutions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ST. LOUIS, MO-IL MSA #41180

LENDING TEST

Geographic Distribution of Loans

The bank demonstrated excellent geographic distribution of loans in the St. Louis, ML-IL MSA #41180 assessment area. Given performance context from community representatives, home purchase loans were given additional weight in this assessment area, as it was identified as a particular need for the community.

An analysis of the bank's HMDA-reportable and small business lending in 2020 shows that, of the 121 census tracts in the assessment area, the bank made loans in 81.0 percent of the census tracts. It should be noted that of the 22 low-income tracts, 17 tracts received no small business or HMDA loans. In moderate-income tracts, the bank made loans in 24 of the 28 tracts, or 85.7 percent of census tracts. While the bank did not reach all of the census tracts, the assessment area is very competitive with the bank holding just a 0.8 percent market share. Based upon this analysis, it appears there are no conspicuous geographic lending gaps.

HMDA-Reportable Loans

Geographic distribution of HMDA-reportable loans reflects excellent dispersion throughout the assessment area. Geographic dispersion of 2019 HMDA-reportable loans are comparable, as shown in Appendix C. The bank's primary HMDA-reportable products during the review period were home purchase and refinance loans. The remaining HMDA-reportable products will not be evaluated due to low volumes of originations.

Home Purchase

In 2020, home purchase loans accounted for 51.0 percent of the bank's total HMDA-reportable loans. The bank originated 2.7 percent of its home purchase loans in low-income census tracts by number. This was slightly above the aggregate of lenders rate at 1.9 percent, but below the percentage of owner-occupied units of 8.6 percent. The bank originated 21.1 percent of its home purchase loans by number in moderate-income census tracts. This outperformed the number by aggregate of lenders at 16.6 percent and the percentage of owner-occupied units of 18.6 percent.

The geographic distribution of HMDA-reportable home purchase loans in 2019 was generally consistent with the pattern of lending in 2020.

Refinance

In 2020, refinance loans accounted for 47.8 percent of the bank's total HMDA-reportable loans. The bank originated 0.3 percent of its refinance loans by number in low-income census tracts, which was similar to the aggregate of lenders at 0.5 percent, but below the owner-occupied units of 8.6 percent. In moderate-income tracts, the bank originated 5.8 percent by number, which was slightly below the aggregate of lenders percentage of 8.0 percent and well below the percentage of owner-occupied units at 18.6 percent.

The geographic distribution of HMDA-reportable refinance loans in 2019 was above the pattern of lending in 2020.

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2020 St. Louis, MO-IL MSA 41180							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2020			Dollar		
		Count Bank		Agg %	Bank		
		#	%	%	\$ (000s)	%	%
Home Purchase	Low	9	2.7	1.9	679	1.4	8.6
	Moderate	70	21.1	16.6	6,760	14.4	18.6
	Middle	158	47.7	49.2	19,615	41.7	45.4
	Upper	94	28.4	32.2	20,031	42.5	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	331	100.0	100.0	47,085	100.0	100.0
Refinance	Low	1	0.3	0.5	50	0.1	8.6
	Moderate	18	5.8	8.0	2,198	3.6	18.6
	Middle	115	37.1	44.1	20,135	33.0	45.4
	Upper	176	56.8	47.4	38,555	63.3	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	310	100.0	100.0	60,938	100.0	100.0
Home Improvement	Low	0	0.0	3.0	0	0.0	8.6
	Moderate	0	0.0	13.9	0	0.0	18.6
	Middle	0	0.0	43.2	0	0.0	45.4
	Upper	1	100.0	39.9	22	100.0	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	1	100.0	100.0	22	100.0	100.0
Multi-Family	Low	0	0.0	7.7	0	0.0	21.4
	Moderate	0	0.0	35.0	0	0.0	24.0
	Middle	5	83.3	41.3	2,362	39.3	37.7
	Upper	1	16.7	16.1	3,650	60.7	16.9
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	6	100.0	100.0	6,012	100.0	100.0
Other Purpose LOC	Low	0	0.0	2.7	0	0.0	8.6
	Moderate	0	0.0	9.0	0	0.0	18.6
	Middle	0	0.0	43.4	0	0.0	45.4
	Upper	0	0.0	44.9	0	0.0	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	1.4	0	0.0	8.6
	Moderate	0	0.0	17.2	0	0.0	18.6
	Middle	0	0.0	45.5	0	0.0	45.4
	Upper	0	0.0	35.9	0	0.0	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	5.5	0	0.0	8.6
	Moderate	0	0.0	25.0	0	0.0	18.6
	Middle	0	0.0	48.5	0	0.0	45.4
	Upper	0	0.0	21.1	0	0.0	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	10	1.5	1.3	729	0.6	8.6
	Moderate	88	13.6	12.4	8,958	7.9	18.6
	Middle	278	42.9	46.3	42,112	36.9	45.4
	Upper	272	42.0	40.0	62,258	54.6	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	648	100.0	100.0	114,057	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Small Business Loans

Geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. In low-income census tracts, the bank originated 5.6 percent by number, which is below the total business percentage of 9.2 percent. In moderate-income census tracts, the bank originated 21.2 percent of its small business loans by number, which aligns with the total business percentage of 21.2 percent.

The following table presents the geographic distribution of small business loans in 2020 in this assessment area. The institution's small business lending for 2019 was consistent with the pattern of lending in 2020 and can be found in Appendix C.

Geographic Distribution of Small Business Loans						
Assessment Area: 2020 St. Louis, MO-IL MSA 41180						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2020 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	10	5.6	1,200	6.3	9.2
	Moderate	38	21.2	2,699	14.1	21.2
	Middle	72	40.2	8,873	46.3	44.2
	Upper	59	33.0	6,412	33.4	25.4
	Unknown	0	0.0	0	0.0	0.0
	Total	179	100.0	19,184	100.0	100.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The bank's distribution of loans reflects excellent penetration among individuals of different income levels, including low- and moderate-income, and businesses of different sizes. As with the geographic distribution, given the performance context from community representatives, home purchase loans were given additional weight in this assessment area, as it was identified as a particular need for the community.

HMDA-Reportable Loans

The distribution of 2020 HMDA-reportable loans reflects excellent distribution among individuals of different income levels. In 2019, Town and Country's borrower distribution of HMDA-reportable loans was generally comparable to its lending in 2020, as shown in Appendix C. The bank's primary HMDA-reportable products during the review period were home purchase and refinance loans. The remaining HMDA-reportable products will not be evaluated due to low volumes of originations. Loans to borrowers of unknown income are loans originated to businesses, and while they are HMDA-reportable loans, they are not required to report income.

Home Purchase

In 2020, Town and Country Bank originated 15.7 percent of its home purchase loans to low-income borrowers. The bank's performance is slightly above the percentage by aggregate of lenders at 14.2 percent, but below the percentage of low-income families located in the assessment area at 24.6 percent. The bank originated 33.5 percent of its home purchase loans to moderate-income borrowers, which is well above the number by the aggregate of lenders in the assessment area at 22.1 percent, and the percentage of moderate-income families at 17.6 percent.

The borrower distribution of HMDA-reportable home purchase loans in 2019 was consistent with the bank's performance in 2020.

Refinance

In 2020, Town and Country Bank originated 2.9 percent of refinance loans to low-income borrowers by number. This was slightly below the percentage by the aggregate of lenders at 4.5 percent and significantly below the percentage of low-income families at 24.6 percent. The bank originated 10.0 percent of refinance loans to moderate-income borrowers. This also was slightly below the aggregate of lenders at 12.0 percent and below the percentage of moderate-income families at 17.6 percent.

The borrower distribution of HMDA-reportable refinance loans in 2019 was above the pattern of lending in 2020.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 St. Louis, MO-IL MSA 41180								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	52	15.7	14.2	3,815	8.1	7.2	24.6
	Moderate	111	33.5	22.1	11,034	23.4	16.8	17.6
	Middle	85	25.7	20.7	13,889	29.5	21.8	19.8
	Upper	80	24.2	24.6	18,099	38.4	37.1	38.0
	Unknown	3	0.9	18.4	248	0.5	17.1	0.0
	Total	331	100.0	100.0	47,085	100.0	100.0	100.0
Refinance	Low	9	2.9	4.5	773	1.3	2.0	24.6
	Moderate	31	10.0	12.0	3,955	6.5	7.7	17.6
	Middle	83	26.8	19.7	13,753	22.6	16.5	19.8
	Upper	182	58.7	37.0	41,306	67.8	43.5	38.0
	Unknown	5	1.6	26.9	1,151	1.9	30.2	0.0
	Total	310	100.0	100.0	60,938	100.0	100.0	100.0
Home Improvement	Low	0	0.0	7.2	0	0.0	3.3	24.6
	Moderate	0	0.0	20.2	0	0.0	17.1	17.6
	Middle	0	0.0	19.1	0	0.0	18.7	19.8
	Upper	1	100.0	45.7	22	100.0	53.6	38.0
	Unknown	0	0.0	7.8	0	0.0	7.3	0.0
	Total	1	100.0	100.0	22	100.0	100.0	100.0
Multi-Family	Low	0	0.0	1.4	0	0.0	0.3	24.6
	Moderate	0	0.0	1.4	0	0.0	0.3	17.6
	Middle	0	0.0	2.8	0	0.0	0.7	19.8
	Upper	0	0.0	11.2	0	0.0	2.2	38.0
	Unknown	6	100.0	83.2	6,012	100.0	96.6	0.0
	Total	6	100.0	100.0	6,012	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	10.2	0	0.0	4.9	24.6
	Moderate	0	0.0	17.2	0	0.0	13.2	17.6
	Middle	0	0.0	18.4	0	0.0	18.1	19.8
	Upper	0	0.0	49.2	0	0.0	59.1	38.0
	Unknown	0	0.0	5.1	0	0.0	4.8	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	12.9	0	0.0	7.4	24.6
	Moderate	0	0.0	13.9	0	0.0	10.8	17.6
	Middle	0	0.0	24.9	0	0.0	20.4	19.8
	Upper	0	0.0	34.9	0	0.0	49.6	38.0
	Unknown	0	0.0	13.4	0	0.0	11.8	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.1	0	0.0	0.1	24.6
	Moderate	0	0.0	0.0	0	0.0	0.0	17.6
	Middle	0	0.0	0.0	0	0.0	0.0	19.8
	Upper	0	0.0	0.0	0	0.0	0.0	38.0
	Unknown	0	0.0	99.9	0	0.0	99.9	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	61	9.4	8.4	4,588	4.0	3.9	24.6
	Moderate	142	21.9	15.9	14,989	13.1	10.9	17.6
	Middle	168	25.9	19.4	27,642	24.2	17.7	19.8
	Upper	263	40.6	30.8	59,427	52.1	39.0	38.0
	Unknown	14	2.2	25.5	7,411	6.5	28.6	0.0
	Total	648	100.0	100.0	114,057	100.0	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Small Business Loans

The borrower distribution of small business loans reflects reasonable penetration among businesses of different sizes. The implementation of the Small Business Administration’s Paycheck Protection Program (PPP) did not require banks to obtain proof of annual revenue prior to extending credit through the program. Therefore, the bank’s 2020 lending reflects an abnormally high number of loans with unknown revenues. As a result, an increased emphasis was placed on the loan size instead of revenue as loans in amounts of \$100,000 or less are considered most beneficial to the financing needs of small business borrowers and are considered particularly responsive to the challenges of small businesses from the COVID-19 pandemic. In 2020, 124 of TCB’s 179 loan originations, or 69.3 of loans, were in amounts of \$100,000 or less.

While an increased emphasis was placed on the loan size, of loans to businesses with recorded revenue, the bank originated 36 of 54 loans, or 66.7 percent of loans to businesses with \$1.0 million or less in revenue. All 125 loans with unknown revenue were PPP loans; thus in total, the bank’s PPP lending and loans to businesses with revenue of \$1.0 million or less represented 89.9 percent of the bank’s small business lending in the assessment area, demonstrating the bank’s responsiveness to the COVID-19 pandemic and the willingness to meet the credit needs of small businesses in the community.

Please refer to Appendix C for the 2019 borrower distribution of small business loans. Lending in 2019 was pre-pandemic, showing slightly lower levels of lending to small businesses.

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2020 St. Louis, MO-IL MSA 41180							
Product Type		Bank & Demographic Comparison					
		2020		2020		Total Businesses %	
Revenue	Loan Size	Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	36	20.1	7,385	38.5	90.4
		Over \$1 Million	18	10.1	4,586	23.9	8.3
		Unknown	125	69.8	7,213	37.6	1.3
		Total	179	100.0	19,184	100.0	100.0
	Loan Size	\$100,000 or Less	124	69.3	4,173	21.8	
		\$100,001 - \$250,000	36	20.1	5,645	29.4	
		\$250,001 - \$1 Million	19	10.6	9,366	48.8	
		Total	179	100.0	19,184	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	18	50.0	1,007	13.6	
		\$100,001 - \$250,000	9	25.0	1,473	19.9	
		\$250,001 - \$1 Million	9	25.0	4,905	66.4	
		Total	36	100.0	7,385	100.0	

Originations & Purchases
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

COMMUNITY DEVELOPMENT TEST

Lending, Investments, and Services Activities

The bank's community development performance demonstrates an excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services as appropriate, considering the bank's capacity and the need and the availability of such opportunities for community development in the bank's assessment area.

Lending

During the evaluation period, the bank originated 46 qualified loans totaling approximately \$40.8 million toward affordable housing, revitalization and stabilization, and economic development within the assessment area. Nearly 70.0 percent of these loans were for affordable housing, which is particularly responsive to community needs. The bank increased community development lending since the previous evaluation period, in which nine loans totaling \$8.3 million were originated in the assessment area over 64 months.

Investments

The bank made six new investments totaling \$1,223,887 and had two outstanding investments within the assessment area from the prior period evaluation totaling \$192,559. Overall, the bank had \$1.4 million in qualified investments in the assessment area. During the prior evaluation, the bank held \$777,000 in qualified investments in this assessment area. During the evaluation period, the bank made 42 qualified donations totaling approximately \$48,707 to community services and economic development. The bank did not make any donations in this assessment area at the previous evaluation.

Services

During the evaluation period, bank staff provided nearly 278 hours of community development services. Of the total number of service hours, about 268 were dedicated to organizations with a community service focus and 10 were dedicated to organizations with an economic development focus. During the prior evaluation, the bank's qualified community development service hours totaled 432.5 hours over 64 months. On a per month basis, this was 6.8 hours per month at the prior evaluation, compared to 7.3 during this evaluation.

The following table presents the bank's community development activities during the evaluation period.

Community Development Activities July 17, 2018 – September 27, 2021										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	33	28,187,960	8	6,972,000	5	5,607,500	0	0	46	40,767,460
Investment	8	1,416,446	0	0	0	0	0	0	8	1,416,446
Donations	0	0	3	3,500	0	0	39	45,207	42	48,707
Services	0	0	10	10	0	0	81	267.9	91	277.9

ADAMS COUNTY, ILLINOIS NON-MSA - FULL REVIEW

SCOPE OF EXAMINATION

Full scope examination procedures were used to evaluate the bank's performance in the Adams County, Illinois Non-MSA assessment area. The scope is consistent with the scope of the examination described within the institution summary. For further information, refer to the "Scope of Examination" section for details.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ADAMS COUNTY, ILLINOIS NON-MSA

Town and Country Bank's Adams County, Illinois Non-MSA assessment area consists of Adams County in its entirety. The bank operates one branch office with a cash-only ATM in the assessment area. The branch is located in Quincy, in a middle-income census tract. The assessment area remains unchanged since the previous evaluation and consists of 18 census tracts, including five moderate-, 10 middle-, and three upper-income census tracts. There are no distressed or underserved middle-income census tracts.

In 2020, Town and Country Banc Mortgage Services ranked sixth and TCB ranked 21st among 130 institutions that originated or purchased HMDA-reportable loans, originating 76 and 5 HMDA-reportable loans, respectively. By comparison, the first ranked organization by HMDA-reportable loans is United Community Bank with 496 originated or purchased home mortgage loans.

The June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report ranks Town and Country Bank sixth of 13 FDIC-insured depository institutions operating in the bank's assessment area with a market share of 5.0 percent. Leaders in market share include First Bankers Trust Company (33.6 percent), United Community Bank (19.4 percent), and State Street Bank and Trust Company (12.4 percent). The 12 banks competing for deposits and loans with Town Country Bank have 35 offices in the assessment area.

