

PUBLIC DISCLOSURE

August 8, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Wintrust Bank
RSSD# 2239288

231 South LaSalle Street
Chicago, Illinois 60604

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, Illinois 60604-1413

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

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INSTITUTION'S RATING

Wintrust Bank's Overall CRA Rating: Outstanding

Performance Test Rating Table

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

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

* Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating

Summary of Major Factors that Support the Rating

Lending Test:

- Lending levels reflect good responsiveness to assessment area credit needs.
- A high percentage of loans are made in the bank's assessment area.
- The geographic distribution of loans reflects good penetration throughout the assessment area.
- The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses of different sizes.
- The bank exhibits an excellent record of serving the credit needs of low-income individuals and areas and very small businesses.
- The bank is a leader in making community development loans.

- The bank makes extensive use of innovative and/or flexible lending practices in serving assessment area credit needs.

Investment Test:

- The bank made a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those not routinely provided by private investors.
- The bank makes occasional use of innovative and/or complex investments to support community development initiatives.
- The bank exhibits good responsiveness to credit and community development needs.

Service Test:

- Delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its assessment area.
- The bank's record of opening and closing branches has improved the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.
- Services do not vary in a way that inconveniences its assessment area, particularly low- and moderate-income geographies and/or low- and moderate-income individuals.
- The bank is a leader in providing community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Wintrust Bank, headquartered in Chicago, Illinois, is a wholly owned subsidiary of Wintrust Financial Corporation (WTFC) with assets of \$3.9 billion as of June 30, 2016. WTFC is a publicly traded financial holding company headquartered in Rosemont, Illinois with assets of \$24.4 billion as of June 30, 2016. WTFC controls nine Illinois chartered state member banks, one Wisconsin chartered state member bank, and five nationally chartered banks located in Illinois. An affiliate, Wintrust Mortgage Company, originates home mortgage loans throughout the assessment area on behalf of Wintrust Bank.

Wintrust Bank was formerly known as North Shore Community Bank and Trust. The bank changed its name on June 6, 2014 to Wintrust Bank. The bank's main office is located in the downtown area of the city of Chicago, Illinois. In addition to the main office, the bank operates 22 branch locations, two of which are limited service branches (deposit and withdrawal activities only). All bank locations offer full-service automated teller machines (ATMs) and are located in Cook County, Illinois. The bank also operates two cash-only ATMs in Cook County. The bank's services and products are accessible via telephone, website, and mobile banking.

According to the June 30, 2016 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, Wintrust Bank ranked 13th out of 123 FDIC-insured institutions operating in Cook County, Illinois with a market share of 1.2 percent. The top four financial institutions in the county were JPMorgan Chase Bank with 23.3 percent, BMO Harris Bank with 15.0 percent, Bank of America with 13.1 percent, and the Northern Trust Company with 9.8 percent of deposits.

The bank offers a wide variety of non-complex deposit and lending products, as well as standard banking services to consumers and businesses. According to the June 30, 2016 Uniform Bank Performance Report (UBPR), Wintrust Bank is primarily a commercial lender with 74.4 percent by dollar volume of its loan portfolio concentrated in commercial-related lending. Multifamily and 1-4 family residential real estate loans represent 15.6 percent of the loan portfolio by dollar volume.

Composition of Loan Portfolio as of June 30, 2016			
(000's)			
Category	Type	\$	%
Residential Real Estate Secured	1-4 Family Residential	324,689	10.0
	Multi-Family	180,979	5.6
	Total Residential Real Estate Secured	505,668	15.6
Commercial Related Lending	Commercial and Industrial	1,498,278	46.4
	Construction and Land Development - Real Estate Secured	162,576	5.0
	Non-Farm Non-Residential - Real Estate Secured	741,865	23.0
	Total Commercial Related Lending	2,402,719	74.4
Consumer	Loans to Individuals	263,407	8.2
Other	All Other Loans	59,850	1.8
	Total	3,231,644	100.0

Note: Percentages may not total 100.0 percent due to rounding

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

At its previous performance evaluation, conducted on June 2, 2014, the bank was rated Outstanding under the Community Reinvestment Act.

SCOPE OF THE EXAMINATION

Wintrust Bank's performance was evaluated using the Federal Financial Institutions Examination Council's Large Institution CRA Examination Procedures. The CRA performance evaluation assesses the bank's responsiveness and effectiveness in meeting the credit and community development needs of its assessment area. Performance is evaluated within the context of information about the institution including asset size, financial condition, and competitive factors. The economic and demographic characteristics of its assessment area are also considered.

Loan data for years 2014 and 2015 were analyzed and evaluated in the assessment area. Home purchase, refinancing, home improvement, and multifamily loans, in addition to loans to small businesses, were reviewed to determine the percentage of loans originated within the assessment area. The bank's lending performance was compared to the aggregate of all other lenders within the assessment area for 2014 and 2015. Greater weight was given to the bank's performance in small business lending as it comprises a significant portion of the bank's lending activity by number. Mortgage origination efforts are primarily conducted through Wintrust Mortgage, a Wintrust holding company affiliate. Appendix C includes a summary of the scope of the evaluation and Appendix D provides a glossary of key terms used in the evaluation. The examination scope specifically included the following:

Lending in the Assessment Area - Home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA-reportable loans) and loans to small businesses reported under the provisions of Regulation BB – Community Reinvestment (CRA-reportable small business loans) were reviewed for the period beginning January 1, 2014 and ending December 31, 2015.

Geographic Distribution of Lending in the Assessment Area - HMDA-reportable loans, in addition to CRA-reportable small business loans, were analyzed to evaluate the extent to which the institution is making loans in census tracts of different income levels, particularly those designated as low- or moderate-income. Loans were reviewed for the period beginning January 1, 2014 and ending December 31, 2015.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes - HMDA-reportable loans and CRA-reportable small business loans, were analyzed to assess loan distribution among individuals of different income levels and to businesses of different sizes. Loans were reviewed for the period beginning January 1, 2014 and ending December 31, 2015.

Community Development Lending - The number, dollar volume, and complexity of community development loans originated between June 3, 2014 and August 8, 2016 were reviewed to determine the bank's responsiveness to community development lending needs in the assessment area.

Innovative or Flexible Lending Practices – Special lending programs were reviewed to determine the degree to which the bank uses innovative and flexible lending practices to address the credit needs of low-and moderate-income individuals or geographies and small businesses.

Investments - The number and dollar volume of qualified community development investments, including donations, made between June 3, 2014 and August 8, 2016 were evaluated to determine the bank’s responsiveness to community development investment needs in the assessment area, as well as the bank’s uses use of innovative or complex investments, if any, particularly those not typically provided by private investors.

Services - The distribution of the bank's branch offices, types of banking services, hours of operation, availability of loan and deposit products, and the extent to which community development services were provided were reviewed in comparison to community development needs. Services qualified as community development purpose were reviewed for the period beginning June 3, 2014 and ending August 8, 2016.

