PUBLIC DISCLOSURE

June 6, 2016

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

St. Charles Bank & Trust Company
RSSD# 428547

411 W. Main Street
St. Charles, Illinois 60174

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

St. Charles Bank and Trust Company's Overall CRA Rating: Satisfactory

Performance Test Rating Table

The following table indicates the performance level of St. Charles Bank and Trust Company with respect to the lending, investment, and service test.

Performance Levels	Performance Tests		
	Lending Test	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	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, good penetration among customers of different income levels and businesses of different sizes.
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- St. Charles Bank and Trust Company makes an adequate level of community development loans.

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

Investment Test:
- The bank makes a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors, occasionally in a leadership position.
- The bank exhibits good responsiveness to credit and community development needs.

Service Test:
- Delivery systems are 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 not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.
- The bank's 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.
- St. Charles Bank and Trust Company provides a relatively high level of community development services.

ST. CHARLES BANK AND TRUST COMPANY

DESCRIPTION OF INSTITUTION

St. Charles Bank and Trust Company (St. Charles B&TC), St. Charles, Illinois, with total assets of $811.8 million as of March 31, 2016, is a wholly-owned subsidiary of Wintrust Financial Corporation, a multi-bank holding company located in Rosemont, Illinois. Wintrust Financial Corporation (WTFC) has a total of 15 subsidiary banks; nine are state chartered in Illinois, one is state charted in Wisconsin, and four are nationally chartered in Illinois. An affiliate, Wintrust Mortgage Company, originates home mortgage loans throughout the assessment area on behalf of St. Charles B&TC. As of March 31, 2016, the holding company had $23.5 billion in consolidated assets.

The bank operates six offices including the main office as well as six automated teller machines (ATMs) in Kane County, Illinois. The bank's services and products are also accessible via telephone, its website, and mobile banking.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report dated June 30, 2015, St. Charles B&TC ranked 16 out of 75 FDIC-insured institutions operating in Kane and DuPage Counties with a market share of 1.4 percent. The top four financial institutions in the counties are JPMorgan Chase Bank, PNC Bank, and BMO Harris Bank with 18.6, 9.7, and 9.2 percent of area deposits, respectively.

The bank offers a wide variety of non-complex deposit and lending products, as well as standard banking services to consumers. Deposit products are traditional and include demand, savings, money market account, time deposits, and negotiable orders of withdrawal (NOW accounts). Lending products include home equity lines of credit, consumer, residential real estate, and commercial loans. According to the March 31, 2016 Uniform Bank Performance Report (UBPR), St. Charles B&TC is primarily a commercial lender with 65.7 percent by dollar volume of its loan portfolio concentrated in commercial-related lending. Multifamily and 1-4 family residential real estate loans represent 12.9 percent of the loan portfolio by dollar volume.

Composition of Loan Portfolio as of March 31, 2016 (000's)			
Category	Type	$	%
Real Estate Secured	1-4 Family Residential	59,182	9.1
	Construction and Land Development	11,369	1.7
	Farmland	649	0.1
	Multi-Family	24,511	3.8
	Non-Farm Non-Residential	266,207	40.9
	Total Real Estate Secured	**361,918**	**55.7**
Agricultural	Agricultural	0	0.0
Commercial	Commercial and Industrial	161,487	24.8
Consumer	Loans to Individuals	126,735	19.5
Other	All Other Loans	103	0.0
	Total	**650,243**	**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 evaluation conducted on April 22, 2013, the bank was rated Satisfactory under the Community Reinvestment Act (CRA).

SCOPE OF THE EXAMINATION

St. Charles Bank and Trust Company'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 were also considered.

The lending analysis was based on 2013, 2014, and 2015 Home Mortgage Disclosure Act (HMDA)-reportable and CRA-reportable loans, specifically home purchase, refinancing, home improvement, multifamily loans, and small business loans originated in the assessment area. The bank's lending performance was compared to the aggregate of all other lenders within the assessment area for 2013 and 2014; aggregate data for 2015 was not available at the time of this evaluation. Appendix C includes a summary of the scope of the evaluation and Appendix D provides a glossary of key terms used. The examination scope specifically included the following:

Lending in the Assessment Area – HMDA- reportable and CRA-reportable small business loans, originated from January 1, 2013 through December 31, 2015, were analyzed to determine the percentage of loans originated in the assessment area.

Geographic Distribution of Lending in the Assessment Area – HMDA- reportable and CRA-reportable small business loans originated from January 1, 2013 through December 31, 2015, were analyzed to determine the extent to which the bank is lending in census tracts of different income levels, particularly those designated as low- or moderate-income.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes – HMDA-reportable and CRA-reportable small business loans originated from January 1, 2013 through December 31, 2015, were analyzed to determine the distribution among borrowers of different income levels, particularly those considered low- or moderate-income, and to businesses of different revenue sizes.

Community Development Lending - The number, dollar volume, innovativeness, and complexity of community development loans originated from April 22, 2013 through June 6, 2016 were assessed.

Innovative or Flexible Lending Practices - The degree to which the bank uses innovative or flexible lending practices to address the credit needs of low-and moderate-income individuals or geographies and small businesses was assessed.

Investments - Qualified investments, grants and donations made between April 22, 2013 and June 6, 2016 were considered in the evaluation. In addition, outstanding investments made prior to April 22, 2013 were considered. Qualified investments were also evaluated to determine the bank's use of innovative or complex investments.

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 performed from April 22, 2013 through June 6, 2016 was considered in the evaluation.

Interviews were conducted with six community representatives to further understand community credit needs. Individuals contacted represent organizations with municipal agencies, community services, and business associations in the assessment area. For more information on the information gathered from the community representatives, please reference the Community Contacts section below.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHICAGO-NAPERVILLE-ELGIN, IL-IN-WI METROPOLITAN STATISTICAL AREA #16980

The bank maintains six offices throughout Kane County, each with a full service ATM. One branch in Elgin, Illinois, is in a moderate-income census tract, and the remaining five offices are located in middle-income census tracts. St. Charles B&TC closed a branch located in Geneva, Illinois in November of 2013, leaving the bank with a network of five branches and ATMs until a temporary location was established in Aurora, Illinois in September 2015. The closed branch was located in a middle-income census tract. The temporary branch was established to provide the bank's products and services in Aurora until a newly built, full service branch could open in a moderate-income tract in Aurora later in the year. All locations, with the exception of the temporary Aurora branch, include attached drive-up services.

The bank's assessment area is comprised of all 298 census tracts in Kane and DuPage Counties in Illinois. The bank's assessment area has been expanded to include the entirety of DuPage County since the previous evaluation due to the bank's lending activity in the county. DuPage County is located in the Chicago-Naperville –Arlington Heights, IL Metropolitan Division #16974. Previously, the assessment area consisted of Kane County in its entirety, which is located in the Elgin, IL Metropolitan Division #20994. The current assessment area is part of the Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area #16980.

Assessment Area: 2015 Chicago-Naperville-Elgin, IL-IN-WI MSA 16980								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	0.7	1,015	0.3	279	27.5	56,257	15.4
Moderate-income	47	15.8	57,750	15.8	7,930	13.7	55,386	15.2
Middle-income	104	34.9	125,246	34.3	6,607	5.3	72,617	19.9
Upper-income	145	48.7	181,266	49.6	3,796	2.1	181,017	49.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**298**	**100.0**	**365,277**	**100.0**	**18,612**	**5.1**	**365,277**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,902	475	0.1	25.0	1,229	64.6	198	10.4
Moderate-income	88,898	51,097	13.2	57.5	31,194	35.1	6,607	7.4
Middle-income	190,381	132,289	34.2	69.5	48,015	25.2	10,077	5.3
Upper-income	253,274	202,682	52.4	80.0	37,452	14.8	13,140	5.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**534,455**	**386,543**	**100.0**	**72.3**	**117,890**	**22.1**	**30,022**	**5.6**
	Total Businesses Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	370	0.5	329	0.6	41	0.5	0	0.0
Moderate-income	7,694	11.3	6,478	10.8	1,192	14.9	24	11.9
Middle-income	23,293	34.3	20,165	33.7	3,038	38.0	90	44.6
Upper-income	36,612	53.9	32,791	54.9	3,733	46.6	88	43.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**67,969**	**100.0**	**59,763**	**100.0**	**8,004**	**100.0**	**202**	**100.0**
	Percentage of Total Businesses:			**87.9**		**11.8**		**0.3**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	24	5.9	22	5.6	2	15.4	0	0.0
Middle-income	164	40.2	159	40.4	5	38.5	0	0.0
Upper-income	220	53.9	213	54.1	6	46.2	1	100.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**408**	**100.0**	**394**	**100.0**	**13**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:			**96.6**		**3.2**		**0.2**

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

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

Population

The population in Kane County increased significantly from 2000 to 2010 with a rate of 27.5 percent. DuPage County realized a lower increase in population of 1.4 percent over the same period. The rate of population increase for each county is similar to their respective MDs. The greater Chicago MD experienced a 1.8 percent increase while the Elgin MD had a greater population increase of 25.8. One community representative made mention that the increase in population in Kane County is in part to individuals wanting a lower cost of living compared to suburban cities closer to the city of Chicago. A community representative from DuPage County mentioned the lower rate of population increase could be attributed to slow development growth and high-income wages necessary to live in DuPage County. The cost of living in DuPage County has prevented those of lower income levels from migrating to the county.

