

PUBLIC DISCLOSURE

June 21, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Midland States Bank
RSSD #773247**

**1201 Network Centre Drive
Effingham, Illinois 62401**

Federal Reserve Bank of St. Louis

**P.O. Box 442
St. Louis, Missouri 63166-0442**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of the institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution

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INSTITUTION’S CRA RATING: This institution is rated SATISFACTORY.

The following table indicates the performance level of Midland States Bank with respect to the Lending, Investment, and Service Tests.

Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors supporting the institution’s rating include the following:

- The bank’s lending levels reflect good responsiveness to assessment areas’ credit needs.
- A high percentage of the bank’s loans are made in the bank’s assessment areas.
- The distribution of loans by borrowers’ income and revenue profiles reflects good penetration among customers of different income levels and businesses and farms of different sizes.
- The overall geographic distribution of loans reflects good penetration throughout the bank’s assessment areas.
- Overall, the bank makes a relatively high level of community development loans.
- The bank makes an adequate level of community development investments and grants.
- Service delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels. Changes in branch locations have generally not adversely affected accessibility, and business hours and services do not vary in a way that inconveniences low- or moderate-income geographies or individuals.
- The bank provides an adequate level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Midland States Bank is an interstate, full-service retail bank headquartered in Effingham, Illinois. The bank is a wholly owned subsidiary of Midland States Bancorp, Inc., a single-bank holding company also headquartered in Effingham, Illinois.

The bank operates 53 branches across 8 assessment areas covering 2 states. Of the 53 branches, 3 new branches were opened during the examination period. Each branch has a cash-dispensing automated teller machine (ATM) on site, most have drive-up accessibility, and all but one of the bank's branches are full service. In addition to the bank's branch-based ATMs, the bank operates 70 Meirtran co-branded ATMs throughout Illinois. During the review period, the bank acquired Homestar Bank, growing Midland's presence within its Kankakee and Chicago area markets. Following the acquisition, the bank engaged in an operational efficiency effort to address its overlapping branch network. This led to 18 branches being closed or consolidated throughout the bank's footprint.

The bank's assessment areas are as follows:

St. Louis Multistate Metropolitan Statistical Area (MSA)

- Franklin, Jefferson, St. Charles, St. Louis City, and St. Louis Counties in Missouri; Bond, Clinton, Madison, Monroe, and St. Clair Counties in Illinois (10 of 15 counties in the multistate MSA).

State of Illinois

- Rockford assessment area – All of the Rockford, Illinois MSA, including Boone and Winnebago Counties.
- Northern Illinois assessment area – Bureau, LaSalle, Lee, Livingston, Ogle, Putnam, Stephenson, and Whiteside nonMSA Counties.
- Southern Illinois assessment area – Clay, Coles, Cumberland, Douglas, Effingham, Fayette, Jasper, Jefferson, Marion, Montgomery, Randolph, Shelby, and Washington nonMSA Counties.
- Chicago assessment area – DeKalb, Grundy, Kankakee, Kendall, and Will Counties (five of the counties located in the Chicago-Naperville, Illinois-Indiana-Wisconsin combined statistical area (Chicago CSA)). For purposes of this evaluation, this assessment area combines three of the bank's assessment areas within the Chicago CSA:
 - Chicago assessment area – Grundy and Will Counties (two of the five counties in the Chicago-Naperville-Evanston, IL MSA).

- Kankakee assessment area – All of the Kankakee, Illinois MSA.
- Elgin assessment area – DeKalb and Kendall Counties (two of the three counties in the Elgin, Illinois MSA).
- Champaign assessment area – All of the Champaign-Urbana, Illinois MSA, including Champaign and Piatt Counties.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its assessment area. Moreover, the bank is capable of meeting those credit needs based on its available resources and financial products. As of March 31, 2021, the bank reported total assets of \$6.9 billion. That represents an increase of \$1.3 billion, or 23.2 percent, in assets since the previous evaluation. As of the same date, loans and leases outstanding were \$5.0 billion, while deposits totaled \$5.4 billion. The following table displays the bank’s loan portfolio by credit category.

Distribution of Total Loans as of March 31, 2021		
Credit Category	Amounts (\$000s)	Percentage of Total Loans
Construction and development	\$191,870	3.9%
Commercial real estate	\$1,222,738	24.6%
Multifamily residential	\$161,499	3.3%
1–4 family residential	\$485,053	9.8%
Farmland	\$76,734	1.5%
Farm loans	\$57,515	1.2%
Commercial and industrial	\$1,194,064	24.0%
Loans to individuals	\$813,194	16.4%
Total other loans	\$763,313	15.4%
TOTAL	\$4,965,980	100%

Based on the dollar volume of loans outstanding, the most significant loan category is commercial real estate loans, which account for 24.6 percent of all loans. Other significant categories include commercial and industrial loans (24.0 percent) and loans to individuals (16.4 percent). In addition, the bank originates and subsequently sells a significant volume of loans related to residential real estate; as these loans are typically sold on the secondary market shortly after origination, this activity is not fully reflected in the previous table.

Midland States Bank received a Satisfactory rating at the previous CRA evaluation conducted by this Reserve Bank on April 22, 2019.

SCOPE OF EXAMINATION

The bank’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s (FFIEC’s) large bank procedures, which include a Lending Test, Investment Test, and Service Test. Bank performance under these tests is rated at the institution level, as well as by multistate MSAs and state levels.

As was stated earlier, the bank maintains operations in eight delineated assessment areas within two states (Illinois and Missouri). The Missouri portion of the bank’s assessment area is contained entirely within the St. Louis, Missouri-Illinois MSA (St. Louis MSA). In light of these characteristics, the bank received three sets of ratings: overall institution ratings, ratings for the St. Louis multistate MSA, and ratings for the state of Illinois.

The following table details the number of branch offices and breakdown of deposits at the state and multistate MSA levels. It also includes the scope of review performed by assessment area. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2020. See *Appendix A* for additional details regarding the bank’s level of deposits in the eight individual assessment areas.

State/ Multistate MSA	Offices		Deposits as of June 30, 2020		Assessment Area Reviews		
	#	%	\$ (000s)	%	Full Scope	Limited Scope	TOTAL
St. Louis MSA	15	28.3%	\$1,130,868	22.6%	1	0	1
Illinois	38	71.7%	\$3,876,479	77.4%	4	1	5
OVERALL	53	100%	\$5,007,347	100%	5	1	6

The bank’s institution ratings are a blend of the multistate MSA and the state rating. Both are weighted and used to make overall rating decisions. In light of branch structure, loan and deposit activity, and supervisory history, CRA performance in the state of Illinois was given primary consideration.

Residential real estate, small business loans, and small farm loans were used to evaluate the bank’s lending performance, as these loan categories are considered the bank’s core business lines based on lending volume and the bank’s stated business strategy. Therefore, the loan activity represented by these credit products is deemed indicative of the bank’s overall lending performance. However, because the bank places an emphasis on home mortgage lending across its assessment areas, performance based on the Home Mortgage Disclosure Act (HMDA) loan category carried the most significance toward the bank’s overall performance conclusions.

In evaluating the credit needs of the assessment areas, as well as local market conditions, interviews with 11 community contacts throughout the bank’s full-scope assessment areas were used. The following table displays the number of community contacts used as part of each full-scope assessment area review.

Assessment Area	Community Contacts
St. Louis	3
Rockford MSA	2
Northern Illinois	2
Southern Illinois	2
Chicago	2
TOTAL	11

The information shared by the community contacts was used to help ascertain specific credit needs and opportunities in the bank’s assessment areas. Information from these interviews also assisted in evaluating the bank’s responsiveness to identified community credit needs and community development opportunities. Key details from these community contact interviews are included in the *Description of Institution’s Operations* section, applicable to the assessment area for which they were conducted.

Lending Test

Under the Lending Test, the bank’s performance is evaluated using the following criteria and the corresponding time periods.

Performance Criteria	Products Selected	Time Period
Level of Lending Activity	Home mortgage loans reported under the HMDA	January 1, 2018 – December 1, 2019
Assessment Area Concentration		
Loan Distribution by Borrower’s Profile	Small business and small farm loans reported under the CRA	April 22, 2019 – June 20, 2021
Geographic Distribution of Loans		
Community Development Lending Activities		
Product Innovation ¹		

Under the Lending Test criteria previously noted, analyses often involve comparisons of bank performance to assessment area demographics and the performance of other lenders based on HMDA and CRA aggregate data. Unless otherwise noted, the following are the information sources referenced throughout the evaluation:

- Assessment area demographics are based on 2015 American Community Survey (ACS) data, and business demographics are based on 2019 Dun & Bradstreet data.
- Median family incomes are based on the FFIEC’s 2015 annual estimates. The 2015 estimates were used to classify borrowers into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure for that area.

¹ Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank’s performance negatively. These activities are used largely to augment consideration given to an institution’s performance under the quantitative criteria, resulting in a higher performance rating.

- Deposit dollar amounts are taken from the FDIC Deposit Market Share Report Data as of June 30, 2020.
- Industry demographics are sourced from the 2017 U.S. Census Bureau Business Patterns data, according to the North American Industry Classification System.
- Unemployment data is sourced from the U.S. Department of Labor, Bureau of Labor Statistics, and is not seasonally adjusted.

When analyzing bank performance, greater emphasis is placed on performance in relation to aggregate lending data because it is updated annually and perceivably more accurately describes contemporary factors impacting lenders. Moreover, more weight was placed on the bank's performance in 2019 as it provides a more contemporary reflection of the bank's lending levels.

Investment Test

All community development investments, including grants and donations made since the bank's previous CRA evaluation, were reviewed. In addition, investments made prior to the date of the previous CRA evaluation but still outstanding as of this review date were also considered. Qualified investments and grants were evaluated to determine the bank's overall level of activity, use of innovative and/or complex investments, and responsiveness to the credit and community development needs of the bank's assessment areas.

Service Test

The review period for retail and community development services includes activity from the date of the bank's previous CRA evaluation to the date of the current evaluation. The Service Test considers the following criteria:

- Distribution and accessibility of bank branches and alternative delivery systems
- Changes in branch locations
- Reasonableness of business hours and retail services
- Community development services

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Midland States Bank’s performance under the Lending Test is rated High Satisfactory. Lending levels reflect good responsiveness to the credit needs of the assessment areas, and a high percentage of the bank’s lending activity is inside the assessment areas. The distribution of loans by borrower’s income and revenue profile reflects good dispersion, while geographic distribution of loans reflects good penetration throughout the assessment areas. Additionally, the bank makes a relatively high level of community development loans and makes use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.

Rated Area	Lending Test Rating
Illinois	High Satisfactory
St. Louis MSA	High Satisfactory
OVERALL	HIGH SATISFACTORY

Lending Activity

Overall, the bank’s lending levels reflect good responsiveness to credit needs, based on lending activity analyzed under the Lending Test. Lending activity from 2018 and 2019, based on the product lines reviewed during this evaluation, is detailed in the following table.

Summary of Lending Activity January 1, 2018 through December 31, 2019				
Loan Type	#	%	\$(000s)	%
Home Improvement	100	1.7%	\$4,693	0.5%
Home Purchase	2,633	45.8%	\$358,402	41.3%
Multifamily Housing	38	0.7%	\$25,340	2.9%
Refinancing	885	15.4%	\$112,636	13.0%
Total HMDA	3,768	65.5%	\$504,950	58.1%
Small Business	1,352	23.5%	\$263,200	30.3%
Small Farm	632	11.0%	\$100,584	11.6%
Total Loans	5,752	100.0%	\$868,734	100.0%

The total number and dollar volume of loans were considered in arriving at lending activity conclusions. Additional consideration was also given to competitive factors and the bank’s overall importance to the area when evaluating lending activity performance. A more detailed analysis of these factors is present in sections for each assessment area reviewed under full-scope procedures.

Assessment Areas Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans originated inside and outside the bank’s assessment areas for 2018 and 2019.

Lending Inside and Outside of Assessment Areas January 1, 2018 through December 31, 2019						
Loan Type	Inside Assessment Areas		Outside Assessment Areas		TOTAL	
	HMDA	3,768	84.7%	680	15.3%	4,448
\$504,950		63.7%	\$287,542	36.3%	\$792,492	100%
Small Business	1,352	83.8%	262	16.2%	1,614	100%
	\$263,200	77.2%	\$77,638	22.8%	\$340,838	100%
Small Farm	632	86.3%	100	13.7%	732	100%
	\$100,584	87.9%	\$13,822	12.1%	\$114,406	100%
TOTAL LOANS	5,752	84.7%	1,042	15.3%	6,794	100%
	\$868,734	69.6%	\$379,002	30.4%	\$1,247,736	100%

As shown in the table above, a high percentage of the bank’s loan originations are made inside its assessment areas by both number and dollar volume. The bank made 84.7 percent of its loans by number and 69.6 percent of its loans by dollar volume inside the assessment areas.

Borrower and Geographic Distribution

As displayed in the following table, performance by borrower’s income/revenue profile is good, based on the analyses of lending in Illinois and the St. Louis MSA.

Rated Area	Loan Distribution by Borrower’s Profile
Illinois	Good
St. Louis MSA	Good
OVERALL	GOOD

The bank’s overall distribution of lending by income level of census tract reflects good penetration throughout the rated areas detailed below.

Rated Area	Geographic Distribution of Loans
Illinois	Good
St. Louis MSA	Good
OVERALL	GOOD

Community Development Lending Activities

Overall, the bank makes a relatively high level of community development loans considering performance in all rated areas, as noted in the following table.

Rated Area	Community Development Lending
Illinois	Adequate
St. Louis MSA	Relatively High
OVERALL	RELATIVELY HIGH

As is displayed in the preceding table, the bank's performance varied between rated areas. Moreover, the bank's overall performance in Illinois, which was weighted higher between the two areas, was not as strong as the bank's performance in the St. Louis MSA. Even so, the bank's performance warranted the higher of the two ratings for several reasons. First, Midland States Bank originated 33 community development loans within its assessment areas, which is 10 more loans than during the last examination period. The bank also substantially increased its community development lending by dollar value, going from \$53.2 million during the prior examination period to \$132.5 million within the current examination period. Second, the bank's community development lending activity included 16 Paycheck Protection Program (PPP) loans that were deemed responsive to area community development needs and positively affected the bank's overall rating. Finally, the bank made four community development loans outside of its assessment area totaling \$5.0 million. Together, these factors support the overall higher rating.

Product Innovation

Midland States Bank makes use of innovative and flexible lending practices in serving its assessment areas' credit needs. Various offerings by the bank include:

- U.S. Department of Agriculture, Rural Development (RD): This loan program is designed to assist low- and moderate-income (LMI) individuals in purchasing affordable housing in rural areas. There is no down payment; however, borrowers must meet income requirements for these loans and have good credit histories. During the review period, the bank originated 93 RD loans totaling \$10.0 million.
- Farm Credit System (Farmer Mac): The bank works with Farmer Mac to increase the availability of long-term credit at stable interest rates to further development in rural America. During the review period, the bank originated five Farmer Mac loans totaling \$2.3 million.
- Federal Housing Administration/U.S. Department of Veterans Affairs-Insured Loan Programs: These government-insured loan programs offer flexible, long-term financing to eligible borrowers with low or no down payments. During the review period, the bank originated 301 loans through these programs, totaling \$48.0 million.

- Federal Home Loan Bank (FHLB) of Chicago Down Payment Plus: This FHLB assistance program offers down payment funds for families with income at or below 80.0 percent of the area median income. During the review period, the bank originated 115 loans using a total of \$7.5 million in down payment assistance funds.
- Illinois Housing Development Authority (IHDA): The bank works with the IHDA to provide affordable housing and home loans to LMI borrowers. Through this program, borrowers have multiple options to receive below-market interest rates, down payment assistance, or funds to be applied toward closing costs. During the review period, the bank originated 466 IHDA loans totaling \$27.0 million.
- Missouri Housing Development Commission (MHDC): Through this program, the bank is able to provide home loans that include down payment and closing cost assistance to first-time homebuyers not otherwise able to afford a mortgage loan. During the review period, the bank originated four MHDC loans totaling \$246,507
- Believable Banking Home Mortgage and Believable Banking Home Improvement Loan: These loan products were created as a portfolio product by the bank to address the affordable housing needs for people living in LMI areas. During the review period, the bank originated 267 loans totaling \$41.8 million.
- Small Business Administration (SBA): The bank offers SBA products that provide small businesses access to capital with more flexible terms than conventional commercial financing. During the review period, the bank originated 65 SBA loans totaling \$66.6 million.
- SBA PPP: The bank was an active participant in the SBA's PPP, which offered no-interest, forgivable loans to businesses across the country. During the review period, the bank originated 3,280 PPP loans totaling \$402.2 million.

INVESTMENT TEST

Overall, Midland States Bank is rated Low Satisfactory for the Investment Test. The bank made an adequate level of qualified community development investments and grants when given the opportunity for such investments and grants within the assessment areas. These investments and grants exhibit adequate responsiveness to credit and community development needs throughout the combined assessment areas, and the bank makes occasional use of innovative and/or complex investments to support community development initiatives.

Rated Area	Community Development Investments
Illinois	Low Satisfactory
St. Louis MSA	High Satisfactory
OVERALL	LOW SATISFACTORY

During the review period, the bank made new investments totaling \$26.8 million, which exceeds the level of community development investments made during the bank’s prior examination period (\$13.3 million). It also had \$16.5 million in previous period investments still outstanding. In addition to meeting the investment needs of its own assessment areas, the bank had \$4.9 million in investments that benefit areas outside of the bank’s delineated assessment areas.

Lastly, the bank made community development grants and donations totaling \$321,171 to organizations serving the bank’s assessment areas.

SERVICE TEST

Midland States Bank’s performance is rated Low Satisfactory under the Service Test, which includes four components—accessibility, changes in branch locations, reasonableness of hours and services, and community development services. While the Service Test rating is a blend of these four components, greater emphasis was placed on branch accessibility and the bank’s record of opening and closing offices.

Overall, bank offices are reasonably accessible to the bank’s geographies, and the bank’s record of opening and closing offices has generally not adversely affected accessibility to delivery systems. Furthermore, services do not vary in a way that inconveniences its assessment areas. Finally, the bank provides an adequate level of community development services.

Rated Area	Community Development Services
Illinois	Low Satisfactory
St. Louis MSA	High Satisfactory
OVERALL	LOW SATISFACTORY

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings from the Consumer Affairs examination, including a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements, conducted concurrently with this CRA evaluation, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

ST. LOUIS, MISSOURI-ILLINOIS MULTISTATE MSA²

CRA RATING FOR ST. LOUIS MSA:

The Lending Test is rated:

The Investment Test is rated:

The Service Test is rated:

SATISFACTORY

High Satisfactory

High Satisfactory

High Satisfactory

Major factors supporting the institution's St. Louis assessment area rating include the following:

- The bank's lending levels reflect good responsiveness to assessment area credit needs in the St. Louis assessment area.
- The distribution of loans by borrower's income and revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The bank's overall geographic distribution of loans reflects good penetration throughout the St. Louis assessment area.
- The bank makes a relatively high level of community development loans within the St. Louis assessment area.
- The bank makes a significant level of qualified community development investments and grants within the St. Louis assessment area.
- The bank provides an adequate level of community development services in the St. Louis assessment area.
- Service delivery systems are accessible to areas and individuals of different income levels in the St. Louis assessment area, and changes in branch locations have not adversely affected accessibility in the St. Louis assessment area.

SCOPE OF EXAMINATION

Examination scope considerations applicable to the review of the St. Louis assessment area are consistent with the overall CRA examination scope, as presented in the *Institution/Scope of Examination* section. However, as the bank's small farm loan activity is minimal in this assessment area, this lending category did not play a material role in the evaluation of St. Louis MSA lending performance. Consequently, small farm lending activity is not included in the evaluation of lending activity within the St. Louis MSA Lending Test discussions. The assessment area was reviewed under full-scope evaluation procedures and included information obtained from three community contacts to ascertain the specific credit needs of the assessment area. Details from these interviews are included in the *Description of Institution's Operations* section that follows.

² This rating reflects performance within the multistate MSA. The Missouri statewide evaluation is adjusted and does not reflect performance in the multistate MSA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ST. LOUIS ASSESSMENT AREA

Bank Structure

The bank operates 15 branches in the assessment area, representing 28.3 percent of total branches. Of the 15 branches, the bank operates 11 in the Missouri portion of the multistate metropolitan area and 4 in the Illinois portion. The bank has one branch located in a low-income census tract, three located in moderate-income census tracts, four located in middle-income census tracts, and seven located in upper-income census tracts. During the review period, the bank did not open any branches in the assessment area and closed one branch located in an upper-income census tract in Freeburg, Illinois. Based on this branch network and other service delivery systems, the bank is well positioned to deliver financial services to the entire St. Louis assessment area.

General Demographics

The multistate MSA is composed of 15 counties in Missouri and Illinois, including the independent city of St. Louis. The bank has designated 10 of the 15 counties in the St. Louis MSA as an assessment area. According to 2015 U.S. Census Data, the largest county in the assessment area is St. Louis County (Missouri) with a population of 1,001,327, while the smallest county is Bond County (Illinois) with a population of 17,313.

This assessment area's population and demographics are quite diverse. As a result, credit needs in the area vary and include a blend of consumer and business credit products. According to community contacts, the region needs innovative mortgage products that address appraisal challenges and borrowers with smaller down payments. Community contacts also stressed the need for microloans that target small businesses and businesses in underserved neighborhoods. The St. Louis assessment area has a plethora of community development intermediaries and organizations that are ready and able to support banks in reaching their community.

This assessment area is a highly competitive banking market, with 104 total financial institutions operating within the market. The bank is ranked 18th among the 104 financial institutions operating within the assessment area, encompassing 1.1 percent of the assessment area's deposit market share.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	79	125	202	172	4	582
	13.6%	21.5%	34.7%	29.6%	0.7%	100%
Family Population	52,106	127,832	260,017	234,562	1,439	675,956
	7.7%	18.9%	38.5%	34.7%	0.2%	100%

As shown above, 35.1 percent of the census tracts in the assessment area are LMI geographies, but only 26.6 percent of the family population resides in these tracts.

Based on 2015 U.S. Census data, the median family income for the assessment area was \$71,007. At the same time, median family incomes for Missouri, Illinois, and the MSA were \$60,809, \$71,546, and \$70,718, respectively. More recently, the FFIEC estimates the 2019 median family income for the St. Louis MSA to be \$81,200. The following table displays population percentages of assessment area families by income level compared to the Missouri and Illinois family populations.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	145,635	115,986	134,182	280,153	675,956
	21.6%	17.2%	19.9%	41.5%	100%
State of Illinois	706,235	526,032	608,217	1,2984,199	3,124,683
	22.6%	16.8%	19.5%	41.1%	100%
State of Missouri	327,271	274,380	319,267	609,088	1,530,006
	21.4%	17.9%	20.9%	39.8%	100%

As shown in the table above, 38.8 percent of families within the assessment area were considered LMI, which is slightly lower than LMI family percentages of 39.4 percent in Illinois and 39.3 percent in Missouri. The percentage of families living below the poverty level in the assessment area, 9.6 percent, falls below the 10.5 percent level in the state of Illinois and the 11.1 percent level in the state of Missouri. Considering these factors, the assessment area appears similar in affluence to Illinois and Missouri.

Housing Demographics

The following table shows the median housing value, the median gross rent, and the affordability ratio in the assessment area compared to the state of Illinois and the state of Missouri.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)
Bond County (Illinois)	\$158,830	34.87	\$821
Clinton County (Illinois)	\$106,900	44.85	\$608
Madison County (Illinois)	\$134,500	47.02	\$779
Monroe County (Illinois)	\$126,500	42.24	\$778
St. Claire County (Illinois)	\$191,200	37.06	\$830
Franklin County (Missouri)	\$120,400	41.44	\$796
Jefferson County (Missouri)	\$149,400	32.45	\$696
St. Charles County (Missouri)	\$149,900	36.92	\$783
St. Louis County (Missouri)	\$188,200	38.48	\$931
St. Louis City (Missouri)	\$173,400	34.46	\$882
Assessment Area	\$158,830	34.9%	\$821
State of Illinois	\$173,800	33.1%	\$907
State of Missouri	\$138,400	34.8%	\$746

The assessment area’s median housing value and the median gross monthly rent are higher than the state of Missouri but lower than the state of Illinois, which is highly influenced by housing costs in the greater Chicago metropolitan area. It is also notable that although the affordability ratios for the three geographies are relatively similar, the assessment area’s is the highest, indicating housing is slightly more affordable when compared to Illinois and Missouri overall. However, affordability varies throughout the assessment area. The three counties with the highest affordability are all in Illinois, while the three counties with the lowest affordability ratio are all in Missouri. Ultimately, this suggests that while the state of Missouri is overall more affordable than Illinois, within the assessment area, housing is more affordable on the Illinois side of the bistate metropolitan area.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. County business patterns indicate that there are 1,076,176 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are healthcare and social assistance (18.5 percent), followed by retail trade (11.4 percent), and manufacturing (10.1 percent). The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area as a whole, the state of Illinois, and the state of Missouri.

Unemployment Levels for the Assessment Area			
Geography	Time Period (Annual Average)		
	2018	2019	2020
Assessment Area	3.4%	3.2%	6.7%
Illinois	4.4%	4.0%	9.5%
Missouri	3.2%	3.3%	6.1%

As shown in the table above, unemployment levels in the assessment area, the state of Illinois, and the state of Missouri were relatively similar in 2018 and 2019. Additionally, the assessment area, the state of Illinois, and the state of Missouri all saw their unemployment rates increase in 2020. Based on the data, the state of Illinois saw a more significant increase in its unemployment rate than the assessment area and the state of Missouri.

Community Contact Information

For the St. Louis assessment area, three community contact interviews were referenced as part of this evaluation. One of the interviews focused on affordable housing needs, one focused on small business needs, and the final community contact interview was used to better understand COVID-19's effects on LMI individuals and communities.

The community contact interviewees categorized the overall economy positively, indicating the metropolitan area has seen steady growth in the last few years. Interviewees also cited significant economic disparities between the northern and southern portions of St. Louis City and County, along with similar disparities between East St. Louis, Illinois, and the surrounding suburban counties in Illinois. Interviewees voiced frustration that despite a robust banking ecosystem in the region overall, branches are hard to find in underserved communities, and products are not tailored to the needs of LMI populations.

One community contact specializing in affordable housing mentioned that lower-income neighborhoods in the metropolitan area have a small number of livable, single family housing units and little to no new construction. Instead, the majority of single family homes are older and need expensive repairs. There also is a large number of vacant homes in lower-income communities, according to the contact. The quality of rental housing varies substantially across the metropolitan area, including expensive, market-rate units in the southern and central parts of St. Louis and less expensive, lower-quality multifamily units in the northern parts of the metropolitan area. According to the contact, substantive barriers exist for lower-income residents who want to buy and own their home, including an inability to save for a down payment, low credit scores, and generally rigid lending standards. The contact suggested more innovative lending products were needed to help first-time and minority homebuyers. This contact mentioned Midland States Bank by name as an institution that is particularly responsive to the needs of the local community.

The second community contact spoke to the small business needs of the St. Louis metropolitan area. According to the interviewee, small businesses are concentrated on the Missouri side of the bistate area because of a more robust entrepreneurial ecosystem. The contact also highlighted that

it is cheaper to buy space for a small business the closer the business is to the city of St. Louis, which makes developing and growing harder in St. Louis County and St. Charles County. Credit needs for small businesses include flexible start-up and working capital, especially capital that has a lower interest rate.

The final community contact emphasized that COVID-19 had a cataclysmic effect on the local economy, shutting down businesses throughout the region. This forced some small businesses to close and many households to lose portions of their income. Ultimately, organizations that support LMI individuals were stretched thin due to increased demand from residents. The contact emphasized that many of the residents in lower-quality housing were most likely to be employed in the industries hit hardest by the pandemic. Thus, needs and challenges were only compounded for those who were already struggling.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. LOUIS ASSESSMENT AREA

LENDING TEST

Midland States Bank’s Lending Test performance in the St. Louis MSA is rated High Satisfactory. The bank’s lending levels reflect good responsiveness to assessment area credit needs. The distribution of loans reflects good penetration among borrowers of different income levels and businesses of different sizes. Similarly, the geographic distribution of loans reflects good penetration throughout the assessment area. Lastly, the bank makes a relatively high level of community development loans and makes use of innovative and/or flexible lending practices in serving the credit needs of the assessment area.

Lending Activity

The following table displays the lending volume in the St. Louis assessment area by number and dollar volume.