Interviews were conducted with five community representatives to further understand community credit needs. Individuals contacted represent organizations focused on affordable housing and community services, and with knowledge of the small business needs in the assessment area. Refer to the assessment area performance context section for information from community contacts.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN ILLINOIS METROPOLITAN DIVISION AREA #16974

The bank’s assessment area is located within the Chicago-Naperville-Arlington Heights, Illinois Metropolitan Division (MD) #16974 which includes Cook, DuPage, Grundy, Kendall, McHenry, and Will counties. The MD is part of the larger Chicago-Naperville-Elgin Illinois-Indiana-Wisconsin Metropolitan Statistical Area (MSA) #16980. The bank’s assessment area is primarily in the northern portion of Cook County, Illinois. The assessment area boundaries are Lake Cook Road on the north, Lake Michigan on the east, Interstate 55 and 31st Street on the south, and Interstate 294, Elmhurst Road, and City of Chicago boundary on the west. The area includes the townships of Northfield, New Trier, Maine, and Niles, as well as portions of the City of Chicago north from I-55 and 31st Street extending to the city’s north, east, and western boundaries. In addition to a portion of the City of Chicago, the assessment area includes the municipalities of Evanston, Glencoe, Kenilworth, Lincolnwood, Morton Grove, Northbrook, Skokie, Winnetka, and Wilmette.

The bank expanded its assessment area from the previous performance evaluation as a result of the acquisition of and opening of new branches. On June 9, 2014, the bank purchased ten branches, two of which were located in moderate-income census tracts, from Northbrook Bank & Trust, a Wintrust-affiliated bank. In addition, the bank opened two new branches in Chicago in July 2015 in upper-income census tracts and a third in a moderate-income census tract in May 2016. During the evaluation period, the bank closed one branch with an ATM in an upper-income census tract

and one cash-only ATM in a middle-income census tract. The current assessment area of 597 census tracts includes 105 (17.6 percent) low-income, 137 (22.9 percent) moderate-income, 162 (27.1 percent) middle-income, and 193 (32.3 percent) upper-income census tracts.

Based on 2010 Census information, the assessment area contains 490,707 families, 12.2 percent of whom are living in poverty. In addition, the assessment area contains 995,313 housing units, 46.7 percent of which are owner-occupied. Of the remaining units, 41.9 percent are rental and 11.4 percent are vacant.

Based on family income, low- and moderate-income families represent 43.6 percent of families living in the assessment area. Additionally, businesses with \$1 million or less in total revenue represent 86.3 percent of all businesses located in the assessment area. This suggests opportunities exist for institutions to lend to borrowers of different income levels, as well as businesses of different revenue sizes.

Assessment Area: 2015 Chicago-Naperville-Arlington Hts, IL MD 16974								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	105	17.6	64,928	13.2	21,663	33.4	133,438	27.2
Moderate-income	137	22.9	121,688	24.8	21,434	17.6	80,506	16.4
Middle-income	162	27.1	155,262	31.6	11,654	7.5	81,900	16.7
Upper-income	193	32.3	148,829	30.3	5,227	3.5	194,863	39.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	597	100.0	490,707	100.0	59,978	12.2	490,707	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	128,973	30,707	6.6	23.8	73,704	57.1	24,562	19.0
Moderate-income	225,764	83,598	18.0	37.0	114,328	50.6	27,838	12.3
Middle-income	287,675	157,446	33.9	54.7	105,991	36.8	24,238	8.4
Upper-income	352,901	193,209	41.6	54.7	123,083	34.9	36,609	10.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	995,313	464,960	100.0	46.7	417,106	41.9	113,247	11.4
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	7,167	6.4	6,393	6.5	762	6.1	12	4.8
Moderate-income	14,892	13.3	13,557	13.7	1,308	10.4	27	10.8
Middle-income	27,677	24.8	25,110	25.4	2,521	20.1	46	18.3
Upper-income	62,076	55.5	53,961	54.5	7,949	63.4	166	66.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	111,812	100.0	99,021	100.0	12,540	100.0	251	100.0
	Percentage of Total Businesses:			88.6		11.2		0.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
#		%	#	%	#	%	#	%
Low-income	24	8.6	23	8.7	1	7.1	0	0.0
Moderate-income	35	12.6	32	12.1	3	21.4	0	0.0
Middle-income	60	21.6	55	20.8	5	35.7	0	0.0
Upper-income	159	57.2	154	58.3	5	35.7	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	278	100.0	264	100.0	14	100.0	0	0.0
Percentage of Total Farms:			95.0		5.0		0.0	

2015 FFIEC Census Data & 2015 Dun & Bradstreet information according to 2010 ACS

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

Community Contacts

Representatives from five community organizations familiar with the bank’s assessment area were contacted with respect to the current economic and demographic trends in the assessment area. The need for affordable housing throughout the area was an issue voiced by all contacted parties. One contact noted the need for more banks in the northwest side of Chicago, especially west of Kedzie Avenue. Concerns were raised with the rapid pace of gentrification in the Logan Square area and the significant displacement of low- and moderate income individuals and families due to decreasing availability of affordable housing. Job training and development has become an increasing emphasis among community organizations, especially with respect to computer literacy, as they try to prepare residents to compete in the current employment market. Established small businesses have similarly become displaced due to increasing rents. Another contact also noted the challenge that small and emerging business owners were encountering in accessing capital.

Population

The population in Cook County decreased moderately at 3.4 percent from 2000 to 2010. Cook County’s loss of 182,066 inhabitants was primarily due to a population decrease of 200,418 in the City of Chicago during the same time period. Community contacts indicated that the housing bubble during the mid-2000s contributed to people moving out of the city to the greater metropolitan area. The Chicago-Naperville-Arlington Heights MD grew slightly at 1.8 percent. The State of Illinois population increase of 3.3 percent exceeded, by percentage, only eight other states.

Population Change 2000 and 2010			
Area	2000 Population	2010 Population	Percentage Change
Cook County	5,376,741	5,194,675	-3.4
Chicago-Naperville-Arlington Heights MD	7,135,324	7,262,718	1.8
State of Illinois	12,419,293	12,830,632	3.3
<i>Source: 2000—U.S. Census Bureau: Decennial Census 2010—U.S. Census Bureau: Decennial Census</i>			

Income Characteristics

Median family income in Cook County increased 20.9 percent from 2000 to 2010, which was marginally above the Chicago-Naperville-Arlington Heights MD increase of 20.0 percent; however it was below the 22.8 percent increase for the state of Illinois during the same time period. The increases for each of the three geographic areas noted were below the 25.2 percent increase nationally during the same time period.

Median Family Income Change 2000 and 2010			
Area	2000 Median Family Income	2006-2010 Median Family Income	Percentage Change
Cook County, IL	53,784	65,039	20.9
Chicago-Naperville-Arlington Heights, IL. MD	60,166	72,196	20.0
State of Illinois	55,545	68,236	22.8

*Source: 2000—U.S. Census Bureau: Decennial Census
2006-2010—U.S. Census Bureau: American Community Survey*

Housing Characteristics and Affordability

Cook County had the highest increase by percentage in housing prices with a 72.3 percent growth from 2000 to 2010. In comparison, the Chicago-Naperville-Arlington Heights MD increased by 67.7 percent and the state of Illinois experienced a 58.5 percent increase. There were no significant differences in increases in median gross rents with Cook County at 38.9 percent slightly above the 37.5 percent increase experienced by the Chicago-Naperville-Arlington Heights MD and the 37.9 percent of the state of Illinois.