Population Change

Area	2000 Population	2010 Population	Percentage Change
DuPage County, IL	904,161	916,924	1.4
Kane County, IL	404,119	515,269	27.5
Chicago-Naperville-Arlington Heights, IL MD	7,135,324	7,262,718	1.8
Elgin, IL MD	493,088	620,429	25.8
State of Illinois	12,419,293	12,830,632	3.3
Source: U.S. Census Bureau -- Decennial Census			

Income Characteristics

Median family income increased 16.5 and 17.2 percent from 2000 to 2010, respectively for DuPage and Kane Counties; which is below the rate of 22.8 percent for the state of Illinois. However, the dollar amount of median family income in both counties is higher than either metropolitan division. Community representatives for both counties said salaries from individuals working in the city of Chicago and living in the western suburbs help keep wages high. Furthermore, representatives noted that, due to the cost of housing in DuPage County, higher wages are necessary to reside there and serve as a barrier to those with lower incomes.

Median Family Income Change

Area	2000 Median Family Income (In 1999 Dollars)	2006-2010 Median Family Income (In 2010 Dollars)	Percentage Change
DuPage County, IL	79,314	92,423	16.5
Kane County, IL	66,558	77,998	17.2
Chicago-Naperville-Arlington Heights, IL MD	60,166	72,196	20.0
Elgin, IL MD	NA	76,576	NA
State of Illinois	55,545	68,236	22.8
Source: 2000 - U.S. Census Bureau: Decennial Census *2010 - U.S. Census Bereau: Decennial Census*			

Housing Characteristics and Affordability

The median housing value in DuPage and Kane Counties increased from 2000 to 2010. The housing costs of DuPage County increased by 68.9 percent, which is consistent with the increase in the Chicago MD. Kane County realized a gain of 55.3 percent. While a comparison to the newly delineated Elgin MD is not possible, Kane County's increase is similar to the state of Illinois at 58.5 percent. Median gross rent increased, but at a slower pace than the housing values. Although the increase in rents in DuPage County, at 20.4 percent, are lower than the Chicago MD at a rate of 37.4, actual median rents in DuPage County are approximately 10.2 percent higher than the MD. The median rents in Kane County are closer to those in the rest of the Elgin MD, with the median rents in the county approximately 4.3 percent higher than the MD. Two community representatives mentioned many individuals are becoming priced out of the area due to the increase in home values, specifically in Kane County, making affordable housing more difficult to obtain. A contact from DuPage County stated the county encompasses safe communities, good schools, and shopping which attracts families. For this reason, and the scarcity of single family homes on the market, home values have been driven higher.

Affordability ratios, as defined in Appendix D, indicate that housing is slightly more affordable in each of the counties in the assessment area when compared to their respective MDs. DuPage County, with an affordability ratio of 0.24, is slightly more affordable than the Chicago MD, which has a ratio of 0.22. Both the county and the MD are less affordable than the state of Illinois, which has an affordability ratio of 0.28. Kane County, with a ratio of 0.28 is as affordable as the state. Both the county and the state are slightly more affordable than the Elgin MD, which has a ratio of 0.27.

Housing Costs Change				
Area	2000 Median Housing Value	2006-2010 Median Housing Value	2000 Median Gross Rent	2006-2010 Median Gross Rent
DuPage County, IL	187,600	316,900	837	1,008
Kane County, IL	157,800	245,000	686	929
Chicago-Naperville-Arlington Heights, IL MD	159,773	267,990	665	914
Elgin, IL MD	NA	236,073	NA	891
State of Illinois	127,800	202,500	605	834
Source: 2000 - U.S. Census Bureau: Decennial Census 2010 - U.S. Census Bereau: Decennial Census				

Foreclosure Trends

According to LPS Applied Analytics, DuPage and Kane Counties experienced a decrease in foreclosure activity during the evaluation period. As of December 2014, DuPage County had a foreclosure inventory rate of 1.3 percent and Kane County had an FIR of 1.7 percent. The state of Illinois had a higher FIR of 2.2 percent. This is consistent with the improving economic conditions in the area during the evaluation period. An affordable housing community representative from Kane County also stated that the organization's foreclosure crisis efforts have gradually been decreasing. A community representative from DuPage County explained low interest rates have helped decrease the foreclosure rate. Individuals have refinanced their mortgages at lower rates, reducing their monthly payments, which have had a significant impact in reducing foreclosure rates.

Unemployment Conditions

The unemployment rate in all areas has realized a steady decline since 2011, with the exception of 2013 when there was a slight increase. Community contacts noted a general improvement of the economy in Kane County, which has spurred business growth, and an increase in disposable income. One community representative from DuPage County stated although the unemployment rate is low, many residents work outside of the county as available jobs within the county are lower wage jobs that do not cover the costs of homeownership in the county.

Recent Unemployment Rates				
Area	**2011**	**2012**	**2013**	**2014**
DuPage County, IL	8.0	7.3	7.5	5.6
Kane County, IL	9.9	8.8	8.9	7.0
Chicago-Naperville-Arlington Heights, IL MD	10.0	8.9	9.2	7.1
Elgin, IL MD	9.8	8.7	8.8	6.9
State of Illinois	9.8	8.9	9.2	7.1
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics				

Bankruptcy Trends

According to the Administrative Offices of U.S. Courts, the bankruptcy filing rate in the assessment area is slightly lower compared to the state. The rate for DuPage and Kane Counties decreased from 5.0 and 5.8 per 1,000 population in 2011 to 3.6 and 4.0 per 1,000 population in 2014, respectively. The decrease in bankruptcy filing rates was similar for both the Chicago MD and Elgin MD. The Chicago MD decreased from 6.4 per 1,000 population to 5.9 per 1,000 population over the same period. A community representative noted improvement in the economy in the metropolitan divisions has attributed to the decrease in bankruptcy filing rate. This evaluation would be on par with the improvements in the unemployment rates, affordability ratio, and higher wages in the assessment area.

Personal Bankruptcy Filing Rate (per 1,000 population)				
Area	**2011**	**2012**	**2013**	**2014**
DuPage County, IL	5.0	4.7	4.0	3.6
Kane County, IL	5.8	5.3	4.6	4.0
Chicago-Naperville-Arlington Heights, IL MD	6.4	6.3	6.2	5.9
Elgin, IL MD	5.5	5.0	4.5	3.8
State of Illinois	5.5	5.2	5.1	4.7

Employment Characteristics

The assessment area contains a mix of industries ranging from healthcare to manufacturing; the table below lists the ten largest employers in DuPage and Kane Counties. In addition to these large companies, there were 67,969 businesses in the bank's assessment area in 2015, the majority of which (87.9 percent) had revenues of less than $1 million.

Largest Employers in the Assessment Area		
Company	**Number of Employees**	**Industry**
Edward-Elmhurst Healthcare	5000	Health Care Management
Program Productions Inc.	3300	Business Services NEC
Mc Donald's Corp	3000	Restaurant Management
Sleepy's The Mattress Pros	2000	Mattresses
Navistar International Corp	1800	Truck & Bus Bodies (Manufacturers)
Unilever Food Solutions	1200	Food Products (Wholesale)
SIRVA Inc.	1100	Movers
Videojet Technologies Inc.	1001	Industrial Instrumentation (Manufacturers)
Spraying Systems Co	1001	Spraying Equipment-Manufacturers
United Building Maintenance Inc.	1000	Building Maintenance
Source: America's Labor Market Information Systems		

Community Contacts

Six community representatives from DuPage and Kane Counties were interviewed and represented local government, community service and business organizations, and affordable housing. The community representatives noted that economic conditions have greatly improved in recent years and communities such as Geneva, in Kane County, have seen its tourism industry improving. Concerns were raised over the diminishing supply of affordable housing in communities in both counties, as the popularity of the area as a place to live has resulted in a significant increase in housing costs. Another community representative stated that a current challenge for small businesses is increasing profits and sustaining their business. In general, the representatives had positive thoughts of the performance of local financial institutions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

St. Charles B&TC's performance relative to the Lending Test is rated High Satisfactory. Lending levels reflect good responsiveness to the assessment area's credit needs, and a high percentage of loans are made within its assessment area. Additionally, the bank has demonstrated a good geographic distribution of loans in its assessment area. The distribution of borrowers reflects, given the product lines offered, good penetration among customers of different income levels and to businesses of different sizes. The bank exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses. The bank has made an adequate level of community development loans during the evaluation, including those for affordable housing, which was identified as a need within its assessment area by community representatives. The bank makes use of innovative and/or flexible lending practices in serving assessment area credit needs.