Summary of Lending Activity January 1, 2018 through December 31, 2019				
Loan Type	#	%	\$(000s)	%
Home Improvement	13	1.2%	\$989	0.4%
Home Purchase	658	59.2%	\$134,266	58.8%
Multifamily Housing	5	0.5%	\$2,344	1.0%
Refinancing	196	17.6%	\$38,521	16.9%
Total HMDA	883	79.4%	\$176,538	77.3%
Small Business	220	19.8%	\$50,454	22.1%
Small Farm	9	0.8%	\$1,349	0.6%
Total Loans	1,112	100.0%	\$228,341	100.0%

The bank’s lending activity in this assessment area represents 19.3 percent of the total HMDA and CRA loans made in the bank’s combined assessment areas. The level of lending activity in the assessment area approaches the percentage of the total bank deposits held within the assessment area (22.6 percent) but trails the percentage of total bank branches in the assessment area (28.3 percent).

St. Louis has a diverse, active banking market that includes several credit unions and national mortgage lenders that increase the level of competition for HMDA and CRA lending opportunities. However, a community contact specializing in affordable housing indicated Midland States Bank is actively trying to reach underserved families and geographies with loan products. Therefore, the bank’s lending activity levels reflect good responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the St. Louis assessment area, based on HMDA and small business lending performance.

HMDA Lending

The distribution of HMDA loans by borrower's income level is good.

The distribution of HMDA loans to low-income borrowers is considered good in 2018 (11.1 percent) and 2019 (11.1 percent), as the bank's performance exceeds the performance of peer institutions in the assessment area in 2018 (8.7 percent) and in 2019 (8.5 percent). While the bank's performance exceeds peer performance, it trailed the demographic figure in both years, which was 21.5 percent.

The bank originated 22.5 percent of its HMDA loans to moderate-income borrowers in 2018, which exceeds both aggregate lending levels (18.1 percent) and the percentage of families who are moderate income (17.2 percent) and reflects excellent performance. Similarly, the bank's level of lending to moderate-income borrowers in 2019 (20.9 percent) exceeds aggregate (17.8 percent) and demographic levels (17.2 percent) and thus is considered excellent.

Small Business

Overall, the distribution of small business loans by business revenue profile is good.

In 2018, the bank originated 53.2 percent of its small business loans to businesses with annual revenues of \$1 million or less, which exceeds aggregate lending levels (45.3 percent). However, the bank's lending to small businesses in 2018 by dollar (29.6 percent) trailed aggregate performance (31.3 percent). Moreover, the bank's performance was well below the corresponding demographic figure (89.0 percent). Together, this makes the bank's performance adequate.

The bank's level of lending in 2019 was good because the bank's performance by number (55.0 percent) and dollar (35.2 percent) exceeds aggregate lending levels by number (47.4 percent) and dollar (30.3 percent). As in 2018, both the bank's and aggregate lenders' lending levels were significantly below the percentage of small businesses in the assessment area (89.6 percent). Because more weight was placed on performance in 2019, the bank's overall performance is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is good.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is good.

The percentage of HMDA loans originated in low-income census tracts in 2018 (2.7 percent) exceeds aggregate performance (1.9 percent) but trailed the demographic figure (5.2 percent). Similarly, the bank's HMDA lending in low-income census tracts in 2019 (2.5 percent) exceeds aggregate performance (1.7 percent) and trailed the demographic figure (5.2 percent). As was aforementioned, community contacts indicated a lack of single family homes in area lower-income communities which, in turn, limits lending opportunities. Therefore, the bank's HMDA lending performance within low-income census tracts is considered adequate in both 2018 and 2019.

The bank's HMDA lending levels in moderate-income census tracts in 2018 (17.4 percent) and in 2019 (18.0 percent) exceeds aggregate performance in 2018 (14.3 percent) and 2019 (12.8 percent). While the bank's performance in moderate-income census tracts approached the corresponding demographic figure (17.6 percent) in 2018, the bank's performance exceeds the demographic figure (17.6 percent) in 2019. Bank performance in moderate-income census tracts is considered good in both 2018 and 2019.

Small Business Lending

The percent of small business loans made by the bank in low-income census tracts in 2018 was 7.3 percent, which exceeds both aggregate performance (5.1 percent) and the demographic figure (5.9 percent), reflecting excellent performance. In 2019, the bank made 6.3 percent of its small business loans in low-income census tracts, which exceeds aggregate performance (5.3 percent) and just barely exceeds the corresponding demographic figure (6.0 percent), reflecting good performance.

The bank's lending to small businesses in moderate-income census tracts was 13.8 percent in 2018, which trailed aggregate performance (17.6 percent) and the demographic figure (18.5 percent). That ultimately reflects poor performance. In 2019, 22.5 percent of the bank's small business loans were in moderate-income geographies, which exceeds both the aggregate (17.7 percent) and the corresponding demographic figure (18.6 percent), reflecting excellent performance.

The bank's total small business lending in the assessment area within low- or moderate-income geographies was 21.1 percent in 2018, which approached peer lending levels (22.7 percent) and the aggregate demographic figure (24.4 percent). Small business lending performance in low- or moderate-income geographies improved in 2019 (28.8 percent), exceeding both the aggregate (23.0 percent) and demographic (24.6 percent) comparator. Due to the fact more weight was placed on performance in 2019, overall performance is good.

Finally, based on an analysis of the dispersion of HMDA and small business loans, no conspicuous lending gaps were noted. In 2018, the bank had loan activity in 57.6 percent of all assessment area census tracts and 36.3 percent of all LMI census tracts. In 2019, the bank had loan activity in 35.6 percent of all census tracts and 24.0 percent of LMI census tracts. When considering the competitiveness of this banking market, the dispersion of the bank's loans was generally consistent with its branch structure in the assessment area and supports the conclusion that the bank's distribution of loans by geography income level is good overall.

Community Development Lending Activities

Midland States Bank made a relatively high level of community development loans in the assessment area. During the review period, the bank originated 13 community development loans totaling \$63.6 million. These loans qualified for a variety of purposes, including affordable housing, economic development, and revitalization/stabilization. The bank worked with several community development intermediaries, one of which supports local small businesses and another that utilizes state and local tax credits to build and/or rehabilitate affordable housing. This type of community development work was highlighted by a community contact as a particularly innovative and impactful way to support LMI communities and geographies. The bank also made one PPP loan that qualified for community development credit in the assessment area.

INVESTMENT TEST

Midland States Bank's performance under the Investment Test is rated High Satisfactory for the St. Louis MSA. The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position. The bank makes occasional use of complex investments to support community development initiatives and exhibits adequate responsiveness to credit and community development needs in the assessment area. During the examination period, the bank executed 9 investments while maintaining 15 prior period investments. Together, they totaled \$18.9 million. Noteworthy activities included three investments (one on the Missouri side of the MSA and two on the Illinois side) into a local syndicator that leverages low-income housing tax credits to build and maintain affordable rental housing. The bank also made 18 donations totaling \$62,000 in the assessment area.

SERVICE TEST

Midland States Bank's Service Test rating for the St. Louis assessment area is High Satisfactory. Delivery systems remain accessible to the bank's geographies and individuals of different income levels in the assessment area. Additionally, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems to LMI geographies and/or LMI individuals. Business hours and services do not vary in a way that inconveniences LMI geographies and/or LMI individuals. Finally, the bank provides an adequate level of community development services in the St. Louis MSA assessment area.

Accessibility of Delivery Systems

The bank operates 15 branches with full-service ATMs at each location in the assessment area. The following table illustrates the distribution of branch facilities by geography income level compared to the distribution of census tracts and households.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	1	3	4	7	0	15
	6.7%	20.0%	26.7%	46.7%	0.0%	100%
Census Tracts	13.6%	21.5%	34.7%	29.6%	0.7%	100%
Family Population	7.7%	18.9%	38.5%	34.7%	0.2%	100%

As illustrated in the preceding table, the bank’s offices in LMI census tracts represent 26.7 percent of offices in the assessment area. That is below the percentage of LMI census tracts (35.1 percent) but just exceeds the family population in LMI tracts (26.6 percent).

In addition to traditional offices and ATMs in the area, the bank uses online banking, which is available to all individuals and geographies, including LMI. As a result, service delivery systems are accessible to geographies and individuals of different income levels in the St. Louis assessment area.

Changes in Branch Locations

The bank did not open or close any branches in the assessment area that were in either a low- or moderate-income census tract during the review period. Therefore, the accessibility of the bank’s service delivery systems was not adversely affected.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain segments of this assessment area, particularly LMI geographies and individuals. Hours of operation, while slightly different at each branch, are reflective of normal business hours, and services are uniform across all branches in the assessment area.

Community Development Services

During the review period, 20 employees provided services to 20 different community development organizations. The organizations served focus on providing financial education to youth and adults, providing affordable housing, promoting economic development in both urban and rural areas, and providing social services, such as childcare, job training, and shelter to LMI individuals. These bank representatives served on various boards and committees for a total of 235 hours during the review period. However, the bank’s ability to engage in community development service opportunities was severely hindered by COVID-19, and thus performance is considered adequate.

ILLINOIS

CRA RATING FOR ILLINOIS:

The Lending Test is rated:

The Investment Test is rated:

The Service Test is rated:

SATISFACTORY

High Satisfactory

Low Satisfactory

Low Satisfactory

Major factors supporting the institution's Illinois rating include the following:

- The bank's lending levels reflect good responsiveness to credit needs throughout the Illinois assessment areas.
- The distribution of loans by borrower's income and revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes throughout the Illinois assessment areas.
- The overall geographic distribution of loans reflects good penetration throughout the Illinois assessment areas.
- The bank makes an adequate level of community development loans within the Illinois assessment areas.
- The bank makes an adequate level of qualified community development investments and grants throughout the Illinois assessment areas.
- The bank provides an adequate level of community development services in the Illinois assessment areas.
- Service delivery systems are reasonably accessible to areas and individuals of different income levels in the Illinois assessment areas, and changes in branch locations have generally not adversely affected the accessibility of those delivery systems.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Illinois assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank's ratings in the state of Illinois reflect a composite of the bank's performance in all of the bank's assessment areas within the state. Two of the bank's Illinois assessment areas are in nonMSA Illinois, while five are located within MSAs across the state. The bank's CRA performance in each of the assessment areas was evaluated using full-scope review procedures, except for the Champaign assessment area, which was evaluated using limited-scope procedures.

Although analyses for each full-scope assessment area were completed individually, the conclusions for the Kankakee, Chicago, and Elgin assessment areas are combined and presented together in the *Conclusions with Respect to Performance Tests* in the Chicago assessment area

section. Performance divergences between the three assessment areas are noted, where applicable. In such cases, performance in the Kankakee assessment area received primary consideration when making performance conclusions in light of branch structure, loan/deposit activity, and the bank’s CRA evaluation history.

To augment the evaluation of the full-scope review assessment areas in Illinois, eight community contact interviews were conducted to ascertain specific community credit needs, community development opportunities, and local economic conditions. Four of the interviews were with individuals who specialized in affordable housing/community services, and the remaining four interviews were with representatives specializing in economic and small business development. Details from these interviews are included in the *Description of Institution’s Operations* sections, as applicable to the assessment areas for which the community contacts were made.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN ILLINOIS

The bank operates 38 branches throughout the 7 CRA assessment areas in the state of Illinois. As mentioned in the *Institution, Description of Institution* section, the bank segregates its Chicago-assessment area, its Elgin assessment area, and its Kankakee assessment area; however, those assessment areas have been combined for this evaluation and are referred to collectively henceforth as the Chicago assessment area.

Assessment Area	Offices #	Offices %	Deposits (\$000s)	Deposits %	CRA Review Procedures
Rockford MSA	10	26.3%	\$1,047,763	27.0%	Full Scope
Northern Illinois	9	23.7%	\$916,155	23.6%	Full Scope
Southern Illinois	4	10.5%	\$808,264	20.9%	Full Scope
Chicago	14	36.8%	\$1,056,517	27.3%	Full Scope
Champaign MSA	1	2.6%	\$47,780	1.2%	Limited Scope
OVERALL	38	100%	\$3,876,479	100%	4 Full Scope

During the review period, the bank closed 17 branches in the state of Illinois. Of those branches, four were in low- or moderate-income areas. Eleven of the branch closures were deemed consolidations following the acquisition of a separate financial institution, which occurred during the bank’s last examination period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

Midland States Bank’s Lending Test performance in Illinois is rated High Satisfactory. The test considers the following criteria:

Lending Activity

Assessment Area (Full-Scope Reviews)	Lending Activity
Rockford	Excellent
Northern Illinois	Good
Southern Illinois	Adequate
Chicago	Good
OVERALL	GOOD

Assessment Area (Limited-Scope Reviews)	Lending Activity
Champaign	Below

Overall, lending levels reflect good responsiveness to the credit needs of assessment areas in Illinois. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank’s overall importance to that area.

Borrower and Geographic Distribution

Overall, the bank’s performance by borrower’s income and revenue profile is good, as is displayed in the following tables.

Assessment Area (Full-Scope Reviews)	Loan Distribution by Borrower’s Profile
Rockford	Good
Northern Illinois	Good
Southern Illinois	Excellent
Chicago	Good
OVERALL	GOOD

Assessment Area (Limited-Scope Reviews)	Loan Distribution by Borrower’s Profile
Champaign	Below

As displayed in the following tables, the bank’s overall geographic distribution of loans reflects good penetration throughout Illinois.

Assessment Area (Full-Scope Reviews)	Geographic Distribution of Loans
Rockford	Excellent
Northern Illinois	Good
Southern Illinois	Adequate
Chicago	Excellent
OVERALL	GOOD

Assessment Area (Limited-Scope Reviews)	Geographic Distribution of Loans
Champaign	Consistent

Community Development Lending Activities

Overall, the bank makes an adequate level of community development loans throughout Illinois, as displayed in the following tables.

Assessment Area (Full-Scope Reviews)	Community Development Lending Activities
Rockford	Relatively High
Northern Illinois	Low
Southern Illinois	Adequate
Chicago	Relatively High
OVERALL	ADEQUATE

Assessment Area (Limited-Scope Reviews)	Community Development Lending Activities
Champaign	Below

The following table provides a breakdown of the bank’s community development loans within its Illinois assessment areas during the examination period. Midland States Bank originated 20 community development loans totaling \$68.9 million, which represents a significant improvement from the previous examination, when the bank made \$11.1 million in loans within its Illinois assessment areas.

Assessment Area	Community Development Lending
Rockford	\$43.6 million
Northern Illinois	\$150,000
Southern Illinois	\$4.5 million
Chicago	\$20.6 million
Champaign	\$0
Total	\$68.9 million

Product Innovation

As noted in the overall *Conclusions with Respect to Performance Tests* section, Midland States Bank makes use of flexible and innovative lending products. As previously described, the bank has a

number of current programs to benefit LMI individuals and areas. Many of these programs have direct benefits to lending needs in the state of Illinois, including IHDA, FHLB of Chicago Down Payment Plus, and the Believable Banking Home Mortgage and Home Improvement loan products.

INVESTMENT TEST

Overall, Midland States Bank is rated Low Satisfactory under the Investment Test. The following tables display investment and grant activity performance for Illinois assessment areas.

Assessment Area (Full-Scope Reviews)	Investment and Grant Activities
Rockford	Adequate
Northern Illinois	Adequate
Southern Illinois	Significant
Chicago	Significant
OVERALL	ADEQUATE

Assessment Area (Limited-Scope Reviews)	Investment and Grant Activities
Champaign	Below

The following table provides a breakdown of investments and grant activity by assessment area in Illinois. The investments were made through a variety of channels, including equity investments, mortgage-backed securities, low-income housing tax credits (LIHTC), municipal bonds, and donations. Of the total Illinois investments, \$19.4 million were made during the current review period (described in the following table), and \$4.3 million were made during prior periods but were still outstanding.

Illinois Assessment Area	Investments	Donations/Grants
Rockford	\$5.4 million	\$23,375
Northern Illinois	\$5.6 million	\$57,295
Southern Illinois	\$3.5 million	\$47,500
Chicago	\$7.1 million	\$124,501
Champaign	\$2.2 million	\$2,500
TOTAL	\$19.4 million	\$255,171

SERVICE TEST

Midland States Bank's performance in Illinois is rated Low Satisfactory under the Service Test. This test considers the following criterion:

Accessibility of Delivery Systems

As displayed in the following tables, the bank’s delivery systems in Illinois are reasonably accessible to geographies and individuals of different income levels.

Assessment Area (Full-Scope Reviews)	Accessibility of Delivery Systems
Rockford	Reasonably Accessible
Northern Illinois	Accessible
Southern Illinois	Accessible
Chicago	Accessible
OVERALL	REASONABLY ACCESSIBLE

Assessment Area (Limited-Scope Reviews)	Accessibility of Delivery Systems
Champaign	Below

Changes in Branch Locations

Midland States Bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and individuals. The bank’s performance under this criterion is displayed in the following tables:

Assessment Area (Full-Scope Reviews)	Changes in Branch Locations
Rockford	Generally Not Adversely Affected
Northern Illinois	Generally Not Adversely Affected
Southern Illinois	Not Adversely Affected
Chicago	Not Adversely Affected
OVERALL	GENERALLY NOT ADVERSELY AFFECTED

Assessment Area (Limited-Scope Reviews)	Changes in Branch Locations
Champaign	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Banking services and business hours do not vary in a way that inconveniences any portions of the bank’s Illinois assessment areas. The bank’s performance is displayed by assessment area in the following tables.

Assessment Area (Full-Scope Reviews)	Reasonableness of Business Hours and Services
Rockford	Do Not Vary
Northern Illinois	Do Not Vary
Southern Illinois	Do Not Vary
Chicago	Do Not Vary
OVERALL	DO NOT VARY

Assessment Area (Limited-Scope Reviews)	Reasonableness of Business Hours and Services
Champaign	Consistent

Community Development Services

Midland States Bank provides an adequate level of community development services across its Illinois assessment areas, as displayed in the following table:

Assessment Area (Full-Scope Reviews)	Community Development Services
Rockford	Limited Level
Northern Illinois	Adequate Level
Southern Illinois	Relatively High Level
Chicago	Adequate Level
OVERALL	ADEQUATE Level

Assessment Area (Limited-Scope Reviews)	Community Development Services
Champaign	Below

ROCKFORD, ILLINOIS MSA

(Full- Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ROCKFORD ASSESSMENT AREA

Bank Structure

The bank operates nine branches and 48 ATMs, 38 of which are co-branded, within the assessment area. Based on this branch network and other service delivery systems, the bank is adequately positioned to serve substantially all of this assessment area.

General Demographics

The assessment area has a population of 344,290 and is composed of two counties (Boone County and Winnebago County) in the state of Illinois, which make up the entire Rockford, Illinois MSA. Between 2010 and 2015, the assessment area's population declined by about 1.5 percent. Winnebago County is the more populous of the two counties with a population of 290,439, compared to Boone County with a population of 53,851.

According to community contacts, area credit needs include a mix of consumer, business, and agricultural loan products. More specifically, contacts indicated a need for small dollar home improvement loans to repair aging properties, as well as financial education. Finally, community contacts indicated that there are several local organizations that are well suited for partnerships that can leverage investments within the local community.

Of the 24 FDIC-insured depository institutions with a branch presence in the assessment area, the bank ranked second in terms of deposit market share, encompassing 14.8 percent of total deposit dollars.

Income and Wealth Demographics

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	13	19	25	25	2	84
	15.5%	22.6%	29.8%	29.8%	2.4%	100%
Family Population	7,820	16,409	27,788	36,430	145	88,592
	8.8%	18.5%	31.4%	41.1%	0.2%	100%

As shown in the preceding table, 38.1 percent of the census tracts in the assessment area are low or moderate income, while 27.3 percent of the family population in the assessment area resides in those tracts.

Based on 2015 ACS data, the median family income for the assessment area is \$60,039. That trails the median family income for the entire state of Illinois, which is \$71,546. As of 2019, the median family income for the Rockford MSA is estimated to be \$63,600. The following table compares the population of assessment area families to the entire state of Illinois.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Rockford Assessment Area	19,393	15,075	18,041	36,083	88,592
	21.9%	17.0%	20.4%	40.7%	100%
State of Illinois	706,235	526,032	608,217	1,284,199	3,124,683
	22.6%	16.8%	19.5%	41.1%	100%

According to the previous table, 38.9 percent of the families in the Rockford assessment area are low or moderate income, while 39.4 percent of the families in the state of Illinois are low or moderate income. Additionally, the percentage of families living in poverty within the assessment area (12.3 percent) is slightly higher than in the entire state of Illinois (10.5 percent). Based on this data, the assessment area appears to be similar, but slightly less affluent than the state of Illinois as a whole.

Housing Demographics

The following table provides details of the housing demographics of the assessment area compared to the state of Illinois. The housing demographics vary both within the assessment area and compared to the state as whole.

Housing Demographics			
Geography	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Boone County	\$143,700	40.5%	\$722
Winnebago County	\$117,700	41.0%	\$748
Assessment Area	\$121,052	41.3%	\$745
Illinois	\$173,800	33.1%	\$907

As shown in the table above, the median housing value in Boone County is \$26,000 more than in Winnebago County. Despite this, the affordability ratio for housing and the median gross rent in both counties are similar. However, the affordability ratio of the assessment area is over eight percentage points higher than the state of Illinois, indicating greater affordability within the assessment area.

Industry and Employment Demographics

According to County Business Patterns, there are 117,762 paid employees in the assessment area. Manufacturing (23.8 percent), healthcare and social assistance (18.7 percent), and retail trade (12.8 percent) are the largest industries in the region.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Illinois.

Unemployment Levels for the Assessment Area			
Geography	Time Period (Annual Average)		
	2018	2019	2020
Assessment Area	5.6%	5.4%	11.4%
Illinois	4.4%	4.0%	9.5%

The table above indicates that the assessment area and the state of Illinois followed a similar trend of unemployment rates falling until 2020 (the spike in the unemployment rate is likely due to COVID-19). However, the table also shows that the assessment area's unemployment rate has consistently been higher than the state as a whole.

Community Contact Information

To better understand local community and economic conditions in the assessment area, two community contact interviews were conducted for this examination. The first was with a representative from an affordable housing development and rehabilitation organization. The second was with an individual who specializes in economic and small business development financing.

Both community contacts indicated that the region has only recently started to recover from the effects of COVID-19. They mentioned that many businesses in the region have started expanding and/or hiring to reach their pre-pandemic production levels. Both contacts also mentioned population levels have not grown and may have even decreased over the last three to five years. They cite lower-cost locations locally in nearby Wisconsin as reasons some residents, particularly those at or near retirement, are leaving the Rockford area. The contacts also both mentioned that there is a noticeable east/west divide in the assessment area caused by the Rock River. They stated that traditionally, more affluent residents live on the east side of the river, and thus there has been more business development. Less affluent and often more racially diverse residents live on the western side of the river in communities that struggle for economic and community services.

The contact who specializes in affordable housing mentioned that the region has an aging housing stock, and due to limited neighborhood development, demand often surpasses supply. While traditional mortgage products are needed in the community, smaller-dollar loans for home repair and rehabilitation are equally, if not more important, as much of the current housing stock is older. The contact said that the most common barrier to LMI homeownership is a borrower's poor credit

history. The contact also stressed that there is a shortage of affordable rental housing, and the units that exist are often in poor condition. The contact stated there are several ways to engage in affordable housing development, including offering financial education, creating/deploying affordable mortgage products, and partnering with the area's community development organizations.

The contact who specializes in small business financing indicated that while small business development is occurring across the region, it is most concentrated in the downtown Rockford area and east of the city. While there are several active small business lenders, the contact indicated that there are some structural challenges with business development in and around Rockford. Additionally, lack of collateral, inexperience, and other factors routinely make it hard for businesses to obtain financing from lenders. Of the businesses currently operating, the contact stressed the importance of the federal PPP loans, which provided financing to keep businesses open and staff employed during the pandemic. Like the affordable housing community contact, the interviewee indicated that partnering with local organizations and providing financial education are two impactful ways to support area small businesses.

Both community contacts mentioned Midland States Bank by name as a local institution that takes supporting LMI residents/communities and small businesses seriously.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ROCKFORD ASSESSMENT AREA

LENDING TEST

Lending levels reflect excellent responsiveness to assessment area credit needs. The distribution of loans by borrower’s income/revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Lastly, the bank makes a relatively high level of community development loans and makes use of innovative and/or flexible lending practices in serving the credit needs of the assessment area.

Lending Activity

The following table displays the lending volume in the Rockford assessment area by number and dollar volume.

Summary of Lending Activity January 1, 2018 through December 31, 2019				
Loan Type	#	%	\$(000s)	%
Home Improvement	15	1.0%	\$800	0.4%
Home Purchase	853	54.8%	\$73,521	40.1%
Multifamily Housing	12	0.8%	\$10,874	5.9%
Refinancing	177	11.4%	\$17,652	9.6%
Total HMDA	1,088	69.9%	\$103,978	56.6%
Small Business	353	22.7%	\$61,104	33.3%
Small Farm	116	7.5%	\$18,480	10.1%
Total Loans	1,557	100.0%	\$183,562	100.0%

The bank’s lending levels reflect excellent penetration in the assessment area. Lending activity represents 27.1 percent of the total HMDA and CRA loans made in the bank’s combined assessment areas. This level of lending in the assessment area exceeds the percentage of total bank deposits held within the assessment area (20.9 percent) and the percentage of total bank branches in the assessment area (18.9 percent).

Loan Distribution by Borrower’s Profile

Overall, the bank’s borrower distribution in the Rockford assessment area is good.

HMDA Lending

The distribution of HMDA loans by borrower’s income level is considered excellent. The distribution of HMDA loans to low-income borrowers in 2018 (18.7 percent) and 2019 (16.1

percent) exceeds aggregate performance (9.9 percent and 7.0 percent, respectively) and approached the population figure (21.9 percent for both years). This represents good performance for both years. For moderate-income borrowers, the bank's HMDA lending in 2018 (26.4 percent) and in 2019 (31.0 percent) exceeds both aggregate performance (19.5 percent in 2018 and 17.9 percent in 2019) and the demographic figure (17.0 percent), representing excellent performance. As mentioned earlier, there are several barriers to LMI home ownership. Therefore, the bank's ability to exceed peer performance and approach or exceed the population of LMI families reflects excellent distribution of HMDA loans to LMI borrowers in the assessment area.

Small Business Lending

Overall, the distribution of small business loans by business revenue profile is good. In 2018, 55.6 percent of the bank's commercial loans went to businesses with less than \$1 million in revenue, which exceeds aggregate performance (43.2 percent) while trailing the demographic figure (88.1 percent). Similarly, 54.5 percent of the bank's commercial loans went to businesses with less than \$1 million in revenue in 2019, which again exceeds aggregate (45.3 percent) and trailed the demographic comparator (88.6 percent). Additionally, of the bank's loans to small businesses, 72.6 percent in 2018 and 80.9 percent in 2019 were for \$100,000 or less. Because small dollar lending was emphasized as an area of need for small businesses, Midland's performance in each year is considered good.

Small Farm Lending

The bank's distribution of small farm loans by business revenue is considered good. According to the assessment area's demographics, over 98 percent of the farms in 2018 and 2019 had less than \$1 million in revenue. Of the bank's agricultural loans in 2018, 82.8 percent were to farms with less than \$1 million in revenue, which exceeds peer performance (65.8 percent). In 2019, 86.2 percent of the bank's loans were to small farms, which again exceeds peer performance (63.1 percent). Because the bank exceeds peer in both years and approached the assessment area's demographic measure, performance for each year is considered good.

Geographic Distribution of Loans

As noted previously, 32 of the assessment area's census tracts are either low or moderate income, representing 38.1 percent of the total number of census tracts. The bank's overall performance in relation to its geographic distribution of loans in the assessment area is excellent.

HMDA Lending

The bank's HMDA lending in low-income census tracts is considered excellent in 2018. The bank made 5.2 percent of its HMDA loans in low-income census tracts, which nearly doubled peer performance (2.8 percent) and slightly exceeds the demographic comparator (5.1 percent). In 2018, 14.0 percent of the bank's mortgage loans were made in moderate-income areas, which exceeds peer performance (13.6 percent) but trailed the demographic figure (15.9 percent), reflecting good performance. In total, 19.2 percent of the bank's HMDA loans in 2018 were in either a low- or moderate-income geography. That exceeds peer performance (16.4 percent), while approaching

the percent of owner-occupied units in the assessment area (21 percent). Ultimately, HMDA performance is considered good in 2018.