Trends in Housing Costs 2000 and 2010				
Location	2000 Median Housing Value	2006-2010 Median Housing Value	2000 Median Gross Rent	2006-2010 Median Gross Rent
Cook County, Illinois	154,300	265,800	648	900
Chicago-Naperville-Arlington Heights, IL. MD	159,773	267,990	665	914
State of Illinois	127,800	202,500	605	834

*Source: 2000—U.S. Census Bureau: Decennial Census
2006-2010—U.S. Census Bureau: American Community Survey*

A common method to compare the relative affordability of housing across geographic areas is the affordability ratio. An area with a high ratio generally has more affordable housing than an area with a low ratio (see complete definition in Appendix C). Based on the 2006-2010 American Community Survey, Cook County's affordability ratio is .20, which indicates it is slightly less affordable than the MD which has a ratio of .22. Both the County and the MD are less affordable than the state of Illinois which has an affordability ratio of .28.

Unemployment Conditions

The unemployment rate in Cook County was slightly above the unemployment rate for the state

from 2011 to 2014. The Chicago-Naperville-Arlington Heights, IL MD had an identical rate as the state of Illinois. Overall, each of the areas experienced similar decreasing rates, indicating an improving economy.

Recent Unemployment Rates				
Area	2011	2012	2013	2014
Cook County, IL	10.4	9.3	9.6	7.4
Chicago-Naperville-Arlington Heights, IL MD	10.0	8.9	9.2	7.1
State of Illinois	9.8	8.9	9.2	7.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics (LAUS)

Bankruptcy Trends

According to the Administration Office of the U.S. Courts, the bankruptcy filing rates in Cook County and the Chicago-Naperville-Arlington Heights, IL MD are both higher than the state of Illinois. The county’s personal bankruptcy filing by percentage was 6.5 in 2011, increasing to as high as 6.8 percent in 2013, before returning to 6.5 percent in 2014 displaying no overall improvement. The personal bankruptcy percentage for the MD and the state showed steady declines during the same time period, providing further evidence of the financial struggles in Cook County. The MD decreased slightly during the same period. The State was consistently below the County and the MD in each year of the four year periods.

Personal Bankruptcy Filing Rate (per 1,000 population)				
Area	2011	2012	2013	2014
Cook County, IL.	6.5	6.6	6.8	6.5
Chicago-Naperville-Arlington Heights, IL. MD	6.4	6.3	6.2	5.9
State of Illinois	5.5	5.2	5.1	4.7

Source: Administrative Office of the U.S. Courts

Employment Characteristics

According to the Bureau of Labor Statistics, the Chicago-Naperville-Arlington Heights, IL MD represents 80.0 percent of the Chicago-Naperville-Elgin, IL-IN-WI MSA’s workforce. From February 2014 to February of 2016, there were 120,300 jobs added in the MD with employment in health services increasing by 26,200 or 21.8 percent of the jobs added. Hospitals occupy five of the top nine major non-municipal employer rankings in Cook County, though Allstate Insurance is the largest single employer.

Largest Employers in the Assessment Area

Company	Number of Employees	Industry
Allstate Insurance	13,000	Insurance
University of Illinois-Chicago	11,515	Schools, Universities, and Colleges
Loyola University Medical Center	7,000	Hospitals
Evanston Hospital	6,500	Hospitals
Sears Home and Business Enterprise	6,000	Home Improvements
Northwestern Memorial Hospital	6,000	Hospital
Northern Trust Company	6,000	Banking
John H. Stroger Hospital	6,000	Hospitals
Advocate Christ Medical Center	6,000	Hospitals

Source: InfoUSA

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Wintrust Bank’s performance relative to the Lending Test is rated Outstanding based on lending levels reflecting good responsiveness to the assessment area’s credit needs, a high percentage of the loans made in the bank’s assessment area, the bank’s position as a leader in making community development loans, and an excellent record of serving the credit needs of low-income individuals and areas and very small businesses. In addition, the geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrowers reflects, given the product lines offered, excellent penetration among customers of different income levels and businesses of different sizes.

Level of Lending Activity

Wintrust Bank’s lending levels reflects good responsiveness to the assessment area’s credit needs. During the two years included in this evaluation, the bank originated 1,399 small business loans for \$273.5 million. This reflected an increase of 35.0 percent by number and 22.6 percent by dollar over the previous evaluation period. The bank displayed a significant decrease of 82.5 percent by number and 59.8 percent by dollar in HMDA-reportable lending. The decrease in HMDA-reportable loans was primarily attributed to a structural realignment within the organization that transitioned the bank’s mortgage origination activity and staff to Wintrust Financial Corporation’s mortgage subsidiary, Wintrust Mortgage Company.

The bank's loan origination volume is significant in relation to other CRA-reporters and HMDA-reporters within the assessment area. In 2014, the bank ranked 16th of 163 CRA-reporting institutions in the Chicago-Naperville-Arlington Heights, IL MD, which placed the bank in the 90th percentile of small business lending by such institutions. In the same year, the bank ranked 50th of 655 HMDA-reporting institutions in the assessment area, which placed the bank in the 92nd percentile for HMDA lending.

Summary of Lending Activity Wintrust Bank January 1, 2014-December 31, 2015				
Loan Type	#	%	\$(000s)	%
Home Purchase	238	13.3	93,632	16.3
Multi-Family Housing	73	4.1	155,952	27.2
Refinancing	58	3.2	33,658	5.9
Home Improvement	18	1.0	16,916	2.9
Total HMDA related	387	21.7	300,158	52.3
Total Small Business related	1,399	92.4	273,493	47.7
TOTAL LOANS	1,786	78.3	573,651	100.0
<i>Note: Percentages may not total to 100.0 percent due to rounding</i>				

Assessment Area Concentration

Based on volume and dollar amount, a high percentage of loans were made in the bank's assessment area. During the evaluation period, the bank originated 81.4 percent by number and 66.8 percent of the dollar value of HMDA-reportable and CRA-reportable small business loans in the assessment area. The bank performed slightly better by number and slightly lower by dollar volume when compared to the previous evaluation. Specifically, the bank increased the number of loan originations by 5.5 percent while the dollar value originated in the bank's assessment area decreased by 3.7 percent.

The table below displays the composition of loans originated inside and outside the bank's assessment area during the evaluation period.

Lending Inside and Outside the Assessment Area								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase – Conv.	213	90.3	81,949	87.8	23	9.7	11,394	12.2
Home Purchase – FHA	2	100.0	289	100.0	0	0.0	0	0.0
Refinancing	48	82.8	26,322	78.2	10	17.3	7,326	21.8
Multi-Family Housing	60	82.2	92,037	59.0	13	17.8	63,915	41.0
Home Improvement	16	88.9	15,283	90.3	2	11.1	1,633	9.7
Total HMDA related	339	87.6	215,880	71.9	48	12.4	84,278	28.1
Small Business	1,106	79.6	164,766	61.1	283	20.4	104,751	38.9
Total Small Bus. related	1,106	79.6	164,766	61.1	283	20.4	104,751	38.9
TOTAL LOANS	1,445	81.4	380,646	66.8	331	18.6	189,029	33.2

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

Geographic Distribution of Loans

The geographic distribution of 2014 and 2015 HMDA-reportable and CRA-reportable small business loans reflects good penetration throughout the bank's assessment area. The bank extended financing in 60.3 percent of all the census tracts in the assessment area. The distribution of loans indicated the following lending activity during the two year period: loan originations occurred in 31.4 percent of low-income, 56.9 percent of moderate-income, 58.6 percent of middle-income, and 79.8 percent of upper-income census tracts.

