

PUBLIC DISCLOSURE

April 25, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Pacific Global Bank
RSSD# 2360904

2323 South Wentworth Avenue
Chicago, Illinois, 60616

Federal Reserve Bank of Chicago

230 South LaSalle Street
Chicago, IL 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.

TABLE OF CONTENTS

PERFORMANCE EVALUATION2

SCOPE OF EXAMINATION2

DESCRIPTION OF INSTITUTION.....3

 DESCRIPTION OF ASSESSMENT AREA4

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA.....9

 LENDING TEST9

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW15

APPENDIX A - MAP OF ASSESSMENT AREA16

APPENDIX B - SCOPE OF EXAMINATION17

APPENDIX C - GLOSSARY18

APPENDIX D - 2013 LENDING TABLES.....21

BANK'S CRA RATING

Pacific Global Bank is rated Satisfactory.

Pacific Global Bank is meeting the credit needs of its community based on an analysis of its lending activities. The loan-to-deposit ratio is reasonable given the bank's size, financial condition, and credit needs of the assessment area. A majority of home mortgage loans were originated inside the assessment area. Loans reflect reasonable geographic distribution throughout the assessment area. Similarly, the borrower distribution reflects reasonable distribution of loans among individuals of different income levels. Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

Pacific Global Bank's performance was evaluated using the Federal Financial Institutions Examinations Council's (FFIEC) Small Institution Examination Procedures. Performance was evaluated in the context of information about the institution and its assessment area, such as asset size, financial condition, competition, economic, and demographic characteristics. Performance in the assessment area was evaluated using a streamlined assessment method for small banks based on the following performance criteria:

- ***Loan-to-Deposit Ratio*** – A 16 quarter average loan-to-deposit ratio, from December 31, 2011 through September 30, 2015, was calculated for the bank and compared to its national peer group and a sample of local competitors;
- ***Lending in the Assessment Area*** – The bank's Home Mortgage Disclosure Act (HMDA)-reportable loans originated from January 1, 2013 through December 31, 2014 were reviewed to determine the percentage of loans originated in the assessment area;
- ***Geographic Distribution of Lending in the Assessment Area*** - The bank's HMDA-reportable loans originated in the assessment area, from January 1, 2013 through December 31, 2014, were analyzed to determine the extent to which the bank is making loans in geographies of different income levels, particularly those designated as low- and moderate-income;
- ***Lending to Borrowers of Different Income*** - The bank's HMDA-reportable loans originated in the assessment area, from January 1, 2013 through December 31, 2014, were reviewed to determine the distribution among borrowers of different income levels, particularly those considered low- or moderate-income; and
- ***Response to Substantiated Complaints*** – Neither Pacific Global Bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

DESCRIPTION OF INSTITUTION

Pacific Global Bank is a subsidiary of PGB Holdings, Inc., a one-bank holding company located in Chicago, Illinois. The bank is a minority-owned, certified Community Development Financial Institution (CDFI). The bank has been certified with the CDFI designation since 2004. The United States Department of Treasury grants the CDFI designation to organizations that meet, among other requirements, a primary mission of promoting community development. As the result of various CDFI efforts, the bank has received Bank Enterprise Awards from the Department of Treasury. The Bank Enterprise Award Program was created in 1994 to support FDIC-insured financial institutions around the country that are dedicated to financing and supporting community and economic development activities. Additionally, the bank has received other awards for its continued support in the low- and moderate-income communities within its assessment area.

Pacific Global Bank operates three branches (including the main office). The main office is located in Chicago, Illinois in the Chinatown neighborhood, which is approximately three miles south of downtown Chicago. Two full-service branch offices are also located in Chicago; one in Chinatown and one in McKinley Park. All offices operate full service ATMs. The bank's main office and two branch offices are located in the Chicago-Naperville-Arlington Heights, IL Metropolitan Division (MD#16974). Pacific Global bank has not opened or closed any branches or ATMs since the previous CRA evaluation, dated February 6, 2012.