The 2020 assessment area demographics are provided in the following table. Please refer to Appendix C for 2019 demographic information.

Assessment Area: 2020 IL Non MSA Adams County								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,272	18.9
Moderate-income	5	27.8	2,545	14.7	766	30.1	3,198	18.5
Middle-income	10	55.6	11,278	65.3	858	7.6	3,864	22.4
Upper-income	3	16.7	3,449	20.0	154	4.5	6,938	40.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	18	100.0	17,272	100.0	1,778	10.3	17,272	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	6,316	2,239	11.8	35.4	3,012	47.7	1,065	16.9
Middle-income	18,082	12,891	67.8	71.3	3,687	20.4	1,504	8.3
Upper-income	5,578	3,875	20.4	69.5	1,179	21.1	524	9.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	29,976	19,005	100.0	63.4	7,878	26.3	3,093	10.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	704	26.8	625	26.7	75	30.0	4	9.8
Middle-income	1,427	54.2	1,259	53.8	137	54.8	31	75.6
Upper-income	500	19.0	456	19.5	38	15.2	6	14.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,631	100.0	2,340	100.0	250	100.0	41	100.0
	Percentage of Total Businesses:		88.9		9.5		1.6	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1	0.4	1	0.4	0	0.0	0	0.0
Middle-income	245	88.1	243	88.7	2	50.0	0	0.0
Upper-income	32	11.5	30	10.9	2	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	278	100.0	274	100.0	4	100.0	0	0.0
	Percentage of Total Farms:		98.6		1.4		0.0	
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Population Change

The table below presents population changes in the assessment area from 2010 to 2015. Population was stable in Adams County, while the Non MSA Illinois population declined and the state of Illinois increased slightly at 0.3 percent. A community representative indicated that population has remained stagnant since 2015, but also mentioned several recently implemented marketing and economic initiatives aimed at reversing this trend, including rebates for housing for new residents.

Population Change			
Area	2010 Population	2015 Population	Percent Change (%)
Adams County	67,103	67,081	0.0
Non MSA Illinois	1,509,418	1,486,185	-1.5
Illinois	12,830,632	12,873,761	0.3

Source: 2010 U.S. Census Bureau Decennial Census
2011 - 2015 U.S. Census Bureau American Community Survey

Income Characteristics

According to 2020 FFIEC Census Data, the assessment area is comprised of 17,272 families, of which 18.9 percent are low-income, 18.5 percent are moderate-income, 22.4 percent are middle-income, and 40.2 percent are upper-income. Adams County has 10.3 percent of families that live below the poverty line, which is slightly below the 13.4 percent in the state of Illinois.

The following table compares the MFI for the assessment area and the state of Illinois. According to the 2011-2015 American Community Survey (ACS), the MFI in the assessment area was lower than the rest of the state at \$60,544 compared to \$71,546 in 2015. Over the period between 2010 and 2015, Adams County MFI decreased at a lower rate than the rest of the state.

Median Family Income Change			
Area	2010 Median Family Income (\$)	2015 Median Family Income (\$)	Percent Change (%)
Adams County	60,754	60,544	-0.4
Non MSA Illinois	58,992	59,323	0.6
Illinois	74,306	71,546	-3.7

Source: 2006 - 2010 U.S. Census Bureau American Community Survey
2011 - 2015 U.S. Census Bureau American Community Survey
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

Housing Characteristics

There are 29,976 housing units within the assessment area, the majority of which are owner-occupied at 63.4 percent. The remaining units are comprised of 26.3 percent rental and 10.3 percent vacant.

Renters and homeowners are considered overburdened when housing costs equal 30.0 percent or more of household income. The table below shows the percentage of renters and owners spending more than 30.0 percent of household income on housing costs. The Adams County rental market is generally in line with the rest of the state with 69.3 percent of low-income, 24.9 percent of moderate-income, and 41.7 percent of all renters facing a housing cost burden. For homeowners, the assessment area is more affordable than the rest of the state, with 52.1 percent of low-income, 19.8 percent of moderate-income, and 13.5 percent of all owners facing a cost burden. A community representative indicated that housing costs were commensurate with income in the area, but abundant space and low population growth helps keep home ownership affordable.

Housing Cost Burden						
Area	Cost Burden (%) - Renters			Cost Burden (%) - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Adams County	69.3	24.9	41.7	52.1	19.8	13.5
Non MSA Illinois	65.4	18.3	37.2	54.4	22.3	16.4
Illinois	75.2	35.0	44.9	69.7	42.9	26.1

Cost Burden is housing cost that equals 30.0 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy

Employment Characteristics

The following table presents the unemployment trends for the assessment area and the state of Illinois from 2015-2020. The assessment area and the state all experienced declining unemployment rates between 2015-2019, before increasing in 2020. A community representative confirmed this was as a result of the COVID-19 pandemic. The community representative stated this has been reversed in 2021, and now businesses are short staffed with a tight labor market.

Unemployment Rates (%)						
Area	2015	2016	2017	2018	2019	2020
Adams County	5.0	4.8	3.9	3.8	3.3	6.3
Non MSA Illinois	6.1	6.0	4.9	4.8	4.2	7.7
Illinois	6.0	5.9	5.0	4.4	4.0	9.5

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

Industry Characteristics

Major employers in the assessment area include manufacturing, health care, and retail trade. A community representative indicated decreases in retail trade were a result of big box retailers moving away from the county. The community representative confirmed the large jump in accommodation and food service in the third quarter of 2020 has continued into 2021, with many restaurants and food shops short staffed.

Community Representatives

One community representative was contacted to provide information regarding local economic and demographic conditions. The community representative provided information on the trends in population, recent economic shifts, and opportunities for local financial institutions. As discussed previously, the representative indicated that population has remained stagnant since 2015 with no major shifts in recent years. They attributed the MFI below the rest of the state to rural nature of the county compared to denser, more urban areas in the state with higher costs of living. The representative detailed the effects of the COVID-19 pandemic on the local economy, as well as the recovery since the start of the pandemic. Finally, the representative discussed initiatives in the community to attract more residents and boost the economy further.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ADAMS COUNTY, ILLINOIS NON-MSA

LENDING TEST

Geographic Distribution of Loans

The bank demonstrates reasonable geographic distribution of loans throughout the Adams County, Illinois Non-MSA assessment area. In 2020, Town and Country Bank originated loans in all 18 census tracts in the assessment area. HMDA-reportable loans were made in 16 of the 18 census tracts (88.9 percent), while small business loans were made in 15 of 18 census tracts (83.3 percent). While there are no low-income census tracts, the bank made HMDA loans in 60.0 percent of the assessment area's moderate-income census tracts. Similarly, the bank made small business loans in three out of the five moderate-income tracts. In 2019, the bank's dispersion was consistent with 2020. The bank originated loans in 94.4 percent of census tracts, including all moderate-income tracts. In 2019, the bank made HMDA loans in 80 percent of the moderate-income tracts. For small business lending, the bank made loans in three out of the five census tracts. Based upon this analysis there are no conspicuous geographic lending gaps.

HMDA-Reportable Loans

The geographic distribution of HMDA-reportable loans reflects reasonable dispersion throughout the assessment area. Geographic dispersion of 2019 HMDA-reportable loans are comparable, as shown in Appendix C. The bank's primary HMDA-reportable products during the review period were home purchase and refinance loans. The remaining HMDA-reportable products will not be evaluated due to low volumes of originations.

Home Purchase

In 2020, home purchase loans accounted for 43.2 percent of the bank's total HMDA-reportable loans. The bank originated 2.9 percent of its home purchase loans in moderate-income census tracts. This was below the aggregate of lenders at 11.4 percent, as well as the percentage of owner-occupied units of 11.8 percent.

The geographic distribution of HMDA-reportable home purchase loans in 2019 was slightly better than the distribution in 2020. In 2019, the bank's home purchase lending was comparable to the aggregate and above the percentage of owner-occupied units in moderate-income census tracts.

Refinance

In 2020, refinance loans accounted for 55.6 percent of the bank's total HMDA-reportable loans. The bank originated 6.7 percent of its refinance loans in moderate-income census tracts. This was comparable to the aggregate of lenders at 6.3 percent, but below the percentage of owner-occupied units of 11.8 percent.

The geographic distribution of HMDA-reportable refinance loans in 2019 was below the pattern of lending in 2020. In 2019, the overall volume for refinance loans was smaller, with the bank originating 10 refinance loans in the assessment area. None of these loans were in moderate-income census tracts.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 IL Non MSA Adams County								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2020			Dollar			
		Count Bank		Agg %	Bank			Agg \$ %
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	2.9	11.4	124	4.1	7.1	11.8
	Middle	31	88.6	68.7	2,585	85.3	66.0	67.8
	Upper	3	8.6	19.9	322	10.6	26.9	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		35	100.0	100.0	3,031	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	3	6.7	6.3	256	3.9	3.8	11.8
	Middle	30	66.7	69.0	3,849	59.2	68.4	67.8
	Upper	12	26.7	24.7	2,402	36.9	27.9	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		45	100.0	100.0	6,507	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	13.6	0	0.0	5.9	11.8
	Middle	0	0.0	63.6	0	0.0	81.1	67.8
	Upper	0	0.0	22.7	0	0.0	13.0	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	1	100.0	68.0	1,556	100.0	37.2	45.3
	Middle	0	0.0	16.0	0	0.0	53.7	43.7
	Upper	0	0.0	16.0	0	0.0	9.2	11.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	1,556	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	11.8
	Middle	0	0.0	66.7	0	0.0	70.0	67.8
	Upper	0	0.0	33.3	0	0.0	30.0	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	11.1	0	0.0	5.2	11.8
	Middle	0	0.0	77.8	0	0.0	65.1	67.8
	Upper	0	0.0	11.1	0	0.0	29.7	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	17.2	0	0.0	11.0	11.8
	Middle	0	0.0	65.5	0	0.0	68.3	67.8
	Upper	0	0.0	17.2	0	0.0	20.7	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	5	6.2	9.3	1,936	17.5	7.6	11.8
	Middle	61	75.3	68.1	6,434	58.0	66.5	67.8
	Upper	15	18.5	22.6	2,724	24.6	25.9	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		81	100.0	100.0	11,094	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Small Business Loans

Geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The bank originated 23.8 percent of its small business loans by number in moderate-income census tracts, which was slightly below the 26.8 percent of total business.

The following table presents the geographic distribution of small business loans in 2020 in this assessment area. The institution’s small business lending for 2019 reflected greater distribution than 2020 and can be found in Appendix C.

Geographic Distribution of Small Business Loans						
Assessment Area: 2020 IL Non MSA Adams County						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2020 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	10	23.8	376	19.4	26.8
	Middle	18	42.9	590	30.4	54.2
	Upper	14	33.3	972	50.2	19.0
	Unknown	0	0.0	0	0.0	0.0
	Total	42	100.0	1,938	100.0	100.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The bank’s distribution of loans reflects excellent penetration among individuals of different income levels, including low- and moderate-income, and businesses of different sizes.

HMDA-Reportable Loans

The distribution of 2020 HMDA-reportable loans reflects excellent penetration among individuals of different income levels. In 2019, Town and Country’s borrower distribution of HMDA-reportable loans was generally comparable to its lending in 2020, as shown in Appendix C. The bank’s primary HMDA-reportable products during the review period were home purchase and refinance loans. The remaining HMDA-reportable products will not be evaluated due to low volumes of originations. Loans to borrowers of unknown income are loans originated to businesses, and while they are HMDA-reportable loans, they are not required to report income.

Home Purchase

In 2020, Town and Country Bank originated 17.1 percent of its home purchase loans to low-income borrowers. The bank's performance is well above the percentage by the aggregate of lenders at 11.1 percent, and comparable to the percentage of low-income families located in the assessment area of 18.9 percent. Further, the bank originated 28.6 percent of its home purchase loans to moderate-income borrowers. The bank's performance was above the percentage by the aggregate of lenders in the assessment area at 25.4 percent, as well as the percentage of moderate-income families located in the assessment area at 18.5 percent.

The borrower distribution of HMDA-reportable home purchase loans in 2019 was consistent with the bank's performance in 2020.

Refinance

In 2020, Town and Country Bank originated 8.9 percent of refinance loans to low-income borrowers. This was above the aggregate of lenders at 4.6 percent, but below the percentage of low-income families at 18.9 percent. The bank originated 26.7 percent of its loans to moderate-income borrowers, which was well above the percentage by the aggregate of lenders at 15.6 percent, and the percentage of moderate-income families at 18.5 percent.

The borrower distribution of HMDA-reportable refinance loans in 2019 was below 2020; however the volume of lending in 2019 was much lower than 2020.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 IL Non MSA Adams County								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020			2020			
		Count Bank		Agg %	Dollar Bank		Agg \$ %	
		#	%	%	\$(000s)	\$ %	\$ %	%
Home Purchase	Low	6	17.1	11.1	589	19.4	6.9	18.9
	Moderate	10	28.6	25.4	723	23.9	20.3	18.5
	Middle	16	45.7	20.5	1,397	46.1	19.5	22.4
	Upper	3	8.6	29.5	322	10.6	42.1	40.2
	Unknown	0	0.0	13.5	0	0.0	11.2	0.0
	Total		35	100.0	100.0	3,031	100.0	100.0
Refinance	Low	4	8.9	4.6	178	2.7	2.2	18.9
	Moderate	12	26.7	15.6	1,242	19.1	9.5	18.5
	Middle	8	17.8	20.0	1,014	15.6	16.3	22.4
	Upper	18	40.0	45.7	3,682	56.6	55.6	40.2
	Unknown	3	6.7	14.2	391	6.0	16.4	0.0
	Total		45	100.0	100.0	6,507	100.0	100.0
Home Improvement	Low	0	0.0	4.5	0	0.0	1.4	18.9
	Moderate	0	0.0	13.6	0	0.0	5.0	18.5
	Middle	0	0.0	22.7	0	0.0	13.9	22.4
	Upper	0	0.0	59.1	0	0.0	79.7	40.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	18.9
	Moderate	0	0.0	4.0	0	0.0	0.3	18.5
	Middle	0	0.0	8.0	0	0.0	0.4	22.4
	Upper	0	0.0	16.0	0	0.0	3.3	40.2
	Unknown	1	100.0	72.0	1,556	100.0	95.9	0.0
	Total		1	100.0	100.0	1,556	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	18.9
	Moderate	0	0.0	0.0	0	0.0	0.0	18.5
	Middle	0	0.0	33.3	0	0.0	51.3	22.4
	Upper	0	0.0	66.7	0	0.0	48.7	40.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	18.9
	Moderate	0	0.0	22.2	0	0.0	10.4	18.5
	Middle	0	0.0	22.2	0	0.0	8.1	22.4
	Upper	0	0.0	44.4	0	0.0	74.1	40.2
	Unknown	0	0.0	11.1	0	0.0	7.4	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	18.9
	Moderate	0	0.0	0.0	0	0.0	0.0	18.5
	Middle	0	0.0	0.0	0	0.0	0.0	22.4
	Upper	0	0.0	0.0	0	0.0	0.0	40.2
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	10	12.3	6.8	767	6.9	3.5	18.9
	Moderate	22	27.2	18.6	1,965	17.7	12.1	18.5
	Middle	24	29.6	19.5	2,411	21.7	15.9	22.4
	Upper	21	25.9	38.2	4,004	36.1	46.5	40.2
	Unknown	4	4.9	16.9	1,947	17.6	22.0	0.0
	Total		81	100.0	100.0	11,094	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Small Business Loans

The borrower distribution of small business loans reflects excellent penetration among businesses of different sizes. The implementation of the Small Business Administration’s Paycheck Protection Program (PPP) did not require banks to obtain proof of annual revenue prior to extending credit through the program. Therefore, the bank’s 2020 lending reflects an abnormally high number of loans with unknown revenues. As a result, an increased emphasis was placed on the loan size instead of revenue as loans in amounts of \$100,000 or less are considered most beneficial to the financing needs of small business borrowers and are considered particularly responsive to the challenges of small businesses from the COVID-19 pandemic. In 2020, 36 of the bank’s 42 loan originations, or 85.7 percent of loans, were in amounts of \$100,000 or less.