Wintrust Bank's performance, by percentage in 2014 and 2015, was above the aggregate of lenders in HMDA-reportable loans in both low- and moderate-income census tracts and above the percentage of owner-occupied units in moderate-income census tracts. The bank was below the percentage of owner occupied units in low-income census tracts in 2014 and above in 2015. The bank's distribution by percentage of small business loans was above aggregate lender performance in both low- and moderate-income census tracts. The bank's lending also exceeded the percentages of businesses located in both low- and moderate-income census tracts.

HMDA- Reportable Loans

In 2015, home purchases represented 60.9 percent of the bank's HMDA-reportable lending in the assessment area, with refinances representing 10.6 percent, and multi-family representing 20.7 percent. Home improvement loans in 2015 (7.8 percent) experienced an increase in originations from 2014, but will not be analyzed separately in the evaluation due to a low level of originations.

In 2015, the bank originated 17.4 percent of home purchase loans by number and 12.0 percent by dollar amount in low-income census tracts and 20.2 percent by number and 12.9 percent by dollar in moderate-income tracts. The bank's performance in low-income census tracts exceeds aggregate lenders by both number (5.3 percent) and dollar (4.1 percent). The bank's performance by the number of loan originations in low-income census tracts exceeds the percentage (6.6 percent) of owner-occupied units located in the low-income tracts while aggregate lenders performed below assessment area demographics. The bank's performance in moderate-income geographies exceeds aggregate lenders by both number of originations (15.4 percent) and dollar volume (11.2 percent). The bank's performance in moderate-income census tracts exceeds the percentage (18.0) of owner occupied units located in moderate-income geographies by number of loan originations while aggregate lenders performed below assessment area demographics.

The bank originated 23.9 percent of its home purchase loans by number and 25.1 percent by dollar in middle-income census tracts. The bank performance was below aggregate lenders of 29.0 percent by number; however was above the 22.8 percent by dollar volume. The bank was below, by both number and dollar volume, the 33.9 percent of owner-occupied units in middle-income census tracts. The bank originated 38.5 percent by number and 50.0 percent by dollar volume in upper-income census tracts, which was below aggregate lenders performance of 50.3 percent by number and 61.9 percent by dollar in the same tracts.

In 2015, the bank did not originate any refinance loans in low-income census tracts. The aggregate lenders originated 4.6 percent by number and 3.2 percent by dollar, and the percentage of owner occupied units is 6.6 percent. In moderate-income tracts, the bank's 26.3 percent of refinance loans by number and 12.4 percent by dollar exceeds aggregate lenders' performance. Specifically, aggregate lenders originated 13.2 percent by number and 8.8 percent by dollar. The bank's performance in moderate-income census tracts exceeds the percentage (18.0) of owner occupied units located in moderate-income geographies by number of loan originations while aggregate lender's performed below assessment area demographics.

The bank originated 10.5 percent of its refinances by number and 4.1 percent by dollar in middle-income census tracts. The bank performance was below aggregate lenders' 28.6 percent by number and 21.9 by dollar volume and the 33.9 percent of owner-occupied units in middle-income census tracts. The bank originated 63.2 percent by number and 83.6 percent by dollar in upper-income census tracts which was above aggregate lenders' 53.6 percent by number and 66.1 percent by dollar volume.

In 2015, the bank originated 10.8 percent by number and 11.7 by dollar volume of multi-family loans in low-income census tracts. The bank's performance by number was below both aggregate and multi-family units located in low-income census tracts. Specifically, aggregate lenders originated 12.6 percent by number, which is above the number of multi-family units (11.2 percent) located in this census tract. The bank's performance by dollar was similar to aggregate lenders with each being at 11.7 percent and above the demographic of 11.2 percent. The bank's multi-

family lending in moderate-income geographies exceeded both aggregate lenders and multi-family units. The bank originated 37.8 percent by number and 30.7 percent by dollar volume of multi-family loans in moderate-income census tracts. There are 20.4 percent of multi-family units located in these income tracts and aggregate lenders originated 30.7 percent by number and 13.5 percent by dollar volume.

In 2015, the bank originated 29.7 percent by number and 44.5 percent by dollar of multi-family loans in middle-income census tracts. The bank's performance was above both aggregate lenders' 25.6 percent by number and 13.7 percent by dollar volume and the 25.1 percent multi-family units located in middle-income census tracts. The bank originated 21.6 percent by number and 11.7 percent by dollar volume in upper-income census tracts which was below aggregate lenders 31.0 percent by number and 61.0 percent by dollar volume.

In 2014, home purchases represented 66.3 percent of all mortgage loans, with refinance lending representing 18.1 percent, and multi-family representing 14.4 percent. Home improvement represented only 1.3 percent of the bank's HMDA-reportable lending. For home mortgage lending activity, performance in 2014 was generally consistent with performance in 2015. The 2014 HMDA-reportable loan data by tract income is presented in Appendix B. The bank's 2015 HMDA-reportable loan data by tract income is presented in the table below.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2015 Chicago-Naperville-Arlington Hts, IL MD 16974								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2015			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	19	17.4	5.3	4,666	12.0	4.1	6.6
	Moderate	22	20.2	15.4	4,990	12.9	11.2	18.0
	Middle	26	23.9	29.0	9,733	25.1	22.8	33.9
	Upper	42	38.5	50.3	19,427	50.0	61.9	41.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		109	100.0	100.0	38,816	100.0	100.0
Refinance	Low	0	0.0	4.6	0	0.0	3.2	6.6
	Moderate	5	26.3	13.2	1,420	12.4	8.8	18.0
	Middle	2	10.5	28.6	468	4.1	21.9	33.9
	Upper	12	63.2	53.6	9,593	83.6	66.1	41.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		19	100.0	100.0	11,481	100.0	100.0
Home Improvement	Low	0	0.0	6.9	0	0.0	2.7	6.6
	Moderate	0	0.0	15.6	0	0.0	9.2	18.0
	Middle	2	14.3	30.1	892	6.3	20.1	33.9
	Upper	12	85.7	47.4	13,320	93.7	68.0	41.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		14	100.0	100.0	14,212	100.0	100.0
Multi-Family	Low	4	10.8	12.6	8,356	11.7	11.7	11.2
	Moderate	14	37.8	30.7	22,978	32.1	13.5	20.4
	Middle	11	29.7	25.6	31,850	44.5	13.7	25.1
	Upper	8	21.6	31.0	8,360	11.7	61.0	43.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		37	100.0	100.0	71,544	100.0	100.0
HMDA Totals	Low	23	12.8	5.1	13,022	9.6	4.5	6.6
	Moderate	41	22.9	14.6	29,388	21.6	10.4	18.0
	Middle	41	22.9	28.8	42,943	31.6	21.4	33.9
	Upper	74	41.3	51.5	50,700	37.3	63.8	41.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		179	100.0	100.0	136,053	100.0	100.0
Originations & Purchases								
2015 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Loans

Wintrust Bank’s geographic distribution of small business loans reflects good dispersion throughout the assessment area.

In 2015, 6.4 percent of small businesses were located in low-income tracts and 13.3 percent in moderate-income tracts. The bank exceeded aggregate lender performance and the percentage of total business located in low-income tracts. The bank originated 9.8 percent by number in low-income tracts, exceeding the percentages of number of businesses located in low-income census tracts. The bank exhibited the same performance in moderate-income census tracts with 17.1 percent by number of its small business loans extended in such tracts compared to aggregate lender performance of 15.0 percent. The bank’s percentage also was above the total businesses in moderate-income tracts.