Level of Lending Activity

The bank's lending levels reflect good responsiveness to the assessment area's credit needs. During the three years included in this evaluation, the bank originated 1,250 HMDA-reportable and CRA-reportable small business loans totaling $293.5 million. The bank's lending activity reflects an increase from the previous evaluation of 752 loans due to a substantial increase in small business lending activity. Small business lending increased from 669 loans during the previous evaluation to 1,155 loans, or 72.6 percent, during the current evaluated period. Community representatives indicated need for small business loans, especially short term loans, to support temporary cash flow issues faces by some businesses. The bank is primarily a commercial lender; small business lending represents 92.4 percent by number and 88.6 percent by dollar volume of total loans.

Summary of Lending Activity
January 1, 2013 – December 31, 2015

Loan Type	#	%	$(000s)	%
Home Improvement	1	0.1	$125	0.0
Home Purchase	38	3.0	$10,606	3.6
Multi-Family Housing	22	1.8	$12,799	4.4
Refinancing	34	2.7	$9,956	3.4
Total HMDA related	**95**	**7.6**	**$33,486**	**11.4**
Total Small Business related	**1,155**	**92.4**	**$260,031**	**88.6**
TOTAL LOANS	**1,250**	**100.0**	**$293,517**	**100.0**

Note: Affiliate loans include only loans originated or purchased within the bank's assessment area
Note: Percentages may not total to 100.0 percent due to rounding

Assessment Area Concentration

A high percentage of the bank's loans were originated within its assessment area. Overall, 78.2 percent by volume and 66.5 percent by dollar amount were originated in DuPage and Kane Counties. This performance is an increase over the previous evaluation when the bank originated 63.0 percent of its loans in the assessment area. Additionally, small business loans made in the assessment area increased from 64.1 percent during the prior evaluation to 79.8 percent during the current evaluation period. The increase in number of loans within the assessment area is in part due to the expansion of the assessment area to include DuPage County. Small businesses receive the most weight, as this product comprises the majority of the bank's loan portfolio.
The table below shows the loans originated in the bank's assessment area during the evaluation period.

Loan Types	Inside				Outside			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Improvement	0	0.0	$0	0.0	1	100.0	$125	100.0
Home Purchase – Conv.	25	69.4	$5,962	57.6	11	30.6	$4,390	42.4
Home Purchase – FHA	2	100.0	$254	100.0	0	0.0	$0	0.0
Multi-Family Housing	11	50.0	$7,103	55.5	11	50.0	$5,696	44.5
Refinancing	18	52.9	$4,925	49.5	16	47.1	$5,031	50.5
Total HMDA related	**56**	**58.9**	**$18,244**	**54.5**	**39**	**41.1**	**$15,242**	**45.5**
Small Business	914	79.8	$175,384	68.1	231	20.2	$82,150	31.9
Total Small Bus. related	**914**	**79.8**	**$175,384**	**68.1**	**231**	**20.2**	**$82,150**	**31.9**
TOTAL LOANS	**970**	**78.2**	**$193,628**	**66.5**	**270**	**21.8**	**$97,392**	**33.5**
Note: Percentages may not add to 100.0 percent due to rounding								

Geographic Distribution of Loans

The geographic distribution of HMDA- and CRA-reportable small business lending reflects good penetration throughout the bank's assessment area. Small business loans were given the most weight as the bank is primarily a commercial lender. As noted above, Wintrust Mortgage Company originates home mortgage loans throughout the assessment area on behalf of St. Charles B&TC. As a result, the bank's portion of lending in the assessment area is based on a relatively low number of HMDA-reportable loan originations. Since the bank did not originate any home improvement loans in any of the years included in this evaluation, a meaningful analysis cannot be performed. The narrative, below, describes the analysis of 2014, then 2013 and 2015, loan data. Load data tables for 2014 data are included with the narrative, and 2013 and 2015 tables are included in Appendix A.

Home Purchase Loans

St. Charles B&TC's geographic distribution of home purchase loans within the assessment area is good. Home purchase loans represent 51.9 percent of the bank's total HMDA-reportable loans in 2014. The bank made 28.6 percent of its home purchase loans in low-income census tracts, which outperformed aggregate lenders and the demographic of owner-occupied units in such tracts. The aggregate lenders originated 0.1 percent of their home purchase loans in low-income census tracts which is comparable to the 0.2 percent of owner-occupied homes in low-income census tracts. The bank had similar performance compared to the aggregate lenders in moderate-income census tracts. St. Charles B&TC originated 14.3 percent of its loans in moderate-income census tracts compared to 14.3 percent by aggregate lenders. Given that 17.1 percent of owner-occupied housing is located in moderate-income census tracts, the level of lending by the bank and aggregate lenders is appropriate. The bank originated 42.9 percent of its loans in middle-income tracts compared to the 34.3 percent by aggregate lenders and the 34.3 percent of owner-occupied housing located in middle-income tracts. The bank originated 14.3 percent of its loans in upper-income tracts compared to the 51.3 percent by aggregate lenders and the 48.4 percent of owner-occupied housing located in upper-income tracts.

In 2015, home purchase loans represented 60.0 percent of the bank's total HMDA-reportable loans. The bank made no home purchase loans in low-income census tracts, however; however the assessment area only contains two low-income tracts, or 0.1 percent of the assessment area's census tracts. The bank originated 20.0 percent of its home purchase loans in moderate-income census tracts. Given that 17.1 percent of owner-occupied housing is located in moderate-income census tracts, the level of lending by the bank and aggregate lenders is appropriate. The bank originated 26.7 percent of its loans in middle-income tracts compared to the 34.2 percent of owner-occupied housing located in middle-income tracts. The bank originated 53.3 percent of its loans in upper-income tracts compared to the 52.4 percent of owner-occupied housing located in upper-income tracts.

In 2013, the bank did not originate home purchase loans in low- or moderate-income census tracts. For low-income census tracts, however, this is consistent with the 0.1 percent originated by the aggregate lenders and the 0.1 percent of owner-occupied homes in such tracts. The bank's performance in moderate-income tracts was below the 10.1 percent made by aggregate lenders and the 12.7 percent of owner-occupied homes in moderate-income census tracts. The bank originated 20.0 percent of its loans in middle-income tracts compared to the 31.2 percent by aggregate lenders and the 32.8 percent of owner-occupied housing located in middle-income tracts. The bank originated 80.0 percent of its loans in upper-income tracts compared to the 58.6 percent by aggregate lenders and the 54.4 percent of owner-occupied housing located in upper-income tracts.

Refinance Loans

In 2014, the bank originated no refinance loans in low-, moderate-, or high-income census tracts. This is consistent with the 0.1 percent originated by the aggregate lenders and the 0.2 percent of owner-occupied homes in low-income census tracts. The bank's performance in moderate-income tracts was below the 11.5 percent made by aggregate lenders and the 17.1 percent of owner-occupied homes in moderate-income census tracts. The bank originated five refinance loans in middle-income tracts, accounting for all refinance loans by the bank in 2014. In comparison, the aggregate lenders originated 32.1 percent of its loans in middle-income tracts and 34.3 percent of owner-occupied housing units are locate in such tracts.

In 2015, the bank made no refinance loans in low-income census tracts; however, the assessment area only contains two low-income tracts, or 0.1 percent of the assessment area's census tracts. The bank originated 28.6 percent of its refinance loans in moderate-income census tracts, which is above the 13.2 percent of owner-occupied housing in such tracts. The bank originated 28.6 percent of its loans in middle-income tracts compared to the 34.2 percent of owner-occupied housing located in middle-income tracts. The bank originated 28.6 percent of its loans in upper-income tracts compared to the 52.4 percent of owner-occupied housing located in upper-income tracts.