In 2019, 3.0 percent of the bank's mortgage loans were in low-income census tracts, which exceeds peer performance (2.3 percent) but trails the demographic figure (5.1 percent). Performance in low-income census tracts for the year is considered good. The bank made 15.6 percent of its HMDA loans in moderate-income census tracts in 2019. That performance exceeds peer performance of 13.2 percent while just trailing the owner-occupied figure of 15.9 percent. Therefore, the bank's performance in moderate-income census tracts is considered good. Overall, the bank's HMDA lending performance by geographic distribution for 2019 is considered good.

Small Business Lending

Overall, the bank's small business lending in terms of geographic distribution is considered excellent. In 2018, the bank made 11.3 percent of its small business loans in low-income areas and 19.2 percent of its loans in moderate-income areas. That performance exceeds peer performance in both low-income census tracts (8.4 percent) and in moderate-income census tracts (16.0 percent). Bank performance also exceeds comparable demographic figures in low-income geographies (9.1 percent) and in moderate-income geographies (16.3 percent). Therefore, bank performance in 2018 is considered excellent.

Similarly, the bank's small business lending in 2019 is excellent. The bank made 12.9 percent of its loans to businesses in low-income census tracts, which exceeds peer performance of 9.3 percent and the percentage of small businesses in low-income census tracts (8.9 percent). The bank made 16.8 percent of its loans in moderate-income census tracts, which likewise exceeds peer (15.7 percent) and the demographic comparator (16.5 percent).

Small Farm Lending

Since a marginal number (0.7 percent) of the assessment area's farms are in low-income census tracts and peers had 0 percent of their loans in low-income census tracts, the bank's performance was not analyzed in low-income areas.

Nonetheless, the bank's overall small farm lending is considered excellent. In 2018, 3.4 percent of the bank's small farm loans were in moderate-income census tracts, which exceeds peer performance (0.8 percent) and approaches but trails the demographic measure (4.9 percent). This ultimately reflects good performance. In 2019, the bank made 5.7 percent of its loans in moderate-income census tracts, which exceeds both peer performance of 2.8 percent and the demographic figure of 4.8 percent, reflecting excellent performance.

Lastly, based on an analysis of the dispersion of all three loan products, no conspicuous lending gaps were noted, particularly in LMI areas. In 2018 and 2019, the bank had loan activity in 94.0 percent of all assessment area census tracts. Additionally, the bank had loan activity in 90.6 percent of LMI census tracts in 2018 and 84.4 percent of LMI census tracts in 2019. The dispersion of the bank's loans was consistent with its branch structure in the assessment area and supports the conclusion that the bank's distribution of loans by geography income level is excellent overall.

Community Development Lending

Midland States Bank made a relatively high level of community development loans in the assessment area. During the review period, the bank originated eight loans, for a total of \$43.6 million. The bank's community development loans supported economic development and the revitalization and stabilization of LMI or distressed middle-income geographies.

- Two of the loans were to a local economic development agency that specializes in financing and providing technical assistance to small businesses. These loans are responsive to area need, as they provide an avenue for small businesses to obtain the low-cost, small dollar capital described by community contacts.
- Two loans funded the purchase and refurbishment of a series of restaurants and a brewery in a low-income census tract, helping not only to revitalize the area but also add jobs for LMI individuals.
- The bank originated four PPP loans to businesses in LMI census tracts that retained jobs and helped to stabilize the local economy during the COVID-19 pandemic.

INVESTMENT TEST

The bank makes an adequate level of qualified community development investments and grants in the assessment area, making occasional use of innovative or complex investments, and exhibiting adequate responsiveness to credit and community development needs in the assessment area. During the review period, the bank made eight qualified community development investments, totaling \$5.4 million. No prior-period investments were made and are still outstanding. Of the investments made, most were municipal bonds that revitalized and/or stabilized low- or moderate-income communities through infrastructure development.

The bank also made six community development donations totaling \$27,375 in the assessment area. All six of the bank's donations were in 2020 and aimed at mitigating the effects of COVID-19 within the community. Therefore, the donations were considered particularly responsive and impactful.

SERVICE TEST

The bank's delivery systems are reasonably accessible to geographies and individuals of different incomes levels in the assessment area. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or individuals. Business hours and retail services do not vary in a way that inconveniences LMI geographies and/or individuals. Finally, Midland States Bank provides a limited level of community development services within the assessment area.

Accessibility of Delivery Systems

The bank operates ten branches in the assessment area. The following table highlights the distribution of these facilities by income level of the geography compared to other key assessment area demographics.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	1	2	7	0	10
	0.0%	10.0%	20.0%	70.0%	0.0%	100%
Census Tracts	15.5%	22.6%	29.8%	29.8%	2.4%	100%
Household Population	10.2% %	19.7%	31.1%	38.4%	0.5%	100%

As illustrated in the table above, the bank’s offices in LMI census tracts represent 10.0 percent of the bank’s branches in the assessment area. That is less than the percentage of LMI census tracts (38.1 percent) and less than the household population living within LMI geographies (29.9 percent). However, the bank has deposit-taking ATMs in the area, and the bank uses online banking, which expands access to its products and services. Therefore, the bank’s delivery systems are reasonably accessible to geographies and individuals of different incomes.

Changes in Branch Locations

The bank’s record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to those who are low or moderate income or live in a low- or moderate-income area. During the review period, the bank closed five branches in the assessment area: two in moderate-income census tracts, two in middle-income census tracts, and one in an upper-income census tract. These closures were primarily done to consolidate the bank’s geographic footprint following a merger, and thus the changes did not substantively change the bank’s ability to reach its assessment area.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking products and services are relatively consistent across all offices in the assessment area. Most offices have Saturday operating hours, and all locations offer the same products. Furthermore, the varied hours across the offices are not skewed negatively toward moderate-income census tracts. Therefore, bank services do not vary in a way that inconveniences certain segments of the assessment area, particularly LMI geographies and/or LMI individuals.

Community Development Services

The bank provided a limited level of community development services in the assessment area. During the review period, five employees provided services to seven organizations. In total, those employees logged about 57 hours of community development service aimed at economic development, community service, or the revitalization and/or stabilization of low- or moderate-income geographies.

NONMETROPOLITAN ILLINOIS STATEWIDE AREA

(Full-Scope Reviews)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NORTHERN ILLINOIS ASSESSMENT AREA

Bank Structure

The bank operates 9 offices, 11 ATMs, and 19 co-branded ATMs in the Northern Illinois assessment area. Based on this branch network and other service delivery systems, the bank is adequately positioned to serve substantially all of this assessment area.

General Demographics

The assessment area is composed of eight counties: Bureau, LaSalle, Lee, Livingston, Ogle, Putnam, Stephenson, and Whiteside. The assessment area has a population of 381,779. LaSalle County is the largest of the eight with a population of 112,579, while the smallest is Putnam County with a population of 5,822.

The population of this assessment area is diverse, and credit needs vary and include a mix of consumer, business, and agricultural loan products. Other needs, as noted from community contacts, include small dollar home rehabilitation loans, microloans for small business, and financial education. Of the 63 FDIC-insured depository institutions with a branch presence in the assessment area, the bank ranked first in terms of deposit market share, encompassing 8.3 percent of total deposit dollars.

Income and Wealth Demographics

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	1	12	70	18	0	101
	1.0%	11.9%	69.3%	17.8%	0.0%	100%
Family Population	638	8,776	70,673	19,973	0	100,060
	0.6%	8.8%	70.6%	20.0%	0.0%	100%

As shown above, the majority of census tracts are middle-income. There are one low-income census tract and 12 moderate-income census tracts, together comprising 12.9 percent of all tracts in the assessment area and containing 9.4 percent of assessment area families.

According to 2015 ACS data, the median family income for the assessment area was \$62,947, which is above the nonMSA Illinois figure of \$59,323. More recently, the FFIEC estimates the nonMSA Illinois median family income to be \$64,200 as of 2019. The following table displays the distribution of assessment area families by income level, as well as family population income characteristics for nonMSA Illinois.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	17,581	17,507	21,524	43,448	100,060
	17.6%	17.5%	21.5%	43.4%	100%
NonMSA Illinois	78,116	70,252	83,510	153,709	385,587
	20.3%	18.2%	21.7%	39.9%	100%

While the first table in this section shows that 9.4 percent of families in the assessment area reside in low- or moderate-income census tracts, the table above shows that a much larger percentage of families in the assessment area are LMI (35.1 percent). The 35.1 percent figure for the assessment area is below the 38.5 percent of LMI families in nonMSA Illinois as a whole. Furthermore, 8.9 percent of families live below the poverty level in the assessment area compared to 10.4 percent in all of nonMSA Illinois. This information implies the assessment area is slightly more affluent than the totality of the nonMSA portions of the state.

Housing Demographics

The following table provides details of the housing demographics of the assessment area compared to nonMSA Illinois.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Bureau County	\$105,600	47.8%	\$640
LaSalle County	\$123,100	41.1%	\$700
Lee County	\$113,600	46.1%	\$672
Livingston County	\$107,200	50.6%	\$626
Ogle County	\$140,000	39.2%	\$674
Putnam County	\$121,300	46.5%	\$605
Stephenson County	\$98,900	45.8%	\$610
Whiteside County	\$99,200	47.8%	\$639
Assessment Area	\$114,296	44.2%	\$653
NonMSA Illinois	\$93,478	49.0%	\$604

As indicated above, both median housing values and median gross rents are higher in the assessment area than in nonMSA Illinois. Ogle County has the highest median housing value in the assessment area at \$140,000, while LaSalle County has the highest median gross rent at \$700/month. According to recent data, Stephenson County has the lowest median housing value at \$98,900, while Putnam County has the lowest median gross rent at \$605/month. Although income levels in the assessment area are above those of nonMSA Illinois and indicate a more affluent population, housing in the area is on average less affordable than in nonMSA Illinois as a whole, evidenced by the affordability ratio. In addition, community contacts explained that there are not enough affordable housing and housing support resources targeted to LMI people in the assessment area.

Industry and Employment Demographics

The assessment area supports a diverse business community dominated by small businesses and farms. County business patterns indicate that the number of paid employees in the assessment area is 105,732. This is led by manufacturing (21.2 percent), followed by retail trade (13.8 percent), and healthcare and social assistance (11.7 percent).

The following table displays unemployment data for the individual counties within the assessment area, along with state figures.

Unemployment Levels for the Assessment Area			
Geography	Time Period (Annual Average)		
	2018	2019	2020
Assessment Area	5.0%	4.5%	8.1%
NonMSA Illinois	4.9%	4.2%	7.7%

As shown in the preceding table, average assessment area unemployment rates are similar to state figures. Additionally, both the assessment area and nonMSA Illinois exhibited downward trends from 2018 to 2019 but a significant uptick in unemployment in 2020.

Community Contact Information

As noted previously, two community contact interviews were used during this evaluation to obtain additional performance context information. One of the interviews was with an individual specializing in affordable housing, and the other one was with an individual specializing in economic development.

The community contact who specializes in affordable housing suggested that the region has been largely stable. Agriculture and manufacturing are two of the largest industries in the region, and both were able to navigate the pandemic better than other local industries. The contact said that the population has been shrinking as residents move to border states for economic and social reasons. In terms of credit needs, the community contact suggested that there is a significant need for small-dollar, home improvement and/or repair loans. This is because much of the housing stock in the assessment area is older and in need of rehabilitation. The interviewee also mentioned that

LMI individuals often struggle to save for a down payment due to lower-wage jobs. The cost of mortgage loans also prevents LMI individuals and families from pursuing homeownership; thus, first-time homebuyer education is an additional need in the community.

The second contact specializes in small business development and echoed several of the same sentiments regarding the dominance of the agriculture and manufacturing industry. The region's economy is strongest around its major thoroughfares. Once one ventures away from those highways and interstates, communities face more economic challenges. One of those challenges is access to broadband Internet. Other obstacles to small business development indicated by the community contact are a lack of skilled labor and challenges accessing transportation infrastructure. The contact believes that the region has lenders willing to provide the capital needed for businesses. Instead, the interview suggested that businesses are most in need of technical assistance for things like creating a business plan. The contact specializing in small business development indicated that Midland States Bank is one of the more active banks in the community and offers a good host of products for small businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHERN ILLINOIS ASSESSMENT AREA

LENDING TEST

Lending levels reflect good responsiveness to the credit needs of the assessment area. The distribution of loans by borrower’s income/revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. The bank’s geographic distribution of loans reflects good penetration throughout the assessment area. Finally, the bank makes a low level of community development loans in the assessment area.

Lending Activity

The following table displays lending volume in the assessment area by number and dollar volume.

Summary of Lending Activity January 1, 2018 through December 31, 2019				
Loan Type	#	%	\$(000s)	%
Home Improvement	10	1.0%	\$456	0.3%
Home Purchase	169	16.1%	\$17,991	10.8%
Multifamily Housing	3	0.3%	\$698	0.4%
Refinancing	116	11.1%	\$9,563	5.7%
Total HMDA	312	29.7%	\$29,295	17.5%
Small Business	383	36.5%	\$77,731	46.4%
Small Farm	355	33.8%	\$60,383	36.1%
Total Loans	1,050	100.0%	\$167,409	100.0%

The bank’s lending levels reflect good penetration in the assessment area. Lending activity represents 18.3 percent of the total HMDA and CRA loans made in the bank’s combined assessment areas. The level of lending activity in the assessment area is comparable to the percentage of the total bank deposits held within the assessment area (18.3 percent) and the percentage of total bank branches in the assessment area (17.0 percent).

Loan Distribution by Borrower’s Profile

HMDA Lending

The distribution of HMDA loans by borrower’s income level is considered good. The distribution of HMDA loans to low-income borrowers in 2018 (15.0 percent) and 2019 (8.8 percent) exceeds corresponding aggregate peer performance (8.3 percent and 7.6 percent, respectively) but trailed the demographic figure (17.5 percent in 2018 and 17.6 percent in 2019). This represents good performance for both years.

In terms of moderate-income borrowers, the bank's HMDA lending in 2018 (27.3 percent) and in 2019 (24.0 percent) exceeds both aggregate performance (21.2 percent in 2018 and 18.8 percent in 2019) and the demographic figure (17.4 percent in 2018 and 17.5 percent in 2019), representing excellent performance. The bank's total HMDA lending to LMI borrowers in 2018 was 42.3 percent of total HMDA lending, which exceeds peer performance (29.5 percent) and the LMI demographic comparator (34.9 percent). The bank's LMI HMDA lending in 2019 was 32.8 percent, which exceeds peer performance of 26.4 percent but fell short of the percentage of LMI families in the assessment area (35.1 percent). Thus, overall HMDA lending to LMI borrowers in 2018 was considered excellent and in 2019 was considered good.

Small Business Lending

Overall, the distribution of small business loans by business revenue profile is good. In 2018, 51.8 percent of the bank's loans went to businesses with less than \$1 million in revenue, which exceeds aggregate performance (47.6 percent) while trailing the demographic figure (88.4 percent). Similarly, 58.9 percent of the bank's commercial loans went to businesses with less than \$1 million in revenue in 2019, which again exceeds peer performance (48.4 percent) but trailed the demographic comparator (88.8 percent).

Although the bank just exceeds peer performance, 63.6 percent of the bank's loans in 2018 and 73.5 percent in 2019 were for \$100,000. Small-dollar lending was mentioned as a community need for small businesses, and Midland's lending emphasis makes performance for each year good.

Small Farm Lending

The bank's distribution of small farm loans by business revenue is considered good. According to the assessment area's demographics, 98.4 percent of the farms in 2018 and 2019 had less than \$1 million in revenue. Of the bank's agricultural loans in 2018, 90.5 percent were to farms with less than \$1 million in revenue, which exceeds peer performance (62.1 percent). In 2019, 89.8 percent of the bank's loans were to small farms, which also exceeds peer performance of 59.0 percent. Because the bank exceeds peer in both years and approached the assessment area's demographic measure, performance for each year is considered good.

Geographic Distribution of Loans

As noted previously, the assessment area includes 1 low- and 12 moderate-income census tracts, representing 12.9 percent of all assessment area census tracts. Overall, the bank's geographic distribution of loans in the assessment area reflects good penetration throughout LMI census tracts, based on the loan categories reviewed, with primary emphasis on the bank's HMDA lending.

HMDA Lending

The bank's HMDA lending in LMI geographies is good.

In 2018 and 2019, the bank made zero loans in low-income census tracts. However, only 0.4 percent of the assessment area's owner-occupied housing is in low-income census tracts, limiting opportunity. Moreover, peer lending was just 0.4 and 0.2 percent in 2018 and 2019, respectively, further contextualizing the bank's lack of lending. Therefore, the bank's performance in low-income census tracts in 2018 and 2019 is considered adequate. In 2018, 12.8 percent of the bank's HMDA loans were in moderate-income census tracts, which exceeds peer performance (5.7 percent) and the demographic figure (8.2 percent). That reflects excellent performance. In 2019, 7.2 percent of the bank's mortgage loans were in moderate-income census tracts, which exceeds peer performance (5.3 percent) but trails the demographic comparator of 8.2 percent, making performance good.

Small Business Lending

The distribution of small business loans across geographies is considered excellent overall.

In 2018, the bank made 0.5 percent of its loans in low-income census tracts, less than both peer lending levels (1.6 percent) and the demographic figure (2.4 percent), making performance poor. Midland States Bank made 17.8 percent of its small business loans in moderate-income census tracts in 2018. That exceeds both peer (11.3 percent) and demographic figures (12.2 percent) and reflects excellent performance. The bank made zero loans in low-income census tracts in 2019, while peer lending levels were 1.6 percent, and 2.4 percent of the assessment area's businesses are in low-income census tracts. Therefore, performance is considered poor. The bank made 17.7 percent of its small business loans in moderate-income census tracts in 2019, which exceeds both peer (11.1 percent) and the demographic comparator (12.4 percent) and reflects excellent lending.

Although the bank's performance in low-income geographies was poor, the combined performance in LMI geographies achieves excellent dispersion levels. In 2018, the bank made 18.3 percent of its loans in LMI geographies in the assessment area, which outperforms peer lending (12.9 percent) and exceeds the percentage of businesses in the assessment area located in LMI geographies (14.6 percent). Similarly, the bank made 17.7 percent of its small business loans in LMI geographies in 2019, which exceeds peer (12.7 percent) and demographic levels (14.8 percent).

Small Farm Lending

Despite the importance of agriculture to the assessment area as a whole, the lending opportunities in the LMI geographies within the assessment area are minimal, as only one small farm was in the low-income census tract in 2018 and two in 2019. Similarly, 1.2 percent of all farms were in moderate-income tracts in 2018 and 1.4 percent of farms were in the moderate-income census tracts in 2019. The bank made one loan in a moderate-income census tract in 2018 and zero in 2019. However, due to the lack of lending opportunities, performance is considered adequate in

both years and adequate overall. Additionally, small farm lending was given minimal weight when determining the overall rating for the bank's geographic distribution within the assessment area.

Finally, based on an analysis of the dispersion of all three loan products, no conspicuous lending gaps were noted, particularly in LMI areas. In 2018, the bank had loan activity in 85.1 percent of all assessment area census tracts and 76.9 percent of LMI census tracts. In 2019, the bank had loan activity in 80.2 percent of all assessment area census tracts and 69.2 percent of LMI census tracts. The dispersion of the bank's loans was generally consistent with its branch structure in the assessment area and supports the conclusion that the bank's distribution of loans by geography income level is good overall.

Community Development Lending

Midland States Bank made a low level of community development loans in the assessment area. During the review period, the bank originated two loans, for a total of \$150,000. These loans supported community services for low- and/or moderate-income individuals.

INVESTMENT TEST

The bank makes an adequate level of qualified community development investments and grants in the assessment area, making occasional use of innovative or complex investments, and demonstrating adequate responsiveness to credit and community development needs in the assessment area. During the review period, the bank made 15 qualified community development investments totaling \$4.6 million. The bank also held one prior-period, still outstanding investment on its books valued at \$1.0 million. The majority of the investments were municipal bonds for improvements to public facilities that serve low- and/or moderate-income residents and geographies.

The bank also made 12 community development donations totaling \$57,295 in the assessment area. All of the bank's donations in 2020 were to COVID-19 relief projects and initiatives and thus were considered particularly responsive and impactful.

SERVICE TEST

The bank's delivery systems are accessible to geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches generally has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or individuals. Business hours and retail services do not vary in a way that inconveniences LMI geographies and/or individuals. Finally, Midland States Bank provides an adequate level of community development services within the assessment area.

Accessibility of Delivery Systems

The bank operates nine branches in the assessment area. The following table highlights the distribution of these facilities by income level of the geography compared to other key assessment area demographics.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	1	8	0	0	9
	0.0%	11.1%	88.9%	0.0%	0.0%	100%
Census Tracts	1.0%	11.9%	67.3%	19.8%	0.0%	100%
Household Population	0.9%	9.8%	68.7%	20.6%	0.0%	100%

As illustrated in the table above, the bank’s offices in LMI census tracts represent 11.1 percent of the bank’s branches in the assessment area. This is in line with the percentage of LMI census tracts (12.9 percent) and the household population living within LMI geographies (10.7 percent). That, in addition to the fact that the bank uses online banking, which expands access to its products and services, suggests the bank’s delivery systems are accessible to geographies and individuals of different incomes.

Changes in Branch Locations

The bank’s record of opening and closing branches has not generally adversely affected the accessibility of its delivery systems, particularly to those who are low- or moderate-income or live in a low- or moderate-income area. During the review period, the bank closed five branches in the assessment area, two of which were in moderate-income census tracts.

However, the bank’s branch closures were part of the aforementioned consolidation effort. That, in addition to the fact that one branch remains in an LMI geography and the bank’s remaining branches are in a reasonable proximity to LMI geographies, indicates the changes to the bank’s branch footprint were deemed to generally not adversely affect LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking products and services are relatively consistent across all offices in the assessment area. Most offices have Saturday operating hours, and all locations offer the same products. Furthermore, the varied hours across the offices are not skewed negatively toward low- or moderate-income census tracts. Therefore, bank services do not vary in a way that inconveniences certain segments of the assessment area, particularly LMI geographies and/or LMI individuals.

Community Development Services

The bank provided an adequate level of community development services in the assessment area. During the review period, six employees provided services to five organizations. In total, those employees amassed just over 242 hours of community development service aimed at economic development, community service, or the revitalization and/or stabilization of low- or moderate-income or distressed middle-income geographies.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE SOUTHERN ILLINOIS ASSESSMENT AREA

Bank Structure

The bank operates four offices within the assessment area, representing 7.5 percent of total offices. One office is in a moderate-income census tract, and three offices are in middle-income census tracts. The bank’s main office is also located in this assessment area, but no banking services are offered there. Based on this branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of the assessment area.

General Demographics

The bank’s Southern Illinois assessment area is composed of 13 counties: Clay, Coles, Cumberland, Douglas, Effingham, Fayette, Jasper, Jefferson, Marion, Montgomery, Randolph, Shelby, and Washington. Amongst the 13 counties, Coles County is the largest with a population of 53,037, while Jasper County is the smallest with a population of 9,635. The assessment area has a total population of 339,723.

The population of this assessment area is diverse, and credit needs vary and include a mix of consumer, business, and agricultural loan products. Other needs, as noted by community contacts, include loans for home rehabilitation, financial education, and agricultural lending products. Of the 73 FDIC-insured depository institutions with a branch presence in the assessment area, the bank ranked second in terms of deposit market share, encompassing 8.2 percent of total deposit dollars.

Income and Wealth Demographics

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	1	14	66	10	1	92
	1.1%	15.2%	71.7%	10.9%	1.1%	100%
Family Population	317	10,850	64,068	11,930	204	87,369
	0.4%	12.4%	73.3%	13.7%	0.2%	100%

As shown above, the largest portion of census tracts are middle-income. There are one low-income census tract and 14 moderate-income census tracts, which contain 12.8 percent of assessment area families. The low-income census tract is in Jefferson County, which is in the far southern portion of the assessment area.

According to 2015 ACS data, the median family income for the assessment area was \$58,839, which is below the nonMSA Illinois figure of \$59,323. The following table displays the distribution of assessment area families by income level, as well as family population income characteristics for nonMSA Illinois.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	18,304	15,874	18,929	34,262	87,369
	21.0%	18.2%	21.7%	39.2%	100%
NonMSA Illinois	78,116	70,252	83,510	153,709	385,587
	20.3%	18.2%	21.7%	39.9%	100%

While the first table in this section shows that 12.8 percent of families reside in LMI census tracts, the table above shows that a much larger percentage of families in the assessment area are LMI (39.2 percent). The 39.2 percent figure for the assessment area is slightly above the 38.5 percent of LMI families in nonMSA Illinois. Furthermore, 10.8 percent of families are living below the poverty level in the assessment area compared to 10.4 percent in nonMSA Illinois. This information implies the assessment area is similar to, but slightly less affluent, than the nonMSA portions of the state.

Housing Demographics

The following table provides details of the housing demographics of the assessment area compared to nonMSA Illinois.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Clay County	\$77,000	57.4%	\$508
Coles County	\$91,800	43.1%	\$626
Cumberland County	\$93,400	49.3%	\$515
Douglas County	\$100,500	51.6%	\$653
Effingham County	\$128,200	40.7%	\$581
Fayette County	\$82,400	53.3%	\$578
Jasper County	\$94,500	57.4%	\$537
Jefferson County	\$87,300	49.5%	\$590
Marion County	\$68,600	61.6%	\$623
Montgomery County	\$78,300	60.0%	\$595
Randolph County	\$96,700	49.8%	\$623
Shelby County	\$85,300	56.1%	\$554
Washington County	\$106,600	49.9%	\$615
Assessment Area	\$89,368	51.5%	\$601
NonMSA Illinois	\$93,478	49.0%	\$604

While income levels in the assessment area are below those of nonMSA Illinois and point to less affluence, the affordability ratio indicates that housing in the area is slightly more affordable when compared to nonMSA Illinois. However, housing affordability varies significantly within the

assessment area. For instance, Marion County has the lowest median housing value (\$68,600) and the highest affordability ratio (61.6%). Conversely, Effingham County has the highest median housing value (\$128,200) and is considered the least affordable, with an affordability ratio of 40.7 percent.

Industry and Employment Demographics

The assessment area supports a diverse business community that is predominantly small businesses and farms, as business demographic estimates indicate that 88.2 percent of assessment area businesses and 98.9 percent of assessment area farms have annual revenues of \$1 million or less. County business patterns indicate that the number of paid employees in the assessment area is 107,809. This is led by manufacturing (20.3 percent), followed by healthcare and social assistance (15.3 percent), and retail trade (14.5 percent).

The following table displays unemployment data for the individual counties within the assessment area, along with state figures.

Unemployment Levels for the Assessment Area			
Geography	Time Period (Annual Average)		
	2018	2019	2020
Assessment Area	4.5%	3.8%	7.5%
NonMSA Illinois	4.9%	4.2%	7.7%

As shown in the preceding table, average assessment area unemployment rates are fairly similar to nonmetropolitan statewide figures. However, unemployment rates varied throughout the assessment area between 2018 and 2020. Washington (2.9 percent and 2.4 percent) and Effingham (3.7 percent and 3.1 percent) Counties maintained the lowest unemployment levels within the assessment area in 2018 and 2019. In 2020, during the height of the COVID-19 pandemic, Washington County (5.3 percent) maintained the lowest unemployment rate. Jefferson and Clay Counties appear to have been the most affected by the pandemic, with unemployment levels in 2020 at 10.1 and 9.4 percent, respectively.

Community Contact Information

As noted previously, two community contact interviews were used during this evaluation to obtain additional performance context information. One of the interviews was with an individual specializing in affordable housing, and the other was with an individual specializing in economic development.

The contacts indicated that parts of the assessment area have been able to maintain a fairly strong economy, primarily due to proximity to major interstates. Effingham County benefits the most from access to those interstates, followed by the neighboring counties. Geographies located outside of these core counties are rural in nature and face more economic challenges. Both contacts also mentioned that the region has faced demographic challenges with some net migration to more populous parts of

the state and region. The population that remains in the assessment area is aging, which increases the need for low-cost home loans to make necessary repairs/upgrades and ultimately allow older residents to remain in their homes.

The contact specializing in affordable housing noted that affordable housing is not concentrated in just one county, providing some geographic flexibility. However, the region remains in need of more single family units for purchase and multifamily units for renting. As was aforementioned, some of the assessment area's housing stock is older, which creates demand for home rehabilitation credit products. Outside of credit specific needs, the housing contact indicated that the area stands to benefit from more accessible financial education for individuals of all ages. The affordable housing contact indicated that Midland States Bank has been responsive to these needs in the assessment area.