The bank’s performance in middle-income census tracts by number at 25.5 percent was below aggregate lenders 29.5 percent; however was comparable to the 24.8 percent of total businesses in such tracts. The bank’s small business lending by number of 47.5 percent in upper-income census tracts was below lender aggregate of 49.4 percent and below the 55.5 percent of total businesses in such tracts.

The bank’s performance in 2014 was generally consistent with performance in 2015. Both the 2014 and 2015 small business lending displayed strong improvement over the previous evaluation period; whereby the percentage small business originations were below both aggregate lender and the percentage of small businesses located in low-and moderate-income census tracts.

Geographic Distribution of Small Business Loans								
Assessment Area: 2015 Chicago-Naperville-Arlington Hts, IL MD 16974								
	Tract Income Levels	Bank & Aggregate Lending Comparison						Total Businesses %
		2015			Dollar			
		Count		Agg	Bank		Agg	
		#	%	%	\$ (000s)	\$ %	\$ %	
Small Business	Low	58	9.8	6.1	5,059	5.6	6.4	6.4
	Moderate	101	17.1	15.0	9,544	10.6	12.5	13.3
	Middle	151	25.5	29.5	18,386	20.3	24.3	24.8
	Upper	281	47.5	49.4	57,432	63.5	56.8	55.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.0			0.0	
	Total		591	100.0	100.0	90,421	100.0	100.0
Originations & Purchases								
2015 FFIEC Census Data & 2015 Dun & Bradstreet information according to 2010 ACS								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

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

Overall, Wintrust Bank's record of lending reflects, given the product lines offered, excellent penetration among borrowers of different income levels and businesses of different sizes. The bank's record of lending demonstrates an adequate penetration among individuals of different income levels including low- and moderate- income individuals and excellent penetration of businesses of different sizes. Greater weight was given to the bank's performance in small business lending as it comprises a significant portion of the bank's lending by number, and mortgage origination efforts are primarily conducted through Wintrust Mortgage.

HMDA- Reportable Loans

The distribution of borrowers reflects an adequate penetration among customers of different income levels. Only home purchase and refinance loans were analyzed for borrower distribution. Home improvement loans represent only 7.8 percent of the bank's total HMDA-reportable lending, and borrower income is not reported for multi-family loans.

In 2015, the bank originated 1.8 percent of home purchase loans by number and 0.7 percent by dollar amount to low-income borrowers and 18.3 percent by number and 7.2 percent by dollar amount to moderate-income borrowers. The bank was below aggregate lenders by number and similar by dollar. Specifically, aggregate lenders originated 4.0 percent by number and 1.5 percent by dollar amount to low-income borrowers. The bank and aggregate lenders performed below assessment area demographics, as 27.2 percent of the families residing in the assessment area are low-income families reflecting the concerns expressed by community contacts regarding the availability of affordable housing. The bank's home purchase lending to moderate-income borrowers was above aggregate lenders by number while similar by dollar amount. Aggregate lenders originated 13.4 percent by number of home purchase loans to moderate-income borrowers and 7.3 percent by dollar amount. The bank outperformed both the aggregate lenders performed and area demographics, as 16.4 percent of the families residing in the assessment area are moderate-income families.

The bank originated 10.1 percent of home purchase loans by number and 5.6 percent by dollar to middle-income borrowers and 58.7 percent by number and 76.9 percent by dollar amount to upper-income borrowers. The bank performance relative to middle-income borrowers was below aggregate lenders who originated 18.4 percent by number and 17.5 percent by dollar. Both the bank and aggregate lender performance by dollar were below the assessment area demographic of 16.7 percent. The bank's home purchase lending to upper-income individuals was above aggregate lenders 48.0 percent by number and 62.4 percent by dollar volume.

The bank originated 11.0 percent of home purchase loans by number and 9.6 percent by dollar to borrowers of unknown income. Aggregate lender performance for like transactions was 16.2 percent by number and 15.4 percent by dollar.

The bank did not originate any refinance loans to low-income borrowers, which is below aggregate and percentage of low-income families. Aggregate lenders originated 3.2 percent by number and 1.3 by dollar amount to low-income borrowers, while the percentage of low-income families was 27.2 percent. The bank's performance by number of originations to moderate-income borrowers was below aggregate and assessment area demographics. Specifically, the bank originated 5.3 percent by number and 0.6 percent by dollar amount to moderate-income borrowers while aggregate lenders originated 8.8 percent by number and 4.4 percent by dollar amount to moderate-income borrowers. Moderate-income families represent 16.4 percent of families by family income.

The bank did not originate any refinance loans to middle-income borrowers; however it originated 78.9 percent by number and 84.1 percent by dollar volume to upper-income borrowers. The bank's performance to middle-income borrowers was below the aggregate lenders 16.1 percent by number and 10.6 percent by dollar, and the 16.7 percent assessment area demographic. The bank's refinance lending to upper-income borrowers was above aggregate lenders 55.2 percent by number and 68.0 percent by dollar volume.

The bank originated 15.8 percent of refinance loans by number and 15.3 percent by dollar to borrowers of unknown income. The aggregate lenders performance for like transactions was 16.7 percent by number and 15.7 percent by dollar.

The bank's 2014 lending performance was similar to the 2015. In 2014, the bank's origination rate for home purchase loans by percentage was below aggregate lender performance in loans to low-income borrowers and comparable to moderate-income borrowers. The bank was also below the percentage of families by family income in both low-and moderate-income census tracts in 2014 and 2015.

Lending data for 2014 is included in Appendix B. The bank's 2015 HMDA-reportable loan data by borrower income is presented below.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2015 Chicago-Naperville-Arlington Hts, IL MD 16974								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison					Families by Family Income %	
		2015			Dollar			
		Count		Agg	Bank			Agg
		#	%	%	\$(000s)	\$ %	\$ %	
Home Purchase	Low	2	1.8	4.0	283	0.7	1.5	27.2
	Moderate	20	18.3	13.4	2,790	7.2	7.3	16.4
	Middle	11	10.1	18.4	2,156	5.6	13.5	16.7
	Upper	64	58.7	48.0	29,856	76.9	62.4	39.7
	Unknown	12	11.0	16.2	3,731	9.6	15.4	0.0
	Total		109	100.0	100.0	38,816	100.0	100.0
Refinance	Low	0	0.0	3.2	0	0.0	1.3	27.2
	Moderate	1	5.3	8.8	67	0.6	4.4	16.4
	Middle	0	0.0	16.1	0	0.0	10.6	16.7
	Upper	15	78.9	55.2	9,653	84.1	68.0	39.7
	Unknown	3	15.8	16.7	1,761	15.3	15.7	0.0
	Total		19	100.0	100.0	11,481	100.0	100.0
Home Improvement	Low	0	0.0	4.6	0	0.0	1.1	27.2
	Moderate	0	0.0	11.7	0	0.0	4.5	16.4
	Middle	1	7.1	19.1	180	1.3	9.5	16.7
	Upper	12	85.7	56.5	12,232	86.1	75.5	39.7
	Unknown	1	7.1	8.1	1,800	12.7	9.5	0.0
	Total		14	100.0	100.0	14,212	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	27.2
	Moderate	0	0.0	0.0	0	0.0	0.0	16.4
	Middle	0	0.0	0.0	0	0.0	0.0	16.7
	Upper	0	0.0	0.0	0	0.0	0.0	39.7
	Unknown	37	100.0	100.0	71,544	100.0	100.0	0.0
	Total		37	100.0	100.0	71,544	100.0	100.0
HMDA Totals	Low	2	1.1	3.6	283	0.2	1.2	27.2
	Moderate	21	11.7	10.9	2,857	2.1	5.2	16.4
	Middle	12	6.7	17.0	2,336	1.7	10.6	16.7
	Upper	91	50.8	50.9	51,741	38.0	58.3	39.7
	Unknown	53	29.6	17.6	78,836	57.9	24.7	0.0
	Total		179	100.0	100.0	136,053	100.0	100.0
Originations & Purchases 2015 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Loans

Wintrust Bank’s distribution of loans reflects an excellent distribution among businesses of different sizes when compared to aggregate lenders and the percentage of small businesses in the assessment area.