In 2013, St. Charles B&TC originated one refinance loan in a low-income census tract accounting for 12.5 percent of the bank's refinance loans. The bank outperformed the 0.1 percent by the aggregate lenders and the owner-occupied homes in low-income census tracts. The bank originated one loan in a moderate-income census tract, which represented 12.5 percent of its refinance lending. The bank's performance in moderate-income tracts exceeded the 8.1 percent by aggregate lenders and was consistent with the 12.7 percent of owner-occupied units in such tracts. The bank originated four loans in middle-income tracts, which represented 50.0 percent of its loans. The bank's performance exceeded the 29.4 percent by aggregate lenders and the 32.8 percent of owner-occupied housing units in such tracts. The bank originated two loans in upper-income tracts, which represented 25.0 percent of its refinance loans. The bank's performance was below the 62.4 percent by aggregate lenders and the 54.4percent of owner-occupied housing located in upper-income tracts.

Multi-Family Loans

In 2014, the bank's performance of originating multi-family loans in low-income census tracts was below both the aggregate and the demographic of multi-family housing units in such tracts. The bank originated no multi-family loans in low-income census whereas the aggregate lenders originated 5.1 percent of its loans in such tracts and 1.0 percent of multi-family housing units are located. The bank made 50.0 percent of its multi-family loans in moderate-income census tracts. The bank outperformed aggregate lenders which originated 28.3 percent of its loans in moderate-income census tracts. In comparison, 26.0 percent of multi-family units are located in moderate-income census tracts. The bank made 50.0 percent of its multi-family loans in middle-income census tracts. The bank outperformed aggregate lenders which originated 48.9 percent of its loans in middle-income census tracts. In comparison, 40.9 percent of multi-family units are located in middle-income census tracts. The bank originated no multi-family loans in upper-income tracts compared to the 17.7 percent by aggregate lenders and the 32.1 percent of multi-family housing units in upper-income tracts.

The bank originated three multi-family loans in 2015. No loans were made in low-income census tracts; however, only 0.6 percent of multifamily units are located in low-income census tracts. One loan was originated in each of the other census tract income levels, representing 33.3 percent of multi-family loans in each category. In comparison, 21.4 percent of owner-occupied multi-family housing units are located in moderate-income census tracts, 41.9 percent in middle-income, and 36.1 percent in upper-income tracts.

In 2013, the bank originated all of its four multi-family loans in moderate-income census tracts. The bank outperformed the 32.0 percent originated by the aggregate lenders and the 20.9 percent of multi-family units in the assessment area are in such census tracts.. The bank did not originate any loans any of the other census tract income levels. In comparison 0.6 percent of owner-occupied multi-family housing units are located in low-income census tracts, 42.0 percent in middle-income, and 36.5 percent in upper-income tracts.

The table below shows the bank's geographic distribution compared to aggregate lenders and the percentage of owner-occupied units in 2014. Please refer to Appendix A for 2013 and 2015 geographic distribution tables.

Geographic Distribution of HMDA Reportable Loans
Assessment Area: 2014 Chicago-Naperville-Elgin, IL-IN-WI MSA 16980

Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison 2014						Owner Occupied
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	$ (000s)	$ %	$ %	% of Units
Home Purchase	Low	4	28.6	0.1	540	14.7	0.1	0.2
	Moderate	2	14.3	14.3	210	5.7	8.1	17.1
	Middle	6	42.9	34.3	2,354	64.1	27.9	34.3
	Upper	2	14.3	51.3	568	15.5	63.9	48.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	**14**	**100.0**	**100.0**	**3,672**	**100.0**	**100.0**	**100.0**
Refinance	Low	0	0.0	0.1	0	0.0	0.1	0.2
	Moderate	0	0.0	11.5	0	0.0	6.4	17.1
	Middle	5	100.0	32.1	1,578	100.0	26.1	34.3
	Upper	0	0.0	56.3	0	0.0	67.3	48.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	**5**	**100.0**	**100.0**	**1,578**	**100.0**	**100.0**	**100.0**
Home Improvement	Low	0	0.0	0.1	0	0.0	0.0	0.2
	Moderate	0	0.0	11.6	0	0.0	4.2	17.1
	Middle	0	0.0	32.7	0	0.0	27.6	34.3
	Upper	0	0.0	55.6	0	0.0	68.3	48.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	**0**	**0.0**	**100.0**	**0**	**0.0**	**100.0**	**100.0**
Multi-Family								**Multi-Family**
	Low	0	0.0	5.1	0	0.0	0.6	1.0
	Moderate	4	50.0	28.3	2,516	54.9	23.8	26.0
	Middle	4	50.0	48.9	2,068	45.1	41.9	40.9
	Upper	0	0.0	17.7	0	0.0	33.7	32.1
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	**8**	**100.0**	**100.0**	**4,584**	**100.0**	**100.0**	**100.0**
HMDA Totals	Low	4	14.8	0.1	540	5.5	0.1	0.2
	Moderate	6	22.2	13.2	2,726	27.7	8.2	17.1
	Middle	15	55.6	33.4	6,000	61.0	27.9	34.3
	Upper	2	7.4	53.2	568	5.8	63.8	48.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	**27**	**100.0**	**100.0**	**9,834**	**100.0**	**100.0**	**100.0**

Originations & Purchases
2014 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Small Business Loans

St. Charles B&TC's small business lending reflects good geographic distribution of small business loans. The table below shows the bank's 2014 record of small business lending when compared to aggregate lenders and the distribution of small businesses throughout the assessment area. Tables for 2013 and 2015 data are included in Appendix A.

In 2014, the bank originated 3.0 percent of its small business loans in low-income census tracts, which was above aggregate lender performance of 0.7 percent and the 0.9 percent of small businesses in low-income census tracts. The bank originated 10.8 percent of small business loans in moderate-income census tracts, which was slightly below the aggregate lender performance of 12.7 percent and the 14.0 percent of businesses in such tracts. The bank originated 57.8 percent of its small business loans in middle-income census tracts, which was above aggregate lender performance of 36.2 percent and the 35.5 percent of small businesses in middle-income census tracts. The bank originated 28.3 percent of small business loans in upper-income census tracts, which was below the aggregate lender performance of 48.8 percent and the 49.7 percent of businesses in such tracts.

Lending improved in 2015, with 8.4 percent of small business loans originated in low-income census tracts. Conversely, the 0.5 percent of small businesses in low-income tracts represents a decline in the percentage of business in such tracts. The percentage of small business loans originated in moderate-income increased to 19.8 percent in 2015, which exceeded the 11.3 percent of business in such tracts. The bank originated 44.8 percent of small business loans in middle-income census tracts, which was above the 34.3 percent of businesses in such tracts. The bank originated 27.0 percent of small business loans in upper-income census tracts, which was below the 53.9 percent of businesses in such tracts.

In 2013, the bank originated 4.9 percent of its small business loans in low-income census tracts which exceeded the aggregate lender performance of 0.5 percent and the 0.6 percent of small businesses in such tracts. The bank originated 8.1 percent of its small business loans in moderate-income census tracts, which was below the performance of aggregate lenders of 11.2 percent and the 11.2 percent of business located in such tracts. The bank originated 46.1 percent of its small business loans in middle-income census tracts, which was above the aggregate lenders of 33.6 percent and the 32.6 percent of business located in such tracts. The bank originated 40.8 percent of its small business loans in upper-income census tracts, which was below the aggregate lenders of 53.1 percent and the 55.5 percent of business located in such tracts.

The table below shows the bank's geographic distribution compared to aggregate lenders and the percentage of total businesses in 2014. Please refer to Appendix A for 2013 and 2015 geographic distribution tables.

Geographic Distribution of Small Business Loans Assessment Area: 2014 Chicago-Naperville-Elgin, IL-IN-WI MSA 16980								
	Tract Income Levels	Bank & Aggregate Lending Comparison 2014						Total Businesses
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	$ (000s)	$ %	$ %	%
Small Business	Low	16	3.0	0.7	3,876	3.4	0.6	0.9
	Moderate	57	10.8	12.7	15,442	13.6	15.9	14.0
	Middle	304	57.8	36.2	68,596	60.4	39.4	35.5
	Upper	149	28.3	48.8	25,715	22.6	43.6	49.7
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			1.6			0.5	
	Total	**526**	**100.0**	**100.0**	**113,629**	**100.0**	**100.0**	**100.0**
Originations & Purchases								
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS								
Note: Percentages may not add to 100.0 percent due to rounding								

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

The bank's lending reflects good distribution among borrowers of different income levels and businesses of different sizes. The bank exhibits a good record of serving the credit needs of low- and moderate- income individuals and small businesses. As noted above, Wintrust Mortgage Company originates home mortgage loans throughout the assessment area on behalf of St. Charles B&TC. As a result, the bank's portion of lending in the assessment area is based on a relatively low number of HMDA-reportable loan originations. Since the bank did not originate any home improvement loans in any of the years included in this evaluation, a meaningful analysis cannot be performed. The narrative, below, describes the analysis of 2014, then 2013 and 2015, loan data. Load data tables for 2014 data are included with the narrative, and 2013 and 2015 tables are included in Appendix A.