The bank offers a full range of traditional deposit and loan products and services to meet the banking needs of consumers, businesses, and other entities operating in its assessment area. Deposit products include checking, savings, money market, and certificates of deposit. Loan products include secured and unsecured consumer loans and lines of credit, home equity loans and lines of credit, construction loans, residential real estate loans, commercial loans and lines of credit, and loans secured by commercial real estate. Pacific Global Bank offers telephone and online banking through its website, pacificglobalbank.com. The bank's website offers general information on loan and deposit product offerings, as well as, online banking capabilities such as account transfer and bill pay.

According to the Uniform Bank Performance Report, Pacific Global Bank's assets totaled \$170.6 million, as of December 31, 2015. The bank's loan portfolio is primarily comprised of residential real estate and commercial loans at 79.6 and 21.1 percent, respectively. The table below depicts the bank's loan portfolio composition as of December 31, 2015.

Composition of Loan Portfolio as of December 31, 2015 (\$ are in 000s)		
Type	\$	%
Residential Real Estate	100,245	79.6
Commercial	26,587	21.1
Agricultural	0	0.0
Consumer	1	0.0
Other	10	0.0
Total	126,843	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

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

The bank was rated Satisfactory under the CRA at its previous evaluation conducted on February 6, 2012.

DESCRIPTION OF ASSESSMENT AREA

The bank maintains one assessment area consisting of 35 census tracts (9 low-income; 21 moderate-income; 4 middle-income; and 1 upper-income census tract) located in the Chicago-Naperville-Arlington Heights MD - #16974. Of the three bank offices, two are located in low-income census tracts (includes the main office), and one is located in a moderate-income census tract.

The bank's assessment area has changed since the previous examination; however, the changes are due to the 2010 US Census adjustments. These changes resulted in a decrease of moderate-income census tracts (from 33 to 21), a decrease of middle-income census tracts (from 6 to 4), and an increase of upper-income census tracts (from 0 to 1).

According to the June 30, 2015 FDIC Deposit Market Share Report, Pacific Global Bank ranked 78th out of 132 FDIC-insured institutions with a presence in Cook County. The bank held \$147.8 million in deposits, representing 0.1 percent of the total deposit market share in the county. Based on the market share report, the largest market share belongs to J.P Morgan Chase Bank N.A (24.9 percent), BMO Harris Bank N.A (13.6 percent), and Bank of America (13.4 percent). Select demographics of the assessment area are presented in the following table.

Assessment Area: 2014 Chgo-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	9	25.7	6,414	23.8	1,810	28.2	11,429	42.5
Moderate-income	21	60.0	17,358	64.5	3,345	19.3	5,612	20.9
Middle-income	4	11.4	2,835	10.5	419	14.8	4,793	17.8
Upper-income	1	2.9	306	1.1	0	0.0	5,079	18.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	35	100.0	26,913	100.0	5,574	20.7	26,913	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low -income	10,887	3,696	20.2	33.9	5,312	48.8	1,879	17.3
Moderate-income	27,369	11,586	63.3	42.3	12,083	44.1	3,700	13.5
Middle-income	5,836	2,601	14.2	44.6	2,530	43.4	705	12.1
Upper-income	614	429	2.3	69.9	109	17.8	76	12.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	44,706	18,312	100.0	41.0	20,034	44.8	6,360	14.2
	Total Businesses Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low -income	779	27.5	644	27.2	83	25.8	52	35.4
Moderate-income	1,613	56.9	1,351	57.1	191	59.3	71	48.3
Middle-income	430	15.2	360	15.2	47	14.6	23	15.6
Upper-income	13	0.5	11	0.5	1	0.3	1	0.7
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	2,835	100.0	2,366	100.0	322	100.0	147	100.0
	Percentage of Total Businesses:			83.5	11.4		5.2	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low -income	4	33.3	4	33.3	0	0.0	0	0.0
Moderate-income	7	58.3	7	58.3	0	0.0	0	0.0
Middle-income	1	8.3	1	8.3	0	0.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	12	100.0	12	100.0	0	0.0	0	0.0
	Percentage of Total Farms:			100.0	0.0		0.0	
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>								

Population Change

According to 2010 U.S. Census Bureau data, the population of the assessment area is 121,629. The population of the assessment area has remained stable, as the area has experienced a loss of only 207 people. Conversely, Cook County has experienced a 3.4 percent decrease in population, while the Chicago-Naperville-Arlington Heights, IL MD and State of Illinois have grown at 1.8 and 3.3 percent, respectively. The following table presents population data for the assessment area, Cook County, Chicago-Naperville-Arlington Heights, IL MD, and the State of Illinois.