In 2015, the bank outperformed aggregate lenders in lending to businesses with revenues of \$1 million or less by number and dollar amount. The bank originated 62.8 percent of small business loans to businesses with revenues of \$1 million or less, and 69.9 percent of these loans were in amounts of \$100,000 or less. Neither the bank nor aggregate lenders met or exceeded the 88.6 percentage of businesses within the assessment area with revenue of \$1 million or less.

The bank’s 2014 lending performance was similar to that in 2015. In 2014 and 2015, the bank’s small business lending in the assessment area significantly exceeded aggregate by number and was slightly above by dollar in loans to businesses with revenues less than \$1 million. These results were similar to the bank’s performance in the previous evaluation period. In both 2014 and 2015, the percentage of loans to businesses with revenues under one million dollars was below the percentage of such businesses in the assessment area

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2015 Chicago-Naperville-Arlington Hts, IL MD 16974									
Product Type		Bank & Aggregate Lending Comparison							
		Count		2015				Total Businesses	
				Dollar		Total			
#	%	Agg %	Bank		Agg \$ %		%		
			\$ 000s	\$ %					
Small Business	Revenue	\$1 Million or Less	371	62.8	44.7	29,158	32.2	27.8	88.6
		Over \$1 Million or Unknown	220	37.2	55.3	61,263	67.8	72.2	11.4
		Total	591	100.0	100.0	90,421	100.0	100.0	100.0
	Loan Size	\$100,000 or Less	413	69.9	92.3	6,930	7.7	26.8	
		\$100,001 - \$250,000	53	9.0	3.2	10,287	11.4	13.3	
		\$250,001 - \$1 Million	125	21.2	4.5	73,204	81.0	60.0	
		Total	591	100.0	100.0	90,421	100.0	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	318	85.7		4,008	13.7		
		\$100,001 - \$250,000	18	4.9		3,243	11.1		
		\$250,001 - \$1 Million	35	9.4		21,907	75.1		
		Total	371	100.0		29,158	100.0		
	Originations & Purchases								
2015 FFIEC Census Data & 2015 Dun & Bradstreet information according to 2010 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

The bank makes extensive use of a number of flexible and innovative lending products in the assessment area. The most notable of these programs, which are structured in a way to specifically meet the needs of low- or moderate-income individuals or small businesses, are described below:

- Every Day Small Dollar Loan - designed as an alternative to “payday lender” type loans; has a maximum loan amount of \$2,500.
- Money Smart CD Secured Loans - “up front funding” with the amount determined by the borrower and repaid in monthly installments. Assists the customer in helping build or establish credit.
- Match Accounts - the bank partnered with a community agency to provide, on a limited basis, matching dollars for participants who successfully achieved the requirements of the community agency program and the bank’s financial education and participation guidelines.
- Portfolio Mortgage Loans - fixed rate loans up to 30 years for qualified borrowers who meet income eligibility limits within the assessment area. The product has a maximum combined loan to value of 105 percent.
- Small Business Overdraft Protection - offers eligible micro businesses (revenues less than one million dollars) overdraft protection up to \$10,000 when incurring short-term cash issues .
- Small Business Easy Access Line of Credit - provides eligible micro business a line of credit up to \$75,000 to cover time periods between expense and revenue shortfalls.
- Easy Access Installment Loan - enables eligible micro businesses to finance fixed assets on a term basis to 36 months with a maximum loan amount of \$75,000 .
- The bank also participates in the Small Business Administration (SBA) 504, 7A, and Express programs.

The following table provides details on the number of transactions regarding some of these programs:

Flexible Lending Programs June 2, 2014 Through August 8, 2016						
Product	Census Tracts					
Consumer	Low	Moderate	Middle	Upper	Total	\$(000)
Everyday Loan	13	57	45	12	127	249
Money Smart CD	4	14	15	7	40	45
Total Consumer	17	71	60	19	167	294
Percentage of Originations	10.2	42.5	35.9	11.4	100.0	N/A
Small Business						
Easy Access Line of Credit	20	44	53	92	209	7,784
Small Business Overdraft	57	116	155	205	533	1,471
Easy Access Micro Loans	7	7	16	14	44	1,557
Small Business Express	2	3	3	12	20	4,928
Small Business 7a	0	2	1	9	12	6,912
Small Business 504	2	4	1	2	9	4,006
Total Small Business	88	176	229	334	827	26,658
Percentage of Originations	10.6	21.3	27.7	40.4	100.0	N/A
Product	Income Levels					
Consumer	Low	Moderate	Middle	Upper	Unknown	Total
Everyday Loan	68	34	10	3	12	127
Money Smart CD	18	11	4	4	3	40
Total Consumer	86	45	14	7	15	167
Percentage of Originations	51.5	26.9	8.4	4.2	9.0	100.0

Community Development Lending

Wintrust Bank is a leader in extending community development loans given the credit and community development needs and opportunities within the assessment area. The bank originated 21 community development loans totaling \$94.3 million during the review period. This represents an increase by dollar amount of \$28.0 million or 42.0 percent over the previous evaluation. Loans included the acquisition and rehabilitation for property for Section 8 tenants and providing a working line of credit for a health facility that provides services primarily for low-and moderate-income individuals. The bank also was involved in revitalization/stabilization efforts in an Enterprise Zone located in a moderate-income census tract in the city of Chicago.

There were two transactions totaling \$6 million that were originated outside of the assessment area with one located in a low-income census tract and the other in a moderate-income tract within Cook County. Because the bank has been responsive to community development needs and opportunities in its assessment area, these loans outside of the assessment area were given additional consideration.

The following table presents a summary of the bank's community development loans by purpose.

Qualified Community Development Loans June 2, 2014- August 8, 2016											
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize & Stabilize		Total		
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	% of Total \$
Chicago	13	44,556	5	23,260	2	25,000	1	1,450	21	94,267	100.0

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

INVESTMENT TEST

Wintrust Bank's performance relative to the Investment Test is rated High Satisfactory based on the significant level of qualified investments and grants throughout the assessment area, occasionally in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives, and exhibited excellent responsiveness to credit and community development needs.

Qualified investments for the review period totaled \$21.4 million. New investments totaled \$11.1 million, including an unfunded portion of \$4.0 million. There were 14 prior period commitments with outstanding balances of \$6.3 million at the end the evaluation period. A number of the investments, especially those made for affordable housing, had multiple disbursements throughout the evaluation period. As the following chart indicates, the majority of the investments, by number and dollar, were made for affordable housing which each of the community contacts indicated was a priority need in the assessment area.