While an increased emphasis was placed on the loan size, of loans to businesses with recorded revenue, the bank originated 100.0 percent of loans to business with \$1.0 million or less in revenue. Furthermore, all of the bank’s unknown loans for this assessment area were PPP loans, reflecting the bank’s responsiveness to the COVID pandemic and willingness to meet the credit needs of small businesses in the community.

Please refer to Appendix C for the 2019 borrower distribution of small business loans. Lending in 2019 was pre-pandemic but showed similar levels of lending to small businesses.

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2020 IL Non MSA Adams County							
Product Type		Bank & Demographic Comparison					
		2020		2020		Total Businesses %	
	Revenue	Count Bank		Dollar Bank			
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	11	26.2	1,008	52.0	88.9
		Over \$1 Million	0	0.0	0	0.0	9.5
		Unknown	31	73.8	930	48.0	1.6
		Total	42	100.0	1,938	100.0	100.0
	Loan Size	\$100,000 or Less	36	85.7	826	42.6	
		\$100,001 - \$250,000	5	11.9	812	41.9	
		\$250,001 - \$1 Million	1	2.4	300	15.5	
		Total	42	100.0	1,938	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	7	63.6	156	15.5	
		\$100,001 - \$250,000	3	27.3	552	54.8	
		\$250,001 - \$1 Million	1	9.1	300	29.8	
		Total	11	100.0	1,008	100.0	

Originations & Purchases
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Lending, Investments, and Services Activities

The bank's community development performance demonstrates an excellent responsiveness to the community development needs of its assessment area through community development loans, qualified investments, and community development services as appropriate, considering the bank's capacity and the need and the availability of such opportunities for community development in the bank's assessment area.

Lending

During the evaluation period, the bank originated nine qualified loans totaling approximately \$12.3 million toward community services, affordable housing, and economic development within the assessment area. A community representative indicated a continued need for economic development in the assessment area, and TCB demonstrates responsiveness to these needs with 67.0 percent of community development loans in support of economic development. The bank increased community development lending since the previous evaluation period, in which three loans totaling \$759,200 were originated in the assessment area over 64 months.

Investments

The bank made three qualified investments during this evaluation period totaling approximately \$8.4 million towards affordable housing. This is a significant increase over the previous evaluation period, where no investments were originated in the assessment area. During the evaluation period, the bank made 17 qualified donations totaling approximately \$12,888 to community services (16 donations) and economic development (one donation). During the prior evaluation, the bank made qualified community development donations totaling \$2,200 over a 64-month time period.

Services

During the evaluation period, the bank staff provided 153 hours of community development services. Of the total number of service hours, 147 were dedicated to organizations with a community service focus. During the prior evaluation, the bank's qualified community development service hours totaled 79. On a per month basis, this represents an increase from 1.2 hours a month at the prior evaluation to 4.0 hours a month during this evaluation.

The table below presents the bank’s community development activities during the evaluation period.

Community Development Activities July 17, 2018 – September 27, 2021										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	6	3,677,000	2	8,250,000	0	0	1	372,000	9	12,299,000
Investment	3	8,375,800	0	0	0	0	0	0	3	8,375,800
Donations	0	0	1	500	0	0	16	12,387.78	17	12,888
Services	1	2	1	4	0	0	54	147	56	153

DECATUR, IL MSA #19500 - LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN DECATUR, IL MSA #19500

The Decatur, IL MSA #19500 assessment area is comprised of one county, Macon County, in central Illinois. Macon County is comprised of 34 census tracts total, of which eight are low-income, five are moderate-income, 11 are middle-income and 10 are upper-income census tracts. The bank operates two deposit facilities, both branch offices, in this assessment area. Both branch offices are equipped with a drive-thru facility, as well as a cash-only ATM. One branch office is located in a low-income census tract in Decatur, Illinois, and the other branch office is located in an upper-income census tract in Mount Zion, Illinois. The assessment area remains unchanged since the previous evaluation.

In 2020, Town and Country Banc Mortgage Services ranked first and TCB ranked 24th among 174 organizations that originated or purchased HMDA-reportable loans, originating 461 and 24 HMDA-reportable loans, respectively. By comparison, the second ranked organization by HMDA-reportable loans is Prairie State Bank and Trust with 333 originated or purchased home mortgage loans.

The June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report ranks Town and Country Bank ninth of 13 FDIC-insured depository institutions operating in the bank's assessment area with a market share of 2.8 percent. Leaders in market share include Busey Bank (22.4 percent), Hickory Point Bank and Trust (22.3 percent) and First Mid Bank and Trust (16.1 percent). The 12 banks competing for deposits and loans with Town Country Bank have 37 offices in the assessment area.

The 2020 assessment area demographics are provided in the following table. Please refer to Appendix C for 2019 demographic information.

Assessment Area: 2020 Decatur, IL MSA 19500								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	23.5	4,017	14.5	1,598	39.8	6,338	22.9
Moderate-income	5	14.7	2,626	9.5	739	28.1	4,663	16.9
Middle-income	11	32.4	9,905	35.8	1,067	10.8	5,564	20.1
Upper-income	10	29.4	11,110	40.2	370	3.3	11,093	40.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	34	100.0	27,658	100.0	3,774	13.6	27,658	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	10,261	2,903	9.4	28.3	5,499	53.6	1,859	18.1
Moderate-income	6,323	2,955	9.5	46.7	2,234	35.3	1,134	17.9
Middle-income	16,794	11,742	37.9	69.9	3,664	21.8	1,388	8.3
Upper-income	17,013	13,395	43.2	78.7	2,523	14.8	1,095	6.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	50,391	30,995	100.0	61.5	13,920	27.6	5,476	10.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	971	27.5	825	26.2	140	42.4	6	13.0
Moderate-income	422	12.0	362	11.5	57	17.3	3	6.5
Middle-income	1,006	28.5	904	28.7	84	25.5	18	39.1
Upper-income	1,129	32.0	1,061	33.7	49	14.8	19	41.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,528	100.0	3,152	100.0	330	100.0	46	100.0
	Percentage of Total Businesses:			89.3		9.4		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4	2.6	4	2.6	0	0.0	0	0.0
Moderate-income	2	1.3	2	1.3	0	0.0	0	0.0
Middle-income	85	55.2	84	55.3	1	50.0	0	0.0
Upper-income	63	40.9	62	40.8	1	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	154	100.0	152	100.0	2	100.0	0	0.0
	Percentage of Total Farms:			98.7		1.3		0.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DECATUR, IL MSA #19500

LENDING TEST

Town and Country Bank's lending performance in the Decatur, IL MSA #19500 assessment area is consistent with the bank's lending performance overall.

Geographic Distribution of Loans

The following tables represent 2020 geographic distribution of HMDA-reportable and small business loans for the assessment area. Please refer to Appendix C for the bank's 2019 HMDA and small business lending information.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Decatur, IL MSA 19500								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2020			Dollar			
		Count Bank	Agg %	Dollar Bank	Agg %	\$ (000s)	\$ %	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	12	3.9	4.0	636	2.0	2.1	9.4
	Moderate	12	3.9	4.3	625	2.0	2.1	9.5
	Middle	109	35.4	37.2	10,029	31.4	32.4	37.9
	Upper	175	56.8	54.5	20,602	64.6	63.4	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		308	100.0	100.0	31,892	100.0	100.0
Refinance	Low	3	1.7	2.8	694	2.4	1.4	9.4
	Moderate	2	1.2	1.5	176	0.6	0.5	9.5
	Middle	38	22.1	29.6	5,126	17.4	25.0	37.9
	Upper	129	75.0	66.1	23,515	79.7	73.0	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		172	100.0	100.0	29,511	100.0	100.0
Home Improvement	Low	0	0.0	1.9	0	0.0	0.6	9.4
	Moderate	0	0.0	4.8	0	0.0	1.8	9.5
	Middle	0	0.0	34.6	0	0.0	21.2	37.9
	Upper	0	0.0	58.7	0	0.0	76.4	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	36.0	0	0.0	46.3	Multi-Family 43.9
	Moderate	0	0.0	8.0	0	0.0	36.6	15.8
	Middle	2	100.0	44.0	708	100.0	11.5	19.8
	Upper	0	0.0	12.0	0	0.0	5.6	20.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		2	100.0	100.0	708	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	9.4
	Moderate	0	0.0	4.8	0	0.0	2.4	9.5
	Middle	0	0.0	33.3	0	0.0	50.6	37.9
	Upper	0	0.0	61.9	0	0.0	47.0	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	4.0	0	0.0	1.2	9.4
	Moderate	0	0.0	4.0	0	0.0	1.3	9.5
	Middle	0	0.0	28.0	0	0.0	28.7	37.9
	Upper	0	0.0	64.0	0	0.0	68.8	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	4.9	0	0.0	5.8	9.4
	Moderate	0	0.0	10.8	0	0.0	7.0	9.5
	Middle	2	66.7	42.2	97	48.3	38.2	37.9
	Upper	1	33.3	42.2	104	51.7	49.1	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		3	100.0	100.0	201	100.0	100.0
HMDA Totals	Low	15	3.1	3.7	1,330	2.1	4.9	9.4
	Moderate	14	2.9	3.5	801	1.3	3.9	9.5
	Middle	151	31.1	34.3	15,960	25.6	27.8	37.9
	Upper	305	62.9	58.6	44,221	71.0	63.5	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		485	100.0	100.0	62,312	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans						
Assessment Area: 2020 Decatur, IL MSA 19500						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2020 Dollar Bank		Total Businesses %
		#	%	\$ 000s	\$ %	
Small Business	Low	39	29.1	3,851	27.9	27.5
	Moderate	15	11.2	2,446	17.7	12.0
	Middle	45	33.6	4,499	32.6	28.5
	Upper	35	26.1	2,998	21.7	32.0
	Unknown	0	0.0	0	0.0	0.0
	Total	134	100.0	13,793	100.0	100.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The following tables represent the 2020 borrower distribution of HMDA-reportable and small business loans in the assessment area. Please refer to Appendix C for the bank’s 2019 HMDA and small business lending information.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 Decatur, IL MSA 19500								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	54	17.5	13.2	3,018	9.5	7.3	22.9
	Moderate	105	34.1	27.3	8,280	26.0	20.8	16.9
	Middle	63	20.5	20.0	6,312	19.8	19.1	20.1
	Upper	84	27.3	26.6	14,135	44.3	41.0	40.1
	Unknown	2	0.6	12.9	147	0.5	11.8	0.0
	Total		308	100.0	100.0	31,892	100.0	100.0
Refinance	Low	2	1.2	4.4	145	0.5	1.7	22.9
	Moderate	23	13.4	12.9	2,376	8.1	7.8	16.9
	Middle	40	23.3	19.6	4,673	15.8	14.9	20.1
	Upper	104	60.5	48.5	22,074	74.8	60.1	40.1
	Unknown	3	1.7	14.6	243	0.8	15.5	0.0
	Total		172	100.0	100.0	29,511	100.0	100.0
Home Improvement	Low	0	0.0	8.7	0	0.0	3.9	22.9
	Moderate	0	0.0	12.5	0	0.0	8.2	16.9
	Middle	0	0.0	26.0	0	0.0	20.7	20.1
	Upper	0	0.0	37.5	0	0.0	58.2	40.1
	Unknown	0	0.0	15.4	0	0.0	9.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	22.9
	Moderate	0	0.0	0.0	0	0.0	0.0	16.9
	Middle	0	0.0	0.0	0	0.0	0.0	20.1
	Upper	1	50.0	20.0	325	45.9	4.6	40.1
	Unknown	1	50.0	80.0	383	54.1	95.4	0.0
	Total		2	100.0	100.0	708	100.0	100.0
Other Purpose LOC	Low	0	0.0	4.8	0	0.0	1.2	22.9
	Moderate	0	0.0	19.0	0	0.0	5.1	16.9
	Middle	0	0.0	28.6	0	0.0	22.5	20.1
	Upper	0	0.0	38.1	0	0.0	64.5	40.1
	Unknown	0	0.0	9.5	0	0.0	6.7	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	16.0	0	0.0	7.2	22.9
	Moderate	0	0.0	4.0	0	0.0	3.8	16.9
	Middle	0	0.0	36.0	0	0.0	37.7	20.1
	Upper	0	0.0	32.0	0	0.0	45.4	40.1
	Unknown	0	0.0	12.0	0	0.0	5.9	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	3	100.0	2.9	201	100.0	2.8	22.9
	Moderate	0	0.0	0.0	0	0.0	0.0	16.9
	Middle	0	0.0	1.0	0	0.0	1.0	20.1
	Upper	0	0.0	0.0	0	0.0	0.0	40.1
	Unknown	0	0.0	96.1	0	0.0	96.1	0.0
	Total		3	100.0	100.0	201	100.0	100.0
HMDA Totals	Low	59	12.2	9.2	3,364	5.4	4.2	22.9
	Moderate	128	26.4	19.9	10,656	17.1	13.2	16.9
	Middle	103	21.2	19.5	10,985	17.6	15.8	20.1
	Upper	189	39.0	34.7	36,534	58.6	46.3	40.1
	Unknown	6	1.2	16.8	773	1.2	20.5	0.0
	Total		485	100.0	100.0	62,312	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2020 Decatur, IL MSA 19500							
Product Type		Bank & Demographic Comparison					
		2020		2020		Total Businesses %	
Revenue	Loan Size	Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	32	23.9	3,626	26.3	89.3
		Over \$1 Million	22	16.4	5,734	41.6	9.4
		Unknown	80	59.7	4,433	32.1	1.3
		Total	134	100.0	13,793	100.0	100.0
	Loan Size	\$100,000 or Less	100	74.6	3,850	27.9	
		\$100,001 - \$250,000	23	17.2	3,921	28.4	
		\$250,001 - \$1 Million	11	8.2	6,022	43.7	
		Total	134	100.0	13,793	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	23	71.9	1,081	29.8	
		\$100,001 - \$250,000	6	18.8	880	24.3	
		\$250,001 - \$1 Million	3	9.4	1,665	45.9	
		Total	32	100.0	3,626	100.0	
Originations & Purchases							
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

COMMUNITY DEVELOPMENT TEST

Town and Country Bank's community development performance in the Decatur, IL MSA #19500 assessment area is consistent with the bank's community development performance overall.

Community Development Activities July 17, 2018 – September 27, 2021										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	19	3,660,000	4	5,089,000	4	4,676,000	0	0	27	13,425,000
Investment	1	96,280	0	0	0	0	0	0	1	96,280
Donations	1	5,000	0	0	0	0	15	11,750	16	16,750
Services	0	0	37	38.5	2	7	36	48.5	75	94

LOGAN COUNTY, ILLINOIS NON-MSA - LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN LOGAN COUNTY, IL NON-MSA

The Logan County, Illinois Non-MSA assessment area consists of Logan County in its entirety. The county consists of eight census tracts, of which seven are middle-income and one is upper-income. TCB operates one branch office with a cash-only ATM and one separate cash-only ATM location in Lincoln, Illinois; all facilities are in middle-income census tracts. There are no distressed or underserved nonmetropolitan middle-income census tracts in this assessment area. The assessment area remains unchanged since the previous examination.

In 2020, Town and Country Banc Mortgage Services ranked second and TCB ranked 18th among 99 institutions that originated or purchased HMDA-reportable loans, originating 59 and 6 HMDA-reportable loans, respectively. By comparison, the first ranked organization by HMDA-reportable loans is Citizens Equity First with 151 originated or purchased home mortgage loans.

The June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report ranks Town and Country Bank second of 12 FDIC-insured depository institutions operating in the bank's assessment area with a market share of 12.9 percent. Other leaders in market share include State Bank of Lincoln (34.0 percent) and Regions Bank (9.4 percent). The 11 banks competing for deposits and loans with Town Country Bank have 17 offices in the assessment area.

The 2020 assessment area demographics are provided in the following table. Please refer to Appendix C for 2019 demographic information.