Population Change 2000 and 2010			
Area	2000 Population	2010 Population	Percentage Change (%)
Assessment Area	121,629	121,422	-0.2
Cook County, IL	5,376,741	5,194,675	-3.4
Chicago-Naperville-Arlington Heights, IL MD	7,135,324	7,262,718	1.8
State of Illinois	12,419,293	12,830,632	3.3

*Source: 2000—U.S. Census Bureau: Decennial Census
2010—U.S. Census Bureau: Decennial Census*

Income Characteristics

Based on 2010 U.S. Census Bureau data, the median family income (“MFI”) in the assessment area was \$42,286. The American Community Survey Census Bureau estimates show that the MFI for the assessment area has increased 10.7 percent since 2000. The increases observed in Cook County, the Chicago-Naperville-Arlington Heights, IL MD, and throughout the State of Illinois were appreciably greater at 20.9, 20.0, and 22.8 percent, respectively. Overall, the median family income in the assessment area is the lowest among all relevant geographies.

Median Family Income Change 2000 and 2010			
Area	2000 Median Family Income (\$)	2006-2010 Median Family Income (\$)	Percentage Change (%)
Assessment Area	38,189	42,286	10.7
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

Based on 2006-2010 American Community Survey data, the assessment area has 44,706 housing units. Of those housing units, 41.0 percent are owner-occupied, 44.8 percent are rental, and 14.2

percent are vacant. Between the 2000 U.S. Census and the 2006-2010 American Community Survey, the median housing value in the assessment area increased by 90.5 percent while median gross rent increased by 48.8 percent. Those increases were above the increases observed in Cook County, the Chicago-Naperville-Arlington Heights, IL MD, and the State of Illinois. However, according to community representatives, while housing values have increased in the assessment area, some communities are still farther behind the recovery of the county and the State of Illinois. Representatives indicated that home values continue to be a big barrier impacting lending activities in certain communities. The contact mentioned that low loan-to-value requirements and low home values continue to make it difficult for individuals to finance properties.

A common method to compare relative affordability of housing across geographic areas is the affordability ratio, which is defined in Appendix C-Glossary. A higher ratio supports more affordable housing opportunities. Based on the 2006-2010 American Community Survey data, the affordability ratio for the assessment area is .16 compared to ratios observed in Cook County (.20), the Chicago-Naperville-Arlington Heights, IL MD (.22), and the State of Illinois (.28). Overall, housing is the least affordable within the assessment area, compared to the other geographies.

New housing permits have increased year-over-year amongst all geographies between 2012 and 2014 (the most recent year available); however, the rate of growth has decreased within the same time period. Specifically, growth rates in Cook County, the Chicago-Naperville-Arlington Heights, IL MD, and the State of Illinois decreased from 37.5, 28.6, and 25.3 percent in 2012 (respectively); to 5.7, 8.4, and 7.0 percent in 2014 (respectively). The year-over-year decrease in new housing permits demonstrates the stabilization of economic conditions across all applicable geographies.

The Federal Reserve Bank of Chicago conducted a study on changes in foreclosure inventory rates at the county level. The foreclosure inventory rate measures the number of residential properties in some phase of foreclosure. It excludes properties that have completed the foreclosure cycle. The foreclosure inventory rates in the State of Illinois have decreased since the previous performance evaluation. Specifically, foreclosure inventory rates have decreased from 5.6 percent in December 2012 to 2.2 percent in December 2014. During the same time period, Cook County foreclosure inventory rates have decreased from 6.7 percent to 2.5 percent. According to community representatives, foreclosure rates have improved, filling rates are down, and many areas are back to pre-recession levels. Community groups are seeing fewer customers for foreclosure prevention; however, many foreclosed properties remain in the pipeline, which will continue to impact the surrounding communities.