Qualified Community Development Investments June 2, 2014-August 8, 2016								
Type of Investment	Prior Period Investments		Current Period Disbursements		Total Investments		Unfunded Commitments	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)
Affordable Housing	4	2,085	12	8,854	13	10,942	3	3,522
Economic Development	6	3,554	6	1,846	6	5,400	2	464
Revitalization and Stabilization	2	575	0	0	2	575	0	0
Community Services	2	108	5	400	7	508	0	0
Total	14	6,322	23	11,101	28	17,423	5	3,986

The bank also made 276 grants and donations totaling \$955,814. Services for low- and moderate-income individuals provided by the recipient organizations included transitional and emergency housing, affordable medical care, and youth programs.

SERVICE TEST

Wintrust Bank's performance relative to the Service Test is rated Outstanding. The bank's delivery systems are readily accessible to geographies and individuals of different income levels in its assessment area. Business hours and services do not vary in a way that inconveniences the needs of its assessment area, particularly low- and moderate-income census tracts or low- and moderate-income individuals. The bank's record of opening and closing branch offices has improved the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals. The bank is a leader in providing community development services.

Retail Services

Wintrust Bank operates 23 bank locations; two of which are limited service drive-up facilities. The bank offers a wide range of products and services including commercial, real estate, small business, and consumer loan products. Deposit and loan offerings include products that are accessible for low- and moderate-income individuals and small businesses. Product availability, pricing and underwriting are consistent at all full service bank branch facilities. The bank branches located in the Logan Square and Pilsen neighborhoods are staffed with bilingual employees.

Office lobby hours are generally 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 1:00 p.m. on Saturday. Extended hours are available through drive-up facilities. In addition, customers can access bank services without cost through telephone, online banking, mobile banking, and through affiliate surcharge free automated teller machines (ATMs). Bank and affiliate mortgage company officers are available to meet with customers at their place of business or by appointment at their local branch for consumer, residential real estate, and small business loan applications and originations.

Bank customers have access to the entire network of Wintrust ATMs. ATM services are provided through the Allpoint and MoneyPass networks, allowing customers access to a network of surcharge free ATMs. Allpoint has over 55,000 ATMs including locations in major retail establishments, complemented by MoneyPass which has over 24,000 ATMs. The bank markets itself through a series of retail mailings, small business mailings, and newspaper advertisements in the bank’s deposit area, as well as various grand opening events. The bank also conducts outreach to local community groups and calling programs to local businesses executed by the community banking team.

The following table illustrates the bank branch and ATM geographic distribution.

Distribution of Branches and ATMs In the Assessment Area (2010 Census)						
Tract Income Level	Number Of Branches	Percentage Of Branches	Number Of ATMs	Percentage Of ATMs	Percentage Of Total Families	Percentage Of Businesses
Low-Income	0	0.0	0	0.0	13.2	6.6
Moderate-Income	3	13.0	3	12.0	24.8	13.5
Middle-Income	6	26.1	7	28.0	31.6	24.9
Upper-Income	14	60.9	15	60.0	30.3	55.0
Total	23	100.0	25	100.0	100.0	100.0

Community Development Services

Wintrust Bank is a leader in providing community development services in the assessment area. Officers and staff were involved with 76 organizations, not including in-office and educational facility located services, providing 4,973 hours of community development services throughout the assessment area. Community development services included serving on the board of a Community Development Financial Institution credit union, providing business expertise on the finance committee of a community development business alliance, and as board president of an organization that provides services for the disabled. Employees also participated in a number of

First Time Homebuyer and Money Smart outreach sessions and assisted a non-profit in obtaining a Federal Home Loan Bank Affordable Housing Program grant.

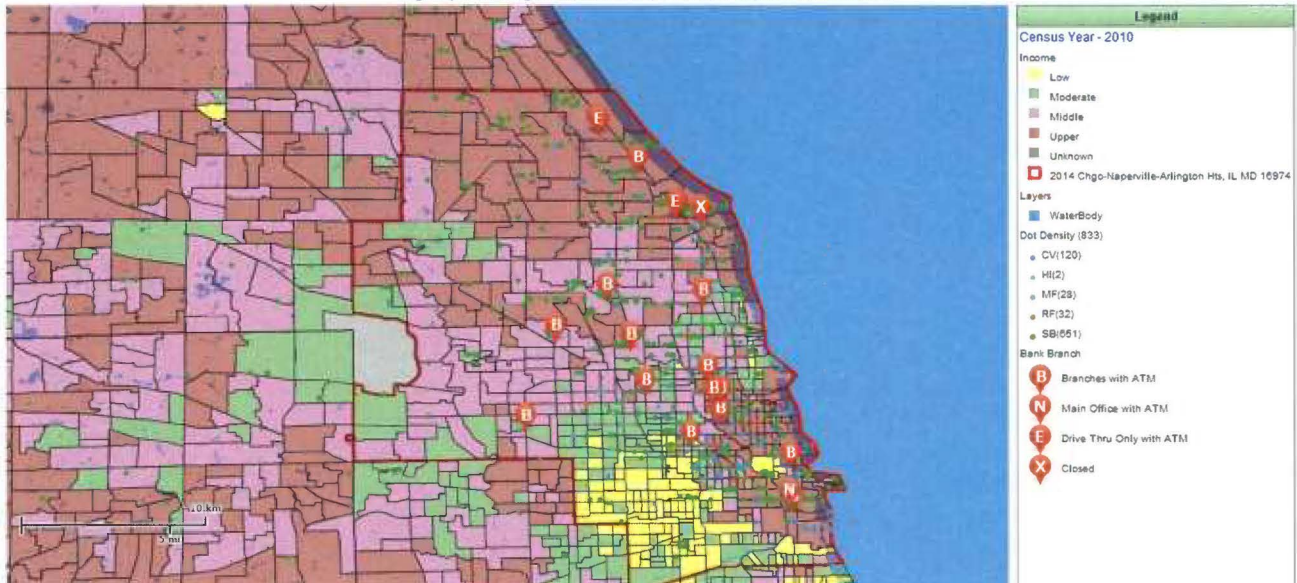
Fair Lending or Other Illegal Credit Practices Review