Assessment Area: 2020 IL Non MSA Logan County								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,372	19.5
Moderate-income	0	0.0	0	0.0	0	0.0	1,062	15.1
Middle-income	7	87.5	6,460	91.7	839	13.0	1,476	20.9
Upper-income	1	12.5	586	8.3	11	1.9	3,136	44.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8	100.0	7,046	100.0	850	12.1	7,046	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	10,740	6,577	90.6	61.2	3,291	30.6	872	8.1
Upper-income	982	686	9.4	69.9	157	16.0	139	14.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	11,722	7,263	100.0	62.0	3,448	29.4	1,011	8.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	830	92.0	731	92.3	71	92.2	28	84.8
Upper-income	72	8.0	61	7.7	6	7.8	5	15.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	902	100.0	792	100.0	77	100.0	33	100.0
	Percentage of Total Businesses:			87.8		8.5		3.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	114	78.6	114	78.6	0	0.0	0	0.0
Upper-income	31	21.4	31	21.4	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	145	100.0	145	100.0	0	0.0	0	0.0
	Percentage of Total Farms:			100.0		0.0		0.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOGAN COUNTY, ILLINOIS NON-MSA

LENDING TEST

Town and Country Bank's lending performance in the Logan County, Illinois Non-MSA assessment area is consistent with the bank's lending performance overall.

Geographic Distribution of Loans

The following tables represent 2020 geographic distribution of HMDA-reportable and small business loans for the assessment area. Please refer to Appendix C for the bank's 2019 HMDA and small business lending information.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 IL Non MSA Logan County								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2020			Dollar			
		Count		Agg	Bank			Agg
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	28	90.3	88.9	2,534	82.5	85.7	90.6
	Upper	3	9.7	11.1	539	17.5	14.3	9.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	31	100.0	100.0	3,073	100.0	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	29	87.9	84.4	3,547	85.3	80.1	90.6
	Upper	4	12.1	15.6	610	14.7	19.9	9.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	33	100.0	100.0	4,157	100.0	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	86.5	0	0.0	73.4	90.6
	Upper	0	0.0	13.5	0	0.0	26.6	9.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	1	100.0	100.0	225	100.0	100.0	99.0
	Upper	0	0.0	0.0	0	0.0	0.0	1.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	1	100.0	100.0	225	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	90.0	0	0.0	57.4	90.6
	Upper	0	0.0	10.0	0	0.0	42.6	9.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	57.1	0	0.0	41.8	90.6
	Upper	0	0.0	42.9	0	0.0	58.2	9.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	0	0.0	87.5	0	0.0	92.6	90.6
	Upper	0	0.0	12.5	0	0.0	7.4	9.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	0.0
	Middle	58	89.2	86.7	6,306	84.6	82.8	90.6
	Upper	7	10.8	13.3	1,149	15.4	17.2	9.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	65	100.0	100.0	7,455	100.0	100.0	100.0

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans						
Assessment Area: 2020 IL Non MSA Logan County						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2020 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	63	78.8	3,384	78.0	92.0
	Upper	17	21.3	954	22.0	8.0
	Unknown	0	0.0	0	0.0	0.0
	Total	80	100.0	4,338	100.0	100.0
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The following tables represents the 2020 borrower distribution of HMDA-reportable and small business loans in the assessment area. Please refer to Appendix C for the bank’s 2019 HMDA and small business lending information.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 IL Non MSA Logan County								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020						
		Count Bank		Agg %	Dollar Bank		Agg \$ %	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	1	3.2	9.2	39	1.3	5.6	19.5
	Moderate	12	38.7	27.2	818	26.6	21.7	15.1
	Middle	9	29.0	24.0	857	27.9	24.9	20.9
	Upper	9	29.0	24.5	1,359	44.2	33.6	44.5
	Unknown	0	0.0	15.1	0	0.0	14.2	0.0
	Total		31	100.0	100.0	3,073	100.0	100.0
Refinance	Low	0	0.0	4.3	0	0.0	2.1	19.5
	Moderate	7	21.2	12.9	813	19.6	10.3	15.1
	Middle	4	12.1	22.5	333	8.0	18.9	20.9
	Upper	22	66.7	38.1	3,011	72.4	45.2	44.5
	Unknown	0	0.0	22.2	0	0.0	23.5	0.0
	Total		33	100.0	100.0	4,157	100.0	100.0
Home Improvement	Low	0	0.0	2.7	0	0.0	1.1	19.5
	Moderate	0	0.0	5.4	0	0.0	11.6	15.1
	Middle	0	0.0	2.7	0	0.0	2.8	20.9
	Upper	0	0.0	24.3	0	0.0	41.4	44.5
	Unknown	0	0.0	64.9	0	0.0	43.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.5
	Moderate	0	0.0	0.0	0	0.0	0.0	15.1
	Middle	0	0.0	0.0	0	0.0	0.0	20.9
	Upper	0	0.0	0.0	0	0.0	0.0	44.5
	Unknown	1	100.0	100.0	225	100.0	100.0	0.0
	Total		1	100.0	100.0	225	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	19.5
	Moderate	0	0.0	10.0	0	0.0	2.1	15.1
	Middle	0	0.0	30.0	0	0.0	20.4	20.9
	Upper	0	0.0	40.0	0	0.0	66.3	44.5
	Unknown	0	0.0	20.0	0	0.0	11.3	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	19.5
	Moderate	0	0.0	0.0	0	0.0	0.0	15.1
	Middle	0	0.0	28.6	0	0.0	36.7	20.9
	Upper	0	0.0	0.0	0	0.0	0.0	44.5
	Unknown	0	0.0	71.4	0	0.0	63.3	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	19.5
	Moderate	0	0.0	0.0	0	0.0	0.0	15.1
	Middle	0	0.0	0.0	0	0.0	0.0	20.9
	Upper	0	0.0	0.0	0	0.0	0.0	44.5
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	1	1.5	6.4	39	0.5	3.8	19.5
	Moderate	19	29.2	19.0	1,631	21.9	15.7	15.1
	Middle	13	20.0	21.6	1,190	16.0	21.2	20.9
	Upper	31	47.7	29.0	4,370	58.6	38.3	44.5
	Unknown	1	1.5	24.0	225	3.0	21.0	0.0
	Total		65	100.0	100.0	7,455	100.0	100.0

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2020 IL Non MSA Logan County							
Product Type		Bank & Demographic Comparison					
		Count Bank		Dollar Bank		Total Businesses	
		#	%	\$ 000s	\$ %	%	
Small Business	Revenue	\$1 Million or Less	16	20.0	1,060	24.4	87.8
		Over \$1 Million	6	7.5	1,507	34.7	8.5
		Unknown	58	72.5	1,771	40.8	3.7
		Total	80	100.0	4,338	100.0	100.0
	Loan Size	\$100,000 or Less	68	85.0	1,517	35.0	
		\$100,001 - \$250,000	7	8.8	900	20.7	
		\$250,001 - \$1 Million	5	6.3	1,921	44.3	
		Total	80	100.0	4,338	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	12	75.0	357	33.7	
		\$100,001 - \$250,000	3	18.8	403	38.0	
		\$250,001 - \$1 Million	1	6.3	300	28.3	
		Total	16	100.0	1,060	100.0	

Originations & Purchases
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

COMMUNITY DEVELOPMENT TEST

Town and Country Bank’s community development performance in Logan County, Illinois Non-MSA assessment area is below the bank’s community development performance overall.

Community Development Activities										
July 17, 2018 – September 27, 2021										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	7	798,000	2	1,271,000	0	0	0	0	9	2,069,000
Investment	0	0	0	0	0	0	0	0	0	0
Donations	0	0	2	15,000	0	0	3	8,000	5	23,000
Services	2	6	0	0	0	0	5	6	7	12

MORGAN COUNTY, ILLINOIS NON-MSA - LIMITED REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MORGAN COUNTY, ILLINOIS NON-MSA

The Morgan County, Illinois Non-MSA assessment consists of Morgan County in its entirety. The assessment area is comprised of 10 census tracts, of which two are moderate-income, four middle-income, and four upper-income. It operates one deposit facility in Jacksonville, Illinois and three cash-only ATMs, two in Jacksonville and one in Waverly, Illinois; the stand-alone cash-only ATM in Jacksonville is in a moderate-income census tract, while the stand-alone cash-only ATM in Waverly is in a middle-income census tract. The branch office with a cash-only ATM in Jacksonville is in an upper-income census tract. There are no distressed or underserved nonmetropolitan middle-income census tracts in this assessment area. The assessment area remains unchanged since the previous evaluation.

In 2020, Town and Country Banc Mortgage Services is ranked second and TCB is ranked 19th among 87 organizations that originated or purchased HMDA-reportable loans, originating 117 and eight HMDA-reportable loans, respectively. By comparison, the first ranked organization by HMDA-reportable loans is CNB Bank and Trust, N.A., with 303 originated or purchased home mortgage loans.

The June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report ranks Town and Country Bank fourth of 12 FDIC-insured depository institutions operating in the bank's assessment area with a market share of 8.4 percent. Leaders in market share include CNB Bank and Trust (26.0 percent), The Farmers State Bank and Trust Company (21.1 percent) and U.S. Bank, N.A. (12.3 percent). The 11 banks competing for deposits and loans with Town Country Bank have 18 offices in the assessment area.

The 2020 assessment area demographics are provided in the following table. Please refer to Appendix C for 2019 demographic information.

Assessment Area: 2020 IL Non MSA Morgan County								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,866	20.8
Moderate-income	2	20.0	1,472	16.4	273	18.5	1,580	17.6
Middle-income	4	40.0	3,016	33.7	345	11.4	1,615	18.0
Upper-income	4	40.0	4,473	49.9	201	4.5	3,900	43.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	10	100.0	8,961	100.0	819	9.1	8,961	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	2,775	1,244	13.0	44.8	1,137	41.0	394	14.2
Middle-income	5,792	3,322	34.7	57.4	1,775	30.6	695	12.0
Upper-income	6,882	5,013	52.3	72.8	1,334	19.4	535	7.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	15,449	9,579	100.0	62.0	4,246	27.5	1,624	10.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	301	25.2	272	25.3	25	24.5	4	21.1
Middle-income	391	32.7	339	31.5	42	41.2	10	52.6
Upper-income	504	42.1	464	43.2	35	34.3	5	26.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,196	100.0	1,075	100.0	102	100.0	19	100.0
	Percentage of Total Businesses:			89.9		8.5		1.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	4	4.5	4	4.5	0	0.0	0	0.0
Middle-income	35	39.3	35	39.3	0	0.0	0	0.0
Upper-income	50	56.2	50	56.2	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	89	100.0	89	100.0	0	0.0	0	0.0
	Percentage of Total Farms:			100.0		0.0		0.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MORGAN COUNTY, ILLINOIS NON-MSA

LENDING TEST

Town and Country Bank's lending performance in the Morgan County, Illinois Non-MSA assessment area is consistent with the bank's lending performance overall. Please refer to Appendix C for the bank's 2019 HMDA and small business lending information.

Geographic Distribution of Loans

The following tables represent 2020 geographic distribution of HMDA-reportable and small business loans for the assessment area. Please refer to Appendix C for the bank's 2019 HMDA and small business lending information.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2020 IL Non MSA Morgan County								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2020			2020			
		Count Bank		Agg %	Dollar Bank		Agg \$ %	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	5	8.2	20.4	277	3.8	9.0	13.0
	Middle	15	24.6	27.8	1,283	17.6	26.1	34.7
	Upper	41	67.2	51.8	5,710	78.5	64.9	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		61	100.0	100.0	7,270	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	2	3.2	4.4	111	1.4	2.5	13.0
	Middle	20	31.7	29.9	2,554	31.1	27.3	34.7
	Upper	41	65.1	65.7	5,545	67.5	70.2	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		63	100.0	100.0	8,210	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	21.4	0	0.0	13.7	13.0
	Middle	0	0.0	21.4	0	0.0	38.5	34.7
	Upper	0	0.0	57.1	0	0.0	47.8	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	50.0	0	0.0	42.9	12.7
	Middle	1	100.0	50.0	597	100.0	57.1	64.3
	Upper	0	0.0	0.0	0	0.0	0.0	23.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	597	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	13.0
	Middle	0	0.0	33.3	0	0.0	26.9	34.7
	Upper	0	0.0	66.7	0	0.0	73.1	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0	13.0
	Middle	0	0.0	33.3	0	0.0	31.0	34.7
	Upper	0	0.0	66.7	0	0.0	69.0	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	32.1	0	0.0	21.2	13.0
	Middle	0	0.0	14.3	0	0.0	10.1	34.7
	Upper	0	0.0	53.6	0	0.0	68.7	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	7	5.6	12.0	388	2.4	6.6	13.0
	Middle	36	28.8	28.6	4,434	27.6	27.7	34.7
	Upper	82	65.6	59.3	11,255	70.0	65.7	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		125	100.0	100.0	16,077	100.0	100.0

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans						
Assessment Area: 2020 IL Non MSA Morgan County						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2020 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	14	20.9	907	27.8	25.2
	Middle	18	26.9	1,095	33.5	32.7
	Upper	35	52.2	1,264	38.7	42.1
	Unknown	0	0.0	0	0.0	0.0
	Total	67	100.0	3,266	100.0	100.0

2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The following tables represent the 2020 borrower distribution of HMDA-reportable and small business loans in the assessment area. Please refer to Appendix C for the bank’s 2019 HMDA and small business lending information.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2020 IL Non MSA Morgan County								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2020						
		Count Bank		Agg %	Dollar Bank		Agg \$ %	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	5	8.2	16.1	304	4.2	8.1	20.8
	Moderate	17	27.9	28.0	1,614	22.2	22.1	17.6
	Middle	21	34.4	21.6	2,716	37.4	22.6	18.0
	Upper	17	27.9	25.7	2,519	34.6	38.3	43.5
	Unknown	1	1.6	8.7	117	1.6	8.9	0.0
	Total		61	100.0	100.0	7,270	100.0	100.0
Refinance	Low	2	3.2	3.4	130	1.6	1.6	20.8
	Moderate	10	15.9	12.3	825	10.0	7.7	17.6
	Middle	18	28.6	24.0	2,321	28.3	20.5	18.0
	Upper	29	46.0	51.4	4,593	55.9	59.5	43.5
	Unknown	4	6.3	8.9	341	4.2	10.6	0.0
	Total		63	100.0	100.0	8,210	100.0	100.0
Home Improvement	Low	0	0.0	7.1	0	0.0	2.0	20.8
	Moderate	0	0.0	7.1	0	0.0	2.8	17.6
	Middle	0	0.0	50.0	0	0.0	50.6	18.0
	Upper	0	0.0	21.4	0	0.0	38.5	43.5
	Unknown	0	0.0	14.3	0	0.0	6.2	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.8
	Moderate	0	0.0	0.0	0	0.0	0.0	17.6
	Middle	0	0.0	0.0	0	0.0	0.0	18.0
	Upper	0	0.0	0.0	0	0.0	0.0	43.5
	Unknown	1	100.0	100.0	597	100.0	100.0	0.0
	Total		1	100.0	100.0	597	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	20.8
	Moderate	0	0.0	33.3	0	0.0	26.9	17.6
	Middle	0	0.0	0.0	0	0.0	0.0	18.0
	Upper	0	0.0	66.7	0	0.0	73.1	43.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	5.6	0	0.0	6.5	20.8
	Moderate	0	0.0	22.2	0	0.0	26.3	17.6
	Middle	0	0.0	27.8	0	0.0	29.0	18.0
	Upper	0	0.0	38.9	0	0.0	31.0	43.5
	Unknown	0	0.0	5.6	0	0.0	7.3	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	20.8
	Moderate	0	0.0	0.0	0	0.0	0.0	17.6
	Middle	0	0.0	0.0	0	0.0	0.0	18.0
	Upper	0	0.0	0.0	0	0.0	0.0	43.5
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	7	5.6	8.5	434	2.7	3.9	20.8
	Moderate	27	21.6	18.5	2,439	15.2	12.5	17.6
	Middle	39	31.2	22.6	5,037	31.3	20.4	18.0
	Upper	46	36.8	38.8	7,112	44.2	48.6	43.5
	Unknown	6	4.8	11.5	1,055	6.6	14.7	0.0
	Total		125	100.0	100.0	16,077	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size										
Assessment Area: 2020 IL Non MSA Morgan County										
Product Type		Bank & Demographic Comparison								
		2020		2020		Total Businesses %				
Revenue	Loan Size	Count Bank		Dollar Bank			%			
		#	%	\$ 000s	\$ %					
Small Business	\$1 Million or Less	Over \$1 Million	Unknown	Total	11	16.4	989	30.3	89.9	
					1	1.5	30	0.9	8.5	
					55	82.1	2,247	68.8	1.6	
					67	100.0	3,266	100.0	100.0	
	\$100,000 or Less	\$100,001 - \$250,000	\$250,001 - \$1 Million	Total	61	91.0	1,413	43.3		
					3	4.5	546	16.7		
					3	4.5	1,307	40.0		
					67	100.0	3,266	100.0		
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	\$100,001 - \$250,000	\$250,001 - \$1 Million	Total	9	81.8	297		30.0
						1	9.1	230		23.3
						1	9.1	462		46.7
						11	100.0	989		100.0

