

# Community Reinvestment Act Public File



# Written Comments

No written comments have been received from the public for the current year or the preceding two calendar years.



# **PUBLIC DISCLOSURE**

June 15, 2020

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Mason City National Bank 14492

104 West Pine Street Mason City, Illinois 62664

Office of the Comptroller of the Currency

211 Fulton Street Suite 604 Peoria, Illinois 61602

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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# **Overall CRA Rating**

**Institution's CRA Rating:** This institution is rated **Satisfactory** 

The Lending Test is rated: Satisfactory

The major factors that support this rating are listed below:

• The Lending Test rating is based on the State of Illinois.

- The borrower distribution reflects reasonable distribution.
- The geographic distribution reflects excellent distribution.
- A majority of the bank's loans are originated or purchased inside its assessment area (AA).
- The loan-to-deposit (LTD) ratio is reasonable.

#### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

The quarterly average LTD ratio was 44.6 percent for the 21-quarter period between March 31, 2015, and March 31, 2020, with a low of 37.7 percent and a high of 52.0 percent. The bank's LTD ratio has been trending upward since the March 31, 2015, when the LTD ratio was 38.1 percent and was 52.0 percent at March 31, 2020.

MCNB ranked seventh of 11 similarly situated FDIC insured financial institutions that compete with the bank for deposits in the AA. The comparable institutions ranged in size from \$15.5 million to \$312.8 million and reported quarterly average LTD ratios from 34.9 percent to 88.8 percent. Four institutions had quarterly LTD ratios from 82.4 percent of 88.8 percent, while the remaining seven institutions had quarterly LTD ratios from 34.9 percent to 60.05 percent. Two institutions with the closest asset size had quarterly LTD ratios of 34.9 percent and 51.0. The LTD ratio is calculated on a bank-wide basis.

#### **Lending in Assessment Area**

A majority of the bank's loans are inside its AA.

The bank originated and purchased 82.5 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and O	Lending Inside and Outside of the Assessment Area														
	N	lumber o	of Loans			Dollar .	Amount of	of Loans \$(	000s)						
Loan Category	Insid	le	Outsi	de	Total	Insid	e	Outsio	Total						
	#	%	#	%	#	\$	%	\$	%	\$(000s)					
Home Mortgage	15	75.0	5	25.0	20	793	49.3	816	50.7	1,609					
Small Farm	18	90.0	2	10.0	20	3,053	66.1	1,567	33.9	4,620					
Total	33	82.5	7	17.5	40	3,846	61.7	2,383	38.3	6,229					

Source: Random sample of farm and home mortgage loans from January 1, 2017 through December 31, 2019.

# **Description of Institution**

Mason City National Bank (MCNB or bank) is an intrastate financial institution headquartered in Mason City, Illinois, with assets of \$67.3 million at March 31, 2020. MCNB is wholly owned by Mason City Bancorp, Inc., a one-bank holding company headquartered in Mason City, Illinois, with assets of \$67.3 million at March 31, 2020.

The CRA evaluation has one rating area for MCNB's AA in Illinois. MCNB has one location serving portions of eastern Mason County and western Logan County, which are in non-metropolitan statistical areas (MSA). The bank office, located in a moderate-income geography, provides lobby, drive-through, and automated teller machine services. Banking services are available on Saturdays and customers have additional banking access through internet platforms. There were no branch closures or openings during the evaluation period.

The bank's lending strategy is focused on agriculture and home mortgage lending but also offers business loans and various consumer loan products to meet the needs of its customers. Please see the Public File for more information.

Agriculture lending represents the largest portfolio at \$17.0 million, followed by residential at \$7.9 million, commercial lending at \$2.5 million, and consumer lending at \$1.1 million, per call report data at March 31, 2020. The bank originated or purchased over 700 loans totaling \$46.5 million from January 1, 2017, through December 31, 2019, per bank data. The bank does not offer long term fixed-rate home mortgages and does not sell loans into the secondary market.

MCNB held a net loans and leases to total assets of 42.2 percent and tier 1 leverage capital ratio of 18.4 percent at March 31, 2020.

There are no legal or financial constraints that impede the bank's ability to meet the credit needs of its AA.

The previous CRA rating, which the OCC determined using Small Bank procedures, was Outstanding as detailed in the CRA Performance Evaluation dated March 15, 2015.

# **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

The evaluation period covers the period from the date of the previous CRA PE of March 30, 2015, through June 15, 2020. We evaluated MCNB under the Small Bank evaluation procedures which includes a Lending Test.