Home Purchase Loans

St. Charles B&TC did not originate any home purchase loans to low- or moderate-income borrowers in 2014. The bank was outperformed by aggregate lenders, who originated 7.8 percent of their home purchase loans to low-income families, which account for 16.5 percent of the families in the bank's assessment area. The aggregate lender performance of 17.9 percent of home purchase loans to moderate-income borrowers also outperformed the bank. Moderate-income families accounted for 15.9 percent of families in the assessment area. The bank originated 28.6 percent of its loans to middle-income borrowers, which was above the 19.2 percent by aggregate lenders and the 20.2 percent of middle-income families in the assessment area. The bank originated 14.3 percent of its loans to upper-income borrowers, which was below the 36.8 percent by aggregate lenders and the 47.4 percent of upper-income families in the assessment area.

The bank's performance improved in 2015. The bank originated 20.0 percent of its home purchase loans to low-income borrowers compared to the 15.4 percent of such borrowers in the assessment area. Further, the bank originated 26.7 percent of its loans to moderate-income borrowers, which exceeded the 15.2 percent of moderate-income families in the assessment area. The bank originated 13.3 percent of its loans to middle-income borrowers, which was below the 19.9 percent of middle-income families in the assessment area. The bank originated 26.7 percent of its loans to upper-income borrowers, which was below the 49.6 percent of upper-income families in the assessment area.

In 2013, the bank originated 20.0 percent of its home purchase loans to low-income borrowers which exceeded the 6.6 percent of loans originated by aggregate borrowers and the 15.0 percent of low-income families in the assessment area. However, the bank did not originate any loans to moderate-income borrowers, whereas, the aggregate lenders originated 18.1 percent of their loans to such borrowers. Moderate-income families account for 15.0 percent of families in the assessment area. The bank did not originate any loans to middle-income borrowers compared to the 21.4 percent by aggregate borrowers and the 19.7 percent of middle-income families in the assessment area. The bank originated 20.0 percent of its loans to upper-income borrowers compared to the 45.0 percent by aggregate borrowers and the 50.3 percent of upper-income families in the assessment area.

Refinance Loans

In 2014, St. Charles B&TC did not originate loans to any low- or moderate-income borrowers. Low-income families by family income level accounted for 16.5 percent of all families in the banks assessment area. In addition, moderate-income families accounted for 15.9 percent of families in the assessment area. The bank was outperformed by aggregate lenders, which originated 6.2 percent of loans to low-income families. In addition, aggregate lenders made 12.7 percent of their loans to moderate-income families. The bank originated 40.0 percent of its loans to middle-income borrowers, which was above the 18.1 percent by aggregate lenders and the 20.2 percent of middle-income families in the assessment area. The bank originated none of its loans to upper-income borrowers, which was below the 46.4 percent by aggregate lenders and the 47.4 percent of upper-income families in the assessment area.

Lending performance to low- and moderate-income borrowers increased in 2015. The bank made 28.6 percent of loans to low-income families, which was well above the assessment area demographics as 15.4 percent of families are low-income. In addition, the bank outperformed assessment area demographics to moderate-income families. The bank originated 28.6 percent of loans to moderate-income families, which was above the s 15.2 percent of moderate-income families residing in the assessment area. The bank originated 28.6 percent of loans to middle-income families, which is above the 19.9 percent of middle-income families residing in the assessment area. The bank originated 14.3 percent of loans to upper-income families, which was below the 49.6 percent of middle-income families residing in the assessment area.

In 2013, St. Charles B&TC originated 25.0 percent of loans to low-income borrowers outperforming aggregate lenders, which originated 4.8 percent of refinance loans to low-income borrowers. The bank's performance exceeded the 15.0 percent of low-income families in the bank's assessment area. The bank's 12.5 percent of loans to moderate-income borrowers also outperformed the 11.3 percent by aggregate lenders; however, both the bank and aggregate lenders performed below the 15.0 percent of moderate-income families in the assessment area demographics. The bank originated 12.5 percent of its loans to middle-income borrowers, which was below the 20.3 percent by aggregate lenders and the 19.7 percent of middle-income families in the assessment area. The bank originated 50.0 percent of its loans to upper-income borrowers, which was below the 52.4 percent by aggregate lenders, but comparable to the 50.3 percent of upper-income families in the assessment area.

Multi-Family Loans

Neither St. Charles B&TC nor aggregate lenders originated any multi-family loans in any of the income categories in any of the years included in this evaluation. All multi-family loans for the bank and aggregate lenders were originated to borrowers with unknown income. Both the bank and the aggregate were below the percentage of families in the each income category in the assessment area.

The table below shows the bank's borrower distribution compared to aggregate lenders and the percentage of owner-occupied units in 2014. Please refer to Appendix A for 2013 and 2015 borrower distribution tables.

Borrower Distribution of HMDA Reportable Loans

Assessment Area: 2014 Chicago-Naperville-Elgin, IL-IN-WI MSA 16980

Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison 2014						Families by Family Income
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	$(000s)	$ %	$ %	%
Home Purchase	Low	0	0.0	7.8	0	0.0	3.5	16.5
	Moderate	0	0.0	17.9	0	0.0	11.2	15.9
	Middle	4	28.6	19.2	952	25.9	16.4	20.2
	Upper	2	14.3	36.8	1,508	41.1	52.1	47.4
	Unknown	8	57.1	18.4	1,212	33.0	16.8	0.0
	Total	**14**	**100.0**	**100.0**	**3,672**	**100.0**	**100.0**	**100.0**
Refinance	Low	0	0.0	6.2	0	0.0	3.0	16.5
	Moderate	0	0.0	12.7	0	0.0	7.7	15.9
	Middle	2	40.0	18.1	330	20.9	13.7	20.2
	Upper	0	0.0	46.4	0	0.0	58.9	47.4
	Unknown	3	60.0	16.6	1,248	79.1	16.7	0.0
	Total	**5**	**100.0**	**100.0**	**1,578**	**100.0**	**100.0**	**100.0**
Home Improvement	Low	0	0.0	4.9	0	0.0	1.7	16.5
	Moderate	0	0.0	10.5	0	0.0	6.9	15.9
	Middle	0	0.0	16.9	0	0.0	12.8	20.2
	Upper	0	0.0	42.6	0	0.0	66.5	47.4
	Unknown	0	0.0	25.1	0	0.0	12.1	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	16.5
	Moderate	0	0.0	0.0	0	0.0	0.0	15.9
	Middle	0	0.0	0.0	0	0.0	0.0	20.2
	Upper	0	0.0	0.0	0	0.0	0.0	47.4
	Unknown	8	100.0	100.0	4,584	100.0	100.0	0.0
	Total	**8**	**100.0**	**100.0**	**4,584**	**100.0**	**100.0**	**100.0**
HMDA Totals	Low	0	0.0	7.1	0	0.0	3.1	16.5
	Moderate	0	0.0	15.6	0	0.0	9.2	15.9
	Middle	6	22.2	18.6	1,282	13.0	14.5	20.2
	Upper	2	7.4	40.6	1,508	15.3	52.2	47.4
	Unknown	19	70.4	18.2	7,044	71.6	20.9	0.0
	Total	**27**	**100.0**	**100.0**	**9,834**	**100.0**	**100.0**	**100.0**

Originations & Purchases
2014 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Small Business Loans

St. Charles B&TC's distribution of loans reflects a good distribution among businesses of different sizes when compared to aggregate lenders, and the percentage of small businesses in the assessment area. In 2014, the bank outperformed aggregate lenders in lending to businesses with revenues of $1 million or less by number and dollar amount. The bank originated 59.7 percent of small business loans to businesses with revenue of $1 million or less, while 75.2 percent of these loans were in amounts of $100,000 or less, which are considered more impactful to small businesses. Neither the bank nor aggregate lenders met or exceeded the number of businesses, 86.4 percent, within the assessment area with revenue of $1 million or less.

The table below shows the bank's borrower distribution compared to aggregate lenders and the percentage of total businesses in 2014. Please refer to Appendix A for 2013 and 2015 geographic distribution tables.