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 (\$)
Assessment Area	128,890	245,549	516	768
Cook County, IL	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*

Unemployment Conditions

The U.S Bureau of Labor Statistics provided unemployment statistics for all applicable geographies from 2011 to 2014. As noted in the table below, the unemployment rate in Cook County has dropped from 10.4 percent in 2011 to 7.4 percent in 2014; while the Chicago-Naperville-Arlington Heights, IL MD and the State of Illinois have seen similar drops (from 10.0 to 7.1 percent and 9.8 to 7.1 percent, respectively). According to community representatives, while unemployment figures have decreased, the current issues impacting the area include under employment, low wages, and reduced hours. Representatives indicated that access to training for sustainable positions is also a need within surrounding communities. The table below provides full unemployment figures.

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

Employment Conditions

Based on data collected by the U.S. Department of Labor, the majority of the assessment area's employment is in insurance, hospitals, and schools. Due to the urban nature of the assessment area, there are multiple organizations with more than 6,000 employees. The following table illustrates some of the largest employers in Cook County.

Largest Employers in the Assessment Area		
Company	Number of Employees	Industry
Allstate Insurance	13,000	Insurance
University Of Illinois-Chicago	11,515	Schools-Universities & Colleges Academic
University Of Chicago	8,534	Schools-Universities & Colleges Academic
Johnston R Bowman Health Center	8,000	Hospitals
Loyola University Medical Center	7,000	Hospitals
Evanston Hospital	6,500	Hospitals
Sears Home & Business Franchises	6,000	Home Improvements
Northwestern Memorial Hospital	6,000	Hospitals
Northern Trust Corp.	6,000	Holding Companies (Bank)
<i>Source: InfoUSA</i>		

Community Representatives

Information obtained from two community representatives within the assessment area was considered to better understand the credit needs and economic conditions of the communities where the bank operates. Representatives stated there is a need for more access to entry level banking products and credit building products for the un-banked. Individuals continue to need partnerships with community groups to obtain conventional lending in surrounding areas. Additional assessment area needs include access to small business capital, affordable housing, and for small dollar loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Pacific Global Bank is meeting the credit needs of its community based on an analysis of its lending activities. The loan-to-deposit ratio is reasonable given the bank's size, financial condition, and credit needs of the assessment area. A majority of home mortgage loans were originated inside the assessment area. Loans reflect reasonable geographic distribution throughout the assessment area. Similarly, the borrower distribution reflects reasonable distribution of loans among individuals of different income levels. Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous evaluation.

Loan-to-Deposit Ratio

The bank's loan-to-deposit ratio (LTD) is reasonable given the bank's size, financial condition, and assessment area credit needs. The following table shows a 16-quarter average ending September 30, 2015. The figures compare the bank's performance to the bank's National Peer Group and select local competitors. Overall, the bank's average LTD ratio (82.4 percent) was higher than the National Peer Group (73.4 percent) and comparable to local competitors. Ultimately, the LTD ratio indicates the bank is actively reinvesting deposits into the community through the origination of loans.

Comparative Loan-to-Deposit Ratios	
Institution	Loan-to-Deposit Ratio (%)
	16 – Quarter Average
Pacific Global Bank	82.4
National Peer Group	73.4
Competitors	
Byline Bank	63.6
Cathay Bank	96.6
International Bank of Chicago	68.1
Lakeside Bank	96.5
Marquette Bank	71.7
Pulaski Savings Bank	59.2
South Central Bank NA	57.6

Assessment Area Concentration

A majority of loans were made in the assessment area. Considering total HMDA-reportable loans, 71.6 percent (by volume) of loans were originated in the assessment area. These lending concentrations within the assessment area indicate that the bank is attuned to the credit needs of its community.

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	2	50.0	\$95	64.6	2	50.0	\$52	35.4
Home Purchase - Conventional	199	72.6	\$26,312	71.8	75	27.4	\$10,350	28.2
Multi-Family Housing	5	83.3	\$954	92.0	1	16.7	\$83	8.0
Refinancing	1	20.0	\$145	16.0	4	80.0	\$760	84.0
Total HMDA related	207	71.6	\$27,506	71.0	82	28.4	\$11,245	29.0

Geographic Distribution of Loans

The geographic distribution of HMDA-reportable lending reflects reasonable dispersion throughout the assessment. Analysis of the bank's performance within the product categories was aggregated given the volume of loans is primarily concentrated in home purchase loans.