Regarding the area's small business and economic development standing, the contact indicated that the region continues to benefit from north-south and east-west transportation infrastructure. This encourages business development in manufacturing, shipping, and agriculture. It also allows for entrepreneurship in businesses that support those industries and the employees who work there. The contact added that the farther one travels away from the main highways, the more challenging it is to create and sustain a business. One of the reasons for those challenges, according to the contact, is a lack of broadband Internet services. Other challenges include lack of business history or collateral, which prevents potential small business owners from getting traditional bank loans. The contact said banks should engage in regional development projects and support municipal business development programs to support the area's business community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SOUTHERN ILLINOIS ASSESSMENT AREA

LENDING TEST

Lending levels reflect adequate responsiveness to the credit needs of the assessment area. The distribution of loans by borrower’s income/revenue profile reflects excellent penetration among customers of different income levels and businesses and farms of different sizes. The bank’s geographic distribution of loans reflects adequate penetration throughout the assessment area. Finally, the bank makes an adequate level of community development loans in the assessment area.

Lending Activity

The following table displays lending volume in the assessment area by number and dollar volume.

Summary of Lending Activity – Southern Illinois January 1, 2018 through December 31, 2019				
Loan Type	#	%	\$(000s)	%
Home Improvement	2	0.5%	\$197	0.3%
Home Purchase	146	35.7%	\$19,569	29.3%
Multifamily Housing	3	0.7%	\$1,024	1.5%
Refinancing	48	11.7%	\$6,844	10.3%
Total HMDA	201	49.1%	\$27,684	41.5%
Small Business	142	34.7%	\$31,757	47.6%
Small Farm	66	16.1%	\$7,255	10.9%
TOTAL LOANS	409	100.0%	\$66,696	100.0%

The bank’s lending activity represents 7.1 percent of the total HMDA and CRA loans made in the bank’s combined assessment areas. That trails the percentage of the total bank deposits held within the assessment area (16.1 percent) and is in line with the percentage of total bank branches in the assessment area (7.5 percent).

The bank ranks 2nd in terms of deposit market share, but it ranks 15th in HMDA lending in 2019 and 5th in small business/small farm lending in 2019 compared to area peers. Additionally, the bank’s headquarters and a substantive number of its employees are in the assessment area. Together, these facts suggest the bank could more completely penetrate the assessment area; thus, performance under this test is considered adequate.

Loan Distribution by Borrower’s Profile

Overall, the bank’s loan distribution by borrower’s profile is excellent, based on performance from the loan categories reviewed.

HMDA Loans

The bank made 14.3 percent of its HMDA loans in the assessment area to low-income borrowers in 2018. That exceeds aggregate performance (9.1 percent) but trailed the population of low-income families (20.9 percent) and reflects good performance. The bank made 21.0 percent of its HMDA loans to moderate-income borrowers in 2018, which exceeds the demographic measure (18.1 percent) and approached but trailed aggregate lending performance (22.0 percent). Therefore, the bank's performance lending to moderate-income borrowers is also considered good.

In 2019, the bank made 17.7 percent of its HMDA loans to low-income borrowers, which nearly doubled peer lending (9.0 percent) and approached the population comparator (21.0 percent), reflecting good performance. Of the bank's HMDA loans in the assessment area in 2019, 24.0 percent were to moderate-income borrowers. The bank's lending levels exceed both aggregate (19.5 percent) and the demographic measure (18.2 percent) and reflect excellent performance.

Overall, HMDA lending is considered excellent. In 2018, the bank's lending to LMI borrowers (35.3 percent) exceeds the aggregate figure (31.1 percent) and approaches the demographic figure (39.0 percent). In 2019, the bank's lending to LMI borrowers (41.7 percent) exceeds both peer lending levels (28.5 percent) and the percentage of LMI families in the assessment area (39.2 percent). Moreover, a community contact indicated that Midland States Bank has accessible, mortgage-related loan products geared to LMI borrowers. Bank performance in 2019 alongside the contact's comment contextualize the overall excellent rating.

Small Business Lending

Small business loans were also reviewed to determine the bank's lending levels to businesses of different sizes. The bank made 54.7 percent of its loans in 2018 and 52.2 percent of its loans in 2019 to businesses with less than \$1 million in revenue. In both years, the bank's lending exceeds comparable peer lending (44.4 percent in 2018 and 46.1 percent in 2019) while trailing the percentage of small businesses in the assessment area (87.5 percent in 2018 and 88.2 percent in 2019). In both years, the bank's lending reflects good performance, leading to an overall good rating.

Small Farm Lending

Finally, small farm loans were reviewed to determine the bank's lending levels to farms of different sizes. The bank made 89.5 percent of its loans to small farms in 2018 and 92.9 percent of its loans to small farms in 2019. In both years, the bank far exceeds aggregate performance (59.1 percent in 2018 and 59.3 percent in 2019) and approaches the demographic figure (98.8 percent in 2018 and 98.9 percent in 2019). In both years, the bank's lending is considered excellent and thus is considered excellent overall.

Geographic Distribution of Loans

As noted previously, the assessment area includes one low- and 14 moderate-income census tracts, representing 16.3 percent of all assessment area census tracts. Overall, the bank's geographic distribution of loans in the assessment area reflects adequate penetration throughout LMI census tracts, based on the loan categories reviewed.

HMDA Lending

As indicated by the very low percentage of owner-occupied housing units (0.2 percent) and the lack of aggregate lending (0.0 percent), the opportunity to make home mortgage loans within the one low-income census tract is minimal. Therefore, the bank's lack of lending in low-income census tracts is considered adequate in both 2018 and 2019. The bank's lending level in moderate-income census tracts in 2018 (10.5 percent) exceeds peer performance of 8.2 percent and approached the percent of owner-occupied housing in moderate-income geographies (11.3 percent). This indicates good performance. In 2019, the bank made 12.5 percent of its HMDA loans in moderate-income areas. That exceeds both peer performance (9.4 percent) and the demographic figure (11.3 percent) and reflects excellent performance. Overall, the bank's level of HMDA lending is considered good.

Small Business Lending

The geographic distribution of small business loans was also reviewed. As has been previously discussed, there being only one low-income census tract in the assessment area limits opportunity for small business lending. However, the comparators (aggregate lending was 1.7 percent in 2018 and 2019) indicate that there are businesses located in the low-income tract and that some lending opportunities exist. Therefore, the bank's performance in the low-income census tract (0 percent) is considered poor in both 2018 and 2019.

In 2018, the bank made 12.0 percent of its small business loans in moderate-income census tracts, which just exceeds peer performance of 11.9 percent but trailed the demographic figure (16.2 percent). Therefore, the bank's performance is considered adequate. In 2019, the bank made 11.9 percent of its small business loans in moderate-income census tracts, which approached peer lending levels (12.5 percent) and trailed the percent of assessment area businesses in moderate-income census tracts (16.0 percent). Ultimately, that reflects adequate performance in 2019 and adequate performance for small business lending overall.

Small Farm Lending

The available farm lending opportunities in the low-income geographies within the assessment area are minimal, as no small farms are in the low-income census tract. Therefore, performance in low-income tracts was not rated. In moderate-income census tracts, the bank made 5.3 percent of its small farm loans in 2018, which exceeds aggregate lending (3.2 percent) and exceeds the percent of assessment area farms located in moderate-income areas (4.9 percent). This reflects good performance. In 2019, the bank made zero loans in moderate-income census tracts compared

to peer lending levels being 3.5 percent and the demographic comparator being 4.7 percent. This level of lending reflects poor performance.

Overall, small farm lending is considered adequate. Between the two years, the bank made 3.0 percent of its loans in moderate-income geographies, which falls just short of peer performance of 3.4 percent and trails the percent of farms located in either low- or moderate-income areas (4.8 percent).

No conspicuous lending gaps were identified in the dispersion of the bank's HMDA and CRA loans, particularly in LMI geographies. In 2018, the bank had loan activity in 56.5 percent of all assessment area census tracts and 60.0 percent of all LMI census tracts. In 2019, the bank's loan dispersion was similar, with loan activity in 55.4 percent of all assessment area census tracts and 53.3 percent of all LMI census tracts. The dispersion of the bank's loans was consistent with its branch structure in the assessment area, with loan activity most heavily concentrated in areas located near a branch location. Therefore, the bank's loan dispersion supports the conclusion that the bank's distribution of loans by geography income level is adequate overall.

Community Development Lending Activities

Midland States Bank makes an adequate level of community development loans in the assessment area. During the review period, the bank originated two community development loans totaling \$4.5 million within the assessment area. Both loans were to a regional transportation entity that provides public transit options to LMI individuals and geographies in the assessment area.

INVESTMENT TEST

The bank made a significant level of qualified community development investments and grants during the review period, made occasional use of innovative or complex investments, and exhibited adequate responsiveness to the credit and community development needs in the assessment area.

The bank made \$3.4 million in qualifying investments and donations. This amount includes four current period investments worth \$619,991 and one prior-period investment worth \$2.8 million. The prior period investment was particularly impactful as it was in a low-income housing tax credit fund used to provide financing for affordable housing in the assessment area, a need noted by community contacts.

The bank also made eight donations in the assessment area equaling \$47,500. Seven of the eight donations were made in 2020 and were to causes and initiatives aimed at providing resources and services to those suffering from economic and social disruptions caused by COVID-19.

SERVICE TEST

Midland States Bank's service delivery systems are accessible to the geographies and individuals of different income levels in this assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI

geographies and/or LMI individuals. Business hours and retail services do not vary in a way that inconveniences LMI geographies and/or individuals. Finally, Midland States Bank provides a relatively high level of community development services within the assessment area.

Accessibility of Delivery Systems

The bank operates four offices within the assessment area. The following table illustrates the distribution of these facilities by income level of geography compared to key assessment area demographics.

Distribution of Delivery Systems by Income Level of Geography – Southern Illinois						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Branches	0	1	3	0	0	4
	0.0%	25.0%	75.0%	0.0%	0.0%	100%
Census Tracts	1.1%	15.2%	71.7%	10.9%	1.1%	100%
Household Population	0.4%	13.3%	72.3%	13.4%	0.7%	100%

As illustrated in the preceding table, the bank has one office in an LMI census tract in the assessment area. In addition to traditional offices and ATMs in the area, the bank offers online banking, which is available to all individuals and geographies, including LMI. As a result, service delivery systems are accessible to geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

The bank’s record of opening and closing offices within this assessment area has not adversely affected the accessibility of its delivery systems, as the bank did not open or close any offices in LMI census tracts within this assessment area during the review period.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking products and services are relatively consistent across all offices in the assessment area. Most offices have Saturday operating hours, and all locations offer the same products. Furthermore, the varied hours across the offices are not skewed negatively toward moderate-income census tracts. Therefore, bank services do not vary in a way that inconveniences certain segments of the assessment area, particularly LMI geographies and/or LMI individuals.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. During the review period, 27 employees provided services to 15 different community development organizations, totaling almost 590 hours of service. These organizations spanned all four community development categories.

CHICAGO-NAPERVILLE, ILLINOIS-INDIANA- WISCONSIN COMBINED STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CHICAGO ASSESSMENT AREA

Bank Structure

The bank operates 14 branches, equaling 26.4 percent of total branches, in the assessment area. Of the 14 branches, 2 are in low-income census tracts, 2 are in moderate-income census tracts, 7 are in middle-income census tracts, and 3 are in upper-income census tracts. The bank also operates 26 ATMS, 12 of which are co-branded, in the region. Based on this branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of the assessment area.

General Demographics

The bank’s Chicago assessment area is composed of the entire counties of DeKalb, Kankakee, Kendall, Will, and Grundy. The largest is Will County, with a population of 683,995. That is attributable to it bordering Cook County, which is the center of the Chicago MSA. The smallest is Grundy County, with a population of 50,277. Since the assessment area is so close to Chicago, it has a highly competitive banking market with 58 financial institutions operating in the market. Of these, Midland States Bank ranked seventh, with a deposit market share of 4.5 percent.

As the demographics of this assessment area cover a significant portion of a metropolitan area and the population is diverse, credit needs in the area are a blend of consumer and business credit products. According to the contacts, there is a need for accessible credit products and banking services, especially products and services offered in Spanish.

Income and Wealth Demographics

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	18	31	102	69	2	222
	8.1%	14.0%	45.9%	31.1%	0.9%	100%
Family Population	12,234	25,287	117,857	109,369	45	264,792
	4.6%	9.6%	44.5%	41.3%	0.0%	100%

As shown in the previous table, 22.1 percent of the census tracts in the assessment area are LMI geographies, but only 14.2 percent of the family population resides in these tracts. According to 2015 ACS data, the median family income for the assessment area was \$82,272, which is well above the state of Illinois (\$71,546). The following table displays the distribution of assessment area families by income level, as well as family population income characteristics for Illinois.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	44,944	41,663	56,545	121,640	264,792
	17.0%	15.7%	21.4%	45.9%	100%
Illinois	706,235	526,032	608,217	1,284,199	3,124,683
	22.6%	16.8%	19.5%	41.1%	100%

While the first table in this section shows that 14.2 percent of families reside in LMI census tracts, the table above shows that a larger percentage of families in the assessment area are LMI. The LMI family percentage of the assessment area (32.7 percent) is below the 39.4 percent of LMI families in Illinois. Additionally, while not shown above, the percentage of families living below the poverty level in the assessment area, 7.0 percent, is below the 10.5 percent found in Illinois. This data points to an assessment area that is overall more affluent when compared to the state of Illinois.

Housing Demographics

The following table provides details of the housing demographics of the assessment area compared to the state of Illinois. As shown, demographics vary significantly by county within the assessment area.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
DeKalb County	\$165,200	32.8%	\$860
Grundy County	\$182,400	36.1%	\$929
Kankakee County	\$138,700	37.6%	\$820
Kendall County	\$200,200	42.2%	\$1,305
Will County	\$209,800	36.3%	\$1,039
Assessment Area	\$194,454	36.3%	\$959
Illinois	\$173,800	33.1%	\$907

Both the median housing value and monthly gross rent are higher in the assessment area than the state of Illinois. This is likely because median housing values and median gross rents in Kendall County and Will County, a Chicago suburb and exurb, are significantly higher than the rest of the assessment area. Nonetheless, housing is more affordable in the assessment area compared to the state of Illinois, as displayed by the affordability ratio.

Industry and Employment Demographics

The assessment area supports a large and diverse business community. County business patterns indicate that there are 313,347 paid employees in the assessment area. By percentage of employees, the three largest job categories are retail trade (15.4 percent), health care and social assistance (12.7 percent), and transportation and warehousing (12.3 percent).

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Illinois.

Unemployment Levels for the Assessment Area			
Dataset	Time Period (Annual Average)		
	2018	2019	2020
Assessment Area	4.3%	4.0%	9.1%
Illinois	4.4%	4.0%	9.5%

The table suggests that unemployment levels in the assessment area were comparable to the state of Illinois for the last three years. Finally, like the bank's other assessment areas, there was a spike in unemployment in 2020 that coincided with the economic disruptions caused by COVID-19.

Community Contact Information

As noted previously, two community contact interviews were used during this evaluation to obtain additional performance context information. One interview was with an individual specializing in affordable housing, and the other was with an individual specializing in small business development.

Both contacts suggested that the region has a relatively stable economy. Most of the population growth and general economic development stems from families moving out of Chicago's core to the more spacious suburbs. The contacts also noted that the farther the counties are from Chicago, the less populated and affluent they often are. The interviews also suggested the Chicago suburbs are becoming more diverse, as Black and Hispanic families move from the city, where housing prices are increasing.

According to the affordable housing community contact, accessible housing availability varies by county. Due to the activity of a local organization, there has been some single family and multifamily rehabilitation and new housing development in Kendall and Will Counties. Otherwise, the contact suggested LMI borrowers face substantive barriers to buying their first home. Those barriers include poor credit histories, the inability to save for a down payment, and having to compete with more affluent buyers. The contact also said that lower-cost housing often stands in need of repair and/or rehabilitation work that sometimes prevents houses from appraising for their full value. The contact indicated there are plenty of opportunities to engage in affordable housing efforts in the community. The contact suggested financing LIHTC projects and partnering with community development financial institutions as two options.

The second community contact specializes in small business and economic development. The interviewee indicated that the region has a diverse economy, with several large major manufacturers and healthcare-related companies. However, the contact indicated there are some

substantive challenges to small business development in the community. The first stems from Kankakee's loss of its local small business development center (SBDC). The SBDC often provided technical assistance to small business owners to help them prepare for a bank credit application. The contact also indicated that some businesses and their workers, particularly in the accommodation and food service industries, suffered considerably during the pandemic. The interviewee suggested the banks should partner with organizations that offer start-up funding and small dollar lines of credit to small businesses.

Both community contacts mentioned Midland States Bank as particularly responsive and engaged in community development projects in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHICAGO ASSESSMENT AREA

LENDING TEST

Due to the fact that the bank’s Kankakee market, Chicago market, and Elgin market are all in the Chicago CSA, performance conclusions in the following sections are based on aggregate performance across all three assessment areas. When appropriate, performance in a specific market will be mentioned.

Lending levels reflect good responsiveness to the credit needs of the assessment area. The distribution of loans by borrower’s income/revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. The bank’s geographic distribution of loans reflects excellent penetration throughout the assessment area. Finally, the bank makes a relatively high level of community development loans in the assessment area.

Lending Activity

The following table displays the lending volume in the assessment area by number and dollar volume.

Summary of Lending Activity – Chicago Assessment Area (AA) January 1, 2018 through December 31, 2019				
Loan Type	#	%	\$(000s)	%
Home Improvement	60	4.2%	\$2,251	1.2%
Home Purchase	675	47.3%	\$95,307	48.5%
Multifamily Housing	15	1.1%	\$10,400	5.3%
Refinancing	318	22.3%	\$34,932	17.8%
TOTAL HMDA	1,121	78.6%	\$144,542	73.6%
Small Business	219	15.4%	\$38,785	19.7%
Small Farm	86	6.0%	\$13,117	6.7%
TOTAL LOANS	1,426	100%	\$196,444	100%

The bank’s lending levels reflect good penetration in the assessment area. Lending activity represents 24.8 percent of the bank’s combined assessment area percentage, which exceeds the total bank deposits held within the assessment area (21.1 percent) but slightly trails the percentage of total bank branches in the assessment area (26.4 percent).

Loan Distribution by Borrower’s Profile

Overall, the bank’s loan distribution by borrower’s profile is good, based on performance from the loan categories reviewed.

HMDA Lending

In 2018, the bank made 10.6 percent of its loans in low-income census tracts. That level of performance exceeds peer performance of 7.1 percent but trails the percentage of the assessment area families that are low income (16.8 percent) and is considered good. In moderate-income census tracts, the bank made 23.0 percent of its HMDA loans in 2018, exceeding both peer (19.7 percent) and the demographic figure (15.6 percent), which reflects excellent performance. Overall, HMDA lending in 2018 is considered excellent because the bank's performance to LMI borrowers (33.6 percent) exceeds both peer (26.8 percent) and demographic figures (32.4 percent).

The bank's 2019 HMDA lending performance was also excellent. The bank made 11.9 percent of its HMDA loans to low-income borrowers, which doubled peer lending levels (5.8 percent) but trailed the demographic comparator (17.0 percent), reflecting good performance. The bank's moderate-income lending level was 23.9 percent, which exceeds the peer figure of 18.6 percent and the percentage of moderate-income families in the assessment area (15.7 percent), demonstrating excellent performance. Overall, the bank's HMDA lending levels to LMI borrowers (35.8 percent) exceeds both peer (24.4 percent) and the demographic figure (32.7 percent) and is considered excellent.

Small Business Lending

The bank's lending to businesses with less than \$1 million in revenue is considered good. In 2018 and 2019, the bank's lending performance (62.9 percent in 2018 and 59 percent in 2019) exceeds peer performance (42 percent in 2018 and 47.5 percent in 2019). However, the bank's lending levels in both years trailed the percentage of small businesses in the assessment area (90.6 percent in 2018 and 91.0 percent in 2019).

Small Farm Lending

The bank made 87.5 percent of its loans to farms with less than \$1 million in revenue in 2018, which exceeds aggregate performance of 55.3 percent. However, the bank's lending levels fall short of the demographic figure of 98.0 percent. Nonetheless, performance in 2018 is considered good. In 2019, the bank made 88.9 percent of its loans to small farms, again exceeding aggregate (65.2 percent) but trailing the demographic figure (98.0 percent). Performance in 2019 and overall is considered good.

Geographic Distribution of Loans

As noted previously, there are 18 low-income census tracts and 31 moderate-income census tracts in the assessment area. This represents 22.1 percent of the assessment area's total census tracts. The bank's lending performance throughout LMI census tracts is considered excellent. However, the bank's performance in the Elgin MSA was below that of the rest of the assessment area.

HMDA Lending

The bank's HMDA lending in LMI geographies is considered excellent overall. In 2018 and 2019, the bank's lending levels in low-income census tracts (4.0 percent in 2018 and 7.0 percent in 2019)

exceeds both peer performance (1.7 percent in 2018 and 1.5 percent in 2019) and the percentage of owner-occupied housing units in low-income census tracts (2.4 percent in both 2018 and 2019). Therefore, performance in low-income areas is considered excellent.

Additionally, the bank's HMDA lending in moderate-income census tracts (14.0 percent in 2018 and 13.6 percent in 2019) exceeds peer lending levels (6.6 percent in 2018 and 6.1 percent in 2019) and exceeds the demographic comparator (7.8 percent in 2018 and 8.1 percent in 2019). The bank's lending in moderate-income areas is excellent in both 2018 and 2019.

Small Business Lending

The bank's small business lending was also assessed across geographies. In 2018, the bank made 12.4 percent of its loans in low-income census tracts, which tripled aggregate performance (3.7 percent) and more than doubled the percentage of small businesses in low-income census tracts (4.6 percent). That reflects excellent performance. The bank made 5.2 percent of its loans in moderate-income census tracts, which approached but trailed peer lending (7.5 percent) and trailed the demographic figure (9.3 percent). Overall, performance in moderate-income census tracts is considered adequate. Lending to LMI geographies in 2018 is considered excellent overall. The bank's total lending in LMI areas (17.6 percent) exceeds peer lending (11.2 percent) and exceeds the demographic figure (13.9 percent).

In 2019, the bank made 9.8 percent of its small business loans in low-income census tracts, which more than doubled peer lending (3.5 percent) and the percentage of businesses in low-income areas (4.7 percent) and reflects excellent performance. The bank's lending in moderate-income geographies (9.0 percent) exceeds peer (7.4 percent) and approached the demographic figure (9.8 percent). Therefore, the bank's lending is considered good. When combined, the bank's lending in LMI areas (18.9 percent) exceeds aggregate lending (10.9 percent) and the percentage of businesses in LMI areas (14.5 percent) and thus is considered excellent.

Overall, the bank's small business lending by geography is excellent.

Small Farm Lending

Finally, the bank's lending to farms in LMI areas was analyzed. In 2018, the bank made zero loans in low- or moderate-income areas compared to aggregate lending levels of 1.1 percent and the demographic comparator being 6.2 percent. This reflects poor performance.

In 2019, the bank made 1.9 percent of its loans in low-income census tracts, which exceeds both peer (1.3 percent) and the demographic comparator (1.1 percent), reflecting good performance. The bank also made 1.9 percent of its loans in moderate-income census tracts in 2019, which trailed both peer lending (6.1 percent) and the demographic figure (6.2 percent), reflecting poor performance. Together, performance was considered adequate. This is in part because the majority of the bank's agricultural lending portfolio in the assessment area stemmed from an acquisition of another bank.

Lastly, based on an analysis of the dispersion of HMDA, small business loans, and small farm loans, no conspicuous lending gaps were noted, particularly in LMI areas. The bank had loan

activity in 53.6 percent of all assessment area census tracts in 2018 and 50.9 percent of all census tracts in 2019. Additionally, the bank had loan activity in 61.2 percent of LMI census tracts in 2018 and 65.3 percent of LMI census tracts in 2019. When considering the high level of competitiveness within this banking market, the dispersion of the bank's loans was consistent with its branch structure and supports the conclusion that the bank's distribution of loans by geography income level is excellent overall.

Community Development Lending Activities

Midland States Bank made a relatively high level of community development loans in the assessment area. However, the bank's performance in Elgin was below that of the larger assessment area.

During the review period, the bank originated eight community development loans totaling \$20.6 million in the assessment area. These loans qualified for a variety of purposes, including affordable housing and community services. A few of the more impactful loans are described below.

- The bank participated in a loan fund that pooled resources to renovate an affordable housing complex in the assessment area. Partnering with area syndicators to build affordable housing was mentioned by a community contact as a particular area of need in the region.
- The bank financed a LIHTC project that built a 102-unit, U.S. Department of Housing and Urban Development-certified multifamily housing development. LIHTCs were also mentioned by the community contact as an impactful way for banks to support affordable housing.

The bank also made three PPP loans in low- or moderate-income geographies that helped sustain businesses during the pandemic and are considered particularly responsive.

INVESTMENT TEST

The bank made a significant level of qualified community development investments and grants during the review period, rarely acted in a leadership position, made occasional use of innovative and/or complex investments, and exhibited adequate responsiveness to credit and community development needs in the assessment area.

The bank made 21 investments worth \$6.6 million during the examination period that support affordable housing, community services for LMI individuals, and the revitalization and stabilization of low- or moderate-income geographies. The bank also had one prior-period investment still on its books equaling \$502,535.26.

Additionally, the bank made 20 donations totaling \$124,501. Like in many of the other assessment areas, Midland States Bank provided several donations in 2020 to organizations and causes that sought to help those suffering from the physical, economic, and social consequences of COVID-19. These donations were considered particularly responsive.

SERVICE TEST

Midland States Bank’s service delivery systems are accessible to the bank’s geographies and individuals of different income levels in the assessment area. Additionally, the bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems to LMI geographies and/or LMI individuals. Business hours and services do not vary in a way that inconveniences LMI geographies and/or LMI individuals. Finally, the bank provides an adequate level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 14 branches with full-service ATMs in the assessment area. The following table illustrates the distribution of branch facilities by geography income level compared to the distribution of census tracts and households.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	2	2	7	3	0	14
	14.3%	14.3%	50.0%	21.4%	0.0%	100%
Census Tracts	8.1%	14.0%	45.9%	31.1%	0.9%	100%
Household Population	5.7%	7.9%	46.3%	39.2%	0.5%	100%

As illustrated in the preceding table, the bank’s offices in LMI census tracts represent 36.8 percent of offices in the assessment area. That exceeds both the percentage of LMI census tracts (22.1 percent) and the household population in LMI tracts (13.6 percent).

As a result, service delivery systems are accessible to geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

Changes in branch locations during the evaluation period have not adversely affected the accessibility of the bank’s delivery systems, particularly to LMI individuals and geographies. The bank closed six offices during the evaluation period, including one in a low-income census tract and five in middle-income tracts. As was mentioned before, a significant number of the bank’s closures were part of the bank’s consolidation effort. Even withstanding, the bank continues to operate four branches in either low- or moderate-income census tracts.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain segments of the assessment area, particularly LMI geographies and individuals. Hours of operation, while slightly different at each branch, are reflective of normal business hours, and services are uniform across all branches in the assessment area. Therefore, bank services do not vary in a way that inconveniences certain segments of the assessment area, particularly LMI geographies and/or LMI individuals.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. During the review period, 26 employees provided services to 15 different community development organizations. These bank representatives served on various boards and committees, their time totaling nearly 264 hours. These organizations promote economic development and affordable housing.

CHAMPAIGN-URBANA, ILLINOIS MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CHAMPAIGN ASSESSMENT AREA

The assessment area includes the entirety of Champaign and Piatt Counties, the two counties that comprise the Champaign-Urbana, Illinois MSA. Midland States Bank operates one branch in this assessment area located in a middle-income census tract and did not open or close any branches during this review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	8	7	20	10	2	47
	17.0%	14.9%	42.6%	21.3%	4.3%	100%
Family Population	3,245	6,537	25,798	11,624	81	47,285
	6.9%	13.8%	54.6%	24.6%	0.2%	100%
Household Population	11,556	13,643	41,921	17,948	1,489	86,557
	13.4%	15.8%	48.4%	20.7%	1.7%	100%
Business Institutions	731	1,224	3,082	2,052	122	7,211
	10.1%	17.0%	42.7%	28.5%	1.7%	100%
Agricultural Institutions	3	8	323	76	0	410
	0.7%	2.0%	78.8%	18.5%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	10,336	7,828	9,782	19,339	47,285
	21.9%	16.6%	20.7%	41.0%	100%
Household Population	23,924	12,555	13,200	36,878	86,557
	27.6%	14.5%	15.3%	42.6%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHAMPAIGN ASSESSMENT AREA

LENDING TEST

The bank’s lending performance in this assessment area is below the bank’s lending performance in the MSA portion of Illinois that was reviewed using full-scope evaluation procedures. For more detailed information relating to the bank’s lending test performance in this assessment area, see the tables contained in *Appendix C*.