Originations & Purchases
2020 FFIEC Census Data & 2020 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

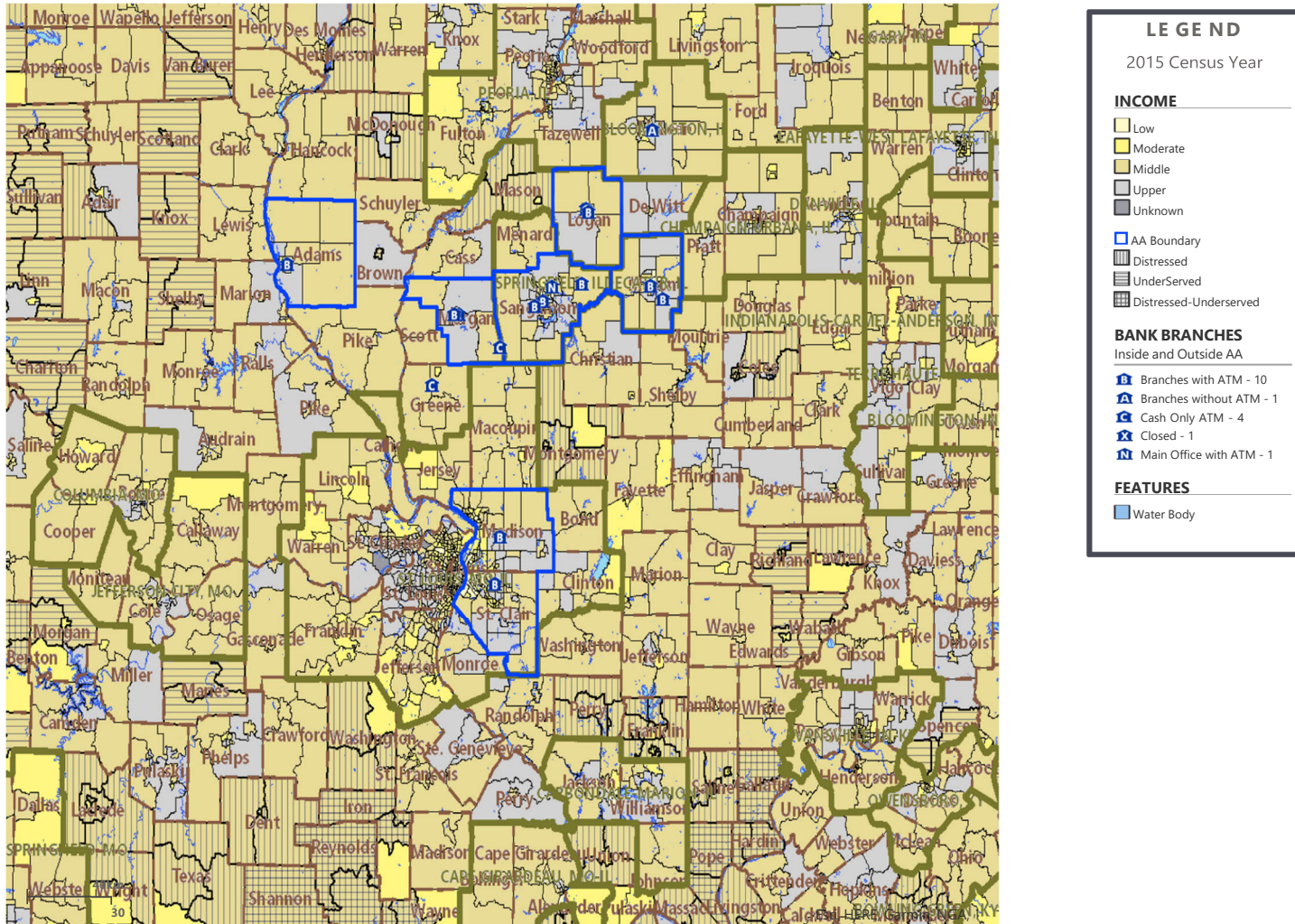
COMMUNITY DEVELOPMENT TEST

Town and Country Bank’s community development performance in Morgan County, Illinois Non-MSA assessment area is below the bank’s community development performance overall.

Community Development Activities										
July 17, 2018 – September 27, 2021										
Type of Activity	Affordable Housing		Economic Development		Activities that Revitalize/Stabilize		Community Services		Totals	
	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours	#	\$/Hours
Lending	0	0	2	265,000	0	0	0	0	2	265,000
Investment	1	96,280	0	0	0	0	0	0	1	96,280
Donations	0	0	4	17,500	2	300	26	10,680	32	28,480
Services	0	0	5	21	0	0	38	76	43	97

APPENDIX A – Map of Assessment Areas

Town and Country Bank 590248 Combined Assessment Area



APPENDIX B – Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED	<p>There are different time periods for lending and community development activities</p> <p>Small Business Lending: January 1, 2019 – December 31, 2020 HMDA –Reportable Lending: January 1, 2019 – December 31, 2020 Community Development Activities: July 16, 2018-September 27, 2021</p>		
FINANCIAL INSTITUTION Town and Country Bank			PRODUCTS REVIEWED HMDA-Reportable Small Business
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
Town and Country Banc Mortgage Services	Subsidiary of Town and Country Bank		Real Estate Mortgage Loans
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Partial Springfield, IL MSA #44100 Sangamon County	Full scope review	N/A	N/A
Adams County, IL Non-MSA	Full scope review	N/A	N/A
Partial St. Louis, MO-IL MSA #41180 - Madison and St. Clair County	Full scope review	N/A	N/A
Logan County-IL Non-MSA	Limited scope review	N/A	N/A
Decatur, IL MSA #19500 -Macon County	Limited scope review	N/A	N/A
Morgan County-IL Non-MSA	Limited scope review	N/A	N/A

APPENDIX C – Supplemental Tables

Assessment Area: 2019 Springfield, IL MSA 44100											
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income				
	#	%	#	%	#	%	#	%			
Low-income	11	20.8	6,991	13.7	2,426	34.7	11,624	22.8			
Moderate-income	10	18.9	6,285	12.3	1,138	18.1	8,264	16.2			
Middle-income	21	39.6	20,952	41.1	1,631	7.8	10,411	20.4			
Upper-income	11	20.8	16,700	32.8	290	1.7	20,629	40.5			
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0			
Total Assessment Area	53	100.0	50,928	100.0	5,485	10.8	50,928	100.0			
	Housing Units by Tract	Housing Types by Tract									
		Owner-Occupied				Rental		Vacant			
		#	%	%	#	%	#	%			
Low-income	14,732	5,695	9.9	38.7	7,211	48.9	1,826	12.4			
Moderate-income	15,315	7,663	13.3	50.0	5,482	35.8	2,170	14.2			
Middle-income	36,183	24,329	42.2	67.2	9,297	25.7	2,557	7.1			
Upper-income	24,203	19,967	34.6	82.5	3,241	13.4	995	4.1			
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0			
Total Assessment Area	90,433	57,654	100.0	63.8	25,231	27.9	7,548	8.3			
	Total Businesses by Tract	Businesses by Tract & Revenue Size									
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%		
Low-income	1,168	14.7	973	13.8	163	21.0	32	23.7			
Moderate-income	1,437	18.1	1,253	17.8	164	21.2	20	14.8			
Middle-income	2,965	37.3	2,626	37.3	284	36.6	55	40.7			
Upper-income	2,381	29.9	2,189	31.1	164	21.2	28	20.7			
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0			
Total Assessment Area	7,951	100.0	7,041	100.0	775	100.0	135	100.0			
	Total Farms by Tract	Percentage of Total Businesses:				88.6		9.7		1.7	
		Farms by Tract & Revenue Size									
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported			
#	%	#	%	#	%	#	%				
Low-income	3	1.2	3	1.2	0	0.0	0	0.0			
Moderate-income	5	2.0	5	2.0	0	0.0	0	0.0			
Middle-income	150	59.3	146	58.9	3	75.0	1	100.0			
Upper-income	95	37.5	94	37.9	1	25.0	0	0.0			
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0			
Total Assessment Area	253	100.0	248	100.0	4	100.0	1	100.0			
Percentage of Total Farms:				98.0		1.6		0.4			