Small Business Lending By Revenue & Loan Size
Assessment Area: 2014 Chicago-Naperville-Elgin, IL-IN-WI MSA 16980

Product Type			Bank & Aggregate Lending Comparison 2014						
			Count			Dollar			Total
			Bank		Agg	Bank		Agg	Businesses
			#	%	%	$ 000s	$ %	$ %	%
Small Business	Revenue	$1 Million or Less	314	59.7	38.9	39,208	34.5	26.6	86.4
		Over $1 Million or Unknown	212	40.3	61.1	74,421	65.5	73.4	13.6
		Total	**526**	**100.0**	**100.0**	**113,629**	**100.0**	**100.0**	100.0
	Loan Size	$100,000 or Less	292	55.5	90.1	6,037	5.3	23.5	
		$100,001 - $250,000	70	13.3	4.1	12,733	11.2	14.2	
		$250,001 - $1 Million	164	31.2	5.8	94,859	83.5	62.3	
		Total	**526**	**100.0**	**100.0**	**113,629**	**100.0**	**100.0**	
	Loan Size & Rev $1 Mill or Less	$100,000 or Less	236	75.2		2,216	5.7		
		$100,001 - $250,000	23	7.3		4,124	10.5		
		$250,001 - $1 Million	55	17.5		32,868	83.8		
		Total	**314**	**100.0**		**39,208**	**100.0**		

Originations & Purchases
2014 FFIEC Census Data & 2014 Dun & Bradstreet information according to 2010 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Small business lending performance in 2015 was similar to 2014 lending. The bank originated 59.1 percent of its small business loans to businesses with $1 million or less in revenue, and 84.9 percent of those loans were in amounts of $100,000 or less. In comparison, this is below the number of small businesses with $1 million or less in revenue within the assessment area, which is 87.9 percent.

In 2013, the bank's performance was better in terms of number of loans originated to small businesses. The majority of the bank's small business loans, 63.7 percent by number were made to businesses with revenue of $1 million or less and 76.2 percent of those loans were in amounts of $100,000 or less. St. Charles B&TC exceeded aggregate lender performance by number and dollar amount to small businesses. However, the bank and aggregate lender's performance was below the 86.9 percent of businesses with revenues of $1 million or less in the assessment area.

The bank makes use of innovative and flexible lending practices in serving assessment area needs. The bank utilizes various small dollar loan programs tailored to meet the credit needs of borrowers with low- or moderate- incomes and those who need to establish or re-establish credit, as well as small businesses. The bank's participation in assisted loan programs is detailed in the table below.

Innovative and Flexible Lending Programs
April 22, 2013 – June 6, 2016

Program	Number of Loans	$ of Loans (000's)
Everyday Loans	114	234
Borrow 'n Save Secured Loans/Money Smart CD Secured	21	16
SBA 504	13	8,135
SBA 7A	8	9,354
SBA Express	8	1,598
Small Business Easy Access/Micro Loan	25	752
Small Business Overdraft Protection: 354 Loans	212	430
Total	401	20,519

Community Development Lending

St. Charles Bank and Trust Company makes an adequate level of community development loans given the credit and community development needs and opportunities within the assessment area. The bank originated 19 community development loans across its assessment area totaling $12,387,282 during the review period. This represents a decrease in both number and dollar amount from the previous evaluation as the bank originated 29 loans (34.5 percent decrease) in the amount of $13.2 million (5.9 percent decrease).

Loan purposes included revitalization and stabilization efforts in Elgin, Illinois, as well as affordable housing efforts throughout the assessment area.

The following table presents the bank's community development loans and community development purpose. The largest portion of the community development loans were made for affordable housing purposes, which community representatives indicated was one of the largest needs in the assessment area.

Qualified Community Development Loans
April 22, 2013 – June 6, 2016

Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize & Stabilize		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
DuPage and Kane Counties	13	7,852	2	90	2	2,790	2	1,655	19	12,387

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

INVESTMENT TEST

St. Charles Bank & Trust Company's performance related to the Investment Test is rated High Satisfactory based on the significant level of qualified investments and grants throughout its assessment area, occasionally in a leadership position. The bank made occasional use of innovative or complex investments to support community development initiatives, and exhibited good responsiveness to credit and community development needs. The bank participated in three innovative and complex bonds that allow schools with a large population of low-income families to benefit from low interest financing to pay for building repairs and additions. The majority of investments were made in funds to assist individuals to obtain affordable housing.

Qualified investments for the review period in the assessment area totaled $6,004,194, which included 19 new investments totaling $5,554,986. There were three prior period commitments with outstanding balances of $449,208. Two unfunded commitments totaled $243,849. Investments were distributed for affordable housing and economic development purposes. Qualified investment activity improved from the prior evaluation period by 23.6 percent by dollar amount. During the 2013 evaluation, the bank totaled $4,495,000 in qualified investments.

Qualified Community Development Investments April 22, 2013 – June 6, 2016								
Assessment Area	Unfunded Commitments		Innovative and Complex		Neither Innovative nor Complex		Total Investments	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
DuPage and Kane Counties	2	244	3	4,790	22	1,214	24	6,004

The bank made 89 qualified grants and donations within the assessment area, totaling $173,508. Services for low- and moderate-income individuals provided by the recipient organizations included community service, affordable housing, revitalization and stabilization, and economic development.

SERVICE TEST

St. Charles Bank and Trust Company's performance relative to the service test is rated High Satisfactory. The bank's delivery systems are reasonably 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 not adversely impacted low- or moderate-income geographies or low- and moderate-income individuals. The bank provides a relatively high level of community development services.

Retail Services

The bank offers a wide range of products and services including commercial, real estate, small business, and consumer loan products at all locations. Deposit and loan offerings include products that are suitable for low- and moderate-income individuals and small businesses. These include Money Smart Checking and Savings accounts that do not require a minimum balance to open or maintain. Customers are eligible for these accounts after attending a Money Smart class. In addition to installment and residential real estate loans, consumer Money Smart loan products targeted towards low- and moderate-income borrowers, are designed to meet small dollar emergency credit needs and build credit through the use of CD-secured installment loans. Small business borrowers can utilize the bank's micro and small business loan and overdraft protection programs, which offer streamlined application processes and small-dollar-amount loans. All offices offer the same products and with the same underwriting and pricing processes.

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 phone, internet, and the surcharge free automated teller machines (ATMs) of the bank and its affiliates. 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.

Branch Distribution

The table below shows a comparison of the St. Charles B&TC's branch and ATM locations to relevant demographic characteristics in the assessment area. Five of the offices are located in middle-income census tracts, and one is located in a moderate-income census tract. All branch locations, with the exception of the temporary branch in Aurora, have drive-up facilities.

During the evaluation period St. Charles B&TC closed a branch office in Geneva, Illinois, in November 2013, and opened a temporary branch in Aurora, Illinois in September 2015. A permanent branch is scheduled to open in June 2016 and will be located in a moderate-income census tract. The closed branch was located in a middle-income census tract and the closure did not adversely affect the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low-and moderate-income individuals.

Distribution of Branches and ATMs 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	19.5	1.9
Moderate-Income	1	16.7	1	16.7	18.2	21.8
Middle-Income	5	83.3	5	83.3	21.0	40.4
Upper-Income	0	0.0	0	0.0	41.3	35.8
Total	6	100.0	6	100.0	100.0	100.0
Note: Percentages may not add to 100.0 percent due to rounding *2015 FFIEC Census Data & 2015 Dun & Bradstreet information according to 2010 ACS*						

Community Development Services

St. Charles Bank and Trust Company provided a relatively high level of community development services. Officers and staff were involved with 52 organizations providing 3,517.5 hours of community development services throughout the assessment area. Qualified community development services include serving in leadership positions of community service organizations that focus on providing healthcare to low- and moderate-income individuals, youth programs for children from low- and moderate-income families, and economic development. The bank's community development services during this evaluation represent a 50.0 percent increase from the 2,345.25 hours from the previous evaluation.

The majority of community services were "Money Smart" related seminars. The seminars were held in bank branch facilities, community service organization offices, and at local educational facilities.

Qualified Community Development Services by Type April 22, 2013 – June 6, 2016														
Assessment Area	Affordable Housing			Community Services			Economic Development			Revitalize & Stabilize			Total	
	#	Hours	%	#	Hours	%	#	Hours	%	#	Hours	%	#	Hours
DuPage and Kane Counties	4	178	5.1	145	2,918	83.0	6	421.5	12.0	0	0	0.0	155	3,517.5
Note: Percentages may not add to 100.0 percent due to rounding.														