Lending Test Criteria	Performance
Lending Activity	Below
Distribution of Loans by Borrower’s Profile	Below
Geographic Distribution of Loans	Consistent
Community Development Lending Activities	Below
OVERALL	BELOW

The bank made zero community development loans in the assessment area during the examination period.

INVESTMENT TEST

The bank’s investment performance in this assessment area is below the bank’s investment performance in the assessment area within the MSA portion of Illinois that was reviewed using full-scope evaluation procedures. The bank originated four community development investments totaling \$2.2 million. The bank also provided one community development donation for \$2,500.

SERVICE TEST

The bank’s service performance in this assessment area is below the bank’s service performance in the assessment area within the MSA portion of Illinois that was reviewed using full-scope evaluation procedures, as shown in the following table; however, it does not change the conclusion for the state of Illinois.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Below
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	BELOW

During the review period, the bank had two employees volunteer with two community development organizations, totaling 21 hours.

SCOPE OF EXAMINATION TABLES

Scope of Examination		
TIME PERIOD REVIEWED	January 1, 2018 – December 31, 2019 for HMDA, small business lending, and small farm lending (St. Louis MSA and the state of Illinois) April 22, 2019 – June 20, 2021 for community development loans, investments, and service activities	
FINANCIAL INSTITUTION		PRODUCTS REVIEWED
Midland States Bank Effingham, Illinois		HMDA Small business Small farm
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
Not applicable		

Assessment Area Details

Assessment Area – Examination Scope Details					
Assessment Area	Rated Area	# of Offices	Deposits (\$000s) (as of June 30, 2020)	Branches Visited	CRA Review Procedures
St. Louis	St. Louis MSA	15	\$1,130,868	0	Full Scope
Rockford MSA	Illinois	10	\$1,047,763	0	Full Scope
Northern NonMSA Illinois	Illinois	9	\$916,155	0	Full Scope
Southern NonMSA Illinois	Illinois	4	\$808,264	0	Full Scope
Chicago CSA	Illinois	14	\$1,056,517	0	Full Scope
Champaign MSA	Illinois	1	\$47,780	0	Limited Scope
OVERALL		53	\$5,007,347	0	5 Full Scope

SUMMARY OF STATE AND MULTISTATE MSA RATINGS

State or Multistate MSA	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Illinois	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
St. Louis MSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

The following table depicts the previous ratings table in numerical form, which is used in determining the overall rating for each state or multistate MSA for large banks.

Point Calculation					
State or Multistate MSA	Lending Test Rating	Investment Test Rating	Service Test Rating	Total Points	Overall Rating
Illinois	9	3	3	15	Satisfactory
St. Louis MSA	9	4	4	17	Satisfactory

Summing the points from the Lending, Investment, and Service Tests, each state or multistate MSA is given a total point value. The total point value for each state or multistate MSA equates to a rating in accordance with the following table:

Total Points	Assigned Rating
20+	Outstanding
11–19	Satisfactory
5–10	Needs to Improve
0–4	Substantial Noncompliance

LENDING PERFORMANCE TABLES BY FULL-SCOPE ASSESSMENT AREAS

St. Louis Multistate MSA

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: St. Louis								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	63	12.3%	9.3%	5,288	5.1%	4.6%	21.5%
	Moderate	129	25.1%	19.9%	18,832	18.0%	14.3%	17.2%
	Middle	123	23.9%	19.4%	23,802	22.8%	18.0%	19.9%
	Upper	190	37.0%	32.7%	54,876	52.5%	45.5%	41.4%
	Unknown	9	1.8%	32.7%	1,821	1.7%	17.5%	0.0%
	TOTAL	514	100.0%	100.0%	104,619	100.0%	100.0%	100.0%
Refinance	Low	7	6.2%	8.4%	289	1.4%	4.3%	21.5%
	Moderate	15	13.3%	17.5%	1,619	7.8%	12.1%	17.2%
	Middle	27	23.9%	20.9%	4,137	20.0%	17.9%	19.9%
	Upper	51	45.1%	37.8%	11,196	54.1%	50.5%	41.4%
	Unknown	13	11.5%	15.3%	3,450	16.7%	15.2%	0.0%
	TOTAL	113	100.0%	100.0%	20,691	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	5.7%	0	0.0%	3.5%	21.5%
	Moderate	0	0.0%	12.7%	0	0.0%	9.8%	17.2%
	Middle	1	14.3%	20.0%	46	6.9%	17.4%	19.9%
	Upper	5	71.4%	53.6%	234	35.1%	56.3%	41.4%
	Unknown	1	14.3%	8.0%	387	58.0%	13.1%	0.0%
	TOTAL	7	100.0%	100.0%	667	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.2%	0	0.0%	0.0%	21.5%
	Moderate	0	0.0%	0.8%	0	0.0%	0.2%	17.2%
	Middle	0	0.0%	1.5%	0	0.0%	0.1%	19.9%
	Upper	0	0.0%	7.2%	0	0.7%	1.2%	41.4%
	Unknown	0	0.0%	90.3%	0	99.3%	98.4%	0.0%
	TOTAL	0	100.0%	100.0%	0	100.0%	100.0%	100.0%
Other Purpose Line of Credit (LOC)	Low	0	0.0%	9.1%	0	0.0%	5.7%	21.5%
	Moderate	0	0.0%	17.2%	0	0.0%	11.7%	17.2%
	Middle	0	0.0%	19.8%	0	0.0%	15.2%	19.9%
	Upper	0	0.0%	51.7%	0	0.0%	65.1%	41.4%
	Unknown	0	0.0%	2.2%	0	0.0%	2.4%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%

Appendix C (Continued)

Other Purpose Closed/Exempt	Low	1	20.0%	11.1%	25	18.4%	5.7%	21.5%
	Moderate	0	0.0%	19.0%	0	0.0%	12.7%	17.2%
	Middle	0	0.0%	21.7%	0	0.0%	15.3%	19.9%
	Upper	4	80.0%	44.1%	111	81.6%	59.7%	41.4%
	Unknown	0	0.0%	4.0%	0	0.0%	6.6%	0.0%
	TOTAL	5	100.0%	100.0%	1,226	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	1.8%	0	0.0%	1.1%	21.5%
	Moderate	0	0.0%	2.1%	0	0.0%	1.5%	17.2%
	Middle	0	0.0%	2.4%	0	0.0%	1.5%	19.9%
	Upper	0	0.0%	2.4%	0	0.0%	2.2%	41.4%
	Unknown	0	0.0%	91.3%	0	0.0%	93.7%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	71	11.1%	8.6%	5,602	4.4%	4.1%	21.5%
	Moderate	144	22.5%	18.1%	20,451	16.2%	12.4%	17.2%
	Middle	151	23.6%	19.2%	27,985	22.2%	16.4%	19.9%
	Upper	250	39.1%	34.8%	66,417	52.7%	43.4%	41.4%
	Unknown	23	3.6%	19.2%	5,658	4.5%	23.7%	0.0%
	TOTAL	639	100.0%	100.0%	126,113	100.0%	100.0%	100.0%

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: St. Louis								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$(000s)	\$ %	\$ %	%
Home Purchase	Low	21	14.6%	10.7%	2,064	7.0%	5.3%	21.5%
	Moderate	26	25.0%	21.2%	5,561	18.8%	15.2%	17.2%
	Middle	25	17.4%	21.3%	6,066	20.5%	19.9%	19.9%
	Upper	59	41.0%	31.4%	15,256	51.5%	45.2%	41.4%
	Unknown	3	2.1%	15.5%	700	2.4%	14.4%	0.0%
	TOTAL	144	100.0%	100.0%	29,647	100.0%	100.0%	100.0%
Refinance	Low	5	6.0%	6.3%	257	1.4%	3.2%	21.5%
	Moderate	14	16.9%	14.8%	1,943	10.9%	9.5%	17.2%
	Middle	12	14.5%	21.0%	2,235	12.5%	17.3%	19.9%
	Upper	41	49.4%	40.1%	11,737	65.8%	52.4%	41.4%
	Unknown	11	13.3%	17.8%	1,658	9.3%	5.9%	0.0%
	TOTAL	83	100.0%	100.0%	17,830	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	8.4%	0	0.0%	5.0%	21.5%
	Moderate	1	16.7%	16.8%	70	21.7%	12.3%	17.2%
	Middle	4	66.7%	22.6%	122	37.9%	20.4%	19.9%
	Upper	1	16.7%	47.4%	130	40.4%	56.3%	41.4%
	Unknown	0	0.0%	4.7%	0	0.0%	5.9%	0.0%
	TOTAL	6	100.0%	100.0%	322	100.0%	100.0%	100.0%

Appendix C (Continued)

Multifamily	Low	0	0.0%	0.5%	0	0.0%	0.0%	21.5%
	Moderate	0	0.0%	0.5%	0	0.0%	0.0%	17.2%
	Middle	0	0.0%	0.9%	0	0.0%	0.0%	19.9%
	Upper	0	0.0%	4.9%	0	0.0%	0.2%	41.4%
	Unknown	5	100.0%	93.1%	2,344	100.0%	0.9%	0.0%
	TOTAL	5	100.0%	100.0%	2,344	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	8.3%	0	0.0%	4.9%	21.5%
	Moderate	0	0.0%	16.9%	0	0.0%	11.5%	17.2%
	Middle	0	0.0%	22.7%	0	0.0%	17.5%	19.9%
	Upper	0	0.0%	49.0%	0	0.0%	63.0%	41.4%
	Unknown	0	0.0%	3.1%	0	0.0%	3.1%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	1	16.7%	9.8%	30	10.6%	5.4%	21.5%
	Moderate	0	0.0%	17.8%	0	0.0%	12.4%	17.2%
	Middle	3	50.0%	22.5%	75	26.6%	15.8%	19.9%
	Upper	2	33.3%	43.5%	177	62.8%	57.4%	41.4%
	Unknown	0	0.0%	6.4%	0	0.0%	9.0%	0.0%
	TOTAL	6	100.0%	100.0%	282	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.3%	0	0.0%	0.1%	21.5%
	Moderate	0	0.0%	0.4%	0	0.0%	0.3%	17.2%
	Middle	0	0.0%	0.3%	0	0.0%	0.2%	19.9%
	Upper	0	0.0%	0.5%	0	0.0%	1.4%	41.4%
	Unknown	0	0.0%	98.5%	0	0.0%	98.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	27	11.1%	8.5%	2,351	4.7%	4.1%	21.5%
	Moderate	51	20.9%	16.9%	7,574	15.0%	11.7%	17.2%
	Middle	44	18.0%	22.7%	8,498	16.9%	17.6%	19.9%
	Upper	103	42.2%	49.0%	27,300	54.1%	46.3%	41.4%
	Unknown	19	7.8%	3.1%	4,702	9.3%	20.3%	0.0%
	TOTAL	244	100.0%	100.0%	50,425	100.0%	100.0%	100.0%

Appendix C (Continued)

Small Business Loans by Revenue and Loan Size								
Assessment Area: St. Louis								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	58	53.2%	45.3%	\$6,791	29.6%	31.3%	89.0%
	Over \$1 Million/Unknown	51	46.8%	54.7%	\$16,178	70.4%	68.7%	11.0%
	TOTAL	109	100.0%	100.0%	\$22,969	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	57	52.3%	90.0%	\$2,750	12.0%	27.8%	
	\$100,001–\$250,000	24	22.0%	4.3%	\$3,960	17.2%	16.3%	
	\$250,001–\$1 Million	28	25.7%	4.8%	\$16,259	70.8%	55.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	109	100.0%	100.0%	\$22,969	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	39	67.2%		\$1,629	24.0%	
		\$100,001–\$250,000	12	20.7%		\$1,971	29.0%	
		\$250,001–\$1 Million	7	12.1%		\$3,191	47.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	58	100.0%		\$6,791	100.0%	

Small Business Loans by Revenue and Loan Size								
Assessment Area: St. Louis								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	61	55.0%	47.4%	\$9,669	35.2%	30.3%	89.6%
	Over \$1 Million/Unknown	50	45.0%	52.6%	\$17,816	64.8%	69.7%	10.4%
	TOTAL	111	100.0%	100.0%	\$27,485	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	48	43.2%	91.4%	\$2,750	10.0%	29.1%	
	\$100,001–\$250,000	23	20.7%	4.1%	\$3,854	14.0%	15.8%	
	\$250,001–\$1 Million	40	36.0%	4.5%	\$20,881	76.0%	55.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	111	100.0%	100.0%	\$27,485	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	35	57.4%		\$1,947	20.1%	
		\$100,001–\$250,000	11	18.0%		\$1,785	18.5%	
		\$250,001–\$1 Million	15	24.6%		\$5,937	61.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	61	100.0%		\$9,669	100.0%	

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: St. Louis								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	6	1.2%	1.8%	447	0.4%	0.8%	5.2%
	Moderate	99	19.3%	15.1%	13,841	13.2%	9.4%	17.6%
	Middle	182	35.4%	42.4%	31,788	30.4%	36.8%	40.4%
	Upper	225	43.8%	40.5%	58,210	55.6%	52.8%	36.6%
	Unknown	2	0.4%	0.2%	333	0.3%	0.2%	0.1%
	TOTAL	514	100.0%	100.0%	104,619	100.0%	100.0%	100.0%
Refinance	Low	10	8.8%	1.5%	1,621	7.8%	0.7%	5.2%
	Moderate	11	9.7%	12.3%	1,398	6.8%	7.5%	17.6%
	Middle	33	29.3%	40.7%	5,641	27.3%	33.8%	40.4%
	Upper	59	52.2%	45.4%	12,031	58.1%	58.0%	36.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	TOTAL	113	100.0%	100.0%	20,691	100.0%	100.0%	100.0%

Appendix C (Continued)

Home Improvement	Low	1	14.3%	1.6%	387	58.0%	1.0%	5.2%
	Moderate	0	0.0%	9.8%	0	0.0%	7.5%	17.6%
	Middle	4	57.1%	35.9%	194	29.1%	31.7%	40.4%
	Upper	2	28.6%	52.6%	86	12.9%	59.7%	36.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	TOTAL	7	100.0%	100.0%	667	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	12.9%	0	0.0%	5.3%	13.3%
	Moderate	0	0.0%	29.4%	0	0.0%	23.6%	21.4%
	Middle	0	0.0%	39.2%	0	0.0%	35.6%	35.0%
	Upper	0	0.0%	18.0%	0	0.0%	34.3%	29.5%
	Unknown	0	0.0%	0.6%	0	0.0%	1.2%	0.9%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	0.9%	0	0.0%	0.4%	5.2%
	Moderate	0	0.0%	8.2%	0	0.0%	5.1%	17.6%
	Middle	0	0.0%	35.8%	0	0.0%	26.4%	40.4%
	Upper	0	0.0%	55.0%	0	0.0%	68.0%	36.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	1.8%	0	0.0%	1.0%	5.2%
	Moderate	1	20.0%	14.8%	25	18.4%	7.7%	17.6%
	Middle	1	20.0%	43.2%	35	25.7%	32.6%	40.4%
	Upper	3	60.0%	39.8%	76	55.9%	58.4%	36.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.2%	0.1%
	TOTAL	5	100.0%	100.0%	136	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	5.8%	0	0.0%	2.7%	5.2%
	Moderate	0	0.0%	23.9%	0	0.0%	15.3%	17.6%
	Middle	0	0.0%	39.7%	0	0.0%	36.8%	40.4%
	Upper	0	0.0%	30.4%	0	0.0%	45.1%	36.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	17	2.7%	1.9%	2,455	1.9%	1.1%	5.2%
	Moderate	111	17.4%	14.3%	15,264	12.1%	9.9%	17.6%
	Middle	220	34.4%	41.3%	37,658	29.9%	35.7%	40.4%
	Upper	289	45.2%	42.4%	70,403	55.8%	53.0%	36.6%
	Unknown	2	0.3%	0.1%	0	0.0%	0.2%	0.1%
	TOTAL	639	100.0%	100.0%	126,113	100.0%	100.0%	100.0%

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: St. Louis								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	3	2.1%	2.0%	326	1.1%	0.9%	5.2%
	Moderate	35	24.3%	15.6%	4,649	15.7%	9.6%	17.6%
	Middle	51	35.4%	42.0%	10,069	34.0%	36.2%	40.4%
	Upper	55	38.2%	40.3%	14,603	49.3%	53.1%	36.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	TOTAL	144	100.0%	100.0%	29,647	100.0%	100.0%	100.0%
Refinance	Low	1	1.2%	1.0%	37	0.2%	0.4%	5.2%
	Moderate	4	4.8%	9.1%	495	2.8%	5.4%	17.6%
	Middle	27	32.5%	38.2%	5,242	29.4%	31.0%	40.4%
	Upper	51	61.4%	51.7%	12,056	67.6%	63.1%	36.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	TOTAL	83	100.0%	100.0%	17,830	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	1.6%	0	0.0%	1.0%	5.2%
	Moderate	3	50.0%	11.7%	102	31.7%	7.6%	17.6%
	Middle	1	16.7%	38.0%	70	21.7%	33.4%	40.4%
	Upper	2	33.3%	48.6%	150	46.6%	57.6%	36.6%
	Unknown	0	0.0%	0.2%	0	0.0%	0.3%	0.1%
	TOTAL	6	100.0%	100.0%	322	100.0%	100.0%	100.0%
Multifamily	Low	2	40.0%	13.5%	290	12.4%	3.1%	13.3%
	Moderate	2	40.0%	35.5%	1,594	68.0%	25.2%	21.4%
	Middle	0	0.0%	34.9%	0	0.0%	43.3%	35.0%
	Upper	1	20.0%	16.0%	460	19.6%	27.0%	29.5%
	Unknown	0	0.0%	0.2%	0	0.0%	1.5%	0.9%
	TOTAL	5	100.0%	100.0%	50,425	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	0.7%	0	0.0%	0.3%	5.2%
	Moderate	0	0.0%	7.5%	0	0.0%	4.5%	17.6%
	Middle	0	0.0%	36.5%	0	0.0%	28.1%	40.4%
	Upper	0	0.0%	55.3%	0	0.0%	67.0%	36.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	1.6%	0	0.0%	0.9%	5.2%
	Moderate	0	0.0%	13.2%	0	0.0%	8.4%	17.6%
	Middle	3	50.0%	39.6%	219	77.7%	29.6%	40.4%
	Upper	3	50.0%	45.5%	63	22.3%	60.9%	36.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.2%	0.1%
	TOTAL	6	100.0%	100.0%	282	100.0%	100.0%	100.0%

Appendix C (Continued)

Purpose Not Applicable	Low	0	0.0%	7.5%	0	0.0%	3.9%	5.2%
	Moderate	0	0.0%	28.0%	0	0.0%	25.7%	17.6%
	Middle	0	0.0%	41.5%	0	0.0%	36.8%	40.4%
	Upper	0	0.0%	23.0%	0	0.0%	33.5%	36.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	6	2.5%	1.7%	653	1.3%	0.8%	5.2%
	Moderate	44	18.0%	12.8%	6,840	13.6%	8.6%	17.6%
	Middle	82	33.6%	40.1%	15,600	30.9%	34.1%	40.4%
	Upper	112	45.9%	45.3%	27,332	54.2%	56.3%	36.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.2%	0.1%
	TOTAL	244	100.0%	100.0%	50,425	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Assessment Area: St. Louis							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	8	7.3%	5.1%	\$1,706	7.4%	6.5%	5.9%
Moderate	15	13.8%	17.6%	\$2,236	9.7%	19.2%	18.5%
Middle	43	39.4%	34.3%	\$9,062	39.5%	32.3%	35.3%
Upper	42	38.5%	41.5%	\$9,458	41.2%	39.5%	39.4%
Unknown	1	0.9%	1.5%	\$507	2.2%	2.5%	0.8%
TOTAL	109	100.0%	100.0%	\$22,969	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Assessment Area: St. Louis							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	7	6.3%	5.3%	\$1,299	4.7%	6.4%	6.0%
Moderate	25	22.5%	17.7%	\$6,223	22.6%	18.8%	18.6%
Middle	46	41.4%	33.9%	\$11,364	41.3%	31.4%	35.2%
Upper	31	27.9%	41.4%	\$8,521	31.0%	40.7%	39.3%
Unknown	2	1.8%	1.7%	\$78	0.3%	2.7%	0.9%
TOTAL	111	100.0%	100.0%	\$27,485	100.0%	100.0%	100.0%

Illinois

Rockford MSA AA

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Rockford MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	96	19.0%	9.7%	4,560	9.8%	5.4%	21.9%
	Moderate	147	29.2%	21.4%	9,048	19.5%	16.4%	17.0%
	Middle	133	26.4%	21.8%	11,715	25.2%	21.7%	20.4%
	Upper	105	20.8%	24.8%	17,870	38.5%	35.8%	40.7%
	Unknown	23	4.6%	22.3%	3,255	7.0%	20.7%	0.0%
	TOTAL	504	100.0%	100.0%	46,448	100.0%	100.0%	100.0%
Refinance	Low	18	20.5%	10.6%	1,284	15.1%	6.8%	21.9%
	Moderate	13	14.8%	17.4%	888	10.4%	13.4%	17.0%
	Middle	26	29.5%	25.2%	2,348	27.6%	23.7%	20.4%
	Upper	30	34.1%	34.3%	3,931	46.2%	43.2%	40.7%
	Unknown	1	1.1%	12.5%	62	0.7%	13.0%	0.0%
	TOTAL	88	100.0%	100.0%	8,513	100.0%	100.0%	100.0%
Home Improvement	Low	1	10.0%	16.1%	47	12.0%	12.3%	21.9%
	Moderate	1	10.0%	17.7%	70	17.9%	14.6%	17.0%
	Middle	2	20.0%	23.4%	55	14.1%	23.2%	20.4%
	Upper	5	50.0%	38.7%	179	45.8%	42.7%	40.7%
	Unknown	1	10.0%	4.0%	40	10.2%	7.2%	0.0%
	TOTAL	10	100.0%	100.0%	391	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.9%
	Moderate	0	0.0%	1.5%	0	0.0%	0.6%	17.0%
	Middle	1	25.0%	3.1%	150	14.2%	0.8%	20.4%
	Upper	0	0.0%	4.6%	0	0.0%	2.9%	40.7%
	Unknown	3	75.0%	90.8%	907	85.8%	95.7%	0.0%
	TOTAL	4	100.0%	100.0%	1,057	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	17.6%	0	0.0%	13.4%	21.9%
	Moderate	0	0.0%	17.6%	0	0.0%	14.3%	17.0%
	Middle	0	0.0%	26.8%	0	0.0%	23.1%	20.4%
	Upper	0	0.0%	36.6%	0	0.0%	47.6%	40.7%
	Unknown	0	0.0%	1.4%	0	0.0%	1.7%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%

Appendix C (Continued)

Other Purpose Closed/Exempt	Low	1	6.7%	12.8%	61	14.1%	11.3%	21.9%
	Moderate	3	20.0%	18.1%	110	25.3%	12.2%	17.0%
	Middle	4	26.7%	23.5%	69	15.9%	18.8%	20.4%
	Upper	6	40.0%	41.6%	160	36.9%	52.2%	40.7%
	Unknown	1	6.7%	4.0%	34	7.8%	5.5%	0.0%
	TOTAL	15	100.0%	100.0%	434	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	2.5%	0	0.0%	2.0%	21.9%
	Moderate	0	0.0%	0.9%	0	0.0%	0.8%	17.0%
	Middle	0	0.0%	0.6%	0	0.0%	0.6%	20.4%
	Upper	0	0.0%	0.9%	0	0.0%	0.9%	40.7%
	Unknown	0	0.0%	94.9%	0	0.0%	95.7%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	116	18.7%	9.9%	5,952	10.5%	5.6%	21.9%
	Moderate	164	26.4%	19.5%	10,116	17.8%	14.6%	17.0%
	Middle	166	26.7%	21.8%	14,337	25.2%	20.7%	20.4%
	Upper	146	23.5%	26.7%	22,140	38.9%	35.2%	40.7%
	Unknown	29	4.7%	22.1%	4,298	7.6%	24.0%	0.0%
	TOTAL	621	100.0%	100.0%	56,843	100.0%	100.0%	100.0%

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Rockford MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	67	19.2%	8.0%	3,284	12.1%	4.3%	21.9%
	Moderate	127	36.4%	21.0%	7,971	29.4%	15.6%	17.0%
	Middle	100	28.7%	23.0%	8,556	31.6%	22.5%	20.4%
	Upper	49	14.0%	27.0%	6,075	22.4%	38.8%	40.7%
	Unknown	6	1.7%	21.0%	1,187	4.4%	18.8%	0.0%
	TOTAL	349	100.0%	100.0%	27,073	100.0%	100.0%	100.0%
Refinance	Low	5	5.6%	5.3%	163	1.8%	2.8%	21.9%
	Moderate	13	14.6%	13.7%	914	10.0%	9.1%	17.0%
	Middle	24	27.0%	21.2%	2,443	26.7%	17.6%	20.4%
	Upper	42	47.2%	43.5%	4,900	53.6%	51.6%	40.7%
	Unknown	5	5.6%	16.3%	719	7.9%	19.0%	0.0%
	TOTAL	89	100.0%	100.0%	9,139	100.0%	100.0%	100.0%
Home Improvement	Low	2	40.0%	10.0%	60	14.7%	8.5%	21.9%
	Moderate	0	0.0%	12.6%	0	0.0%	11.1%	17.0%
	Middle	0	0.0%	18.4%	0	0.0%	13.0%	20.4%
	Upper	2	40.0%	52.5%	48	11.7%	56.2%	40.7%
	Unknown	1	20.0%	6.5%	301	73.6%	11.2%	0.0%
	TOTAL	5	100.0%	100.0%	409	100.0%	100.0%	100.0%

Appendix C (Continued)

Multifamily	Low	1	12.5%	2.1%	105	1.1%	0.8%	21.9%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.0%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	20.4%
	Upper	0	0.0%	6.3%	0	0.0%	7.8%	40.7%
	Unknown	7	87.5%	91.6%	9,712	98.9%	91.4%	0.0%
	TOTAL	8	100.0%	100.0%	9,817	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	9.2%	0	0.0%	6.4%	21.9%
	Moderate	0	0.0%	19.5%	0	0.0%	15.1%	17.0%
	Middle	0	0.0%	23.0%	0	0.0%	25.3%	20.4%
	Upper	0	0.0%	46.0%	0	0.0%	50.5%	40.7%
	Unknown	0	0.0%	2.3%	0	0.0%	2.8%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	5.6%	0	0.0%	3.9%	21.9%
	Moderate	5	31.3%	18.6%	99	14.2%	14.3%	17.0%
	Middle	5	31.3%	24.8%	323	46.3%	27.8%	20.4%
	Upper	6	37.5%	44.7%	275	39.5%	41.6%	40.7%
	Unknown	0	0.0%	6.2%	0	0.0%	12.4%	0.0%
	TOTAL	16	100.0%	100.0%	697	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.9%
	Moderate	0	0.0%	0.3%	0	0.0%	0.2%	17.0%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	20.4%
	Upper	0	0.0%	0.6%	0	0.0%	1.4%	40.7%
	Unknown	0	0.0%	99.0%	0	0.0%	98.4%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	75	16.1%	7.0%	3,612	7.7%	3.6%	21.9%
	Moderate	145	31.0%	17.9%	8,984	19.1%	12.2%	17.0%
	Middle	129	27.6%	21.5%	11,322	24.0%	18.9%	20.4%
	Upper	99	21.2%	31.8%	11,298	24.0%	39.6%	40.7%
	Unknown	19	4.1%	21.8%	11,919	25.3%	25.8%	0.0%
	TOTAL	467	100.0%	100.0%	47,135	100.0%	100.0%	100.0%

Small Business Loans by Revenue and Loan Size								
Assessment Area: Rockford MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	84	55.6%	43.2%	\$7,723	29.9%	29.8%	88.1%
	Over \$1 Million/ Unknown	67	44.4%	56.8%	\$18,099	70.1%	70.2%	11.9%
	TOTAL	151	100.0%	100.0%	\$25,822	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	90	59.6%	92.4%	\$4,354	16.9%	32.5%	
	\$100,001–\$250,000	28	18.5%	3.5%	\$4,598	17.8%	14.3%	
	\$250,001–\$1 Million	33	21.9%	4.0%	\$16,870	65.3%	53.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	151	100.0%	100.0%	\$25,822	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	61	72.6%		\$2,452	31.7%	
		\$100,001–\$250,000	14	16.7%		\$2,138	27.7%	
		\$250,001–\$1 Million	9	10.7%		\$3,133	40.6%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	84	100.0%		\$7,723	100.0%	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Rockford MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	110	54.5%	45.3%	\$10,369	29.4%	25.3%	88.6%
	Over \$1 Million/ Unknown	92	45.5%	54.7%	\$24,913	70.6%	74.7%	11.4%
	TOTAL	202	100.0%	100.0%	\$35,282	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	125	61.9%	92.2%	\$5,846	16.6%	31.5%	
	\$100,001–\$250,000	29	14.4%	3.9%	\$5,725	16.2%	16.1%	
	\$250,001–\$1 Million	48	23.8%	3.9%	\$23,711	67.2%	52.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	202	100.0%	100.0%	\$35,282	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	89	80.9%		\$3,599	34.7%	
		\$100,001–\$250,000	11	10.0%		\$2,151	20.7%	
		\$250,001–\$1 Million	10	9.1%		\$4,619	44.5%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	110	100.0%		\$10,369	100.0%	