2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2019 Springfield, IL MSA 44100								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2019						
		Count Bank		Agg %	Dollar Bank			Agg \$ %
		#	%	%	\$ (000s)	%	\$ %	
Home Purchase	Low	16	5.5	5.9	794	2.0	2.2	9.9
	Moderate	42	14.4	12.6	3,195	8.1	6.9	13.3
	Middle	134	46.0	46.3	15,610	39.8	40.5	42.2
	Upper	99	34.0	35.2	19,650	50.1	50.4	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		291	100.0	100.0	39,249	100.0	100.0
Refinance	Low	5	4.4	3.4	182	1.0	1.7	9.9
	Moderate	5	4.4	8.2	442	2.4	3.6	13.3
	Middle	50	43.9	39.4	6,611	36.4	34.2	42.2
	Upper	54	47.4	49.0	10,932	60.2	60.5	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		114	100.0	100.0	18,167	100.0	100.0
Home Improvement	Low	1	25.0	6.2	33	14.3	4.9	9.9
	Moderate	1	25.0	12.3	18	7.8	10.4	13.3
	Middle	1	25.0	42.3	149	64.8	39.6	42.2
	Upper	1	25.0	39.2	30	13.0	45.1	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		4	100.0	100.0	230	100.0	100.0
Multi-Family	Low	0	0.0	37.9	0	0.0	33.7	Multi-Family 25.8
	Moderate	5	55.6	26.3	1,444	59.3	10.3	20.5
	Middle	3	33.3	27.4	876	35.9	34.5	40.2
	Upper	1	11.1	8.4	117	4.8	21.5	13.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		9	100.0	100.0	2,437	100.0	100.0
Other Purpose LOC	Low	0	0.0	3.7	0	0.0	0.9	9.9
	Moderate	0	0.0	7.4	0	0.0	3.3	13.3
	Middle	0	0.0	50.0	0	0.0	35.9	42.2
	Upper	0	0.0	38.9	0	0.0	60.0	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	3.7	0	0.0	5.6	9.9
	Moderate	0	0.0	11.0	0	0.0	7.2	13.3
	Middle	0	0.0	44.1	0	0.0	38.4	42.2
	Upper	0	0.0	41.2	0	0.0	48.8	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	1	100.0	15.5	65	100.0	9.0	9.9
	Moderate	0	0.0	16.4	0	0.0	13.3	13.3
	Middle	0	0.0	53.6	0	0.0	53.5	42.2
	Upper	0	0.0	14.5	0	0.0	24.2	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	65	100.0	100.0
HMDA Totals	Low	23	5.5	5.7	1,074	1.8	4.1	9.9
	Moderate	53	12.6	11.3	5,099	8.5	6.1	13.3
	Middle	188	44.9	43.7	23,246	38.6	38.0	42.2
	Upper	155	37.0	39.3	30,729	51.1	51.8	34.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		419	100.0	100.0	60,148	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans						
Assessment Area: 2019 Springfield, IL MSA 44100						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2019 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	8	12.5	661	5.9	14.7
	Moderate	13	20.3	1,591	14.3	18.1
	Middle	17	26.6	1,870	16.8	37.3
	Upper	26	40.6	7,026	63.0	29.9
	Unknown	0	0.0	0	0.0	0.0
	Total		64	100.0	11,148	100.0
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2019 Springfield, IL MSA 44100								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2019						
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	51	17.5	11.1	3,617	9.2	5.7	22.8
	Moderate	74	25.4	21.8	7,173	18.3	16.1	16.2
	Middle	65	22.3	20.7	8,506	21.7	19.9	20.4
	Upper	90	30.9	32.7	18,927	48.2	45.8	40.5
	Unknown	11	3.8	13.7	1,026	2.6	12.6	0.0
	Total		291	100.0	100.0	39,249	100.0	100.0
Refinance	Low	7	6.1	5.5	615	3.4	2.6	22.8
	Moderate	20	17.5	14.0	2,241	12.3	9.2	16.2
	Middle	35	30.7	21.4	4,747	26.1	16.7	20.4
	Upper	46	40.4	43.8	9,977	54.9	55.0	40.5
	Unknown	6	5.3	15.3	587	3.2	16.6	0.0
	Total		114	100.0	100.0	18,167	100.0	100.0
Home Improvement	Low	1	25.0	9.2	18	7.8	7.4	22.8
	Moderate	0	0.0	14.6	0	0.0	12.8	16.2
	Middle	1	25.0	18.8	149	64.8	19.1	20.4
	Upper	0	0.0	38.1	0	0.0	41.9	40.5
	Unknown	2	50.0	19.2	63	27.4	18.9	0.0
	Total		4	100.0	100.0	230	100.0	100.0
Multi-Family	Low	1	11.1	1.1	311	12.8	0.5	22.8
	Moderate	0	0.0	2.1	0	0.0	0.5	16.2
	Middle	0	0.0	2.1	0	0.0	1.0	20.4
	Upper	0	0.0	8.4	0	0.0	1.9	40.5
	Unknown	8	88.9	86.3	2,126	87.2	96.1	0.0
	Total		9	100.0	100.0	2,437	100.0	100.0
Other Purpose LOC	Low	0	0.0	9.3	0	0.0	6.1	22.8
	Moderate	0	0.0	11.1	0	0.0	9.7	16.2
	Middle	0	0.0	16.7	0	0.0	18.1	20.4
	Upper	0	0.0	31.5	0	0.0	46.2	40.5
	Unknown	0	0.0	31.5	0	0.0	19.9	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	11.0	0	0.0	7.2	22.8
	Moderate	0	0.0	19.9	0	0.0	11.3	16.2
	Middle	0	0.0	17.6	0	0.0	17.5	20.4
	Upper	0	0.0	37.5	0	0.0	46.1	40.5
	Unknown	0	0.0	14.0	0	0.0	17.9	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	1	100.0	1.8	65	100.0	1.5	22.8
	Moderate	0	0.0	0.0	0	0.0	0.0	16.2
	Middle	0	0.0	0.0	0	0.0	0.0	20.4
	Upper	0	0.0	0.0	0	0.0	0.0	40.5
	Unknown	0	0.0	98.2	0	0.0	98.5	0.0
	Total		1	100.0	100.0	65	100.0	100.0
HMDA Totals	Low	61	14.6	8.9	4,626	7.7	4.3	22.8
	Moderate	94	22.4	18.2	9,414	15.7	12.5	16.2
	Middle	101	24.1	20.1	13,402	22.3	17.4	20.4
	Upper	136	32.5	35.7	28,904	48.1	45.7	40.5
	Unknown	27	6.4	17.1	3,802	6.3	20.2	0.0
	Total		419	100.0	100.0	60,148	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2019 Springfield, IL MSA 44100							
Product Type		Bank & Demographic Comparison					
		Count Bank		2019 Dollar Bank		Total Businesses	
		#	%	\$ 000s	\$ %	%	
Small Business	Revenue	\$1 Million or Less	48	75.0	7,520	67.5	88.6
		Over \$1 Million	16	25.0	3,628	32.5	9.7
		Unknown	0	0.0	0	0.0	1.7
		Total	64	100.0	11,148	100.0	100.0
	Loan Size	\$100,000 or Less	33	51.6	1,457	13.1	
		\$100,001 - \$250,000	16	25.0	2,753	24.7	
		\$250,001 - \$1 Million	15	23.4	6,938	62.2	
		Total	64	100.0	11,148	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	25	52.1	995	13.2	
		\$100,001 - \$250,000	14	29.2	2,427	32.3	
		\$250,001 - \$1 Million	9	18.8	4,098	54.5	
		Total	48	100.0	7,520	100.0	
Originations & Purchases							
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Assessment Area: 2019 IL Non MSA Adams County								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,272	18.9
Moderate-income	5	27.8	2,545	14.7	766	30.1	3,198	18.5
Middle-income	10	55.6	11,278	65.3	858	7.6	3,864	22.4
Upper-income	3	16.7	3,449	20.0	154	4.5	6,938	40.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	18	100.0	17,272	100.0	1,778	10.3	17,272	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	6,316	2,239	11.8	35.4	3,012	47.7	1,065	16.9
Middle-income	18,082	12,891	67.8	71.3	3,687	20.4	1,504	8.3
Upper-income	5,578	3,875	20.4	69.5	1,179	21.1	524	9.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	29,976	19,005	100.0	63.4	7,878	26.3	3,093	10.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	698	26.7	618	26.6	76	29.9	4	10.0
Middle-income	1,415	54.2	1,248	53.8	137	53.9	30	75.0
Upper-income	500	19.1	453	19.5	41	16.1	6	15.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,613	100.0	2,319	100.0	254	100.0	40	100.0
	Percentage of Total Businesses:		88.7		9.7		1.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3	1.0	3	1.1	0	0.0	0	0.0
Middle-income	251	87.2	249	87.7	2	50.0	0	0.0
Upper-income	34	11.8	32	11.3	2	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	288	100.0	284	100.0	4	100.0	0	0.0
	Percentage of Total Farms:		98.6		1.4		0.0	
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2019 IL Non MSA Adams County								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2019			Dollar			
		Count Bank	Agg %	Dollar Bank	Agg \$ %			
		#	%	\$ (000s)	%	\$ %		
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	6	13.6	14.1	434	8.5	8.7	11.8
	Middle	34	77.3	66.8	4,003	78.3	65.8	67.8
	Upper	4	9.1	19.1	673	13.2	25.5	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		44	100.0	100.0	5,110	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	11.7	0	0.0	7.2	11.8
	Middle	9	90.0	62.9	1,465	91.9	65.0	67.8
	Upper	1	10.0	25.4	129	8.1	27.8	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		10	100.0	100.0	1,594	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	1	100.0	36.4	48	100.0	17.7	11.8
	Middle	0	0.0	45.5	0	0.0	34.4	67.8
	Upper	0	0.0	18.2	0	0.0	47.9	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	48	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	Multi-Family 0.0
	Moderate	0	0.0	54.5	0	0.0	44.9	45.3
	Middle	1	33.3	27.3	240	20.5	19.8	43.7
	Upper	2	66.7	18.2	930	79.5	35.3	11.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		3	100.0	100.0	1,170	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	20.0	0	0.0	6.8	11.8
	Middle	0	0.0	80.0	0	0.0	93.2	67.8
	Upper	0	0.0	0.0	0	0.0	0.0	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	20.0	0	0.0	4.9	11.8
	Middle	0	0.0	50.0	0	0.0	76.1	67.8
	Upper	0	0.0	30.0	0	0.0	19.0	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	0	0.0	28.6	0	0.0	25.1	11.8
	Middle	0	0.0	53.6	0	0.0	55.1	67.8
	Upper	0	0.0	17.9	0	0.0	19.7	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0	0.0
	Moderate	7	12.1	14.4	482	6.1	9.2	11.8
	Middle	44	75.9	64.5	5,708	72.1	64.5	67.8
	Upper	7	12.1	21.0	1,732	21.9	26.3	20.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		58	100.0	100.0	7,922	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans						
Assessment Area: 2019 IL Non MSA Adams County						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2019 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	8	34.8	1,227	48.4	26.7
	Middle	12	52.2	957	37.8	54.2
	Upper	3	13.0	349	13.8	19.1
	Unknown	0	0.0	0	0.0	0.0
	Total	23	100.0	2,533	100.0	100.0
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2019 IL Non MSA Adams County								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2019			2019			
		Count Bank		Agg	Dollar Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	6	13.6	11.1	494	9.7	6.7	18.9
	Moderate	10	22.7	22.5	817	16.0	16.5	18.5
	Middle	10	22.7	22.3	1,344	26.3	21.8	22.4
	Upper	14	31.8	29.0	2,000	39.1	42.2	40.2
	Unknown	4	9.1	15.1	455	8.9	12.8	0.0
	Total	44	100.0	100.0	5,110	100.0	100.0	100.0
Refinance	Low	0	0.0	8.8	0	0.0	3.5	18.9
	Moderate	1	10.0	19.9	129	8.1	13.0	18.5
	Middle	0	0.0	16.4	0	0.0	15.3	22.4
	Upper	8	80.0	38.3	1,233	77.4	48.8	40.2
	Unknown	1	10.0	16.7	232	14.6	19.5	0.0
	Total	10	100.0	100.0	1,594	100.0	100.0	100.0
Home Improvement	Low	1	100.0	18.2	48	100.0	12.9	18.9
	Moderate	0	0.0	18.2	0	0.0	18.6	18.5
	Middle	0	0.0	18.2	0	0.0	13.0	22.4
	Upper	0	0.0	27.3	0	0.0	49.1	40.2
	Unknown	0	0.0	18.2	0	0.0	6.4	0.0
	Total	1	100.0	100.0	48	100.0	100.0	100.0
Multi-Family	Low	0	0.0	9.1	0	0.0	2.3	18.9
	Moderate	0	0.0	18.2	0	0.0	2.7	18.5
	Middle	0	0.0	0.0	0	0.0	0.0	22.4
	Upper	1	33.3	27.3	240	20.5	19.8	40.2
	Unknown	2	66.7	45.5	930	79.5	75.1	0.0
	Total	3	100.0	100.0	1,170	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0	18.9
	Moderate	0	0.0	0.0	0	0.0	0.0	18.5
	Middle	0	0.0	20.0	0	0.0	32.4	22.4
	Upper	0	0.0	80.0	0	0.0	67.6	40.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	30.0	0	0.0	12.3	18.9
	Moderate	0	0.0	20.0	0	0.0	6.3	18.5
	Middle	0	0.0	10.0	0	0.0	9.7	22.4
	Upper	0	0.0	40.0	0	0.0	71.7	40.2
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	18.9
	Moderate	0	0.0	0.0	0	0.0	0.0	18.5
	Middle	0	0.0	0.0	0	0.0	0.0	22.4
	Upper	0	0.0	0.0	0	0.0	0.0	40.2
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	7	12.1	10.3	542	6.8	5.5	18.9
	Moderate	11	19.0	20.9	946	11.9	14.7	18.5
	Middle	10	17.2	19.5	1,344	17.0	18.8	22.4
	Upper	23	39.7	31.4	3,473	43.8	43.5	40.2
	Unknown	7	12.1	17.9	1,617	20.4	17.5	0.0
	Total	58	100.0	100.0	7,922	100.0	100.0	100.0
Originations & Purchases								
2016 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2019 IL Non MSA Adams County							
Product Type		Bank & Demographic Comparison					
		2019		2019		Total Businesses %	
	Revenue	Count Bank		Dollar Bank			
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	19	82.6	1,664	65.7	88.7
		Over \$1 Million	4	17.4	869	34.3	9.7
		Unknown	0	0.0	0	0.0	1.5
		Total	23	100.0	2,533	100.0	100.0
	Loan Size	\$100,000 or Less	14	60.9	468	18.5	
		\$100,001 - \$250,000	7	30.4	1,404	55.4	
		\$250,001 - \$1 Million	2	8.7	661	26.1	
		Total	23	100.0	2,533	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	13	68.4	435	26.1	
		\$100,001 - \$250,000	5	26.3	954	57.3	
		\$250,001 - \$1 Million	1	5.3	275	16.5	
		Total	19	100.0	1,664	100.0	
Originations & Purchases							
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Assessment Area: 2019 St. Louis, MO-IL MSA 41180								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	22	18.2	14,956	10.9	5,930	39.6	33,825	24.6
Moderate-income	28	23.1	26,581	19.3	4,728	17.8	24,250	17.6
Middle-income	46	38.0	59,782	43.4	4,539	7.6	27,233	19.8
Upper-income	25	20.7	36,272	26.4	1,422	3.9	52,283	38.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	121	100.0	137,591	100.0	16,619	12.1	137,591	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	32,684	12,315	8.6	37.7	13,775	42.1	6,594	20.2
Moderate-income	51,855	26,702	18.6	51.5	17,444	33.6	7,709	14.9
Middle-income	98,407	65,210	45.4	66.3	24,442	24.8	8,755	8.9
Upper-income	52,922	39,492	27.5	74.6	9,998	18.9	3,432	6.5
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	235,868	143,719	100.0	60.9	65,659	27.8	26,490	11.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,565	9.1	1,331	8.6	200	13.5	34	15.2
Moderate-income	3,684	21.4	3,264	21.0	384	25.9	36	16.1
Middle-income	7,611	44.1	6,900	44.4	608	41.1	103	46.2
Upper-income	4,386	25.4	4,048	26.0	288	19.5	50	22.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	17,246	100.0	15,543	100.0	1,480	100.0	223	100.0
	Percentage of Total Businesses:			90.1		8.6		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6	1.2	5	1.0	1	16.7	0	0.0
Moderate-income	26	5.0	25	4.9	1	16.7	0	0.0
Middle-income	278	53.8	276	54.2	1	16.7	1	50.0
Upper-income	207	40.0	203	39.9	3	50.0	1	50.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	517	100.0	509	100.0	6	100.0	2	100.0
	Percentage of Total Farms:			98.5		1.2		0.4
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2019 St. Louis, MO-IL MSA 41180								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						
		2019			2019			
		Count		Dollar		Owner		
		Bank	Agg	Bank	Agg	Occupied		
		#	%	%	\$ (000s)	%	%	
Home Purchase	Low	3	1.7	1.7	137	0.5	0.6	8.6
	Moderate	31	17.2	15.9	2,468	9.6	9.0	18.6
	Middle	83	46.1	48.3	11,352	44.2	44.7	45.4
	Upper	63	35.0	34.1	11,703	45.6	45.7	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		180	100.0	100.0	25,660	100.0	100.0
Refinance	Low	0	0.0	1.2	0	0.0	0.4	8.6
	Moderate	10	16.4	9.1	806	8.6	4.8	18.6
	Middle	26	42.6	46.6	3,505	37.4	42.1	45.4
	Upper	25	41.0	43.1	5,051	54.0	52.7	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		61	100.0	100.0	9,362	100.0	100.0
Home Improvement	Low	0	0.0	2.6	0	0.0	1.0	8.6
	Moderate	0	0.0	13.9	0	0.0	8.4	18.6
	Middle	0	0.0	44.8	0	0.0	40.9	45.4
	Upper	1	100.0	38.6	46	100.0	49.7	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	46	100.0	100.0
Multi-Family	Low	0	0.0	9.4	0	0.0	3.1	Multi-Family 21.4
	Moderate	3	50.0	37.5	1,455	45.4	39.5	24.0
	Middle	3	50.0	39.1	1,748	54.6	40.5	37.7
	Upper	0	0.0	14.1	0	0.0	16.9	16.9
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		6	100.0	100.0	3,203	100.0	100.0
Other Purpose LOC	Low	0	0.0	1.0	0	0.0	0.5	8.6
	Moderate	0	0.0	9.9	0	0.0	8.2	18.6
	Middle	0	0.0	49.3	0	0.0	45.4	45.4
	Upper	0	0.0	39.7	0	0.0	45.9	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	3.7	0	0.0	2.6	8.6
	Moderate	0	0.0	15.8	0	0.0	13.8	18.6
	Middle	0	0.0	45.2	0	0.0	47.6	45.4
	Upper	0	0.0	35.3	0	0.0	36.0	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	9.1	0	0.0	5.3	8.6
	Moderate	0	0.0	27.7	0	0.0	20.3	18.6
	Middle	0	0.0	46.5	0	0.0	47.8	45.4
	Upper	0	0.0	16.7	0	0.0	26.5	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	3	1.2	1.8	137	0.4	0.7	8.6
	Moderate	44	17.7	13.8	4,729	12.4	9.4	18.6
	Middle	112	45.2	47.5	16,605	43.4	43.5	45.4
	Upper	89	35.9	36.9	16,800	43.9	46.3	27.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		248	100.0	100.0	38,271	100.0	100.0

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans						
Assessment Area: 2019 St. Louis, MO-IL MSA 41180						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2019 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	6	9.0	930	6.5	9.1
	Moderate	12	17.9	2,424	16.8	21.4
	Middle	26	38.8	6,566	45.5	44.1
	Upper	23	34.3	4,497	31.2	25.4
	Unknown	0	0.0	0	0.0	0.0
	Total		67	100.0	14,417	100.0
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2019 St. Louis, MO-IL MSA 41180								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2019			Dollar			
		Count Bank		Agg	Bank		Agg	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	25	13.9	13.0	1,705	6.6	6.4	24.6
	Moderate	40	22.2	21.4	3,821	14.9	16.0	17.6
	Middle	48	26.7	22.0	7,459	29.1	23.0	19.8
	Upper	66	36.7	26.0	12,571	49.0	37.8	38.0
	Unknown	1	0.6	17.7	104	0.4	16.9	0.0
	Total	180	100.0	100.0	25,660	100.0	100.0	100.0
Refinance	Low	1	1.6	7.2	102	1.1	3.6	24.6
	Moderate	9	14.8	13.8	1,020	10.9	8.5	17.6
	Middle	20	32.8	19.3	2,320	24.8	16.5	19.8
	Upper	27	44.3	33.4	5,292	56.5	41.1	38.0
	Unknown	4	6.6	26.3	628	6.7	30.3	0.0
	Total	61	100.0	100.0	9,362	100.0	100.0	100.0
Home Improvement	Low	0	0.0	12.2	0	0.0	7.1	24.6
	Moderate	0	0.0	18.3	0	0.0	14.3	17.6
	Middle	0	0.0	20.3	0	0.0	20.8	19.8
	Upper	1	100.0	44.3	46	100.0	53.4	38.0
	Unknown	0	0.0	4.9	0	0.0	4.4	0.0
	Total	1	100.0	100.0	46	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.8	0	0.0	0.1	24.6
	Moderate	0	0.0	0.8	0	0.0	0.0	17.6
	Middle	0	0.0	2.3	0	0.0	0.3	19.8
	Upper	0	0.0	9.4	0	0.0	1.8	38.0
	Unknown	6	100.0	86.7	3,203	100.0	97.6	0.0
	Total	6	100.0	100.0	3,203	100.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	14.9	0	0.0	9.1	24.6
	Moderate	0	0.0	16.6	0	0.0	14.3	17.6
	Middle	0	0.0	24.5	0	0.0	24.4	19.8
	Upper	0	0.0	41.4	0	0.0	49.9	38.0
	Unknown	0	0.0	2.6	0	0.0	2.3	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	9.5	0	0.0	4.9	24.6
	Moderate	0	0.0	17.0	0	0.0	14.4	17.6
	Middle	0	0.0	24.5	0	0.0	19.7	19.8
	Upper	0	0.0	38.2	0	0.0	46.1	38.0
	Unknown	0	0.0	10.8	0	0.0	14.8	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.5	0	0.0	0.3	24.6
	Moderate	0	0.0	0.0	0	0.0	0.0	17.6
	Middle	0	0.0	0.0	0	0.0	0.0	19.8
	Upper	0	0.0	0.7	0	0.0	1.3	38.0
	Unknown	0	0.0	98.8	0	0.0	98.4	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
HMDA Totals	Low	26	10.5	10.6	1,807	4.7	4.9	24.6
	Moderate	49	19.8	17.9	4,841	12.6	12.0	17.6
	Middle	68	27.4	20.4	9,779	25.6	18.9	19.8
	Upper	94	37.9	28.8	17,909	46.8	36.7	38.0
	Unknown	11	4.4	22.3	3,935	10.3	27.4	0.0
	Total	248	100.0	100.0	38,271	100.0	100.0	100.0