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 – 2013 and 2015 HMDA and CRA Loan Distribution Tables

Geographic Distribution of HMDA Reportable Loans

Assessment Area: 2013 Chicago-Joliet-Naperville, IL MD 16974

Product Type	Tract Income Levels	Bank & Aggregate Lending Comparison 2013						Owner Occupied
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	$ (000s)	$ %	$ %	% of Units
Home Purchase	Low	0	0.0	0.1	0	0.0	0.0	0.1
	Moderate	0	0.0	10.1	0	0.0	5.5	12.7
	Middle	1	20.0	31.2	122	9.6	23.5	32.8
	Upper	4	80.0	58.6	1,145	90.4	71.0	54.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	**5**	**100.0**	**100.0**	**1,267**	**100.0**	**100.0**	**100.0**
Refinance	Low	1	12.5	0.1	204	11.1	0.0	0.1
	Moderate	1	12.5	8.1	50	2.7	7.3	12.7
	Middle	4	50.0	29.4	1,015	55.0	24.7	32.8
	Upper	2	25.0	62.4	575	31.2	68.0	54.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	**8**	**100.0**	**100.0**	**1,844**	**100.0**	**100.0**	**100.0**
Home Improvement	Low	0	0.0	0.1	0	0.0	0.1	0.1
	Moderate	0	0.0	7.5	0	0.0	3.9	12.7
	Middle	0	0.0	25.5	0	0.0	17.3	32.8
	Upper	0	0.0	67.0	0	0.0	78.7	54.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	**0**	**0.0**	**100.0**	**0**	**0.0**	**100.0**	**100.0**
Multi-Family								**Multi-Family**
	Low	0	0.0	1.2	0	0.0	0.2	0.6
	Moderate	4	100.0	32.0	2,914	100.0	49.4	20.9
	Middle	0	0.0	45.0	0	0.0	21.0	42.0
	Upper	0	0.0	21.9	0	0.0	29.5	36.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	**4**	**100.0**	**100.0**	**2,914**	**100.0**	**100.0**	**100.0**
HMDA Totals	Low	1	5.9	0.1	204	3.4	0.0	0.1
	Moderate	5	29.4	8.8	2,964	49.2	7.9	12.7
	Middle	5	29.4	30.0	1,137	18.9	24.1	32.8
	Upper	6	35.3	61.1	1,720	28.5	67.9	54.4
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Total	**17**	**100.0**	**100.0**	**6,025**	**100.0**	**100.0**	**100.0**

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

Geographic Distribution of Small Business Loans

Assessment Area: 2013 Chicago-Joliet-Naperville, IL MD 16974

	Tract Income Levels	Bank & Aggregate Lending Comparison 2013						Total Businesses
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	$ (000s)	$ %	$ %	%
Small Business	Low	14	4.9	0.5	5,467	9.4	0.6	0.6
	Moderate	23	8.1	11.2	5,007	8.6	12.6	11.2
	Middle	131	46.1	33.6	28,077	48.3	37.8	32.6
	Upper	116	40.8	53.1	19,598	33.7	48.4	55.5
	Unknown	0	0.0	0.0	0	0.0	0.0	0.0
	Tr Unknown			1.6			0.5	
	Total	**284**	**100.0**	**100.0**	**58,149**	**100.0**	**100.0**	**100.0**

Originations & Purchases

2013 FFIEC Census Data & 2013 Dun & Bradstreet information according to 2010 ACS

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

Borrower Distribution of HMDA Reportable Loans

Assessment Area: 2013 Chicago-Joliet-Naperville, IL MD 16974

Product Type	Borrower Income Levels	Bank & Aggregate Lending Comparison 2013						Families by Family Income
		Count			Dollar			
		Bank		Agg	Bank		Agg	
		#	%	%	$(000s)	$ %	$ %	%
Home Purchase	Low	1	20.0	6.6	87	6.9	2.6	15.0
	Moderate	0	0.0	18.1	0	0.0	10.8	15.0
	Middle	0	0.0	21.4	0	0.0	17.3	19.7
	Upper	1	20.0	45.0	585	46.2	61.2	50.3
	Unknown	3	60.0	8.9	595	47.0	8.1	0.0
	Total	**5**	**100.0**	**100.0**	**1,267**	**100.0**	**100.0**	**100.0**
Refinance	Low	2	25.0	4.8	113	6.1	2.3	15.0
	Moderate	1	12.5	11.3	550	29.8	6.4	15.0
	Middle	1	12.5	20.3	50	2.7	14.5	19.7
	Upper	4	50.0	52.7	1,131	61.3	59.9	50.3
	Unknown	0	0.0	10.8	0	0.0	16.8	0.0
	Total	**8**	**100.0**	**100.0**	**1,844**	**100.0**	**100.0**	**100.0**
Home Improvement	Low	0	0.0	4.6	0	0.0	1.3	15.0
	Moderate	0	0.0	12.3	0	0.0	7.8	15.0
	Middle	0	0.0	17.8	0	0.0	12.6	19.7
	Upper	0	0.0	59.2	0	0.0	69.1	50.3
	Unknown	0	0.0	6.1	0	0.0	9.1	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	15.0
	Moderate	0	0.0	0.0	0	0.0	0.0	15.0
	Middle	0	0.0	0.0	0	0.0	0.0	19.7
	Upper	0	0.0	0.0	0	0.0	0.0	50.3
	Unknown	4	100.0	100.0	2,914	100.0	100.0	0.0
	Total	**4**	**100.0**	**100.0**	**2,914**	**100.0**	**100.0**	**100.0**
HMDA Totals	Low	3	17.6	5.5	200	3.3	2.3	15.0
	Moderate	1	5.9	13.7	550	9.1	7.7	15.0
	Middle	1	5.9	20.6	50	0.8	15.0	19.7
	Upper	5	29.4	50.0	1,716	28.5	58.6	50.3
	Unknown	7	41.2	10.3	3,509	58.2	16.3	0.0
	Total	**17**	**100.0**	**100.0**	**6,025**	**100.0**	**100.0**	**100.0**

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

Small Business Lending By Revenue & Loan Size Assessment Area: 2013 Chicago-Joliet-Naperville, IL MD 16974										
Product Type			Bank & Aggregate Lending Comparison 2013							
			Count			Dollar				Total Businesses
			Bank		Agg	Bank		Agg		
			#	%	%	$ 000s	$ %	$ %		%
Small Business	Revenue	$1 Million or Less	181	63.7	41.2	22,011	37.9	29.4		86.9
		Over $1 Million or Unknown	103	36.3	58.8	36,138	62.1	70.6		13.1
		Total	**284**	**100.0**	**100.0**	**58,149**	**100.0**	**100.0**		**100.0**
	Loan Size	$100,000 or Less	165	58.1	88.6	3,325	5.7	20.4		
		$100,001 - $250,000	34	12.0	4.7	6,102	10.5	14.6		
		$250,001 - $1 Million	85	29.9	6.7	48,722	83.8	65.0		
		Total	**284**	**100.0**	**100.0**	**58,149**	**100.0**	**100.0**		
	Loan Size & Rev $1 Mill or Less	$100,000 or Less	138	76.2		1,728	7.9			
		$100,001 - $250,000	13	7.2		2,454	11.1			
		$250,001 - $1 Million	30	16.6		17,829	81.0			
		Total	**181**	**100.0**		**22,011**	**100.0**			

Originations & Purchases
2013 FFIEC Census Data & 2013 Dun & Bradstreet information according to 2010 ACS
Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of HMDA Reportable Loans

Assessment Area: 2015 Chicago-Naperville-Elgin, IL-IN-WI MSA 16980

Product Type	Tract Income Levels	Bank & Demographic Comparison 2015				
		Count Bank		Dollar Bank		Owner Occupied
		#	%	$ (000s)	$ %	% of Units
Home Purchase	Low	0	0.0	0	0.0	0.1
	Moderate	3	20.0	315	10.1	13.2
	Middle	4	26.7	484	15.5	34.2
	Upper	8	53.3	2,314	74.3	52.4
	Unknown	0	0.0	0	0.0	0.0
	Total	**15**	**100.0**	**3,113**	**100.0**	**100.0**
Refinance	Low	0	0.0	0	0.0	0.1
	Moderate	2	28.6	107	5.7	13.2
	Middle	3	42.9	1,510	79.8	34.2
	Upper	2	28.6	275	14.5	52.4
	Unknown	0	0.0	0	0.0	0.0
	Total	**7**	**100.0**	**1,892**	**100.0**	**100.0**
Home Improvement	Low	0	0.0	0	0.0	0.1
	Moderate	0	0.0	0	0.0	13.2
	Middle	0	0.0	0	0.0	34.2
	Upper	0	0.0	0	0.0	52.4
	Unknown	0	0.0	0	0.0	0.0
	Total	**0**	**0.0**	**0**	**0.0**	**100.0**
Multi-Family						**Multi-Family**
	Low	0	0.0	0	0.0	0.6
	Moderate	1	33.3	465	24.5	21.4
	Middle	1	33.3	632	33.3	41.9
	Upper	1	33.3	800	42.2	36.1
	Unknown	0	0.0	0	0.0	0.0
	Total	**3**	**100.0**	**1,897**	**100.0**	**100.0**
HMDA Totals	Low	0	0.0	0	0.0	0.1
	Moderate	6	24.0	887	12.9	13.2
	Middle	8	32.0	2,626	38.0	34.2
	Upper	11	44.0	3,389	49.1	52.4
	Unknown	0	0.0	0	0.0	0.0
	Total	**25**	**100.0**	**6,902**	**100.0**	**100.0**