Small Farms Loans by Revenue and Loan Size								
Assessment Area: Rockford MSA								
Farm Revenue and Loan Size		2018						
		Count			Dollars			Total Farm
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	24	82.8%	51.1%	\$3,738	73.8%	65.8%	98.3%
	Over \$1 Million/ Unknown	5	17.2%	48.9%	\$1,324	26.2%	34.2%	1.7%
	TOTAL	29	100.0%	100.0%	\$5,062	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	12	41.4%	73.7%	\$526	10.4%	19.9%	
	\$100,001– \$250,000	8	27.6%	14.3%	\$1,494	29.5%	31.1%	
	\$250,001– \$1 Million	9	31.0%	12.0%	\$3,042	60.1%	49.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	29	100.0%	100.0%	\$5,062	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	12	50.0%		\$526	14.1%	
		\$100,001– \$250,000	5	20.8%		\$870	23.3%	
		\$250,001– \$1 Million	7	29.2%		\$2,342	62.7%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	24	100.0%		\$3,738	100.0%	

Small Farm Loans by Revenue and Loan Size								
Assessment Area: Rockford MSA								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Total Farm
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	75	86.2%	63.1%	\$10,645	79.3%	71.9%	98.5%
	Over \$1 Million/ Unknown	12	13.8%	36.9%	\$2,773	20.7%	28.1%	1.5%
	TOTAL	87	100.0%	100.0%	\$13,418	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	43	49.4%	66.5%	\$2,225	16.6%	21.5%	
	\$100,001– \$250,000	27	31.0%	20.1%	\$4,560	34.0%	32.2%	
	\$250,001– \$1 Million	17	19.5%	13.4%	\$6,633	49.4%	46.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	87	100.0%	100.0%	\$13,418	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	40	53.3%		\$2,155	20.2%	
		\$100,001– \$250,000	23	30.7%		\$3,831	36.0%	
		\$250,001– \$1 Million	12	16.0%		\$4,659	43.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	75	100.0%		\$10,645	100.0%	

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: Rockford MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	32	5.2%	2.8%	1,650	2.9%	2.2%	5.1%
	Moderate	87	14.0%	13.6%	4,326	7.6%	9.1%	15.9%
	Middle	249	40.1%	36.1%	19,766	34.8%	33.2%	33.5%
	Upper	253	40.7%	47.5%	31,101	54.7%	55.3%	45.4%
	Unknown	0	0.0%	0.1%	0	0.0%	0.2%	0.0%
	TOTAL	621	100.0%	100.0%	56,843	100.0%	100.0%	100.0%
Refinance	Low	3	3.4%	2.3%	262	3.1%	1.2%	5.1%
	Moderate	11	12.5%	11.7%	579	6.8%	7.3%	15.9%
	Middle	37	42.0%	33.7%	3,525	41.4%	31.2%	33.5%
	Upper	37	42.0%	52.3%	4,147	48.7%	60.3%	45.4%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.0%
	TOTAL	88	100.0%	100.0%	8,513	100.0%	100.0%	100.0%

Appendix C (Continued)

Home Improvement	Low	0	0.0%	3.2%	0	0.0%	2.8%	5.1%
	Moderate	1	10.0%	10.9%	15	3.8%	7.3%	15.9%
	Middle	8	80.0%	32.7%	323	82.6%	36.1%	33.5%
	Upper	1	10.0%	53.2%	53	13.6%	53.8%	45.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	10	100.0%	100.0%	391	100.0%	100.0%	100.0%
Multifamily	Low	1	25.0%	12.3%	447	42.3%	25.6%	22.0%
	Moderate	0	0.0%	27.7%	0	0.0%	15.9%	29.8%
	Middle	2	50.0%	32.3%	270	25.5%	39.0%	20.2%
	Upper	1	25.0%	23.1%	340	32.2%	14.5%	24.4%
	Unknown	0	0.0%	4.6%	0	0.0%	4.9%	3.7%
	TOTAL	4	100.0%	100.0%	1,057	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	2.8%	0	0.0%	0.8%	5.1%
	Moderate	0	0.0%	6.3%	0	0.0%	5.0%	15.9%
	Middle	0	0.0%	27.5%	0	0.0%	20.6%	33.5%
	Upper	0	0.0%	63.4%	0	0.0%	73.5%	45.4%
	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%	0.7%	0	0.0%	0.3%	5.1%
	Moderate	1	6.7%	5.4%	25	5.8%	4.9%	15.9%
	Middle	8	53.3%	34.9%	287	66.1%	30.3%	33.5%
	Upper	6	40.0%	59.1%	122	28.1%	64.5%	45.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	21	100.0%	100.0%	434	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	9.5%	0	0.0%	3.9%	5.1%
	Moderate	0	0.0%	21.8%	0	0.0%	19.0%	15.9%
	Middle	0	0.0%	37.0%	0	0.0%	33.3%	33.5%
	Upper	0	0.0%	31.6%	0	0.0%	43.8%	45.4%
	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	32	5.2%	2.8%	1,650	2.9%	2.2%	5.1%
	Moderate	87	14.0%	13.6%	4,326	7.6%	9.1%	15.9%
	Middle	249	40.1%	36.1%	19,766	34.8%	33.2%	33.5%
	Upper	253	40.7%	47.5%	31,101	54.7%	55.3%	45.4%
	Unknown	0	0.0%	0.1%	0	0.0%	0.2%	0.0%
	TOTAL	621	100.0%	100.0%	56,843	100.0%	100.0%	100.0%

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: Rockford MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	12	3.4%	2.5%	856	3.2%	1.1%	5.1%
	Moderate	61	17.5%	14.9%	3,664	13.5%	9.3%	15.9%
	Middle	160	45.8%	37.1%	10,807	39.9%	32.8%	33.5%
	Upper	116	33.2%	45.5%	11,746	43.4%	56.7%	45.4%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.0%
	TOTAL	349	100.0%	100.0%	27,073	100.0%	100.0%	100.0%
Refinance	Low	1	1.1%	1.3%	25	0.3%	0.5%	5.1%
	Moderate	6	6.7%	8.9%	556	6.1%	6.0%	15.9%
	Middle	24	27.0%	30.8%	2,057	22.5%	27.6%	33.5%
	Upper	58	65.2%	59.0%	6,501	71.1%	65.9%	45.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	89	100.0%	100.0%	9,139	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	2.3%	0	0.0%	1.5%	5.1%
	Moderate	0	0.0%	10.3%	0	0.0%	7.6%	15.9%
	Middle	1	20.0%	31.0%	36	8.8%	28.2%	33.5%
	Upper	3	60.0%	55.6%	72	17.6%	60.3%	45.4%
	Unknown	1	20.0%	0.8%	301	73.6%	2.4%	0.0%
	TOTAL	5	100.0%	100.0%	409	100.0%	100.0%	100.0%
Multifamily	Low	1	12.5%	9.5%	105	1.1%	12.0%	22.0%
	Moderate	3	37.5%	21.1%	227	2.3%	10.2%	29.8%
	Middle	2	25.0%	45.3%	9,039	92.1%	49.4%	20.2%
	Upper	2	25.0%	22.1%	446	4.5%	27.2%	24.4%
	Unknown	0	0.0%	2.1%	0	0.0%	1.2%	3.7%
	TOTAL	8	100.0%	100.0%	9,817	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	1.7%	0	0.0%	0.8%	5.1%
	Moderate	0	0.0%	9.8%	0	0.0%	5.8%	15.9%
	Middle	0	0.0%	30.5%	0	0.0%	30.2%	33.5%
	Upper	0	0.0%	58.0%	0	0.0%	63.2%	45.4%
	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%	1.9%	0	0.0%	1.1%	5.1%
	Moderate	3	18.8%	10.6%	104	14.9%	7.7%	15.9%
	Middle	4	25.0%	33.5%	146	20.9%	32.9%	33.5%
	Upper	9	56.3%	54.0%	447	64.1%	58.2%	45.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	16	100.0%	100.0%	697	100.0%	100.0%	100.0%

Appendix C (Continued)

Purpose Not Applicable	Low	0	0.0%	7.1%	0	0.0%	3.4%	5.1%
	Moderate	0	0.0%	20.2%	0	0.0%	15.3%	15.9%
	Middle	0	0.0%	39.4%	0	0.0%	38.0%	33.5%
	Upper	0	0.0%	33.3%	0	0.0%	43.3%	45.4%
	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	14	3.0%	2.3%	986	2.1%	1.8%	5.1%
	Moderate	73	15.6%	13.2%	4,551	9.7%	8.5%	15.9%
	Middle	191	40.9%	35.2%	22,085	46.9%	32.6%	33.5%
	Upper	188	40.3%	49.2%	19,212	40.8%	56.9%	45.4%
	Unknown	1	0.2%	0.1%	301	0.6%	0.1%	0.0%
	TOTAL	467	100.0%	100.0%	47,135	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Assessment Area: Rockford MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	17	11.3%	8.4%	\$3,512	13.6%	8.8%	9.1%
Moderate	29	19.2%	15.9%	\$5,334	20.7%	20.3%	16.3%
Middle	38	25.2%	28.8%	\$6,760	26.2%	25.3%	28.8%
Upper	62	41.1%	43.3%	\$9,445	36.6%	40.1%	43.6%
Unknown	5	3.3%	3.5%	\$771	3.0%	5.5%	2.3%
TOTAL	151	100.0%	100.0%	\$25,822	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Assessment Area: Rockford MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	26	12.9%	9.3%	\$3,775	10.7%	11.9%	8.9%
Moderate	34	16.8%	15.7%	\$6,416	18.2%	18.2%	16.5%
Middle	56	27.7%	26.3%	\$7,103	20.1%	24.4%	28.8%
Upper	75	37.1%	44.9%	\$14,466	41.0%	39.9%	43.4%
Unknown	11	5.4%	3.8%	\$3,522	10.0%	5.6%	2.3%
TOTAL	202	100.0%	100.0%	\$35,282	100.0%	100.0%	100.0%

Geographic Distribution of Small Farm Loans Assessment Area: Rockford MSA							
Tract Income Levels	2018						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.7%
Moderate	1	3.4%	0.8%	\$200	4.0%	1.8%	4.9%
Middle	10	34.5%	28.6%	\$1,379	27.2%	35.1%	30.7%
Upper	18	62.1%	69.2%	\$3,483	68.8%	63.0%	63.8%
Unknown	0	0.0%	1.5%	\$0	0.0%	0.1%	0.0%
TOTAL	29	100.0%	100.0%	\$5,062	100.0%	100.0%	100.0%

Geographic Distribution of Small Farm Loans Assessment Area: Rockford MSA							
Tract Income Levels	2019						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.7%
Moderate	5	5.7%	2.8%	\$1,116	8.3%	5.9%	4.8%
Middle	32	36.8%	35.8%	\$5,235	39.0%	37.3%	30.7%
Upper	50	57.5%	60.3%	\$7,067	52.7%	55.3%	63.7%
Unknown	0	0.0%	1.1%	\$0	0.0%	1.5%	0.0%
TOTAL	87	100.0%	100.0%	\$13,418	100.0%	100.0%	100.0%

Northern Illinois AA

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Northern Illinois								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	17	15.6%	8.6%	801	7.3%	4.3%	17.5%
	Moderate	37	33.9%	23.3%	2,520	22.9%	17.2%	17.4%
	Middle	21	19.3%	21.9%	2,264	20.6%	21.6%	21.4%
	Upper	28	25.7%	32.2%	4,441	40.4%	43.2%	43.6%
	Unknown	6	5.5%	14.0%	974	8.9%	13.8%	0.0%
	TOTAL	109	100.0%	100.0%	11,000	100.0%	100.0%	100.0%
Refinance	Low	10	15.4%	8.8%	425	9.5%	4.8%	17.5%
	Moderate	9	13.8%	19.2%	530	11.8%	14.2%	17.4%
	Middle	11	16.9%	23.8%	639	14.2%	21.8%	21.4%
	Upper	29	44.6%	39.5%	1,974	44.0%	46.9%	43.6%
	Unknown	6	9.2%	8.7%	920	20.5%	12.2%	0.0%
	TOTAL	65	100.0%	100.0%	4,488	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	7.0%	0	0.0%	6.0%	17.5%
	Moderate	1	25.0%	19.8%	61	23.1%	16.7%	17.4%
	Middle	1	25.0%	20.2%	10	3.8%	16.5%	21.4%
	Upper	1	25.0%	46.9%	168	63.6%	55.2%	43.6%
	Unknown	1	25.0%	6.2%	25	9.5%	5.7%	0.0%
	TOTAL	4	100.0%	100.0%	264	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	17.5%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.4%
	Middle	0	0.0%	2.3%	0	0.0%	0.9%	21.4%
	Upper	0	0.0%	14.0%	0	0.0%	5.2%	43.6%
	Unknown	2	100.0%	83.7%	652	100.0%	93.8%	0.0%
	TOTAL	2	100.0%	100.0%	652	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	8.0%	0	0.0%	3.6%	17.5%
	Moderate	0	0.0%	12.6%	0	0.0%	8.7%	17.4%
	Middle	0	0.0%	27.6%	0	0.0%	27.4%	21.4%
	Upper	0	0.0%	50.6%	0	0.0%	59.9%	43.6%
	Unknown	0	0.0%	1.1%	0	0.0%	0.5%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%

Appendix C (Continued)

Other Purpose Closed/Exempt	Low	1	14.3%	10.5%	20	5.6%	7.7%	17.5%
	Moderate	4	57.1%	24.3%	155	43.1%	19.0%	17.4%
	Middle	2	28.6%	25.7%	185	51.4%	24.1%	21.4%
	Upper	0	0.0%	37.5%	0	0.0%	45.9%	43.6%
	Unknown	0	0.0%	2.0%	0	0.0%	3.4%	0.0%
	TOTAL	7	100.0%	100.0%	360	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	17.5%
	Moderate	0	0.0%	1.7%	0	0.0%	2.5%	17.4%
	Middle	0	0.0%	1.1%	0	0.0%	0.5%	21.4%
	Upper	0	0.0%	1.1%	0	0.0%	1.9%	43.6%
	Unknown	0	0.0%	96.1%	0	0.0%	95.1%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	28	15.0%	8.3%	1,246	7.4%	4.3%	17.5%
	Moderate	51	27.3%	21.2%	3,266	19.5%	15.7%	17.4%
	Middle	35	18.7%	21.8%	3,098	18.5%	20.7%	21.4%
	Upper	58	31.0%	34.1%	6,583	39.3%	42.7%	43.6%
	Unknown	15	8.0%	14.5%	2,571	15.3%	16.6%	0.0%
	TOTAL	187	100.0%	100.0%	16,764	100.0%	100.0%	100.0%

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Northern Illinois								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	3	5.0%	8.4%	265	3.8%	4.4%	17.6%
	Moderate	14	23.3%	22.1%	883	12.6%	16.1%	17.5%
	Middle	18	30.0%	23.8%	1,795	25.7%	23.1%	21.5%
	Upper	21	35.0%	33.4%	3,199	45.8%	44.4%	43.4%
	Unknown	4	6.7%	12.2%	849	12.1%	12.0%	0.0%
	TOTAL	60	100.0%	100.0%	6,991	100.0%	100.0%	100.0%
Refinance	Low	6	11.8%	6.8%	355	7.0%	3.2%	17.6%
	Moderate	12	23.5%	15.0%	1,121	22.1%	10.4%	17.5%
	Middle	7	13.7%	22.7%	384	7.6%	19.3%	21.5%
	Upper	20	39.2%	43.3%	2,295	45.2%	52.6%	43.4%
	Unknown	6	11.8%	12.2%	920	18.1%	14.4%	0.0%
	TOTAL	51	100.0%	100.0%	5,075	100.0%	100.0%	100.0%
Home Improvement	Low	1	16.7%	6.4%	30	15.6%	5.3%	17.6%
	Moderate	1	16.7%	17.1%	10	5.2%	19.7%	17.5%
	Middle	2	33.3%	25.2%	85	44.3%	23.7%	21.5%
	Upper	2	33.3%	47.0%	67	34.9%	47.8%	43.4%
	Unknown	0	0.0%	4.3%	0	0.0%	3.4%	0.0%
	TOTAL	6	100.0%	100.0%	192	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	17.6%
	Moderate	0	0.0%	3.0%	0	0.0%	0.3%	17.5%
	Middle	0	0.0%	6.1%	0	0.0%	1.4%	21.5%
	Upper	0	0.0%	24.2%	0	0.0%	8.6%	43.4%
	Unknown	1	100.0%	66.7%	46	100.0%	89.6%	0.0%
	TOTAL	1	100.0%	100.0%	46	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	11.0%	0	0.0%	6.4%	17.6%
	Moderate	0	0.0%	16.4%	0	0.0%	12.7%	17.5%
	Middle	0	0.0%	21.9%	0	0.0%	18.7%	21.5%
	Upper	0	0.0%	46.6%	0	0.0%	60.8%	43.4%
	Unknown	0	0.0%	4.1%	0	0.0%	1.3%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	1	14.3%	9.3%	17	7.5%	5.9%	17.6%
	Moderate	3	42.9%	19.2%	140	61.7%	16.3%	17.5%
	Middle	1	14.3%	19.2%	10	4.4%	16.3%	21.5%
	Upper	2	28.6%	47.8%	60	26.4%	58.8%	43.4%
	Unknown	0	0.0%	4.4%	0	0.0%	2.8%	0.0%
	TOTAL	7	100.0%	100.0%	227	100.0%	100.0%	100.0%

Appendix C (Continued)

Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	17.6%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.5%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	21.5%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	43.4%
	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%
HMMA TOTALS	Low	11	8.8%	7.6%	667	5.3%	3.8%	17.6%
	Moderate	30	24.0%	18.8%	2,154	17.2%	13.4%	17.5%
	Middle	28	22.4%	22.7%	2,274	18.1%	20.7%	21.5%
	Upper	45	36.0%	36.9%	5,621	44.9%	45.9%	43.4%
	Unknown	11	8.8%	14.1%	1,815	14.5%	16.2%	0.0%
	TOTAL	125	100.0%	100.0%	12,531	100.0%	100.0%	100.0%

Small Business Loans by Revenue and Loan Size								
Assessment Area: Northern Illinois								
Business Revenue and Loan Size		2018						Total Businesses
		Count			Dollars			
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	99	51.8%	47.6%	\$11,758	30.5%	32.3%	88.4%
	Over \$1 Million/Unknown	92	48.2%	52.4%	\$26,807	69.5%	67.7%	11.6%
	TOTAL	191	100.0%	100.0%	\$38,565	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	91	47.6%	92.2%	\$4,712	12.2%	31.7%	
	\$100,001–\$250,000	55	28.8%	4.4%	\$9,647	25.0%	18.8%	
	\$250,001–\$1 Million	45	23.6%	3.4%	\$24,206	62.8%	49.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	191	100.0%	100.0%	\$38,565	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	63	63.6%		\$2,677	22.8%	
		\$100,001–\$250,000	25	25.3%		\$4,087	34.8%	
		\$250,001–\$1 Million	11	11.1%		\$4,994	42.5%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	99	100.0%		\$11,758	100.0%	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Northern Illinois								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	113	58.9%	48.4%	\$12,916	33.0%	31.9%	88.8%
	Over \$1 Million/ Unknown	79	41.1%	51.6%	\$26,250	67.0%	68.1%	11.2%
	TOTAL	192	100.0%	100.0%	\$39,166	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	105	54.7%	93.4%	\$5,124	13.1%	35.6%	
	\$100,001–\$250,000	42	21.9%	3.3%	\$7,605	19.4%	15.5%	
	\$250,001–\$1 Million	45	23.4%	3.3%	\$26,437	67.5%	48.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	192	100.0%	100.0%	\$39,166	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	83	73.5%		\$3,675	28.5%	
		\$100,001–\$250,000	18	15.9%		\$2,899	22.4%	
		\$250,001–\$1 Million	12	10.6%		\$6,342	49.1%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	113	100.0%		\$12,916	100.0%	

Appendix C (Continued)

Small Farms Loans by Revenue and Loan Size								
Assessment Area: Northern Illinois								
Farm Revenue and Loan Size		2018						
		Count			Dollars			Total Farm
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	171	90.5%	62.1%	28,601	88.2%	76.9%	98.4%
	Over \$1 Million/ Unknown	18	9.5%	37.9%	3,842	11.8%	23.1%	1.6%
	TOTAL	189	100.0%	100.0%	32,443	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	91	48.1%	68.7%	4,912	15.1%	19.2%	
	\$100,001– \$250,000	50	26.5%	16.6%	9,262	28.5%	28.4%	
	\$250,001– \$1 Million	48	25.4%	14.7%	18,269	56.3%	52.4%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	189	100.0%	100.0%	32,443	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	84	49.1%		4,427	15.5%		
	\$100,001– \$250,000	46	26.9%		8,462	29.6%		
	\$250,001– \$1 Million	41	24.0%		15,712	54.9%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	171	100.0%		28,601	100.0%		

Small Farm Loans by Revenue and Loan Size								
Assessment Area: Northern Illinois								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Total Farm
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	149	89.8%	59.0%	23,956	85.7%	77.4%	98.4%
	Over \$1 Million/Unknown	17	10.2%	41.0%	3,984	14.3%	22.6%	1.6%
	TOTAL	166	100.0%	100.0%	27,940	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	78	47.0%	71.9%	4,192	15.0%	20.5%	
	\$100,001–\$250,000	50	30.1%	14.7%	9,071	32.5%	27.5%	
	\$250,001–\$1 Million	38	22.9%	13.4%	14,677	52.5%	52.0%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	166	100.0%	100.0%	27,940	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	73	49.0%		3,837	16.0%	
		\$100,001–\$250,000	45	30.2%		8,124	33.9%	
		\$250,001–\$1 Million	31	20.8%		11,995	50.1%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	149	100.0%		23,956	100.0%	

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: Northern Illinois								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.5%	0	0.0%	0.2%	0.4%
	Moderate	14	12.8%	6.0%	956	8.7%	3.3%	8.2%
	Middle	77	70.6%	66.8%	7,039	64.0%	63.1%	68.1%
	Upper	18	16.5%	26.8%	3,005	27.3%	33.4%	23.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	109	100.0%	100.0%	11,000	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.2%	0	0.0%	0.1%	0.4%
	Moderate	7	10.8%	4.7%	478	10.7%	2.7%	8.2%
	Middle	43	66.2%	66.3%	3,044	67.8%	61.2%	68.1%
	Upper	15	23.1%	28.9%	966	21.5%	36.0%	23.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	65	100.0%	100.0%	4,488	100.0%	100.0%	100.0%

Appendix C (Continued)

Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	2	50.0%	4.9%	193	73.1%	4.4%	8.2%
	Middle	1	25.0%	70.4%	10	3.8%	67.5%	68.1%
	Upper	1	25.0%	24.7%	61	23.1%	28.1%	23.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	4	100.0%	100.0%	264	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	2.3%	0	0.0%	1.4%	2.8%
	Moderate	0	0.0%	4.7%	0	0.0%	5.9%	14.2%
	Middle	1	50.0%	74.4%	92	14.1%	72.4%	70.4%
	Upper	1	50.0%	18.6%	560	85.9%	20.2%	12.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	2	100.0%	100.0%	652	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	0	0.0%	4.6%	0	0.0%	2.8%	8.2%
	Middle	0	0.0%	63.2%	0	0.0%	55.2%	68.1%
	Upper	0	0.0%	32.2%	0	0.0%	42.0%	23.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	1	14.3%	8.6%	26	7.2%	6.8%	8.2%
	Middle	5	71.4%	64.5%	284	78.9%	60.9%	68.1%
	Upper	1	14.3%	27.0%	50	13.9%	32.2%	23.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	7	100.0%	100.0%	360	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	1.1%	0	0.0%	0.5%	0.4%
	Moderate	0	0.0%	9.5%	0	0.0%	5.2%	8.2%
	Middle	0	0.0%	65.9%	0	0.0%	63.7%	68.1%
	Upper	0	0.0%	23.5%	0	0.0%	30.6%	23.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	0.4%	0	0.0%	0.2%	0.4%
	Moderate	24	12.8%	5.7%	1,653	9.9%	3.3%	8.2%
	Middle	127	67.9%	66.7%	10,469	62.4%	62.8%	68.1%
	Upper	36	19.3%	27.2%	4,642	27.7%	33.7%	23.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	187	100.0%	100.0%	16,764	100.0%	100.0%	100.0%

Geographic Distribution of Residential Real Estate Loans Assessment Area: Northern Illinois								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.1%	0	0.0%	0.1%	0.4%
	Moderate	3	5.0%	6.0%	343	4.9%	3.5%	8.2%
	Middle	47	78.3%	68.6%	5,212	74.6%	64.5%	70.6%
	Upper	10	16.7%	25.3%	1,436	20.5%	31.9%	20.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	60	100.0%	100.0%	6,991	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.2%	0	0.0%	0.1%	0.4%
	Moderate	5	9.8%	4.0%	443	8.7%	2.2%	8.2%
	Middle	36	70.6%	65.1%	3,596	70.9%	61.5%	70.6%
	Upper	10	19.6%	30.7%	1,036	20.4%	36.2%	20.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	51	100.0%	100.0%	5,075	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.4%	0	0.0%	0.4%	0.4%
	Moderate	1	16.7%	5.1%	55	28.6%	3.4%	8.2%
	Middle	4	66.7%	69.2%	125	65.1%	66.2%	70.6%
	Upper	1	16.7%	25.2%	12	6.3%	30.0%	20.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	6	100.0%	100.0%	192	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	2.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	14.2%
	Middle	1	100.0%	93.9%	46	100.0%	86.3%	71.3%
	Upper	0	0.0%	6.1%	0	0.0%	13.7%	11.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	1	100.0%	100.0%	46	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	0	0.0%	5.5%	0	0.0%	2.4%	8.2%
	Middle	0	0.0%	69.9%	0	0.0%	67.3%	70.6%
	Upper	0	0.0%	24.7%	0	0.0%	30.3%	20.8%
	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%	0.5%	0	0.0%	0.2%	0.4%
	Moderate	0	0.0%	3.8%	0	0.0%	3.7%	8.2%
	Middle	6	85.7%	70.3%	181	79.7%	62.7%	70.6%
	Upper	1	14.3%	25.3%	46	20.3%	33.5%	20.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	7	100.0%	100.0%	227	100.0%	100.0%	100.0%

Appendix C (Continued)

Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	0	0.0%	10.2%	0	0.0%	6.7%	8.2%
	Middle	0	0.0%	73.7%	0	0.0%	73.4%	70.6%
	Upper	0	0.0%	16.1%	0	0.0%	20.0%	20.8%
	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%	0.2%	0	0.0%	0.1%	0.4%
	Moderate	9	7.2%	5.3%	841	6.7%	3.0%	8.2%
	Middle	94	75.2%	67.7%	9,160	73.1%	64.1%	70.6%
	Upper	22	17.6%	26.9%	2,530	20.2%	32.8%	20.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	125	100.0%	100.0%	12,531	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans Assessment Area: Northern Illinois							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	1	0.5%	1.6%	\$109	0.3%	0.6%	2.4%
Moderate	34	17.8%	11.3%	\$3,751	9.7%	10.0%	12.2%
Middle	124	64.9%	64.4%	\$25,750	66.8%	63.3%	66.7%
Upper	32	16.8%	20.6%	\$8,955	23.2%	25.4%	18.8%
Unknown	0	0.0%	2.1%	\$0	0.0%	0.6%	0.0%
TOTAL	191	100.0%	100.0%	\$38,565	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans Assessment Area: Northern Illinois							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	1.6%	\$0	0.0%	0.6%	2.4%
Moderate	34	17.7%	11.1%	\$5,654	14.4%	9.4%	12.4%
Middle	131	68.2%	65.3%	\$29,569	75.5%	72.2%	68.8%
Upper	27	14.1%	19.2%	\$3,943	10.1%	17.0%	16.4%
Unknown	0	0.0%	2.8%	\$0	0.0%	0.8%	0.0%
TOTAL	192	100.0%	100.0%	\$39,166	100.0%	100.0%	100.0%