Originations & Purchases

2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2019 St. Louis, MO-IL MSA 41180							
Product Type		Bank & Demographic Comparison					
		Count Bank		2019 Dollar Bank		Total Businesses	
		#	%	\$ 000s	\$ %	%	
Small Business	Revenue	\$1 Million or Less	34	50.7	6,717	46.6	90.1
		Over \$1 Million	33	49.3	7,700	53.4	8.6
		Unknown	0	0.0	0	0.0	1.3
		Total	67	100.0	14,417	100.0	100.0
	Loan Size	\$100,000 or Less	30	44.8	1,489	10.3	
		\$100,001 - \$250,000	15	22.4	2,490	17.3	
		\$250,001 - \$1 Million	22	32.8	10,438	72.4	
		Total	67	100.0	14,417	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	17	50.0	834	12.4	
		\$100,001 - \$250,000	7	20.6	1,136	16.9	
		\$250,001 - \$1 Million	10	29.4	4,747	70.7	
		Total	34	100.0	6,717	100.0	
Originations & Purchases							
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Assessment Area: 2019 IL Non MSA Logan County								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,372	19.5
Moderate-income	0	0.0	0	0.0	0	0.0	1,062	15.1
Middle-income	7	87.5	6,460	91.7	839	13.0	1,476	20.9
Upper-income	1	12.5	586	8.3	11	1.9	3,136	44.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	8	100.0	7,046	100.0	850	12.1	7,046	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	10,740	6,577	90.6	61.2	3,291	30.6	872	8.1
Upper-income	982	686	9.4	69.9	157	16.0	139	14.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	11,722	7,263	100.0	62.0	3,448	29.4	1,011	8.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	791	91.9	691	92.1	72	92.3	28	84.8
Upper-income	70	8.1	59	7.9	6	7.7	5	15.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	861	100.0	750	100.0	78	100.0	33	100.0
	Percentage of Total Businesses:			87.1		9.1		3.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	120	79.5	120	79.5	0	0.0	0	0.0
Upper-income	31	20.5	31	20.5	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	151	100.0	151	100.0	0	0.0	0	0.0
	Percentage of Total Farms:			100.0		0.0		0.0
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2019 IL Non MSA Logan County							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2019			Dollar		
		Count Bank	Agg %	Dollar Bank	Agg \$ %		
		#	%	%	\$ (000s)	\$ %	\$ %
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	10	90.9	91.2	1,034	93.0	90.4
	Upper	1	9.1	8.8	78	7.0	9.6
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	11	100.0	100.0	1,112	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	10	100.0	90.9	877	100.0	87.3
	Upper	0	0.0	9.1	0	0.0	12.7
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	10	100.0	100.0	877	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	0	0.0	91.2	0	0.0	87.7
	Upper	0	0.0	8.8	0	0.0	12.3
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	1	100.0	100.0	350	100.0	99.0
	Upper	0	0.0	0.0	0	0.0	1.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	1	100.0	100.0	350	100.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	0	0.0	71.4	0	0.0	65.6
	Upper	0	0.0	28.6	0	0.0	34.4
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	0	0.0	81.3	0	0.0	76.8
	Upper	0	0.0	18.8	0	0.0	23.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	0	0.0	95.8	0	0.0	94.8
	Upper	0	0.0	4.2	0	0.0	5.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	0.0
	Middle	21	95.5	90.6	2,261	96.7	89.1
	Upper	1	4.5	9.4	78	3.3	10.9
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	22	100.0	100.0	2,339	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans						
Assessment Area: 2019 IL Non MSA Logan County						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2019 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	0	0.0	0	0.0	0.0
	Middle	18	100.0	1,663	100.0	91.9
	Upper	0	0.0	0	0.0	8.1
	Unknown	0	0.0	0	0.0	0.0
	Total	18	100.0	1,663	100.0	100.0

2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2019 IL Non MSA Logan County								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2019			2019			
		Count Bank		Agg %	Dollar Bank		Agg \$ %	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0	8.5	0	0.0	5.8	19.5
	Moderate	4	36.4	24.1	384	34.5	19.0	15.1
	Middle	4	36.4	21.9	299	26.9	23.9	20.9
	Upper	3	27.3	22.6	429	38.6	30.4	44.5
	Unknown	0	0.0	22.9	0	0.0	20.9	0.0
	Total		11	100.0	100.0	1,112	100.0	100.0
Refinance	Low	2	20.0	9.1	154	17.6	4.8	19.5
	Moderate	1	10.0	9.8	69	7.9	6.8	15.1
	Middle	2	20.0	19.6	130	14.8	20.5	20.9
	Upper	5	50.0	32.9	524	59.7	40.9	44.5
	Unknown	0	0.0	28.7	0	0.0	27.0	0.0
	Total		10	100.0	100.0	877	100.0	100.0
Home Improvement	Low	0	0.0	2.9	0	0.0	4.7	19.5
	Moderate	0	0.0	5.9	0	0.0	6.3	15.1
	Middle	0	0.0	11.8	0	0.0	12.9	20.9
	Upper	0	0.0	17.6	0	0.0	22.7	44.5
	Unknown	0	0.0	61.8	0	0.0	53.4	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	19.5
	Moderate	0	0.0	0.0	0	0.0	0.0	15.1
	Middle	0	0.0	0.0	0	0.0	0.0	20.9
	Upper	0	0.0	0.0	0	0.0	0.0	44.5
	Unknown	1	100.0	100.0	350	100.0	100.0	0.0
	Total		1	100.0	100.0	350	100.0	100.0
Other Purpose LOC	Low	0	0.0	7.1	0	0.0	4.5	19.5
	Moderate	0	0.0	21.4	0	0.0	16.5	15.1
	Middle	0	0.0	7.1	0	0.0	1.8	20.9
	Upper	0	0.0	7.1	0	0.0	22.5	44.5
	Unknown	0	0.0	57.1	0	0.0	54.7	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0	19.5
	Moderate	0	0.0	6.3	0	0.0	15.9	15.1
	Middle	0	0.0	6.3	0	0.0	1.6	20.9
	Upper	0	0.0	37.5	0	0.0	59.7	44.5
	Unknown	0	0.0	50.0	0	0.0	22.8	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	19.5
	Moderate	0	0.0	0.0	0	0.0	0.0	15.1
	Middle	0	0.0	0.0	0	0.0	0.0	20.9
	Upper	0	0.0	0.0	0	0.0	0.0	44.5
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	2	9.1	7.6	154	6.6	5.1	19.5
	Moderate	5	22.7	17.6	453	19.4	14.4	15.1
	Middle	6	27.3	18.8	429	18.3	21.0	20.9
	Upper	8	36.4	23.9	953	40.7	32.4	44.5
	Unknown	1	4.5	32.1	350	15.0	27.2	0.0
	Total		22	100.0	100.0	2,339	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2019 IL Non MSA Logan County							
Product Type		Bank & Demographic Comparison					
		2019		2019		Total Businesses %	
	Revenue	Count Bank		Dollar Bank			
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	15	83.3	825	49.6	87.1
		Over \$1 Million	3	16.7	838	50.4	9.1
		Unknown	0	0.0	0	0.0	3.8
		Total	18	100.0	1,663	100.0	100.0
	Loan Size	\$100,000 or Less	12	66.7	286	17.2	
		\$100,001 - \$250,000	5	27.8	877	52.7	
		\$250,001 - \$1 Million	1	5.6	500	30.1	
		Total	18	100.0	1,663	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	12	80.0	286	34.7	
		\$100,001 - \$250,000	3	20.0	539	65.3	
		\$250,001 - \$1 Million	0	0.0	0	0.0	
		Total	15	100.0	825	100.0	

Originations & Purchases
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Assessment Area: 2019 Decatur, IL MSA 19500								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	23.5	4,017	14.5	1,598	39.8	6,338	22.9
Moderate-income	5	14.7	2,626	9.5	739	28.1	4,663	16.9
Middle-income	11	32.4	9,905	35.8	1,067	10.8	5,564	20.1
Upper-income	10	29.4	11,110	40.2	370	3.3	11,093	40.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	34	100.0	27,658	100.0	3,774	13.6	27,658	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	10,261	2,903	9.4	28.3	5,499	53.6	1,859	18.1
Moderate-income	6,323	2,955	9.5	46.7	2,234	35.3	1,134	17.9
Middle-income	16,794	11,742	37.9	69.9	3,664	21.8	1,388	8.3
Upper-income	17,013	13,395	43.2	78.7	2,523	14.8	1,095	6.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	50,391	30,995	100.0	61.5	13,920	27.6	5,476	10.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	920	27.2	778	25.9	136	40.1	6	13.3
Moderate-income	389	11.5	327	10.9	61	18.0	1	2.2
Middle-income	965	28.5	857	28.5	90	26.5	18	40.0
Upper-income	1,112	32.8	1,040	34.6	52	15.3	20	44.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	3,386	100.0	3,002	100.0	339	100.0	45	100.0
	Percentage of Total Businesses:			88.7		10.0		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	1.9	3	1.9	0	0.0	0	0.0
Moderate-income	3	1.9	3	1.9	0	0.0	0	0.0
Middle-income	88	55.0	87	55.1	1	50.0	0	0.0
Upper-income	66	41.3	65	41.1	1	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	160	100.0	158	100.0	2	100.0	0	0.0
	Percentage of Total Farms:			98.8		1.3		0.0

2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2019 Decatur, IL MSA 19500							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2019		2019			
		Count Bank	Agg %	Dollar Bank	Agg %	Agg %	
		#	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	9	3.3	3.4	502	1.9	9.4
	Moderate	16	5.9	4.8	625	2.4	9.5
	Middle	96	35.7	37.9	7,875	30.6	37.9
	Upper	148	55.0	54.0	16,745	65.0	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total		269	100.0	100.0	25,747	100.0
Refinance	Low	1	2.3	2.3	17	0.3	9.4
	Moderate	1	2.3	4.2	24	0.4	9.5
	Middle	16	37.2	36.9	2,086	35.5	37.9
	Upper	25	58.1	56.5	3,745	63.8	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total		43	100.0	100.0	5,872	100.0
Home Improvement	Low	0	0.0	1.7	0	0.0	9.4
	Moderate	0	0.0	11.0	0	0.0	9.5
	Middle	0	0.0	36.4	0	0.0	37.9
	Upper	1	100.0	50.8	31	100.0	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total		1	100.0	100.0	31	100.0
Multi-Family	Low	0	0.0	20.0	0	0.0	Multi-Family 43.9
	Moderate	0	0.0	13.3	0	0.0	2.8
	Middle	0	0.0	53.3	0	0.0	85.2
	Upper	0	0.0	13.3	0	0.0	10.6
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total		0	0.0	100.0	0	0.0
Other Purpose LOC	Low	0	0.0	6.9	0	0.0	9.4
	Moderate	0	0.0	0.0	0	0.0	9.5
	Middle	0	0.0	34.5	0	0.0	29.1
	Upper	0	0.0	58.6	0	0.0	66.8
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total		0	0.0	100.0	0	0.0
Other Purpose Closed/Exempt	Low	0	0.0	2.8	0	0.0	9.4
	Moderate	0	0.0	7.0	0	0.0	9.5
	Middle	0	0.0	42.3	0	0.0	37.9
	Upper	0	0.0	47.9	0	0.0	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total		0	0.0	100.0	0	0.0
Loan Purpose Not Applicable	Low	0	0.0	7.6	0	0.0	9.4
	Moderate	0	0.0	15.2	0	0.0	9.5
	Middle	3	75.0	37.9	277	88.8	37.9
	Upper	1	25.0	39.4	35	11.2	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total		4	100.0	100.0	312	100.0
HMDA Totals	Low	10	3.2	3.3	519	1.6	9.4
	Moderate	17	5.4	5.3	649	2.0	9.5
	Middle	115	36.3	37.8	10,238	32.0	37.9
	Upper	175	55.2	53.5	20,556	64.3	43.2
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total		317	100.0	100.0	31,962	100.0

Originations & Purchases
2016 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans						
Assessment Area: 2019 Decatur, IL MSA 19500						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2019 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	
Small Business	Low	10	28.6	897	15.7	27.2
	Moderate	3	8.6	270	4.7	11.5
	Middle	10	28.6	1,547	27.0	28.5
	Upper	12	34.3	3,012	52.6	32.8
	Unknown	0	0.0	0	0.0	0.0
	Total	35	100.0	5,726	100.0	100.0
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS						
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>						

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2019 Decatur, IL MSA 19500								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2019			2019			
		Count Bank		Agg %	Dollar Bank		Agg \$ %	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	32	11.9	10.0	1,538	6.0	5.2	22.9
	Moderate	84	31.2	25.1	5,296	20.6	17.5	16.9
	Middle	64	23.8	20.9	5,438	21.1	18.9	20.1
	Upper	85	31.6	31.2	13,280	51.6	46.5	40.1
	Unknown	4	1.5	12.8	195	0.8	11.8	0.0
	Total	269	100.0	100.0	25,747	100.0	100.0	100.0
Refinance	Low	3	7.0	4.9	132	2.2	2.6	22.9
	Moderate	3	7.0	20.0	224	3.8	12.4	16.9
	Middle	10	23.3	20.7	1,399	23.8	15.8	20.1
	Upper	24	55.8	39.0	3,983	67.8	53.6	40.1
	Unknown	3	7.0	15.4	134	2.3	15.7	0.0
	Total	43	100.0	100.0	5,872	100.0	100.0	100.0
Home Improvement	Low	0	0.0	9.3	0	0.0	6.1	22.9
	Moderate	0	0.0	17.8	0	0.0	12.6	16.9
	Middle	0	0.0	25.4	0	0.0	25.1	20.1
	Upper	1	100.0	25.4	31	100.0	38.2	40.1
	Unknown	0	0.0	22.0	0	0.0	17.9	0.0
	Total	1	100.0	100.0	31	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	22.9
	Moderate	0	0.0	6.7	0	0.0	0.4	16.9
	Middle	0	0.0	0.0	0	0.0	0.0	20.1
	Upper	0	0.0	20.0	0	0.0	1.5	40.1
	Unknown	0	0.0	73.3	0	0.0	98.1	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose LOC	Low	0	0.0	3.4	0	0.0	8.8	22.9
	Moderate	0	0.0	17.2	0	0.0	11.0	16.9
	Middle	0	0.0	20.7	0	0.0	13.5	20.1
	Upper	0	0.0	27.6	0	0.0	28.6	40.1
	Unknown	0	0.0	31.0	0	0.0	38.2	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	14.1	0	0.0	10.8	22.9
	Moderate	0	0.0	21.1	0	0.0	20.4	16.9
	Middle	0	0.0	23.9	0	0.0	23.6	20.1
	Upper	0	0.0	31.0	0	0.0	35.5	40.1
	Unknown	0	0.0	9.9	0	0.0	9.7	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Loan Purpose Not Applicable	Low	1	25.0	1.5	64	20.5	1.4	22.9
	Moderate	1	25.0	1.5	75	24.0	1.6	16.9
	Middle	1	25.0	1.5	35	11.2	0.7	20.1
	Upper	1	25.0	1.5	138	44.2	3.0	40.1
	Unknown	0	0.0	93.9	0	0.0	93.3	0.0
	Total	4	100.0	100.0	312	100.0	100.0	100.0
HMDA Totals	Low	36	11.4	8.7	1,734	5.4	4.2	22.9
	Moderate	88	27.8	22.7	5,595	17.5	14.7	16.9
	Middle	75	23.7	20.5	6,872	21.5	16.5	20.1
	Upper	111	35.0	31.5	17,432	54.5	43.3	40.1
	Unknown	7	2.2	16.7	329	1.0	21.2	0.0
	Total	317	100.0	100.0	31,962	100.0	100.0	100.0
Originations & Purchases 2016 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2019 Decatur, IL MSA 19500							
Product Type		Bank & Demographic Comparison					
		2019		2019		Total Businesses %	
Revenue	Loan Size	Count Bank		Dollar Bank			%
		#	%	\$ 000s	\$ %		
Small Business	Revenue	\$1 Million or Less	26	74.3	4,108	71.7	88.7
		Over \$1 Million	9	25.7	1,618	28.3	10.0
		Unknown	0	0.0	0	0.0	1.3
		Total	35	100.0	5,726	100.0	100.0
	Loan Size	\$100,000 or Less	20	57.1	963	16.8	
		\$100,001 - \$250,000	9	25.7	1,684	29.4	
		\$250,001 - \$1 Million	6	17.1	3,079	53.8	
		Total	35	100.0	5,726	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	17	65.4	859	20.9	
		\$100,001 - \$250,000	5	19.2	970	23.6	
		\$250,001 - \$1 Million	4	15.4	2,279	55.5	
		Total	26	100.0	4,108	100.0	
Originations & Purchases							
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