Originations & Purchases
2015 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Geographic Distribution of Small Business Loans Assessment Area: 2015 Chicago-Naperville-Elgin, IL-IN-WI MSA 16980						
	Tract Income Levels	Bank & Demographic Comparison 2015				
		Count Bank		Dollar Bank		Total Businesses
		#	%	$ 000s	$ %	%
Small Business	Low	30	8.4	1,076	1.9	0.5
	Moderate	71	19.8	3,950	7.1	11.3
	Middle	161	44.8	34,695	62.1	34.3
	Upper	97	27.0	16,126	28.9	53.9
	Unknown	0	0.0	0	0.0	0.0
	Total	**359**	**100.0**	**55,847**	**100.0**	**100.0**

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

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

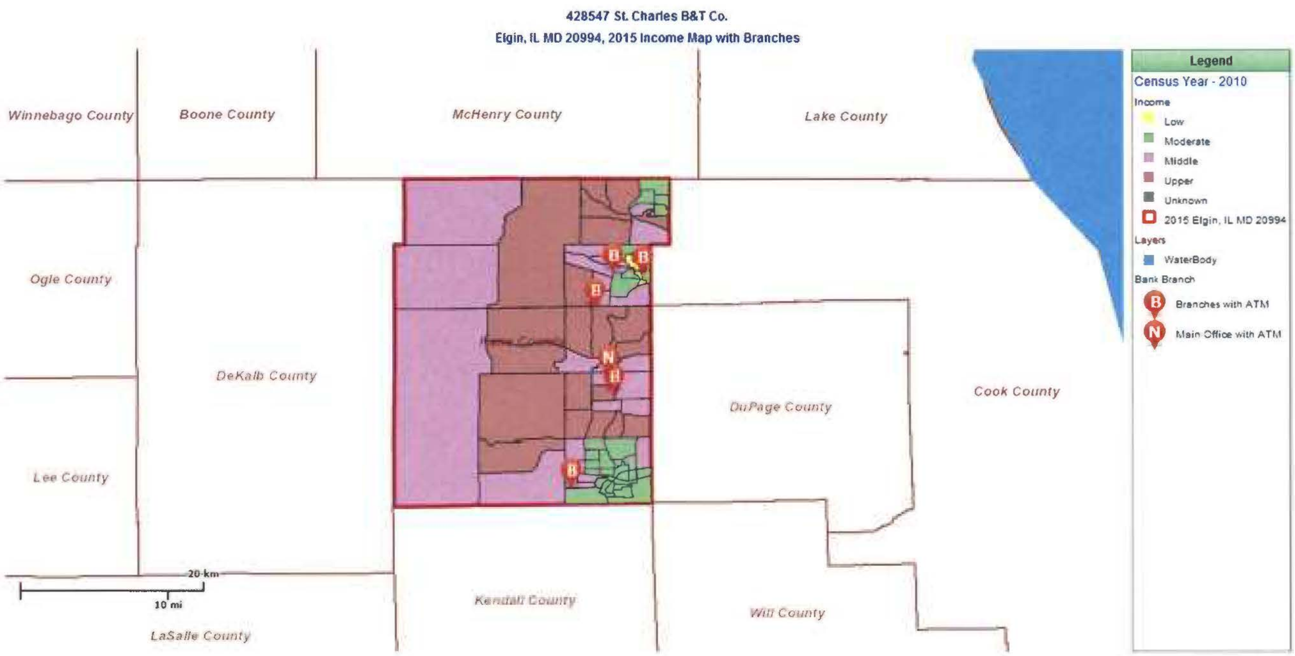
Borrower Distribution of HMDA Reportable Loans						
Assessment Area: 2015 Chicago-Naperville-Elgin, IL-IN-WI MSA 16980						
Product Type	Borrower Income Levels	Bank & Demographic Comparison 2015				Families by Family Income
		Count		Dollar		
		#	%	$ (000s)	$ %	%
Home Purchase	Low	3	20.0	286	9.2	15.4
	Moderate	4	26.7	487	15.6	15.2
	Middle	2	13.3	226	7.3	19.9
	Upper	4	26.7	1,802	57.9	49.6
	Unknown	2	13.3	312	10.0	0.0
	Total	**15**	**100.0**	**3,113**	**100.0**	**100.0**
Refinance	Low	2	28.6	153	8.1	15.4
	Moderate	2	28.6	775	41.0	15.2
	Middle	2	28.6	229	12.1	19.9
	Upper	1	14.3	735	38.8	49.6
	Unknown	0	0.0	0	0.0	0.0
	Total	**7**	**100.0**	**1,892**	**100.0**	**100.0**
Home Improvement	Low	0	0.0	0	0.0	15.4
	Moderate	0	0.0	0	0.0	15.2
	Middle	0	0.0	0	0.0	19.9
	Upper	0	0.0	0	0.0	49.6
	Unknown	0	0.0	0	0.0	0.0
	Total	**0**	**0.0**	**0**	**0.0**	**100.0**
Multi-Family	Low	0	0.0	0	0.0	15.4
	Moderate	0	0.0	0	0.0	15.2
	Middle	0	0.0	0	0.0	19.9
	Upper	0	0.0	0	0.0	49.6
	Unknown	3	100.0	1,897	100.0	0.0
	Total	**3**	**100.0**	**1,897**	**100.0**	**100.0**
HMDA Totals	Low	5	20.0	439	6.4	15.4
	Moderate	6	24.0	1,262	18.3	15.2
	Middle	4	16.0	455	6.6	19.9
	Upper	5	20.0	2,537	36.8	49.6
	Unknown	5	20.0	2,209	32.0	0.0
	Total	**25**	**100.0**	**6,902**	**100.0**	**100.0**

Originations and Purchases
2015 FFIEC Census Data
Note: Percentages may not add to 100.0 percent due to rounding

Small Business Lending By Revenue & Loan Size Assessment Area: 2015 Chicago-Naperville-Elgin, IL-IN-WI MSA 16980							
Product Type			Bank & Demographic Comparison 2015				
			Count Bank		Dollar Bank		Total Businesses
			#	%	$ 000s	$ %	%
Small Business	Revenue	$1 Million or Less	212	59.1	17,106	30.6	87.9
		Over $1 Million or Unknown	147	40.9	38,741	69.4	12.1
		Total	**359**	**100.0**	**55,847**	**100.0**	**100.0**
	Loan Size	$100,000 or Less	237	66.0	3,618	6.5	
		$100,001 - $250,000	45	12.5	8,571	15.3	
		$250,001 - $1 Million	77	21.4	43,658	78.2	
		Total	**359**	**100.0**	**55,847**	**100.0**	
	Loan Size & Rev $1 Mill or Less	$100,000 or Less	180	84.9	1,582	9.2	
		$100,001 - $250,000	8	3.8	1,279	7.5	
		$250,001 - $1 Million	24	11.3	14,245	83.3	
		Total	**212**	**100.0**	**17,106**	**100.0**	

Originations & Purchases
2015 FFIEC Census Data & 2015 Dun & Bradstreet information according to 2010 ACS
Note: Percentages may not add to 100.0 percent due to rounding

APPENDIX B – Map of Assessment Area



APPENDIX C – Scope of Examination

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED	HMDA: January 1, 2013 – December 31, 2015 CRA Small Business: January 1, 2013 – December 31, 2015 Community Development Activity: April 22, 2013 – June 6, 2016		
FINANCIAL INSTITUTION St. Charles Bank and Trust Company			**PRODUCTS REVIEWED** HMDA-Reportable Loans CRA- Reportable Small Business Loans Community Development Activities
AFFILIATE(S)	**AFFILIATE RELATIONSHIP**		**PRODUCTS REVIEWED**
Wintrust Mortgage Company	Subsidiary of affiliate bank		HMDA-Reportable loans
IDENTIFICATION OF ASSESSMENT AREAS			
ASSESSMENT AREA	**TYPE OF EXAMINATION**	**BRANCHES VISITED**	**OTHER INFORMATION**
Chicago-Naperville-Elgin, IL MD #16980 (DuPage and Kane Counties)	Full Review	N/A	Permanent Aurora branch opening June 2016

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.

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 household 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.