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

APPENDIX A- MAP OF ASSESSMENT AREA

Restricted FR

2239288 Wintrust Bank
Chgo-Naperville-Arlington Hts, IL MD 16974, 2014 Income Map with Branches & Loans



APPENDIX B – 2014 LENDING TABLES

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2014 Chicago-Naperville-Arlington Hts, IL MD 16974								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison					Owner Occupied % of Units	
		2014			Dollar			
		Count		Agg	Bank			Agg
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	7	6.6	5.0	1,081	2.5	3.6	6.6
	Moderate	20	18.9	14.9	3,986	9.2	10.6	18.0
	Middle	9	8.5	28.9	3,006	6.9	22.5	33.9
	Upper	70	66.0	51.1	35,349	81.4	63.3	41.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		106	100.0	100.0	43,422	100.0	100.0
Refinance	Low	1	3.4	5.3	503	3.4	3.6	6.6
	Moderate	7	24.1	14.5	1,398	9.4	9.6	18.0
	Middle	2	6.9	29.2	586	3.9	22.3	33.9
	Upper	19	65.5	51.0	12,354	83.2	64.5	41.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		29	100.0	100.0	14,841	100.0	100.0
Home Improvement	Low	0	0.0	7.3	0	0.0	3.2	6.6
	Moderate	0	0.0	19.2	0	0.0	10.8	18.0
	Middle	1	50.0	33.1	71	6.6	22.6	33.9
	Upper	1	50.0	40.5	1,000	93.4	63.4	41.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		2	100.0	100.0	1,071	100.0	100.0
Multi-Family	Low	1	4.3	11.3	430	2.1	13.6	11.2
	Moderate	8	34.8	32.0	6,767	33.0	18.7	20.4
	Middle	8	34.8	28.5	4,500	22.0	19.8	25.1
	Upper	6	26.1	28.1	8,796	42.9	47.8	43.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		23	100.0	100.0	20,493	100.0	100.0
HMDA Totals	Low	9	5.6	5.3	2,014	2.5	4.7	6.6
	Moderate	35	21.9	15.2	12,151	15.2	11.1	18.0
	Middle	20	12.5	29.1	8,163	10.2	22.1	33.9
	Upper	96	60.0	50.3	57,499	72.0	62.0	41.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		160	100.0	100.0	79,827	100.0	100.0
Originations & Purchases 2014 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Geographic Distribution of Small Business Loans								
Assessment Area: 2014 Chicago-Naperville-Arlington Hts, IL MD 16974								
	Tract Income Levels	Bank & Aggregate Lending Comparison					Total Businesses	
		2014						
		Count		Agg	Dollar			Agg
		Bank			Bank	Agg		
#	%	%	\$ (000s)	\$ %	\$ %	%		
Small Business	Low	41	7.8	5.8	4,151	5.3	6.9	6.6
	Moderate	79	15.0	14.4	3,985	5.1	12.5	13.5
	Middle	127	24.2	29.0	14,252	18.2	25.1	24.9
	Upper	278	53.0	50.9	55,933	71.4	55.5	55.0
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			0.0			0.0	
	Total	525	100.0	100.0	78,321	100.0	100.0	100.0
Originations & Purchases 2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2014 Chicago-Naperville-Arlington Hts, IL MD 16974								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2014						
		Count		Dollar				
		Bank #	Agg %	Bank \$(000s)	Agg \$ %	Bank \$ %	Agg \$ %	
Home Purchase	Low	5	4.7	4.2	496	1.1	1.4	27.2
	Moderate	12	11.3	12.9	1,277	2.9	6.6	16.4
	Middle	10	9.4	17.1	1,996	4.6	12.1	16.7
	Upper	69	65.1	48.5	32,663	75.2	63.7	39.7
	Unknown	10	9.4	17.3	6,990	16.1	16.1	0.0
	Total	106	100.0	100.0	43,422	100.0	100.0	100.0
Refinance	Low	0	0.0	5.5	0	0.0	2.4	27.2
	Moderate	5	17.2	10.6	725	4.9	5.4	16.4
	Middle	0	0.0	16.8	0	0.0	11.1	16.7
	Upper	18	62.1	52.7	11,432	77.0	66.8	39.7
	Unknown	6	20.7	14.4	2,684	18.1	14.3	0.0
	Total	29	100.0	100.0	14,841	100.0	100.0	100.0
Home Improvement	Low	0	0.0	6.3	0	0.0	1.5	27.2
	Moderate	1	50.0	13.9	71	6.6	5.0	16.4
	Middle	0	0.0	16.4	0	0.0	7.9	16.7
	Upper	0	0.0	44.3	0	0.0	65.5	39.7
	Unknown	1	50.0	19.1	1,000	93.4	20.1	0.0
	Total	2	100.0	100.0	1,071	100.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	27.2
	Moderate	0	0.0	0.0	0	0.0	0.0	16.4
	Middle	0	0.0	0.0	0	0.0	0.0	16.7
	Upper	0	0.0	0.0	0	0.0	0.0	39.7
	Unknown	23	100.0	100.0	20,493	100.0	100.0	0.0
	Total	23	100.0	100.0	20,493	100.0	100.0	100.0
HMDA Totals	Low	5	3.1	4.6	496	0.6	1.6	27.2
	Moderate	18	11.3	11.7	2,073	2.6	5.5	16.4
	Middle	10	6.3	16.6	1,996	2.5	10.4	16.7
	Upper	87	54.4	49.1	44,095	55.2	58.0	39.7
	Unknown	40	25.0	17.9	31,167	39.0	24.5	0.0
	Total	160	100.0	100.0	79,827	100.0	100.0	100.0
Originations & Purchases 2014 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Small Business Lending By Revenue & Loan Size									
Assessment Area: 2014 Chicago-Naperville-Arlington Hts, IL MD 16974									
Product Type		Bank & Aggregate Lending Comparison							
		Count		2014				Total Businesses	
		Bank	Agg	Dollar		Agg	%		
#	%	%	\$ 000s	\$ %	\$ %	%			
Small Business	Revenue	\$1 Million or Less	321	61.1	39.0	25,256	32.2	28.7	86.3
		Over \$1 Million or Unknown	204	38.9	61.0	53,065	67.8	71.3	13.7
		Total	525	100.0	100.0	78,321	100.0	100.0	100.0
	Loan Size	\$100,000 or Less	356	67.8	91.4	5,866	7.5	25.0	
		\$100,001 - \$250,000	63	12.0	3.6	11,996	15.3	14.6	
		\$250,001 - \$1 Million	106	20.2	4.9	60,459	77.2	60.4	
		Total	525	100.0	100.0	78,321	100.0	100.0	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	263	81.9		3,006	11.9		
		\$100,001 - \$250,000	26	8.1		4,721	18.7		
		\$250,001 - \$1 Million	32	10.0		17,529	69.4		
		Total	321	100.0		25,256	100.0		
	Originations & Purchases								
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS									
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>									

APPENDIX C - Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED June 2, 2014-August 8, 2016	There are different time periods for lending and community development activities Loan activities for the year 2014-2015 Community Development Activities June 2, 2014- August 8, 2016		
FINANCIAL INSTITUTION Wintrust Bank			PRODUCTS REVIEWED HMDA reportable loans Small Business Loans Community Development Loans
AFFILIATE(S) Not reviewed	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
None			
IDENTIFICATION OF ASSESSMENT AREAS			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Chicago-Naperville-Arlington Heights, Illinois MD #16974	Full Review	1800 S. Blue Island, Chicago, Illinois	N/A

APPENDIX D- Glossary

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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

Area Median Income (AMI): AMI means –

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

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

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

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

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

Census tract: Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of

metropolitan statistical areas. They usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

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

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

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

5. Loans, investments, and services that –
 - i. Support, enable or facilitate projects or activities that meet the “eligible uses” criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
 - ii. Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees, and
 - iii. Benefit low-, moderate-, middle-income individuals and geographies in the bank’s assessment area(s) or areas outside the bank’s assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married couple family or other family, which is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

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

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

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

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

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Income Level: Income level means:

- 1) Low-income – an individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a census tract;
- 2) Moderate-income – an individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent in the case of a census tract;
- 3) Middle-income – an individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent in the case of a census tract; and
- 4) Upper-income – an individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent in the case of a census tract.

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

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

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

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

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

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

Nonmetropolitan area: This term refers to any area that is not located in a metropolitan statistical area or metropolitan division. Micropolitan statistical areas are included in the definition of a nonmetropolitan area; a micropolitan statistical area has an urban core population of at least 10,000 but less than 50,000.

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.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

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

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

Small Bank: This term refers to a bank that as of December 31 of either of the prior two calendar years, had assets of less than \$1.226 billion. Intermediate small bank means a small bank with assets of at least \$307 million as of December 31 of both of the prior two calendar years and less than \$1.226 billion as of December 31 of either of the prior two calendar years.

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

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

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

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