Appendix C (Continued)

Geographic Distribution of Small Farm Loans Assessment Area: Northern Illinois							
Tract Income Levels	2018						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.1%
Moderate	1	0.5%	0.6%	\$200	0.6%	0.2%	1.2%
Middle	164	86.8%	79.7%	\$28,457	87.7%	80.5%	78.9%
Upper	24	12.7%	19.7%	\$3,786	11.7%	19.3%	19.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	189	100.0%	100.0%	\$32,443	100.0%	100.0%	100.0%

Geographic Distribution of Small Farm Loans Assessment Area: Northern Illinois							
Tract Income Levels	2019						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.1%
Moderate	0	0.0%	1.0%	\$0	0.0%	0.4%	1.4%
Middle	152	91.6%	81.8%	\$25,163	90.1%	85.1%	80.1%
Upper	14	8.4%	16.9%	\$2,777	9.9%	14.1%	18.3%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.3%	0.0%
TOTAL	166	100.0%	100.0%	\$27,940	100.0%	100.0%	100.0%

Southern Illinois AA

Borrower Distribution of Residential Real Estate Loans Assessment Area: Southern Illinois								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	8	10.5%	8.5%	492	4.4%	4.7%	20.9%
	Moderate	17	22.4%	24.0%	1,438	13.0%	18.0%	18.1%
	Middle	23	30.3%	22.4%	2,796	25.3%	22.0%	21.6%
	Upper	17	22.4%	28.1%	4,488	40.5%	39.4%	39.4%
	Unknown	11	14.5%	16.9%	1,854	16.8%	15.9%	0.0%
	TOTAL	76	100.0%	100.0%	11,068	100.0%	100.0%	100.0%
Refinance	Low	7	26.9%	10.6%	306	10.1%	5.5%	20.9%
	Moderate	4	15.4%	20.2%	273	9.0%	15.0%	18.1%
	Middle	6	23.1%	25.7%	557	18.5%	24.7%	21.6%
	Upper	8	30.8%	35.6%	1,761	58.4%	45.0%	39.4%
	Unknown	1	3.8%	8.0%	120	4.0%	9.9%	0.0%
	TOTAL	26	100.0%	100.0%	3,017	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	11.5%	0	0.0%	7.0%	20.9%
	Moderate	0	0.0%	17.0%	0	0.0%	12.0%	18.1%
	Middle	0	0.0%	23.5%	0	0.0%	30.2%	21.6%
	Upper	0	0.0%	43.0%	0	0.0%	43.5%	39.4%
	Unknown	1	100.0%	5.0%	77	100.0%	7.3%	0.0%
	TOTAL	1	100.0%	100.0%	77	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.9%
	Moderate	0	0.0%	8.3%	0	0.0%	0.9%	18.1%
	Middle	0	0.0%	2.8%	0	0.0%	0.7%	21.6%
	Upper	0	0.0%	11.1%	0	0.0%	4.4%	39.4%
	Unknown	1	100.0%	77.8%	63	100.0%	94.1%	0.0%
	TOTAL	1	100.0%	100.0%	63	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	2.1%	0	0.0%	0.6%	20.9%
	Moderate	0	0.0%	8.5%	0	0.0%	5.1%	18.1%
	Middle	0	0.0%	19.1%	0	0.0%	15.6%	21.6%
	Upper	0	0.0%	66.0%	0	0.0%	74.7%	39.4%
	Unknown	0	0.0%	4.3%	0	0.0%	4.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	17.3%	0	0.0%	11.1%	20.9%
	Moderate	1	100.0%	24.1%	20	100.0%	17.7%	18.1%
	Middle	0	0.0%	18.8%	0	0.0%	19.5%	21.6%
	Upper	0	0.0%	35.3%	0	0.0%	49.1%	39.4%
	Unknown	0	0.0%	4.5%	0	0.0%	2.6%	0.0%
	TOTAL	1	100.0%	100.0%	20	100.0%	100.0%	100.0%

Appendix C (Continued)

Purpose Not Applicable	Low	0	0.0%	0.9%	0	0.0%	0.9%	20.9%
	Moderate	0	0.0%	4.3%	0	0.0%	1.2%	18.1%
	Middle	0	0.0%	6.0%	0	0.0%	3.0%	21.6%
	Upper	0	0.0%	2.6%	0	0.0%	2.7%	39.4%
	Unknown	0	0.0%	86.2%	0	0.0%	92.2%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	15	14.3%	9.1%	798	5.6%	4.8%	20.9%
	Moderate	22	21.0%	22.0%	1,731	12.2%	16.1%	18.1%
	Middle	29	27.6%	22.7%	3,353	23.5%	21.7%	21.6%
	Upper	25	23.8%	30.6%	6,249	43.9%	39.4%	39.4%
	Unknown	14	13.3%	15.6%	2,114	14.8%	18.1%	0.0%
	TOTAL	105	100.0%	100.0%	14,245	100.0%	100.0%	100.0%

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Southern Illinois								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank	HMDA Aggregate	Bank	HMDA Aggregate	Families		
							#	%
Home Purchase	Low	16	22.9%	10.4%	778	9.2%	5.7%	21.0%
	Moderate	16	22.9%	22.8%	1,551	18.2%	17.5%	18.2%
	Middle	14	20.0%	24.3%	1,853	21.8%	24.4%	21.7%
	Upper	17	24.3%	27.3%	3,455	40.6%	38.4%	39.2%
	Unknown	7	10.0%	15.1%	864	10.2%	13.9%	0.0%
	TOTAL	70	100.0%	100.0%	8,501	100.0%	100.0%	100.0%
Refinance	Low	1	4.5%	7.0%	51	1.3%	3.7%	21.0%
	Moderate	6	27.3%	16.2%	562	14.7%	10.1%	18.2%
	Middle	7	31.8%	24.2%	992	25.9%	20.9%	21.7%
	Upper	7	31.8%	38.4%	1,975	51.6%	48.2%	39.2%
	Unknown	1	4.5%	14.2%	247	6.5%	17.1%	0.0%
	TOTAL	22	100.0%	100.0%	3,827	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	10.3%	0	0.0%	8.5%	21.0%
	Moderate	0	0.0%	15.8%	0	0.0%	11.7%	18.2%
	Middle	1	100.0%	24.5%	120	100.0%	24.5%	21.7%
	Upper	0	0.0%	46.2%	0	0.0%	49.9%	39.2%
	Unknown	0	0.0%	3.3%	0	0.0%	5.4%	0.0%
	TOTAL	1	100.0%	100.0%	120	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.2%
	Middle	0	0.0%	4.2%	0	0.0%	0.8%	21.7%
	Upper	0	0.0%	8.3%	0	0.0%	1.8%	39.2%
	Unknown	2	100.0%	87.5%	961	100.0%	97.4%	0.0%
	TOTAL	2	100.0%	100.0%	961	100.0%	100.0%	100.0%

Appendix C (Continued)

Other Purpose LOC	Low	0	0.0%	8.2%	0	0.0%	4.7%	21.0%
	Moderate	0	0.0%	13.1%	0	0.0%	5.7%	18.2%
	Middle	0	0.0%	29.5%	0	0.0%	29.6%	21.7%
	Upper	0	0.0%	49.2%	0	0.0%	60.0%	39.2%
	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%	9.9%	136	11.1%	6.5%	21.0%
	Moderate	1	100.0%	17.0%	0	0.0%	19.7%	18.2%
	Middle	0	0.0%	24.1%	30	100.0%	20.3%	21.7%
	Upper	0	0.0%	41.8%	0	0.0%	42.3%	39.2%
	Unknown	0	0.0%	7.1%	0	0.0%	11.1%	0.0%
	TOTAL	1	100.0%	100.0%	0	0.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.0%
	Moderate	0	0.0%	1.0%	0	0.0%	0.7%	18.2%
	Middle	0	0.0%	1.0%	0	0.0%	1.2%	21.7%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	39.2%
	Unknown	0	0.0%	97.9%	0	0.0%	98.1%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	17	17.7%	9.0%	829	6.2%	4.6%	21.0%
	Moderate	23	24.0%	19.5%	2,143	15.9%	13.5%	18.2%
	Middle	22	22.9%	23.8%	2,965	22.1%	21.6%	21.7%
	Upper	24	25.0%	31.9%	5,430	40.4%	40.3%	39.2%
	Unknown	10	10.4%	15.8%	2,072	15.4%	20.0%	0.0%
	TOTAL	96	100.0%	100.0%	13,439	100.0%	100.0%	100.0%

Small Business Loans by Revenue and Loan Size								
Assessment Area: Southern Illinois								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	41	54.7%	44.4%	\$3,887	25.9%	30.3%	87.5%
	Over \$1 Million/ Unknown	34	45.3%	55.6%	\$11,147	74.1%	69.7%	12.5%
	TOTAL	75	100.0%	100.0%	\$15,034	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	37	49.3%	91.4%	\$1,694	11.3%	31.5%	
	\$100,001–\$250,000	19	25.3%	4.7%	\$3,429	22.8%	18.9%	
	\$250,001–\$1 Million	19	25.3%	3.9%	\$9,911	65.9%	49.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	75	100.0%	100.0%	\$15,034	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	27	65.9%		\$1,131	29.1%	
		\$100,001–\$250,000	11	26.8%		\$1,765	45.4%	
		\$250,001–\$1 Million	3	7.3%		\$991	25.5%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	41	100.0%		\$3,887	100.0%	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Southern Illinois								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	35	52.2%	46.1%	\$5,521	33.0%	33.7%	88.2%
	Over \$1 Million/ Unknown	32	47.8%	53.9%	\$11,202	67.0%	66.3%	11.8%
	TOTAL	67	100.0%	100.0%	\$16,723	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	29	43.3%	92.8%	\$1,275	7.6%	34.0%	
	\$100,001–\$250,000	17	25.4%	3.6%	\$2,955	17.7%	14.9%	
	\$250,001–\$1 Million	21	31.3%	3.6%	\$12,493	74.7%	51.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	67	100.0%	100.0%	\$16,723	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	20	57.1%		\$834	15.1%	
		\$100,001–\$250,000	10	28.6%		\$1,552	28.1%	
		\$250,001–\$1 Million	5	14.3%		\$3,135	56.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	35	100.0%		\$5,521	100.0%	

Small Farm Loans by Revenue and Loan Size								
Assessment Area: Southern Illinois								
Farm Revenue and Loan Size		2018						
		Count			Dollars			Total Farm
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	34	89.5%	59.1%	3,018	82.2%	76.3%	98.8%
	Over \$1 Million/ Unknown	4	10.5%	40.9%	654	17.8%	23.7%	1.2%
	TOTAL	38	100.0%	100.0%	3,672	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	23	60.5%	76.1%	929	25.3%	27.8%	
	\$100,001–\$250,000	12	31.6%	16.3%	1,818	49.5%	35.6%	
	\$250,001–\$1 Million	3	7.9%	7.6%	925	25.2%	36.5%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	38	100.0%	100.0%	3,672	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	21	61.8%		744	24.7%	
		\$100,001–\$250,000	11	32.4%		1,699	56.3%	
		\$250,001–\$1 Million	2	5.9%		575	19.1%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	34	100.0%		3,018	100.0%	

Small Farm Loans by Revenue and Loan Size								
Assessment Area: Southern Illinois								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Total Farm
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	26	92.9%	59.3%	2,733	76.3%	74.9%	98.9%
	Over \$1 Million/Unknown	2	7.1%	40.7%	850	23.7%	25.1%	1.1%
	TOTAL	28	100.0%	100.0%	3,583	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	15	53.6%	72.3%	508	14.2%	24.1%	
	\$100,001–\$250,000	9	32.1%	19.8%	1,650	46.1%	41.3%	
	\$250,001–\$1 Million	4	14.3%	7.9%	1,425	39.8%	34.6%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	28	100.0%	100.0%	3,583	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	15	57.7%		508	18.6%	
		\$100,001–\$250,000	9	34.6%		1,650	60.4%	
		\$250,001–\$1 Million	2	7.7%		575	21.0%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	26	100.0%		2,733	100.0%	

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: Southern Illinois								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.2%
	Moderate	7	9.2%	8.7%	540	4.9%	6.1%	11.3%
	Middle	47	61.8%	74.5%	5,282	47.7%	71.6%	74.2%
	Upper	22	28.9%	16.5%	5,246	47.4%	22.0%	14.2%
	Unknown	0	0.0%	0.3%	0	0.0%	0.2%	0.1%
	TOTAL	76	100.0%	100.0%	11,068	100.0%	100.0%	100.0%

Appendix C (Continued)

Refinance	Low	0	0.0%	0.1%	0	0.0%	0.0%	0.2%
	Moderate	4	15.4%	7.4%	186	6.2%	6.9%	11.3%
	Middle	18	69.2%	76.2%	1,672	55.4%	74.3%	74.2%
	Upper	4	15.4%	14.7%	1,159	38.4%	18.2%	14.2%
	Unknown	0	0.0%	1.6%	0	0.0%	0.6%	0.1%
	TOTAL	26	100.0%	100.0%	3,017	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.2%
	Moderate	0	0.0%	7.5%	0	0.0%	6.9%	11.3%
	Middle	0	0.0%	72.5%	0	0.0%	74.8%	74.2%
	Upper	1	100.0%	14.5%	77	100.0%	15.4%	14.2%
	Unknown	0	0.0%	5.5%	0	0.0%	2.9%	0.1%
	TOTAL	1	100.0%	100.0%	77	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	2.8%	0	0.0%	1.2%	1.6%
	Moderate	0	0.0%	13.9%	0	0.0%	9.0%	17.1%
	Middle	0	0.0%	58.3%	0	0.0%	47.3%	55.5%
	Upper	1	100.0%	22.2%	63	100.0%	42.0%	18.6%
	Unknown	0	0.0%	2.8%	0	0.0%	0.5%	7.2%
	TOTAL	1	100.0%	100.0%	63	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.2%
	Moderate	0	0.0%	2.1%	0	0.0%	2.5%	11.3%
	Middle	0	0.0%	70.2%	0	0.0%	60.8%	74.2%
	Upper	0	0.0%	21.3%	0	0.0%	32.0%	14.2%
	Unknown	0	0.0%	6.4%	0	0.0%	4.6%	0.1%
	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%	0.2%
	Moderate	0	0.0%	7.5%	0	0.0%	5.4%	11.3%
	Middle	1	100.0%	75.9%	20	100.0%	64.7%	74.2%
	Upper	0	0.0%	14.3%	0	0.0%	27.6%	14.2%
	Unknown	0	0.0%	2.3%	0	0.0%	2.4%	0.1%
	TOTAL	1	100.0%	100.0%	20	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.2%
	Moderate	0	0.0%	6.9%	0	0.0%	6.1%	11.3%
	Middle	0	0.0%	75.0%	0	0.0%	68.4%	74.2%
	Upper	0	0.0%	18.1%	0	0.0%	25.6%	14.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDS TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.1%	0.2%
	Moderate	11	10.5%	8.2%	726	5.1%	6.4%	11.3%
	Middle	66	62.9%	74.8%	6,974	49.0%	71.3%	74.2%
	Upper	28	26.7%	16.0%	6,545	45.9%	21.7%	14.2%
	Unknown	0	0.0%	1.0%	0	0.0%	0.4%	0.1%
	TOTAL	105	100.0%	100.0%	14,245	100.0%	100.0%	100.0%

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: Southern Illinois								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.2%
	Moderate	8	11.4%	9.9%	779	9.2%	6.8%	11.3%
	Middle	49	70.0%	72.1%	5,421	63.8%	69.9%	74.2%
	Upper	13	18.6%	17.6%	2,301	27.1%	22.9%	14.2%
	Unknown	0	0.0%	0.4%	0	0.0%	0.4%	0.1%
	TOTAL	70	100.0%	100.0%	8,501	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.1%	0	0.0%	0.0%	0.2%
	Moderate	3	13.6%	7.8%	296	7.7%	5.5%	11.3%
	Middle	11	50.0%	74.4%	1,249	32.6%	71.5%	74.2%
	Upper	8	36.4%	17.7%	2,282	59.6%	23.1%	14.2%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.1%
	TOTAL	22	100.0%	100.0%	3,827	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.2%
	Moderate	0	0.0%	12.5%	0	0.0%	10.5%	11.3%
	Middle	1	100.0%	77.2%	120	100.0%	79.4%	74.2%
	Upper	0	0.0%	10.3%	0	0.0%	10.1%	14.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	1	100.0%	100.0%	120	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	1.6%
	Moderate	1	50.0%	25.0%	78	8.1%	24.6%	17.1%
	Middle	1	50.0%	58.3%	883	91.9%	31.5%	55.5%
	Upper	0	0.0%	12.5%	0	0.0%	36.9%	18.6%
	Unknown	0	0.0%	4.2%	0	0.0%	7.1%	7.2%
	TOTAL	2	100.0%	100.0%	961	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.2%
	Moderate	0	0.0%	8.2%	0	0.0%	4.0%	11.3%
	Middle	0	0.0%	78.7%	0	0.0%	78.4%	74.2%
	Upper	0	0.0%	13.1%	0	0.0%	17.6%	14.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	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%	0.2%
	Moderate	0	0.0%	10.6%	0	0.0%	12.3%	11.3%
	Middle	1	100.0%	63.8%	30	100.0%	58.7%	74.2%
	Upper	0	0.0%	25.5%	0	0.0%	29.0%	14.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	1	100.0%	100.0%	30	100.0%	100.0%	100.0%

Appendix C (Continued)

Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.2%
	Moderate	0	0.0%	17.7%	0	0.0%	15.1%	11.3%
	Middle	0	0.0%	69.8%	0	0.0%	66.7%	74.2%
	Upper	0	0.0%	12.5%	0	0.0%	18.2%	14.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	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%	0.2%
	Moderate	12	12.5%	9.4%	1,153	8.6%	7.4%	11.3%
	Middle	63	65.6%	72.8%	7,703	57.3%	68.6%	74.2%
	Upper	21	21.9%	17.4%	4,583	34.1%	23.5%	14.2%
	Unknown	0	0.0%	0.2%	0	0.0%	0.6%	0.1%
	TOTAL	96	100.0%	100.0%	13,439	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Assessment Area: Southern Illinois							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	1.7%	\$0	0.0%	1.7%	1.6%
Moderate	9	12.0%	11.9%	\$1,290	8.6%	8.1%	16.2%
Middle	41	54.7%	67.5%	\$6,694	44.5%	68.7%	66.3%
Upper	25	33.3%	15.4%	\$7,050	46.9%	20.2%	15.5%
Unknown	0	0.0%	3.5%	\$0	0.0%	1.3%	0.3%
TOTAL	75	100.0%	100.0%	\$15,034	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans							
Assessment Area: Southern Illinois							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	1.7%	\$0	0.0%	1.5%	1.6%
Moderate	8	11.9%	12.5%	\$2,493	14.9%	10.3%	16.0%
Middle	40	59.7%	65.7%	\$8,839	52.9%	69.2%	66.4%
Upper	19	28.4%	15.7%	\$5,391	32.2%	17.2%	15.7%
Unknown	0	0.0%	4.4%	\$0	0.0%	1.8%	0.3%
TOTAL	67	100.0%	100.0%	\$16,723	100.0%	100.0%	100.0%

Appendix C (Continued)

Geographic Distribution of Small Farm Loans Assessment Area: Southern Illinois							
Tract Income Levels	2018						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	2	5.3%	3.2%	\$130	3.5%	1.7%	4.9%
Middle	34	89.5%	76.9%	\$3,217	87.6%	70.5%	79.0%
Upper	2	5.3%	19.4%	\$325	8.9%	27.7%	16.1%
Unknown	0	0.0%	0.5%	\$0	0.0%	0.0%	0.0%
TOTAL	38	100.0%	100.0%	\$3,672	100.0%	100.0%	100.0%

Geographic Distribution of Small Farm Loans Assessment Area: Southern Illinois							
Tract Income Levels	2019						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	3.5%	\$0	0.0%	2.4%	4.7%
Middle	26	92.9%	76.0%	\$3,258	90.9%	71.9%	78.9%
Upper	2	7.1%	19.3%	\$325	9.1%	25.5%	16.4%
Unknown	0	0.0%	1.2%	\$0	0.0%	0.1%	0.0%
TOTAL	28	100.0%	100.0%	\$3,583	100.0%	100.0%	100.0%

Chicago AA

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Chicago								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	38	9.9%	7.4%	3,103	5.8%	4.2%	16.8%
	Moderate	111	29.0%	22.6%	11,319	21.1%	17.4%	15.6%
	Middle	94	24.5%	24.3%	14,229	26.5%	23.8%	21.2%
	Upper	130	33.9%	29.3%	23,622	44.0%	38.8%	46.4%
	Unknown	10	2.6%	16.5%	1,384	2.6%	15.9%	0.0%
	TOTAL	383	100.0%	100.0%	53,657	100.0%	100.0%	100.0%
Refinance	Low	26	13.6%	7.4%	1,765	9.1%	4.2%	16.8%
	Moderate	25	13.1%	16.6%	1,860	9.6%	12.5%	15.6%
	Middle	43	22.5%	24.6%	4,471	23.0%	22.7%	21.2%
	Upper	73	38.2%	39.4%	8,805	45.3%	47.5%	46.4%
	Unknown	24	12.6%	12.0%	2,533	13.0%	13.1%	0.0%
	TOTAL	191	100.0%	100.0%	19,434	100.0%	100.0%	100.0%
Home Improvement	Low	2	5.9%	5.7%	50	3.7%	3.9%	16.8%
	Moderate	4	11.8%	14.3%	99	7.4%	11.6%	15.6%
	Middle	6	17.6%	21.3%	305	22.7%	19.0%	21.2%
	Upper	19	55.9%	55.5%	727	54.1%	60.6%	46.4%
	Unknown	3	8.8%	3.2%	163	12.1%	4.8%	0.0%
	TOTAL	34	100.0%	100.0%	1,344	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	7.7%	0	0.0%	0.7%	16.8%
	Moderate	1	10.0%	3.9%	314	3.9%	0.5%	15.6%
	Middle	0	0.0%	1.3%	0	0.0%	0.1%	21.2%
	Upper	2	20.0%	12.9%	663	8.2%	3.2%	46.4%
	Unknown	7	70.0%	74.2%	7,069	87.9%	95.5%	0.0%
	TOTAL	10	100.0%	100.0%	8,046	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	6.0%	0	0.0%	4.5%	16.8%
	Moderate	0	0.0%	15.7%	0	0.0%	11.6%	15.6%
	Middle	0	0.0%	24.1%	0	0.0%	21.0%	21.2%
	Upper	0	0.0%	51.8%	0	0.0%	60.6%	46.4%
	Unknown	0	0.0%	2.4%	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	3	8.8%	8.5%	155	13.3%	6.7%	16.8%
	Moderate	9	26.5%	18.6%	222	19.0%	15.2%	15.6%
	Middle	8	23.5%	24.3%	337	28.9%	19.9%	21.2%
	Upper	14	41.2%	44.0%	453	38.8%	50.3%	46.4%
	Unknown	0	0.0%	4.6%	0	0.0%	8.0%	0.0%
	TOTAL	34	100.0%	100.0%	1,167	100.0%	100.0%	100.0%

Appendix C (Continued)

Purpose Not Applicable	Low	0	0.0%	1.5%	0	0.0%	1.0%	16.8%
	Moderate	0	0.0%	1.8%	0	0.0%	1.4%	15.6%
	Middle	0	0.0%	1.6%	0	0.0%	1.4%	21.2%
	Upper	0	0.0%	1.6%	0	0.0%	1.6%	46.4%
	Unknown	0	0.0%	93.5%	0	0.0%	94.6%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	69	10.6%	7.1%	5,073	6.1%	4.0%	16.8%
	Moderate	150	23.0%	19.6%	13,814	16.5%	15.2%	15.6%
	Middle	151	23.2%	23.4%	19,342	23.1%	22.2%	21.2%
	Upper	238	36.5%	32.8%	34,270	41.0%	39.7%	46.4%
	Unknown	44	6.7%	17.0%	11,149	13.3%	18.9%	0.0%
	TOTAL	652	100.0%	100.0%	83,648	100.0%	100.0%	100.0%

Borrower Distribution of Residential Real Estate Loans Assessment Area: Chicago								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank	HMDA Aggregate	Bank	HMDA Aggregate	%		
		#	%	%	\$ (000s)		\$ %	\$ %
Home Purchase	Low	37	12.7%	7.2%	3,378	8.1%	4.2%	17.0%
	Moderate	84	28.8%	23.4%	10,226	24.6%	18.0%	15.7%
	Middle	77	26.4%	25.2%	10,863	26.1%	24.7%	21.4%
	Upper	78	26.7%	29.3%	14,970	35.9%	38.5%	45.9%
	Unknown	16	5.5%	14.9%	2,213	5.3%	14.5%	0.0%
	TOTAL	292	100.0%	100.0%	41,650	100.0%	100.0%	100.0%
Refinance	Low	15	11.8%	4.4%	803	5.2%	2.3%	17.0%
	Moderate	22	17.3%	14.0%	1,788	11.5%	9.6%	15.7%
	Middle	33	26.0%	22.1%	4,279	27.6%	19.3%	21.4%
	Upper	43	33.9%	41.7%	6,328	40.8%	49.5%	45.9%
	Unknown	14	11.0%	17.8%	2,300	14.8%	19.3%	0.0%
	TOTAL	127	100.0%	100.0%	15,498	100.0%	100.0%	100.0%
Home Improvement	Low	1	3.8%	5.5%	23	2.5%	3.5%	17.0%
	Moderate	1	3.8%	13.2%	28	3.1%	10.6%	15.7%
	Middle	11	42.3%	26.0%	280	30.9%	23.1%	21.4%
	Upper	9	34.6%	51.9%	285	31.4%	59.3%	45.9%
	Unknown	4	15.4%	3.5%	291	32.1%	3.5%	0.0%
	TOTAL	26	100.0%	100.0%	907	100.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	5.5%	0	0.0%	0.3%	17.0%
	Moderate	0	0.0%	2.1%	0	0.0%	0.3%	15.7%
	Middle	1	20.0%	0.7%	160	6.8%	0.1%	21.4%
	Upper	1	20.0%	11.0%	425	18.1%	1.4%	45.9%
	Unknown	3	60.0%	80.8%	1,769	75.1%	98.0%	0.0%
	TOTAL	5	100.0%	100.0%	2,354	100.0%	100.0%	100.0%

Appendix C (Continued)

Other Purpose LOC	Low	0	0.0%	6.0%	0	0.0%	4.4%	17.0%
	Moderate	0	0.0%	16.2%	0	0.0%	12.7%	15.7%
	Middle	0	0.0%	25.6%	0	0.0%	24.2%	21.4%
	Upper	0	0.0%	49.5%	0	0.0%	56.0%	45.9%
	Unknown	0	0.0%	2.6%	0	0.0%	2.8%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	3	15.8%	7.0%	68	14.0%	5.4%	17.0%
	Moderate	5	26.3%	18.3%	164	33.8%	12.4%	15.7%
	Middle	2	10.5%	25.6%	74	15.3%	19.3%	21.4%
	Upper	9	47.4%	44.1%	179	36.9%	54.0%	45.9%
	Unknown	0	0.0%	5.0%	0	0.0%	8.8%	0.0%
	TOTAL	19	100.0%	100.0%	485	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.2%	0	0.0%	0.2%	17.0%
	Moderate	0	0.0%	0.5%	0	0.0%	0.4%	15.7%
	Middle	0	0.0%	0.3%	0	0.0%	0.3%	21.4%
	Upper	0	0.0%	0.7%	0	0.0%	1.3%	45.9%
	Unknown	0	0.0%	98.2%	0	0.0%	97.8%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	56	11.9%	5.8%	4,272	7.0%	3.2%	17.0%
	Moderate	112	23.9%	18.6%	12,206	20.0%	13.6%	15.7%
	Middle	124	26.4%	23.4%	15,656	25.7%	21.3%	21.4%
	Upper	140	29.9%	34.9%	22,187	36.4%	41.9%	45.9%
	Unknown	37	7.9%	17.3%	6,573	10.8%	19.9%	0.0%
	TOTAL	469	100.0%	100.0%	60,894	100.0%	100.0%	100.0%

Appendix C (Continued)