In 2014, the bank originated 29.3 percent of its HMDA-reportable loans within low-income geographies. The bank's performance exceeded the aggregate of lenders at 16.7 percent and the percentage of owner occupied housing units at 20.2 percent. Within moderate-income geographies, Pacific Global Bank originated 62.6 percent of its HMDA-reportable loans. The bank's performance is comparable to the aggregate of lenders at 59.5 percent and the percentage of owner occupied housing units at 63.3 percent.

In 2013, the bank originated 25.0 percent of its HMDA-reportable loans within low-income geographies and 65.7 percent within moderate-income geographies. Overall, the bank's performance has remained relatively consistent within the two year time period.

The following table provides detailed information regarding the bank's 2014 HMDA-reportable lending by geography. A similar table for 2013 data is included in Appendix D.

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2014 Chgo-Naperville-Arlington Hts, IL MD 16974								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2014			2014			
		Count		Agg	Dollar		Agg	
		Bank			Bank			
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	28	30.4	16.8	3,818	29.4	13.4	20.2
	Moderate	57	62.0	58.1	7,713	59.5	50.1	63.3
	Middle	7	7.6	24.0	1,436	11.1	35.5	14.2
	Upper	0	0.0	1.1	0	0.0	1.0	2.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		92	100.0	100.0	12,967	100.0	100.0
Refinance	Low	0	0.0	16.5	0	0.0	14.4	20.2
	Moderate	1	100.0	61.4	145	100.0	54.4	63.3
	Middle	0	0.0	19.5	0	0.0	28.5	14.2
	Upper	0	0.0	2.7	0	0.0	2.7	2.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		1	100.0	100.0	145	100.0	100.0
Home Improvement	Low	0	0.0	14.3	0	0.0	14.0	20.2
	Moderate	2	100.0	60.7	95	100.0	53.7	63.3
	Middle	0	0.0	21.4	0	0.0	32.1	14.2
	Upper	0	0.0	3.6	0	0.0	0.2	2.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		2	100.0	100.0	95	100.0	100.0
Multi-Family	Low	1	25.0	18.9	250	30.0	15.0	42.8
	Moderate	2	50.0	51.4	370	44.4	51.0	36.4
	Middle	1	25.0	29.7	214	25.7	34.0	20.2
	Upper	0	0.0	0.0	0	0.0	0.0	0.6
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		4	100.0	100.0	834	100.0	100.0
HMDA Totals	Low	29	29.3	16.7	4,068	29.0	13.9	20.2
	Moderate	62	62.6	59.5	8,323	59.3	52.0	63.3
	Middle	8	8.1	22.0	1,650	11.8	32.5	14.2
	Upper	0	0.0	1.8	0	0.0	1.6	2.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total		99	100.0	100.0	14,041	100.0	100.0
Originations & Purchases 2014 FFIEC Census Data <i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Lending to Borrowers of Different Income Levels

The bank's distribution of HMDA-reportable loans reflects a reasonable distribution among individuals of different income levels. Analysis of the bank's performance within the product categories was aggregated given the volume of loans is primarily concentrated in home purchase loans.

In 2014, the bank originated 16.2 percent of HMDA-reportable loans to low-income individuals. The bank's performance was comparable to the aggregate of lenders at 18.4 percent; however, the bank's performance was significantly below the percentage of families-by-family income at 42.5 percent. Among moderate-income borrowers, the bank originated 43.4 percent of HMDA-reportable loans. The bank's performance far exceeded the aggregate of lenders at 26.7 percent and the percentage of families-by-family income at 20.9 percent.

In 2013, the bank originated 25.9 and 36.1 percent of HMDA-reportable to low-and moderate income borrowers, respectively. Overall, within the two year time period, the bank's performance remained relatively stable.

The following table provides detailed information regarding the bank's 2014 HMDA-reportable lending by borrower income level. A similar table for 2013 data is included in Appendix D.