The Lending Test evaluated loans originated or purchased between January 1, 2017, and December 31, 2019, and were compared to the 2015 American Community Survey Census Data. With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

The primary loan products for the evaluation were determined to be farm and home mortgage loans, due to the strategic focus of the bank. These two products accounted for 33.5 percent of loans, by number, and 85.0 percent of loans, by dollar volume, from January 1, 2017, through December 31, 2019, per bank data. Performance conclusions for primary products are based on loan samples, not total originations and purchases, and are considered in context as the bank is not a HMDA or CRA reporter.

#### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate MSA (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

#### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

MCNB's one AA is located within the State of Illinois.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

# **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

# **State Rating**

#### State of Illinois

**CRA rating for the State of Illinois**<sup>1</sup>: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating are listed below:

• Both home mortgage and small loans to small farms exhibit reasonable borrower distribution.

• Both the home mortgage and small loans to farms exhibit excellent geographic distribution.

# **Description of Institution's Operations in Illinois**

MCNB serves the AA with one location in Mason City, Illinois. The bank office, located in a moderate-income geography, provides lobby, drive-through, and automated teller machine services. Banking services are available on Saturdays and customers have additional banking access through internet platforms.

Competition for loans and deposits is moderate, but there is growing competition from online lenders, farm credit lenders, and larger regional banks and credit unions from the Peoria and Springfield markets. In the two counties comprising the AA, MCNB held a 5.8 percent deposit market share and ranked fourth of 19 FDIC insured financial institutions competing for \$955.4 million in deposits, at June 30, 2019. The top three financial institutions held a combined deposit market share of 47.1 percent, at June 30, 2019.

The AA includes one moderate-income CT, which covers Mason City, Mason County, Illinois. The Mason County portion of the AA includes two middle-income CTs, which are distressed due to unemployment and population loss. The Logan County portion of the AA includes one middle-income CT and one upper-income CT. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- and moderate-income areas. Refer to Appendix A, Scope of Examination, for more information.

The local economy is largely centered around agriculture production and agriculture services including processing and transportation.

Annualized unemployment from 2017 through 2019 have improved for both Mason and Logan Counties but Mason County's annualized unemployment was elevated and compared unfavorably to the State of Illinois unemployment rates of 4.9 percent in 2017, 4.3 percent in 2018, and 4.0 percent in 2019. Mason County had unemployment rates of 6.1 percent in 2017, 5.8 percent in 2018, and 5.3 percent in 2019. Logan County had unemployment rates of 4.6 percent in 2017, 4.6 percent in 2018, and 4.3 percent in 2019. Higher rates of unemployment in 2017 may have limited opportunities, particularly in Mason

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<sup>&</sup>lt;sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

County, while an improvement in the unemployment rates in 2018 and 2019 may have provided opportunities for lending.

Housing costs are generally affordable for both low- and moderate-income families given the median housing value of \$92 thousand in the AA.

We contacted two individuals, one from Mason City, and one from the broader Mason County area. The contacts described the community of Mason City as stable to improving while the broader area was stable. One contact noted that while real estate in the county is generally inexpensive, lower value homes may be of a deteriorated quality. The county contact noted the community has a growing need for financial literacy education. Neither contacts were aware of community development opportunities in Mason City or in Mason County and neither had negative perceptions of MCNB.

#### Illinois NonMSA

Demogra	phic Inforn	nation of the	Assessment A	Area								
Assessment Area: Illinois NonMSA, 2015 ACS Census												
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #						
Geographies (Census Tracts)	5	0.0	20.0	60.0	20.0	0.0						
Population by Geography	16,648	0.0	14.1	40.8	45.2	0.0						
Housing Units by Geography	5,194	0.0	22.0	59.1	18.9	0.0						
Owner-Occupied Units by Geography	3,729	0.0	20.5	61.1	18.4	0.0						
Occupied Rental Units by Geography	982	0.0	32.9	51.1	16.0	0.0						
Vacant Units by Geography	483	0.0	11.4	59.8	28.8	0.0						
Businesses by Geography	522	0.0	19.7	58.4	21.8	0.0						
Farms by Geography	161	0.0	7.5	70.2	22.4	0.0						
Family Distribution by Income Level	3,222	15.7	19.7	23.2	41.4	0.0						
Household Distribution by Income Level	4,711	18.9	16.0	18.1	47.0	0.0						
Median Family Income Non-MSAs - IL		\$59,323	Median Housi	ng Value		\$91,840						
		Median Gross	\$615									
			Families Belo	w Poverty Le	vel	7.4%						

Source: 2015 ACS and 2019 D&B Data

Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

# Scope of Evaluation in Illinois

MCNB has one AA and it received a full-scope review.

# LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Satisfactory.

# Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Illinois non-MSA is adequate. The borrower distribution exhibits reasonable distribution while the geographic distribution exhibits excellent distribution.

## Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State. Both the home mortgage and small loans to farms exhibit excellent geographic distribution.

## Home Mortgage Loans

Refer to Table O in the State of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans reflects excellent distribution, given the performance context.

The proportion of lending in moderate-income geographies significantly exceeded the percentage of owner-occupied housing units and was significantly stronger than aggregate distribution. There were no low-income geographies in the AA.

#### Small Loans to Farms

Refer to Table S in the State of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to farms reflects excellent distribution.

The proportion of small loans to farms exceeded the percentage of farms in moderate-income geographies and was significantly stronger than the aggregate distribution. There were no low-income geographies in the AA.

Demographic data indicates that the moderate-income CT contains 12 farms. While the analysis was considered, less weight was placed on geographic performance for small loans to farms. Also, because of the limited number of small farm data reported by CRA reporters, more weight was placed on bank performance against demographic comparators.

#### Lending Gap Analysis

We performed a lending gap analysis that included a review of geocoded sampled loans and compared the distribution to AA maps and location of the bank's branch. We did not identify any unexplained, conspicuous gaps in lending.

# Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank. Both home mortgage and small loans to farms exhibits reasonable performance.

## Home Mortgage Loans

Refer to Table P in the State of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans reflects reasonable distribution, given the performance context.

The proportion of lending to low-income families was less than the percentage of low-income families in the AA and weaker than the aggregate distribution. The proportion of lending to moderate-income families exceeded the percentage of moderate-income families in the AA and was significantly stronger than the aggregate distribution.

#### Small Loans to Farms

Refer to Table T in the State of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to small farms reflects reasonable distribution.

The proportion of lending of small loans to small farms was near to the percentage of small farms in the AA and significantly stronger than the aggregate distribution.

Because of the limited number of small farm data reported by CRA reporters, more weight was placed on bank performance against demographic comparators.

#### **Responses to Complaints**

MCNB did not receive any complaints about its performance in helping to meet the credit needs of its AA during the evaluation period.

# **Appendix A: Scope of Examination**

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

	T	a						
Time Period Reviewed:	January 1, 2017 – December	er 31, 2019						
Bank Products Reviewed:	Home Mortgage and Small Farm							
Affiliate(s)	Affiliate Relationship	Products Reviewed						
NA	NA	NA						
List of Assessment Areas and Type	of Examination							
Rating and Assessment Areas	Type of Exam	Other Information						
States								
State of Illinois								
Illinois NonMSA	Full-scope	Portions of Mason and Logan Counties						

# **Appendix B: Summary of MMSA and State Ratings**

RATINGS	Mason City National Bank
Overall Bank:	Lending Test Rating
Mason City National Bank	Satisfactory
MMSA or State:	
State of Illinois	Satisfactory

# **Appendix C: Definitions and Common Abbreviations**

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

**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).

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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.

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

**Median Family Income** (**MFI**): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**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.

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** 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 \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

# **Appendix D: Tables of Performance Data**

# **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- **Table O.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- **Table P.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- **Table S.** Assessment Area Distribution of Loans to Farms by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table O:	Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography         2017-19														2017-19				
	Total Home Mortgage Low-In Loans				ncome	Tracts	Moderat	te-Income Tracts		Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$			Occupied		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		
IL NonMSA	32	1,750	100	231	0.0	0.0	0.0	20.5	81.3	11.3	61.1	18.8	63.6	18.4	0.0	25.1	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table P: A	P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower         2017-19														2017-19				
	Total Home Mortgage Low-Income Borrowers					orrowers		lerate-I1 Borrowe		Middle-Income Borrowers			Upper-I	ncome F	Borrowers	Not Available-Income Borrowers			
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
IL NonMSA	32	1,750	100	231	15.7	9.4	11.7	19.7	28.1	16.0	23.2	34.4	19.5	41.4	28.1	30.3	0.0	0.0	22.5

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table S:	Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography         2017-19																		
	Total Loans to Farms Low-Income Tracts						Moderate-Income Tracts			Middle-Income Tracts			Uppe	er-Incom	ne Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$		Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
IL NonMSA	38	6,493	100	73	0.0	0.0	0.0	7.5	7.9	2.7	70.2	92.1	72.6	22.4	0.0	24.7	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table T: Assessment A	rea Distri	bution of I	Loans to F	arms by G	ross Annual	Revenues					2017-19	
		Total Loan	ns to Farms		Farms	with Revenues <	= 1MM	_ ***	Revenues >	Farms with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
IL NonMSA	38	6,493	100	73	98.8	78.9	35.6	0.6	5.3	0.6	15.8	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%