Small Business Loans by Revenue and Loan Size								
Assessment Area: Chicago								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	61	62.9%	42.0%	\$8,791	45.9%	29.8%	90.6%
	Over \$1 Million/ Unknown	36	37.1%	58.0%	\$10,358	54.1%	70.2%	9.4%
	TOTAL	97	100.0%	100.0%	\$19,149	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	50	51.5%	91.6%	\$2,710	14.2%	31.4%	
	\$100,001–\$250,000	19	19.6%	4.3%	\$3,508	18.3%	17.0%	
	\$250,001–\$1 Million	28	28.9%	4.1%	\$12,931	67.5%	51.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	97	100.0%	100.0%	\$19,149	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	41	67.2%		\$2,047	23.3%	
		\$100,001–\$250,000	8	13.1%		\$1,454	16.5%	
		\$250,001–\$1 Million	12	19.7%		\$5,290	60.2%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	61	100.0%		\$8,791	100.0%	

Appendix C (Continued)

Small Business Loans by Revenue and Loan Size								
Assessment Area: Chicago								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	72	59.0%	47.5%	\$8,652	44.1%	29.6%	91.0%
	Over \$1 Million/ Unknown	50	41.0%	52.5%	\$10,984	55.9%	70.4%	9.0%
	TOTAL	122	100.0%	100.0%	\$19,636	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	75	61.5%	92.5%	\$3,839	19.6%	33.5%	
	\$100,001–\$250,000	20	16.4%	3.8%	\$3,526	18.0%	16.1%	
	\$250,001–\$1 Million	27	22.1%	3.7%	\$12,271	62.5%	50.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	122	100.0%	100.0%	\$19,636	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	48	66.7%		\$2,133	24.7%	
		\$100,001–\$250,000	15	20.8%		\$2,676	30.9%	
		\$250,001–\$1 Million	9	12.5%		\$3,843	44.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	72	100.0%		\$8,652	100.0%	

Small Farms Loans by Revenue and Loan Size								
Assessment Area: Chicago								
Farm Revenue and Loan Size		2018						
		Count			Dollars			Total Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	28	87.5%	55.3%	3,853	91.0%	66.4%	98.0%
	Over \$1 Million/ Unknown	4	12.5%	44.7%	383	9.0%	33.6%	2.0%
	TOTAL	32	100.0%	100.0%	4,236	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	20	62.5%	60.6%	836	19.7%	14.1%	
	\$100,001–\$250,000	6	18.8%	22.8%	1,145	27.0%	34.7%	
	\$250,001–\$1 Million	6	18.8%	16.6%	2,255	53.2%	51.1%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	32	100.0%	100.0%	4,236	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	17	60.7%		703	18.2%	
		\$100,001–\$250,000	5	17.9%		895	23.2%	
		\$250,001–\$1 Million	6	21.4%		2,255	58.5%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	28	100.0%		3,853	100.0%	

Small Farm Loans by Revenue and Loan Size								
Assessment Area: Chicago								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Total Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	48	88.9%	65.2%	6,881	77.5%	76.3%	98.0%
	Over \$1 Million/ Unknown	6	11.1%	34.8%	2,000	22.5%	23.7%	2.0%
	TOTAL	54	100.0%	100.0%	8,881	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	26	48.1%	64.2%	1,246	14.0%	15.6%	
	\$100,001– \$250,000	17	31.5%	19.9%	2,985	33.6%	32.0%	
	\$250,001– \$1 Million	11	20.4%	15.9%	4,650	52.4%	52.4%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	54	100.0%	100.0%	8,881	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	25	52.1%		1,196	17.4%		
	\$100,001– \$250,000	15	31.3%		2,485	36.1%		
	\$250,001– \$1 Million	8	16.7%		3,200	46.5%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	48	100.0%		6,881	100.0%		

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: Chicago								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	17	4.4%	1.6%	1,213	2.3%	0.9%	2.4%
	Moderate	65	17.0%	7.2%	5,910	11.0%	4.5%	7.8%
	Middle	165	43.1%	45.9%	22,023	41.0%	39.5%	46.2%
	Upper	136	35.5%	45.3%	24,511	45.7%	55.0%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	383	100.0%	100.0%	53,657	100.0%	100.0%	100.0%
Refinance	Low	5	2.6%	1.5%	249	1.3%	0.9%	2.4%
	Moderate	21	11.0%	5.4%	1,444	7.4%	3.8%	7.8%
	Middle	108	56.5%	42.3%	10,796	55.6%	35.4%	46.2%
	Upper	57	29.8%	50.7%	6,945	35.7%	60.0%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	191	100.0%	100.0%	19,434	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.7%	0	0.0%	0.3%	2.4%
	Moderate	2	5.9%	4.5%	135	10.0%	3.5%	7.8%
	Middle	23	67.6%	38.3%	810	60.3%	32.8%	46.2%
	Upper	9	26.5%	56.5%	399	29.7%	63.4%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	34	100.0%	100.0%	1,344	100.0%	100.0%	100.0%
Multifamily	Low	3	30.0%	15.5%	2,964	36.8%	16.3%	28.3%
	Moderate	1	10.0%	20.0%	80	1.0%	38.3%	20.5%
	Middle	5	50.0%	48.4%	2,239	27.8%	31.4%	30.2%
	Upper	1	10.0%	16.1%	2,763	34.3%	13.9%	20.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.8%
	TOTAL	10	100.0%	100.0%	8,046	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	1.2%	0	0.0%	0.8%	2.4%
	Moderate	0	0.0%	3.5%	0	0.0%	2.2%	7.8%
	Middle	0	0.0%	39.5%	0	0.0%	33.8%	46.2%
	Upper	0	0.0%	55.9%	0	0.0%	63.1%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	1	2.9%	3.3%	22	1.9%	2.0%	2.4%
	Moderate	2	5.9%	6.7%	151	12.9%	5.5%	7.8%
	Middle	22	64.7%	48.1%	728	62.4%	42.1%	46.2%
	Upper	9	26.5%	41.9%	266	22.8%	50.4%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	34	100.0%	100.0%	1,167	100.0%	100.0%	100.0%

Appendix C (Continued)

Purpose Not Applicable	Low	0	0.0%	4.0%	0	0.0%	2.5%	2.4%
	Moderate	0	0.0%	7.3%	0	0.0%	4.7%	7.8%
	Middle	0	0.0%	48.7%	0	0.0%	44.3%	46.2%
	Upper	0	0.0%	39.9%	0	0.0%	48.5%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	26	4.0%	1.7%	4,448	5.3%	1.3%	2.4%
	Moderate	91	14.0%	6.6%	7,720	9.2%	5.2%	7.8%
	Middle	323	49.5%	44.6%	36,596	43.8%	38.3%	46.2%
	Upper	212	32.5%	47.1%	34,884	41.7%	55.2%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	652	100.0%	100.0%	83,648	100.0%	100.0%	100.0%

Geographic Distribution of Residential Real Estate Loans								
Assessment Area: Chicago								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	21	7.2%	1.7%	2,038	4.9%	1.1%	2.4%
	Moderate	49	16.8%	7.3%	5,495	13.2%	4.7%	8.1%
	Middle	139	47.6%	46.4%	19,632	47.1%	40.6%	46.8%
	Upper	83	28.4%	44.6%	14,485	34.8%	53.6%	42.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	292	100.0%	100.0%	41,650	100.0%	100.0%	100.0%
Refinance	Low	12	9.4%	1.0%	1,645	10.6%	0.6%	2.4%
	Moderate	9	7.1%	4.2%	795	5.1%	2.6%	8.1%
	Middle	70	55.1%	40.2%	7,931	51.2%	33.6%	46.8%
	Upper	36	28.3%	54.5%	5,127	33.1%	63.2%	42.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	127	100.0%	100.0%	15,498	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	1.9%	0	0.0%	1.2%	2.4%
	Moderate	5	19.2%	6.2%	287	31.6%	4.3%	8.1%
	Middle	14	53.8%	38.3%	435	48.0%	33.7%	46.8%
	Upper	7	26.9%	53.6%	185	20.4%	60.8%	42.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	26	100.0%	100.0%	907	100.0%	100.0%	100.0%

Appendix C (Continued)

Multifamily	Low	0	0.0%	11.6%	0	0.0%	10.3%	28.3%
	Moderate	0	0.0%	18.5%	0	0.0%	8.7%	20.8%
	Middle	4	80.0%	47.9%	1,249	53.1%	30.6%	30.3%
	Upper	1	20.0%	20.5%	1,105	46.9%	50.4%	19.8%
	Unknown	0	0.0%	1.4%	0	0.0%	0.1%	0.8%
	TOTAL	5	100.0%	100.0%	2,354	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	1.5%	0	0.0%	0.9%	2.4%
	Moderate	0	0.0%	5.8%	0	0.0%	4.4%	8.1%
	Middle	0	0.0%	36.8%	0	0.0%	32.5%	46.8%
	Upper	0	0.0%	55.9%	0	0.0%	62.2%	42.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	3.0%	0	0.0%	1.8%	2.4%
	Moderate	1	5.3%	7.0%	17	3.5%	5.1%	8.1%
	Middle	12	63.2%	46.9%	307	63.3%	36.8%	46.8%
	Upper	6	31.6%	43.2%	161	33.2%	56.2%	42.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	19	100.0%	100.0%	485	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	3.3%	0	0.0%	1.8%	2.4%
	Moderate	0	0.0%	8.5%	0	0.0%	6.0%	8.1%
	Middle	0	0.0%	54.6%	0	0.0%	49.2%	46.8%
	Upper	0	0.0%	33.6%	0	0.0%	42.9%	42.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	33	7.0%	1.5%	3,683	6.0%	1.2%	2.4%
	Moderate	64	13.6%	6.1%	6,594	10.8%	4.0%	8.1%
	Middle	239	51.0%	43.6%	29,554	48.5%	37.4%	46.8%
	Upper	133	28.4%	48.8%	21,063	34.6%	57.5%	42.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	469	100.0%	100.0%	60,894	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans Assessment Area: Chicago							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	12	12.4%	3.7%	\$2,889	15.1%	4.7%	4.6%
Moderate	5	5.2%	7.5%	\$398	2.1%	9.6%	9.3%
Middle	56	57.7%	35.1%	\$11,890	62.1%	38.0%	39.8%
Upper	24	24.7%	52.7%	\$3,972	20.7%	47.3%	46.1%
Unknown	0	0.0%	1.0%	\$0	0.0%	0.3%	0.2%
TOTAL	97	100.0%	100.0%	\$19,149	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans Assessment Area: Chicago							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	12	9.8%	3.5%	\$2,294	11.7%	4.6%	4.7%
Moderate	11	9.0%	7.4%	\$2,354	12.0%	8.2%	9.8%
Middle	74	60.7%	37.0%	\$10,976	55.9%	38.9%	40.4%
Upper	25	20.5%	51.1%	\$4,012	20.4%	48.0%	44.9%
Unknown	0	0.0%	0.9%	\$0	0.0%	0.3%	0.2%
TOTAL	122	100.0%	100.0%	\$19,636	100.0%	100.0%	100.0%

Geographic Distribution of Small Farm Loans Assessment Area: Chicago							
Tract Income Levels	2018						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.8%	\$0	0.0%	0.7%	1.2%
Moderate	0	0.0%	3.3%	\$0	0.0%	3.8%	5.0%
Middle	23	71.9%	73.9%	\$2,642	62.4%	76.6%	65.1%
Upper	9	28.1%	21.6%	\$1,594	37.6%	19.0%	28.6%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.0%	0.1%
TOTAL	32	100.0%	100.0%	\$4,236	100.0%	100.0%	100.0%

Geographic Distribution of Small Farm Loans Assessment Area: Chicago							
Tract Income Levels	2019						
	Count			Dollar			Farms
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	1	1.9%	1.3%	\$400	4.5%	0.9%	1.1%
Moderate	1	1.9%	6.1%	\$175	2.0%	4.5%	6.2%
Middle	44	81.5%	78.5%	\$6,926	78.0%	85.1%	67.2%
Upper	8	14.8%	14.0%	\$1,380	15.5%	9.4%	25.4%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.0%	0.1%
TOTAL	54	100.0%	100.0%	\$8,881	100.0%	100.0%	100.0%

LENDING PERFORMANCE TABLES BY LIMITED-SCOPE ASSESSMENT AREAS

Illinois

Champaign MSA AA

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Champaign MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	15	23.8%	10.7%	1,398	14.5%	5.9%	21.8%
	Moderate	18	28.6%	21.4%	2,266	23.6%	16.5%	16.5%
	Middle	8	12.7%	22.5%	1,649	17.2%	22.6%	20.7%
	Upper	20	31.7%	32.7%	4,155	43.2%	43.9%	41.0%
	Unknown	2	3.2%	12.8%	143	1.5%	11.1%	0.0%
	TOTAL	63	100.0%	100.0%	9,611	100.0%	100.0%	100.0%
Refinance	Low	1	11.1%	11.6%	68	7.1%	6.4%	21.8%
	Moderate	2	22.2%	16.8%	298	31.2%	13.1%	16.5%
	Middle	1	11.1%	21.6%	114	11.9%	19.6%	20.7%
	Upper	2	22.2%	32.5%	257	26.9%	43.1%	41.0%
	Unknown	3	33.3%	17.4%	219	22.9%	17.9%	0.0%
	TOTAL	9	100.0%	100.0%	956	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	13.1%	0	0.0%	6.0%	21.8%
	Moderate	0	0.0%	20.4%	0	0.0%	15.9%	16.5%
	Middle	0	0.0%	18.3%	0	0.0%	18.1%	20.7%
	Upper	0	0.0%	40.3%	0	0.0%	52.6%	41.0%
	Unknown	0	0.0%	7.9%	0	0.0%	7.3%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	5.4%	0	0.0%	1.0%	21.8%
	Moderate	0	0.0%	0.7%	0	0.0%	0.1%	16.5%
	Middle	0	0.0%	3.4%	0	0.0%	0.2%	20.7%
	Upper	0	0.0%	11.5%	0	0.0%	6.6%	41.0%
	Unknown	0	0.0%	79.1%	0	0.0%	92.1%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	5.9%	0	0.0%	2.4%	21.8%
	Moderate	0	0.0%	14.9%	0	0.0%	12.4%	16.5%
	Middle	0	0.0%	17.8%	0	0.0%	8.9%	20.7%
	Upper	0	0.0%	59.4%	0	0.0%	75.0%	41.0%
	Unknown	0	0.0%	2.0%	0	0.0%	1.3%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%

Appendix D (Continued)

Other Purpose Closed/Exempt	Low	0	0.0%	16.3%	0	0.0%	5.0%	21.8%
	Moderate	0	0.0%	21.3%	0	0.0%	12.5%	16.5%
	Middle	0	0.0%	23.8%	0	0.0%	12.2%	20.7%
	Upper	0	0.0%	36.3%	0	0.0%	33.0%	41.0%
	Unknown	0	0.0%	2.5%	0	0.0%	37.3%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	2.2%	0	0.0%	1.7%	21.8%
	Moderate	0	0.0%	2.2%	0	0.0%	1.3%	16.5%
	Middle	0	0.0%	4.3%	0	0.0%	4.4%	20.7%
	Upper	0	0.0%	1.1%	0	0.0%	0.0%	41.0%
	Unknown	0	0.0%	90.2%	0	0.0%	92.5%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	16	22.2%	10.7%	1,466	13.9%	4.7%	21.8%
	Moderate	20	27.8%	19.2%	2,564	24.3%	11.7%	16.5%
	Middle	9	12.5%	21.2%	1,763	16.7%	16.2%	20.7%
	Upper	22	30.6%	32.3%	4,412	41.8%	34.4%	41.0%
	Unknown	5	6.9%	16.6%	362	3.4%	33.0%	0.0%
	TOTAL	72	100.0%	100.0%	10,567	100.0%	100.0%	100.0%

Borrower Distribution of Residential Real Estate Loans								
Assessment Area: Champaign MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	18	26.1%	11.5%	1,488	18.3%	6.4%	21.9%
	Moderate	30	43.5%	21.7%	3,034	37.3%	16.4%	16.6%
	Middle	9	13.0%	21.6%	1,322	16.2%	21.0%	20.7%
	Upper	12	17.4%	32.8%	2,293	28.2%	45.4%	40.9%
	Unknown	0	0.0%	12.4%	0	0.0%	10.8%	0.0%
	TOTAL	69	100.0%	100.0%	8,137	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	7.4%	0	0.0%	3.5%	21.9%
	Moderate	0	0.0%	15.2%	0	0.0%	9.8%	16.6%
	Middle	9	42.9%	21.0%	1,141	27.4%	17.3%	20.7%
	Upper	12	57.1%	43.1%	3,027	72.6%	55.5%	40.9%
	Unknown	0	0.0%	13.3%	0	0.0%	13.9%	0.0%
	TOTAL	21	100.0%	100.0%	4,168	100.0%	100.0%	100.0%

Appendix D (Continued)

Home Improvement	Low	0	0.0%	9.5%	0	0.0%	8.5%	21.9%
	Moderate	0	0.0%	22.0%	0	0.0%	17.8%	16.6%
	Middle	0	0.0%	19.6%	0	0.0%	18.2%	20.7%
	Upper	0	0.0%	44.0%	0	0.0%	50.8%	40.9%
	Unknown	0	0.0%	4.8%	0	0.0%	4.7%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	0.7%	0	0.0%	0.0%	21.9%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.6%
	Middle	0	0.0%	0.7%	0	0.0%	0.0%	20.7%
	Upper	0	0.0%	5.9%	0	0.0%	0.9%	40.9%
	Unknown	0	0.0%	92.6%	0	0.0%	99.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	14.0%	0	0.0%	9.4%	21.9%
	Moderate	0	0.0%	15.7%	0	0.0%	11.8%	16.6%
	Middle	0	0.0%	19.8%	0	0.0%	17.7%	20.7%
	Upper	0	0.0%	45.5%	0	0.0%	58.2%	40.9%
	Unknown	0	0.0%	5.0%	0	0.0%	2.9%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	1	100.0%	9.9%	41	100.0%	5.7%	21.9%
	Moderate	0	0.0%	26.8%	0	0.0%	21.0%	16.6%
	Middle	0	0.0%	18.3%	0	0.0%	13.8%	20.7%
	Upper	0	0.0%	33.8%	0	0.0%	49.8%	40.9%
	Unknown	0	0.0%	11.3%	0	0.0%	9.6%	0.0%
	TOTAL	1	100.0%	100.0%	41	100.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.9%
	Moderate	0	0.0%	1.4%	0	0.0%	1.6%	16.6%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	20.7%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	40.9%
	Unknown	0	0.0%	98.6%	0	0.0%	98.4%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	19	20.9%	9.7%	1,529	12.4%	3.6%	21.9%
	Moderate	30	33.0%	18.6%	3,034	24.6%	9.3%	16.6%
	Middle	18	19.8%	20.4%	2,463	19.9%	13.1%	20.7%
	Upper	24	26.4%	35.9%	5,320	43.1%	33.7%	40.9%
	Unknown	0	0.0%	15.4%	0	0.0%	40.3%	0.0%
	TOTAL	91	100.0%	100.0%	12,346	100.0%	100.0%	100.0%

Appendix D (Continued)

Small Business Loans by Revenue and Loan Size								
Assessment Area: Champaign MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	9	40.9%	44.0%	\$675	30.7%	36.2%	89.8%
	Over \$1 Million/ Unknown	13	59.1%	56.0%	\$1,523	69.3%	63.8%	10.2%
	TOTAL	22	100.0%	100.0%	\$2,198	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	15	68.2%	91.2%	\$673	30.6%	30.1%	
	\$100,001–\$250,000	6	27.3%	4.2%	\$1,025	46.6%	16.3%	
	\$250,001–\$1 Million	1	4.5%	4.5%	\$500	22.7%	53.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	22	100.0%	100.0%	\$2,198	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	7	77.8%		\$275	40.7%	
		\$100,001–\$250,000	2	22.2%		\$400	59.3%	
		\$250,001–\$1 Million	0	0.0%		\$0	0.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	9	100.0%		\$675	100.0%	

Small Business Loans by Revenue and Loan Size Assessment Area: Champaign MSA								
Business Revenue and Loan Size		2019						Total Businesses %
		Count			Dollars			
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	4	30.8%	47.2%	\$235	20.1%	39.7%	90.4%
	Over \$1 Million/ Unknown	9	69.2%	52.8%	\$936	79.9%	60.3%	9.6%
	TOTAL	13	100.0%	100.0%	\$1,171	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	10	76.9%	90.6%	\$682	58.2%	29.0%	
	\$100,001– \$250,000	3	23.1%	4.8%	\$489	41.8%	19.1%	
	\$250,001– \$1 Million	0	0.0%	4.6%	\$0	0.0%	51.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	13	100.0%	100.0%	\$1,171	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	4	100.0%		\$235	100.0%	
		\$100,001– \$250,000	0	0.0%		\$0	0.0%	
		\$250,001– \$1 Million	0	0.0%		\$0	0.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	4	100.0%		\$235	100.0%	

Geographic Distribution of Residential Real Estate Loans Assessment Area: Champaign MSA								
Product Type	Tract Income Levels	2018						Owner-Occupied Units %
		Count			Dollar			
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	3	4.8%	3.7%	131	1.4%	1.8%	4.9%
	Moderate	8	12.7%	12.7%	930	9.7%	8.4%	10.8%
	Middle	37	58.7%	55.6%	5,893	61.3%	54.5%	58.1%
	Upper	15	23.8%	27.9%	2,657	27.6%	35.1%	26.1%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	TOTAL	63	100.0%	100.0%	9,611	100.0%	100.0%	100.0%
Refinance	Low	2	22.2%	6.0%	129	13.5%	4.2%	4.9%
	Moderate	1	11.1%	10.5%	90	9.4%	6.4%	10.8%
	Middle	2	22.2%	56.6%	182	19.0%	55.3%	58.1%
	Upper	4	44.4%	26.3%	555	58.1%	32.8%	26.1%
	Unknown	0	0.0%	0.6%	0	0.0%	1.3%	0.1%
	TOTAL	9	100.0%	100.0%	956	100.0%	100.0%	100.0%

Appendix D (Continued)

Home Improvement	Low	0	0.0%	5.2%	0	0.0%	3.0%	4.9%
	Moderate	0	0.0%	7.3%	0	0.0%	4.9%	10.8%
	Middle	0	0.0%	61.8%	0	0.0%	58.8%	58.1%
	Upper	0	0.0%	25.7%	0	0.0%	33.4%	26.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	21.6%	0	0.0%	38.9%	29.1%
	Moderate	0	0.0%	14.9%	0	0.0%	18.5%	22.9%
	Middle	0	0.0%	45.3%	0	0.0%	16.8%	29.4%
	Upper	0	0.0%	13.5%	0	0.0%	12.9%	12.8%
	Unknown	0	0.0%	4.7%	0	0.0%	12.9%	5.8%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	1.0%	0	0.0%	0.4%	4.9%
	Moderate	0	0.0%	3.0%	0	0.0%	1.3%	10.8%
	Middle	0	0.0%	56.4%	0	0.0%	50.5%	58.1%
	Upper	0	0.0%	39.6%	0	0.0%	47.9%	26.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	3.8%	0	0.0%	1.3%	4.9%
	Moderate	0	0.0%	12.5%	0	0.0%	3.8%	10.8%
	Middle	0	0.0%	55.0%	0	0.0%	72.6%	58.1%
	Upper	0	0.0%	26.3%	0	0.0%	20.3%	26.1%
	Unknown	0	0.0%	2.5%	0	0.0%	2.0%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	13.0%	0	0.0%	8.4%	4.9%
	Moderate	0	0.0%	19.6%	0	0.0%	19.3%	10.8%
	Middle	0	0.0%	48.9%	0	0.0%	49.5%	58.1%
	Upper	0	0.0%	18.5%	0	0.0%	22.8%	26.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	5	6.9%	5.0%	260	2.5%	11.4%	4.9%
	Moderate	9	12.5%	12.0%	1,020	9.7%	10.5%	10.8%
	Middle	39	54.2%	55.6%	6,075	57.5%	45.5%	58.1%
	Upper	19	26.4%	27.0%	3,212	30.4%	29.1%	26.1%
	Unknown	0	0.0%	0.4%	0	0.0%	3.5%	0.1%
	TOTAL	72	100.0%	100.0%	10,567	100.0%	100.0%	100.0%

Geographic Distribution of Residential Real Estate Loans Assessment Area: Champaign MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	3	4.3%	4.8%	325	4.0%	2.9%	4.9%
	Moderate	11	15.9%	10.7%	1,259	15.5%	7.3%	10.8%
	Middle	44	63.8%	57.2%	4,640	57.0%	55.2%	58.1%
	Upper	11	15.9%	27.3%	1,913	23.5%	34.6%	26.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.1%	0.1%
	TOTAL	69	100.0%	100.0%	8,137	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	3.4%	0	0.0%	2.1%	4.9%
	Moderate	1	4.8%	6.3%	51	1.2%	3.6%	10.8%
	Middle	15	71.4%	57.6%	3,116	74.8%	55.8%	58.1%
	Upper	5	23.8%	32.7%	1,001	24.0%	38.5%	26.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	21	100.0%	100.0%	4,168	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	1.8%	0	0.0%	1.7%	4.9%
	Moderate	0	0.0%	8.3%	0	0.0%	6.3%	10.8%
	Middle	0	0.0%	69.6%	0	0.0%	71.9%	58.1%
	Upper	0	0.0%	20.2%	0	0.0%	20.0%	26.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Multifamily	Low	0	0.0%	37.8%	0	0.0%	54.7%	29.1%
	Moderate	0	0.0%	6.7%	0	0.0%	2.7%	22.9%
	Middle	0	0.0%	34.8%	0	0.0%	11.6%	29.4%
	Upper	0	0.0%	15.6%	0	0.0%	25.0%	12.8%
	Unknown	0	0.0%	5.2%	0	0.0%	5.9%	5.8%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	1.7%	0	0.0%	0.8%	4.9%
	Moderate	0	0.0%	9.9%	0	0.0%	4.3%	10.8%
	Middle	0	0.0%	57.9%	0	0.0%	52.4%	58.1%
	Upper	0	0.0%	30.6%	0	0.0%	42.5%	26.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	1	100.0%	4.2%	41	100.0%	4.1%	4.9%
	Moderate	0	0.0%	11.3%	0	0.0%	7.4%	10.8%
	Middle	0	0.0%	62.0%	0	0.0%	51.3%	58.1%
	Upper	0	0.0%	22.5%	0	0.0%	37.3%	26.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	1	100.0%	100.0%	41	100.0%	100.0%	100.0%

Appendix D (Continued)

Purpose Not Applicable	Low	0	0.0%	8.3%	0	0.0%	5.1%	4.9%
	Moderate	0	0.0%	23.6%	0	0.0%	17.7%	10.8%
	Middle	0	0.0%	61.1%	0	0.0%	70.1%	58.1%
	Upper	0	0.0%	6.9%	0	0.0%	7.1%	26.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
HMDA TOTALS	Low	4	4.4%	5.0%	366	3.0%	19.3%	4.9%
	Moderate	12	13.2%	9.2%	1,310	10.6%	4.9%	10.8%
	Middle	59	64.8%	57.3%	7,756	62.8%	41.5%	58.1%
	Upper	16	17.6%	28.4%	2,914	23.6%	32.4%	26.1%
	Unknown	0	0.0%	0.1%	0	0.0%	1.9%	0.1%
	TOTAL	91	100.0%	100.0%	12,346	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans Assessment Area: Champaign MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	1	4.5%	9.7%	\$50	2.3%	9.2%	9.8%
Moderate	0	0.0%	14.4%	\$0	0.0%	19.5%	16.8%
Middle	13	59.1%	44.3%	\$826	37.6%	38.3%	43.5%
Upper	8	36.4%	29.4%	\$1,322	60.1%	29.9%	28.1%
Unknown	0	0.0%	2.3%	\$0	0.0%	3.1%	1.8%
TOTAL	22	100.0%	100.0%	\$2,198	100.0%	100.0%	100.0%

Geographic Distribution of Small Business Loans Assessment Area: Champaign MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	1	7.7%	10.1%	\$50	4.3%	11.0%	10.1%
Moderate	0	0.0%	16.5%	\$0	0.0%	21.8%	17.0%
Middle	10	76.9%	43.6%	\$771	65.8%	38.2%	42.7%
Upper	2	15.4%	27.3%	\$350	29.9%	27.6%	28.5%
Unknown	0	0.0%	2.5%	\$0	0.0%	1.5%	1.7%
TOTAL	13	100.0%	100.0%	\$1,171	100.0%	100.0%	100.0%

GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

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

Community contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or 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; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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 nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders who do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and income of applicants; the amount of loan requested; and the disposition of the application (e.g., approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Appendix E (Continued)

Low-income: 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 geography.

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 metropolitan area/assessment area.

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An 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. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent in the case of a geography.

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

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are secured either by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

Upper-income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more, in the case of a geography.