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2014 Chgo-Naperville-Arlington Hts, IL MD 16974								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		2014						
		Count		Dollar		Agg		
		Bank #	Bank %	Agg %	Bank \$(000s)	Bank \$ %	Agg \$ %	
Home Purchase	Low	15	16.3	16.2	1,587	12.2	10.2	42.5
	Moderate	41	44.6	29.4	5,052	39.0	23.3	20.9
	Middle	31	33.7	17.3	4,992	38.5	17.1	17.8
	Upper	5	5.4	22.6	1,336	10.3	33.7	18.9
	Unknown	0	0.0	14.5	0	0.0	15.7	0.0
	Total		92	100.0	100.0	12,967	100.0	100.0
Refinance	Low	0	0.0	22.4	0	0.0	13.6	42.5
	Moderate	1	100.0	25.7	145	100.0	21.2	20.9
	Middle	0	0.0	19.6	0	0.0	21.9	17.8
	Upper	0	0.0	21.5	0	0.0	30.4	18.9
	Unknown	0	0.0	10.8	0	0.0	13.0	0.0
	Total		1	100.0	100.0	145	100.0	100.0
Home Improvement	Low	1	50.0	3.6	50	52.6	2.1	42.5
	Moderate	1	50.0	17.9	45	47.4	27.5	20.9
	Middle	0	0.0	28.6	0	0.0	39.5	17.8
	Upper	0	0.0	39.3	0	0.0	22.4	18.9
	Unknown	0	0.0	10.7	0	0.0	8.5	0.0
	Total		2	100.0	100.0	95	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	42.5
	Moderate	0	0.0	0.0	0	0.0	0.0	20.9
	Middle	0	0.0	0.0	0	0.0	0.0	17.8
	Upper	0	0.0	0.0	0	0.0	0.0	18.9
	Unknown	4	100.0	100.0	834	100.0	100.0	0.0
	Total		4	100.0	100.0	834	100.0	100.0
HMDA Totals	Low	16	16.2	18.4	1,637	11.7	11.0	42.5
	Moderate	43	43.4	26.7	5,242	37.3	21.2	20.9
	Middle	31	31.3	18.1	4,992	35.6	18.3	17.8
	Upper	5	5.1	21.8	1,336	9.5	30.4	18.9
	Unknown	4	4.0	14.9	834	5.9	19.2	0.0
	Total		99	100.0	100.0	14,041	100.0	100.0
Originations & Purchases								
2014 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Response to Complaints

Neither Pacific Global Bank nor this Reserve Bank received any CRA-related complaints since the previous evaluation.