Assessment Area: 2019 IL Non MSA Morgan County								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,866	20.8
Moderate-income	2	20.0	1,472	16.4	273	18.5	1,580	17.6
Middle-income	4	40.0	3,016	33.7	345	11.4	1,615	18.0
Upper-income	4	40.0	4,473	49.9	201	4.5	3,900	43.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	10	100.0	8,961	100.0	819	9.1	8,961	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	2,775	1,244	13.0	44.8	1,137	41.0	394	14.2
Middle-income	5,792	3,322	34.7	57.4	1,775	30.6	695	12.0
Upper-income	6,882	5,013	52.3	72.8	1,334	19.4	535	7.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	15,449	9,579	100.0	62.0	4,246	27.5	1,624	10.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	297	25.1	267	25.3	27	24.8	3	16.7
Middle-income	382	32.3	328	31.1	44	40.4	10	55.6
Upper-income	502	42.5	459	43.5	38	34.9	5	27.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,181	100.0	1,054	100.0	109	100.0	18	100.0
	Percentage of Total Businesses:			89.2		9.2		1.5
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3	3.0	3	3.0	0	0.0	0	0.0
Middle-income	43	43.0	43	43.0	0	0.0	0	0.0
Upper-income	54	54.0	54	54.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	100	100.0	100	100.0	0	0.0	0	0.0
	Percentage of Total Farms:			100.0		0.0		0.0

2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS

Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans							
Assessment Area: 2019 IL Non MSA Morgan County							
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units
		2019			Dollar		
		Count Bank	Agg %	Dollar Bank	Agg \$ %		
		#	%	%	\$ (000s)	\$ %	\$ %
Home Purchase	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	10	19.6	17.7	515	9.2	13.0
	Middle	15	29.4	28.3	1,693	30.1	34.7
	Upper	26	51.0	54.0	3,415	60.7	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	51	100.0	100.0	5,623	100.0	100.0
Refinance	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	10.4	0	0.0	13.0
	Middle	4	36.4	34.4	571	32.8	34.7
	Upper	7	63.6	55.2	1,169	67.2	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	11	100.0	100.0	1,740	100.0	100.0
Home Improvement	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	9.5	0	0.0	13.0
	Middle	0	0.0	23.8	0	0.0	34.7
	Upper	1	100.0	66.7	15	100.0	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	1	100.0	100.0	15	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	60.0	0	0.0	12.7
	Middle	0	0.0	40.0	0	0.0	64.3
	Upper	0	0.0	0.0	0	0.0	23.0
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
Other Purpose LOC	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	13.0
	Middle	0	0.0	30.0	0	0.0	34.7
	Upper	0	0.0	70.0	0	0.0	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	0.0	0	0.0	13.0
	Middle	0	0.0	19.0	0	0.0	34.7
	Upper	0	0.0	81.0	0	0.0	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	0	0.0	15.4	0	0.0	13.0
	Middle	0	0.0	23.1	0	0.0	34.7
	Upper	0	0.0	61.5	0	0.0	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	0	0.0	0.0	0	0.0	0.0
	Moderate	10	15.9	14.9	515	7.0	13.0
	Middle	19	30.2	29.6	2,264	30.7	34.7
	Upper	34	54.0	55.5	4,599	62.3	52.3
	Unknown	0	0.0	0.0	0	0.0	0.0
	Total	63	100.0	100.0	7,378	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans						
Assessment Area: 2019 IL Non MSA Morgan County						
	Tract Income Levels	Bank & Demographic Comparison				
		Count Bank		2019 Dollar Bank		Total Businesses
		#	%	\$ 000s	\$ %	%
Small Business	Low	0	0.0	0	0.0	0.0
	Moderate	4	16.0	346	21.6	25.1
	Middle	8	32.0	373	23.3	32.3
	Upper	13	52.0	881	55.1	42.5
	Unknown	0	0.0	0	0.0	0.0
	Total	25	100.0	1,600	100.0	100.0

2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2019 IL Non MSA Morgan County								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2019						
		Count Bank		Agg %	Dollar Bank		Agg \$ %	
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	8	15.7	11.3	460	8.2	6.8	20.8
	Moderate	6	11.8	20.6	534	9.5	14.3	17.6
	Middle	18	35.3	27.6	1,554	27.6	27.4	18.0
	Upper	18	35.3	27.3	2,975	52.9	40.7	43.5
	Unknown	1	2.0	13.2	100	1.8	10.9	0.0
	Total		51	100.0	100.0	5,623	100.0	100.0
Refinance	Low	0	0.0	7.8	0	0.0	6.5	20.8
	Moderate	1	9.1	10.9	67	3.9	9.3	17.6
	Middle	5	45.5	20.8	711	40.9	18.5	18.0
	Upper	4	36.4	55.7	817	47.0	59.1	43.5
	Unknown	1	9.1	4.7	145	8.3	6.6	0.0
	Total		11	100.0	100.0	1,740	100.0	100.0
Home Improvement	Low	0	0.0	14.3	0	0.0	23.1	20.8
	Moderate	0	0.0	9.5	0	0.0	10.4	17.6
	Middle	1	100.0	28.6	15	100.0	16.0	18.0
	Upper	0	0.0	42.9	0	0.0	41.8	43.5
	Unknown	0	0.0	4.8	0	0.0	8.7	0.0
	Total		1	100.0	100.0	15	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	20.8
	Moderate	0	0.0	0.0	0	0.0	0.0	17.6
	Middle	0	0.0	20.0	0	0.0	10.2	18.0
	Upper	0	0.0	20.0	0	0.0	7.9	43.5
	Unknown	0	0.0	60.0	0	0.0	81.9	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose LOC	Low	0	0.0	10.0	0	0.0	4.0	20.8
	Moderate	0	0.0	20.0	0	0.0	13.7	17.6
	Middle	0	0.0	30.0	0	0.0	53.6	18.0
	Upper	0	0.0	40.0	0	0.0	28.7	43.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Other Purpose Closed/Exempt	Low	0	0.0	28.6	0	0.0	19.0	20.8
	Moderate	0	0.0	9.5	0	0.0	4.5	17.6
	Middle	0	0.0	9.5	0	0.0	13.2	18.0
	Upper	0	0.0	47.6	0	0.0	61.5	43.5
	Unknown	0	0.0	4.8	0	0.0	1.8	0.0
	Total		0	0.0	100.0	0	0.0	100.0
Loan Purpose Not Applicable	Low	0	0.0	0.0	0	0.0	0.0	20.8
	Moderate	0	0.0	0.0	0	0.0	0.0	17.6
	Middle	0	0.0	0.0	0	0.0	0.0	18.0
	Upper	0	0.0	0.0	0	0.0	0.0	43.5
	Unknown	0	0.0	100.0	0	0.0	100.0	0.0
	Total		0	0.0	100.0	0	0.0	100.0
HMDA Totals	Low	8	12.7	10.6	460	6.2	6.9	20.8
	Moderate	7	11.1	16.6	601	8.1	12.1	17.6
	Middle	24	38.1	24.6	2,280	30.9	23.9	18.0
	Upper	22	34.9	36.1	3,792	51.4	44.9	43.5
	Unknown	2	3.2	12.1	245	3.3	12.3	0.0
	Total		63	100.0	100.0	7,378	100.0	100.0

Originations & Purchases
2016 FFIEC Census Data

Note: Percentages may not add to 100.0 percent due to rounding

Small Business Lending By Revenue & Loan Size							
Assessment Area: 2019 IL Non MSA Morgan County							
Product Type		Bank & Demographic Comparison					
		Count Bank		2019 Dollar Bank		Total Businesses	
		#	%	\$ 000s	\$ %	%	
Small Business	Revenue	\$1 Million or Less	24	96.0	1,579	98.7	89.2
		Over \$1 Million	1	4.0	21	1.3	9.2
		Unknown	0	0.0	0	0.0	1.5
		Total	25	100.0	1,600	100.0	100.0
	Loan Size	\$100,000 or Less	21	84.0	586	36.6	
		\$100,001 - \$250,000	3	12.0	539	33.7	
		\$250,001 - \$1 Million	1	4.0	475	29.7	
		Total	25	100.0	1,600	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	20	83.3	565	35.8	
		\$100,001 - \$250,000	3	12.5	539	34.1	
		\$250,001 - \$1 Million	1	4.2	475	30.1	
		Total	24	100.0	1,579	100.0	
Originations & Purchases							
2019 FFIEC Census Data & 2019 Dun & Bradstreet information according to 2015 ACS							
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>							

APPENDIX D – Glossary

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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Affordability ratio: To determine housing affordability, the affordability ratio is calculated by dividing median household income by median housing value. This ratio allows the comparison of housing affordability across assessment areas and/or communities. An area with a high ratio generally has more affordable housing than an area with a low ratio.

Aggregate lending: The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

American Community Survey Data (ACS): The American Community Survey (ACS) data is based on a nationwide survey designed to provide local communities with reliable and timely demographic, social, economic, and housing data each year. The Census Bureau first released data for geographies of all sizes in 2010. This data is known as the “five-year estimate data.” The five-year estimate data is used by the FFIEC as the base file for data used in conjunction with consumer compliance and CRA examinations.¹

Area Median Income (AMI): AMI means –

1. The median family income for the MSA, if a person or geography is located in an MSA, or for the metropolitan division, if a person or geography is located in an MSA that has been subdivided into metropolitan divisions; or
2. The statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment area: Assessment area means a geographic area delineated in accordance with section 228.41

Automated teller machine (ATM): An automated teller machine means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank at which deposits are received, cash dispersed or money lent.

Bank: Bank means a state member as that term is defined in section 3(d)(2) of the Federal Deposit Insurance Act (12 USC 1813(d)(2)), except as provided in section 228.11(c)(3), and includes an uninsured state branch (other than a limited branch) of a foreign bank described in section 228.11(c)(2).

¹ Source: FFIEC press release dated October 19, 2011.

Branch: Branch refers to a staffed banking facility approved as a branch, whether shared or unshared, including, for example, a mini-branch in a grocery store or a branch operated in conjunction with any other local business or nonprofit organization.

Census tract: Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. They usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Combined Statistical Area (CSAs): Adjacent metropolitan statistical areas/metropolitan divisions (MSA/MDs) and micropolitan statistical areas may be combined into larger Combined Statistical Areas based on social and economic ties as well as commuting patterns. The ties used as the basis for CSAs are not as strong as the ties used to support MSA/MD and micropolitan statistical area designations; however, they do bind the larger area together and may be particularly useful for regional planning authorities and the private sector. Under Regulation BB, assessment areas may be presented under a Combined Statistical Area heading; however, all analysis is conducted on the basis of median income figures for MSA/MDs and the applicable state-wide non metropolitan median income figure.

Community Development: The financial supervisory agencies have adopted the following definition for community development:

1. Affordable housing, including for multi-family housing, for low- and moderate-income households;
2. Community services tailored to meet the needs of low- and moderate-income individuals;
3. Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or
4. Activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definitions of community development. Activities that revitalize or stabilize:

- 1) Low- or moderate-income geographies;
- 2) Designated disaster areas; or
- 3) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation and Office of the Comptroller of the Currency based on:
 - a. Rates of poverty, unemployment or population loss; or
 - b. Population size, density and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density and

dispersion if they help to meet essential community services including the needs of low- and moderate-income individuals.

Community Development Loan: A community development loan means a loan that:

- 1) Has as its primary purpose community development; and
- 2) Except in the case of a wholesale or limited purpose bank –
 - a. Has not been reported or collected by the bank or an affiliate for consideration in the bank’s assessment as a home mortgage, small business, small farm, or consumer loan, unless it is a multi-family housing loan (as described in the regulation implementing the Home Mortgage Disclosure Act); and
 - b. Benefits the bank’s assessment area(s) or a broader statewide or regional area that includes the bank’s assessment area(s).

Community Development Service: A community development service means a service that:

- 1) Has as its primary purpose community development; and
- 2) Is related to the provision of financial services.

Consumer loan: 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 of loans: motor vehicle, credit card, other consumer secured loan, includes loans for home improvement purposes not secured by a dwelling, and other consumer unsecured loan, includes loans for home improvement purposes not secured.

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).

Fair market rent: Fair market rents (FMRs) are gross rent estimates. They include the shelter rent plus the cost of all tenant-paid utilities, except telephones, cable or satellite television service, and internet service. HUD sets FMRs to assure that a sufficient supply of rental housing is available to their program participants. To accomplish this objective, FMRs must be both high enough to permit a selection of units and neighborhoods and low enough to serve as many low-income families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard-quality rental housing units. The current definition used is the 40th percentile rent, the dollar amount below which 40 percent of the standard-quality rental housing units are rented. The 40th percentile rent is drawn from the distribution of rents of all units occupied by recent movers (renter households who moved to their present residence within the past 15 months). HUD is required to ensure that FMRs exclude non-market rental housing in their

computation. Therefore, HUD excludes all units falling below a specified rent level determined from public housing rents in HUD's program databases as likely to be either assisted housing or otherwise at a below-market rent, and units less than two years old.

Full review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and amount of qualified investments) and qualitative factors (for example, innovativeness, complexity and responsiveness).

Geography: A census tract delineated by the U.S. Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act: The statute that requires certain mortgage lenders that do business or have banking offices in metropolitan statistical areas to file annual summary reports of their mortgage lending activity. The reports include data such as the race, gender and income of the applicant(s) and the disposition of the application(s) (for example, approved, denied, and withdrawn).

Home mortgage loans: Are defined in conformance with the definitions of home mortgage activity under the Home Mortgage Disclosure Act and include closed end mortgage loans secured by a dwelling and open-end lines of credit secured by a dwelling. This includes loans for home purchase, refinancing and loans for multi-family housing. It does not include loans for home improvement purposes that are not secured by a dwelling.

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.

Income Level: Income level means:

- 1) Low-income – an individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a census tract;
- 2) Moderate-income – an 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 census tract;
- 3) Middle-income – an 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 census tract; and
- 4) Upper-income – an 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 census tract.

Additional Guidance: .12(m) Income Level: The median family income levels (MFI) for census tracts are calculated using the income data from the United States Census Bureau's American Community Survey and geographic definitions from the Office of Management and Budget (OMB) and are updated approximately

every five years (.12(m) Income Level).

Limited-purpose bank: This term refers to a bank that offers only a narrow product line such as credit card or motor vehicle loans to a regional or broader market and for which a designation as a limited-purpose bank is in effect, in accordance with section 228.25(b).

Limited review: Performance under the Lending, Investment, and Services test is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, amount of investments and branch office distribution).

Loan location: Under this definition, a loan is located as follows:

- 1) Consumer loan is located in the census tract where the borrower resides;
- 2) Home mortgage loan is located in the census tract where the property to which the loan relates is located;
- 3) Small business and small farm loan is located in the census tract where the main business facility or farm is located or where the loan proceeds have been applied as indicated by the borrower.

Loan product office: This term refers to a staffed facility, other than a branch, that is open to the public and that provides lending-related services, such as loan information and applications.

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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) 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 it and half below it.

Metropolitan Area: A metropolitan statistical area (**MSA**) or a metropolitan division (**MD**) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a single core population of at least 2.5 million may be divided into MDs. A metropolitan statistical area that crosses into two or more bordering states is called a multistate metropolitan statistical area.

Multifamily: Refers to a residential structure that contains five or more units.

Nonmetropolitan area: This term refers to any area that is not located in a metropolitan statistical area or metropolitan division. Micropolitan statistical areas are included in the definition of a

nonmetropolitan area; a micropolitan statistical area has an urban core population of at least 10,000 but less than 50,000.

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: This term refers to any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: This term refers to a state or multistate metropolitan area. For institutions with domestic branch offices in one state only, the institution's CRA rating is the state's rating. If the institution maintains domestic branch offices in more than one state, the institution will receive a rating for each state in which those branch offices are located. If the institution maintains domestic branch offices in at least two states in a multistate metropolitan statistical area, the institution will receive a rating for the multistate metropolitan area.

Small Bank: This term refers to a bank that as of December 31 of either of the prior two calendar years, had assets of less than \$1.252 billion. Intermediate small bank means a small bank with assets of at least \$313 million as of December 31 of both of the prior two calendar years and less than \$1.252 billion as of December 31 of either of the prior two calendar years.

Annual Adjustment: The dollar figures in paragraph (u)(1) of this section shall be adjusted annually and published by the Board, based on the year-to-year change in the average of the Consumer Price Index for Urban Wage Earners and Clerical Workers, not seasonally adjusted, for each 12-month period ending in November, with rounding to the nearest million.

Small Business Loan: This term refers to a loan that is included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. The loans have original amounts of \$1 million or less and are either secured nonfarm, nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: This term refers to a loan that is included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income. These loans have original amounts of \$500 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Wholesale Bank: This term refers to a bank that is not in the business of extending home mortgage, small business, small farm or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with section 228.25(b).