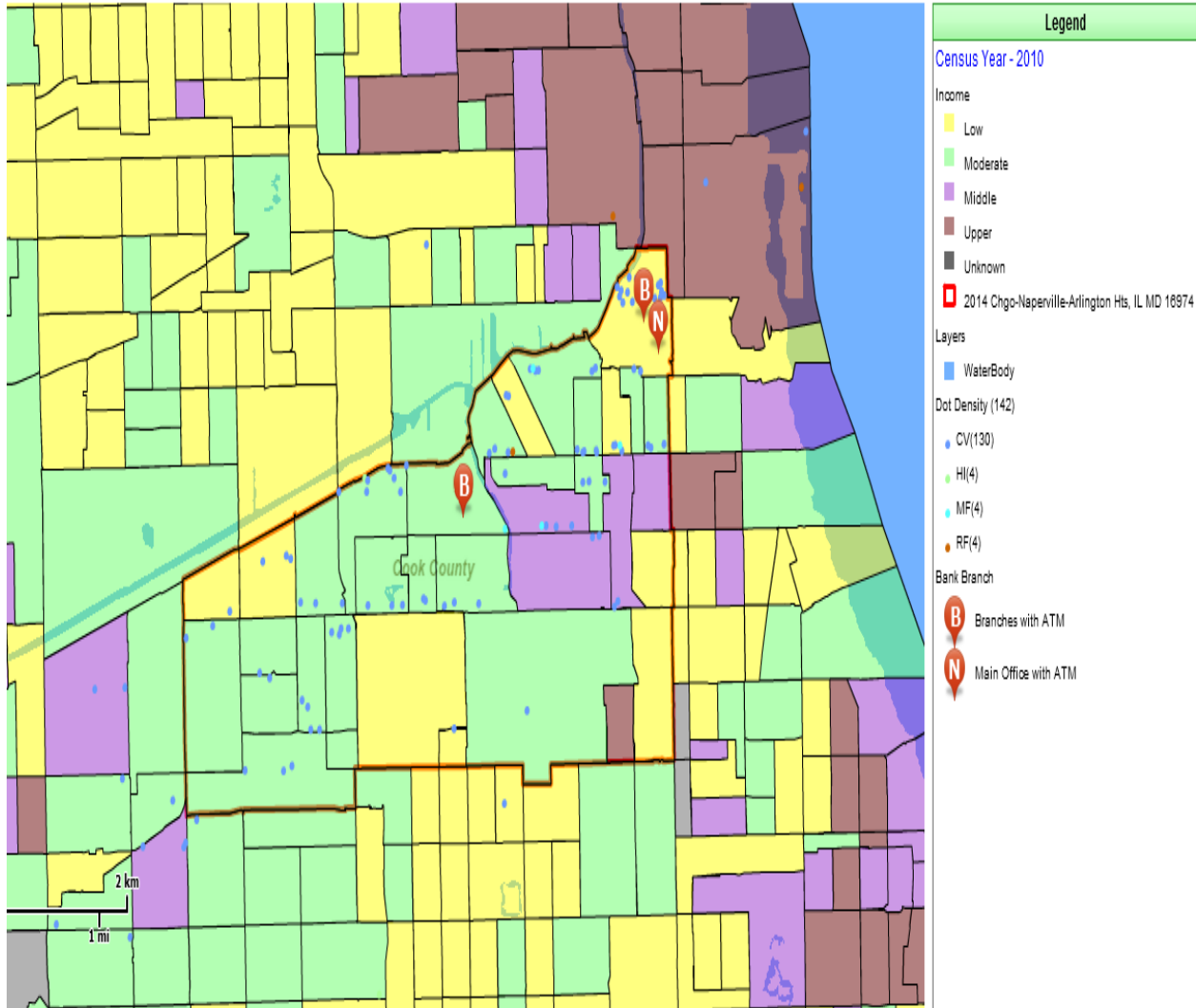
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

2360904 Pacific Global Bank

Chicago-Naperville-Arlington Heights IL, MD 16974, 2014 Income Map with Branches and Loans



APPENDIX B – Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED	Loan-to-Deposit Ratio: 16 quarter average from December 31, 2011 – September 30, 2015 In-and-Out: January 1, 2013 – December 31, 2014 Geographic Distribution: January 1, 2013 – December 31, 2014 Borrower Distribution: January 1, 2013 – December 31, 2014		
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
Pacific Global Bank			HMDA-Reportable Loans
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
N/A	N/A		N/A
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Chicago-Naperville-Arlington Heights MD - #16974	Full scope	None	N/A

APPENDIX C - 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.

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.

Consumer loan: A loan 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 secured loan, and other 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.

Geography: A census tract or a block numbering area delineated by the U.S. Bureau of the Census in the most recent decennial census.

Home mortgage loans: Include 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: 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.

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 lenders in the MSA/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 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 (MMSA). Performance within each MMSA is analyzed separately as a full-scope review and receives its own ratings under the

Lending, Investment and Service Tests provided the financial institution has its main office, branch, or deposit-taking ATM located in each applicable state making up the MMSA.

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

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

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

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

Small loans to business: A loan included in “loans to small businesses” as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small loans to farms: A loan included in “loans to small farms” as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500 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.

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

APPENDIX D – 2013 Lending Tables

Geographic Distribution of HMDA Reportable Loans								
Assessment Area: 2013 Chgo-Joliet-Naperville, IL MD 16974								
Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison						Owner Occupied % of Units
		2013			2013			
		Count		Agg %	Dollar		Agg \$ %	
Bank #	%	Bank \$ (000s)	\$ %					
Home Purchase	Low	27	25.2	19.5	3,657	27.4	19.4	22.5
	Moderate	71	66.4	59.6	8,374	62.8	52.1	60.9
	Middle	9	8.4	19.5	1,314	9.8	27.3	14.2
	Upper	0	0.0	1.4	0	0.0	1.2	2.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	107	100.0	100.0	13,345	100.0	100.0	100.0
Refinance	Low	0	0.0	21.9	0	0.0	17.1	22.5
	Moderate	0	0.0	55.8	0	0.0	46.3	60.9
	Middle	0	0.0	20.3	0	0.0	33.9	14.2
	Upper	0	0.0	1.9	0	0.0	2.7	2.3
	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
Home Improvement	Low	0	0.0	26.9	0	0.0	15.5	22.5
	Moderate	0	0.0	50.0	0	0.0	63.0	60.9
	Middle	0	0.0	11.5	0	0.0	17.3	14.2
	Upper	0	0.0	11.5	0	0.0	4.1	2.3
	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
Multi-Family	Low	0	0.0	20.0	0	0.0	22.1	Multi-Family 43.1
	Moderate	0	0.0	63.3	0	0.0	63.5	
	Middle	1	100.0	16.7	120	100.0	14.4	
	Upper	0	0.0	0.0	0	0.0	0.0	
	Unknown	0	0.0	0.0	0	0.0	0.0	
	Total	1	100.0	100.0	120	100.0	100.0	
HMDA Totals	Low	27	25.0	21.2	3,657	27.2	17.8	22.5
	Moderate	71	65.7	57.0	8,374	62.2	48.3	60.9
	Middle	10	9.3	19.9	1,434	10.6	31.6	14.2
	Upper	0	0.0	1.9	0	0.0	2.2	2.3
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	108	100.0	100.0	13,465	100.0	100.0	100.0
Originations & Purchases								
2013 FFIEC Census Data								
<i>Note: Percentages may not add to 100.0 percent due to rounding</i>								

Borrower Distribution of HMDA Reportable Loans								
Assessment Area: 2013 Chgo-Joliet-Naperville, IL MD 16974								
Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison						Families by Family Income %
		Count		2013 Dollar				
		Bank #	%	Agg %	Bank \$(000s)	\$ %	Agg \$ %	
Home Purchase	Low	28	26.2	21.0	2,096	15.7	12.5	42.8
	Moderate	39	36.4	31.3	3,997	30.0	25.6	20.9
	Middle	35	32.7	23.9	6,289	47.1	27.8	17.8
	Upper	5	4.7	18.4	963	7.2	27.2	18.6
	Unknown	0	0.0	5.3	0	0.0	7.0	0.0
	Total	107	100.0	100.0	13,345	100.0	100.0	100.0
Refinance	Low	0	0.0	22.0	0	0.0	12.4	42.8
	Moderate	0	0.0	22.3	0	0.0	16.3	20.9
	Middle	0	0.0	19.6	0	0.0	18.5	17.8
	Upper	0	0.0	28.8	0	0.0	35.0	18.6
	Unknown	0	0.0	7.3	0	0.0	17.8	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement	Low	0	0.0	11.5	0	0.0	2.2	42.8
	Moderate	0	0.0	34.6	0	0.0	28.5	20.9
	Middle	0	0.0	3.8	0	0.0	4.1	17.8
	Upper	0	0.0	46.2	0	0.0	41.9	18.6
	Unknown	0	0.0	3.8	0	0.0	23.4	0.0
	Total	0	0.0	100.0	0	0.0	100.0	100.0
Multi-Family	Low	0	0.0	0.0	0	0.0	0.0	42.8
	Moderate	0	0.0	0.0	0	0.0	0.0	20.9
	Middle	0	0.0	0.0	0	0.0	0.0	17.8
	Upper	0	0.0	0.0	0	0.0	0.0	18.6
	Unknown	1	100.0	100.0	120	100.0	100.0	0.0
	Total	1	100.0	100.0	120	100.0	100.0	100.0
HMDA Totals	Low	28	25.9	21.3	2,096	15.6	12.1	42.8
	Moderate	39	36.1	24.9	3,997	29.7	18.7	20.9
	Middle	35	32.4	20.4	6,289	46.7	20.7	17.8
	Upper	5	4.6	25.4	963	7.2	32.3	18.6
	Unknown	1	0.9	8.0	120	0.9	16.2	0.0
	Total	108	100.0	100.0	13,465	100.0	100.0	100.0

Originations & Purchases
2013 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding