Office of the
Comptroller of the Currency
Washington, DC 20219

LARGE BANK

PUBLIC DISCLOSURE

June 7, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Old Plank Trail Community Bank, National Association
Charter Number: 24646

20012 Wolf Road
Mokena, IL 60448

Office of the Comptroller of the Currency

Midsize Bank Supervision
425 S. Financial Place, Suite 1700
Chicago, IL 60605

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 Outstanding**.**

The following table indicates the performance level of Old Plank Trail Community Bank, National Association, with respect to the Lending, Investment, and Service Tests:

	Old Plank Trail Community Bank, N.A. Performance Tests		
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on the performance in the Chicago Multistate Metropolitan Statistical Area (MMSA) rating area. The excellent geographic distribution of loans in its Assessment Areas (AA), and the relatively high use of flexible lending programs was considered in arriving at the overall Lending Test rating. The performance of the bank's community development (CD) loans had a positive impact.

- The Investment Test rating is based on performance in the Chicago MMSA rating area. The bank has an excellent level of qualified CD investments and grants across the rating area.

- The Service Test rating is based on performance in the Chicago MMSA rating area. Branch distribution in the bank's AA was good.

Lending in Assessment Area

A very small percentage of the bank's loans are in its AA.

The bank originated and purchased 6.6 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	105	65.6	55	34.4	160	29,609	45.3	35,694	54.7	65,303
Small Business	3,117	5.9	49,502	94.1	52,619	235,107	14.6	1,373,711	85.4	1,608,818
Small Farm	0	0.0	2	100.0	2	0	0.0	400	100.0	400
Consumer	264	95.0	14	5.0	278	846	87.6	120	12.4	966
Total	**3,486**	**6.6**	**49,573**	**93.4**	**53,059**	**265,562**	**15.8**	**1,409,925**	**84.2**	**1,675,487**

Nationwide lending programs utilized by the bank impact the ratio of loans located inside the bank's AA. Home mortgage and small business loans are the bank's primary products based on volume of loans by number. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography.

Description of Institution

Old Plank Trail Community Bank (OPT or the bank) is a $2.1 billion interstate bank headquartered in Mokena, Illinois. OPT is a wholly-owned subsidiary of Wintrust Financial Corporation (WFC). As of December 31, 2020, WFC is a $45 billion financial services holding company located in Rosemont, Illinois. WFC's business strategy includes working with customers in the Chicago metropolitan areas, southern Wisconsin, and northwest Indiana by way of their 15 wholly-owned banking subsidiaries and more than 150 bank locations.

WFC locations provide a wide range of lending and deposit products and services to their customers. WFC residential mortgage applications are referred to Wintrust Mortgage (WM). WM, a division of an affiliate bank, is a national residential mortgage operation with offices throughout the United States. WM offers a wide variety of retail mortgages and originates nearly all WFC mortgages. Loans that cannot be sold on the secondary market are purchased by any one of the 15 WFC banks for their portfolio.

WFC provides niche lending products across the nation within their community bank. WFC banks offer specialty products including wealth management, lease financing, insurance premium financing through First Insurance Funding (FIFCO), short-term account receivable financing, administrative services outsourcing, franchise lending, firm partnership loans, financial servicing to condominiums, townhomes and homeowner's associations, and financial solutions for mission-based organizations.

As of December 31, 2020, OPT reported total loans of $1.3 billion, representing 62 percent of total assets. OPT has four primary loan types that make up 92 percent of the total loan portfolio. The primary loan products include approximately $618 million of commercial loans or 48 percent of total loans, $273 million of consumer loans or 21 percent of total loans, $240 million of nonfarm nonresidential properties or 18 percent of total loans, and $71 million secured by multifamily residential properties or five percent of the total loan portfolio. OPT had tier 1 capital of $161 million.

The bank operates 15 branches. There are 14 full-service offices, each with deposit taking Automated Teller Machines (ATMs) and one cash dispensing ATM only location throughout Will and Cook Counties in Illinois. OPT has one branch in Lake County, Indiana with a deposit taking ATM. Since the last Public Evaluation, OPT acquired a branch in Homer Glen, Illinois in April 2020 as part of the acquisition of Countryside Bank. The acquired branch was within the bank's AA.

According to the June 30, 2020 Federal Deposit Insurance Corporation (FDIC) deposit market share report in the state of Illinois, OPT had less than 0.3 percent market share making it the 39th largest deposit holder out of 466 financial institutions. In the state of Indiana, OPT had less than 0.1 percent market share making it the 115th largest deposit holder out of 139 financial institutions.

There were no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period. OBT's CRA performance was rated "Outstanding" in the last Public Evaluation dated June 6, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assesses the bank's performance under the large bank Lending, Investment, and Service Tests. The evaluation period is January 1, 2018 through December 31, 2020.

In evaluating the bank's lending performance, the OCC analyzed home mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA), and small loans made to businesses and small loans to farms the bank reported under the CRA. At the bank's request, the OCC considered the consumer loan products, which consists of secured and unsecured loans. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. Multifamily loans and small loans to farms are not primary loan products, and the bank did not originate or purchase any small loans to farms during the evaluation period; therefore, we did not evaluate these products separately. However, we did consider multifamily loans meeting the CD definition as part of the evaluation of CD lending.

The OCC compared bank loan data for all applicable years in the state rating area to: demographic data using the U.S. Census American Community Survey (ACS); Federal Financial Institutions Examination Council (FFIEC) adjusted median family incomes; 2019 Dun and Bradstreet (D&B) small business demographic data; 2019 peer mortgage loan data reported under HMDA; and 2019 peer small business data reported under CRA.

In evaluating the geographic distribution and borrower income criteria under the Lending Test for HMDA and CRA, 2018 through 2020 data was analyzed and aggregated. Performance Tables O, P, Q, R, U, and V in Appendix D include data covered by the analysis period 2018 through 2020.

Banks are not required to report data on consumer loans; therefore, no peer aggregate data was available against which to compare bank consumer lending.

Bank and branch deposit data is as of June 30, 2020, based on information from the FDIC. The distribution of bank branches is compared to U.S. Census 2015 ACS population estimates.

We also evaluated retail services, qualified investments, and CD services from January 1, 2018 through December 31, 2020. Qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are addressed in this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MMSA are combined and evaluated as a single AA. The combined AA was evaluated as full-scope. The AA was comprised of contiguous MDs/MSAs that are part of a MMSA; therefore, the bank's performance is presented at the MMSA level.

Refer to the Scope section under the MMSA Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full-scope AAs. There are no limited-scope AAs.

Ratings

The bank's overall rating was based on the MMSA rating.

Refer to the Scope section under the MMSA Rating section for details regarding how the area was weighted in arriving at the respective ratings.

In evaluating the bank's performance under the Lending Test, we placed greater weight on the bank's distribution of small business loans based on the volume. Home mortgage and consumer loans received less weight due to the volume.

Generally, equal emphasis is given to the geographic distribution of loans and lending by borrower income level. Greater weight was generally given to performance compared to aggregate lenders than to performance relative to demographic factors in lending, unless other performance context factors indicate greater consideration should be given to demographics or aggregate performance. The analysis included both the number and dollar volume of lending. The analysis of lending, except for CD loans, emphasized the number of loans rather than the dollar volume because it is a better indicator of the number of businesses or individuals served.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.17, 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 assessment area 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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.

Multistate Metropolitan Statistical Area Rating

Chicago MMSA

CRA rating for the Chicago MMSA: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending activity reflects good responsiveness to credit needs in its AA.
- The bank exhibits an excellent geographic distribution of loans in its AA.
- The bank is a leader in making CD loans, which has a positive impact on the lending test.
- The bank has an excellent level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.
- Its service delivery systems are accessible to geographies and individuals of different income levels in its AA.
- The bank is a leader in providing CD Services.

Description of Institution's Operations in the Chicago MMSA

OPT designated one AA, which is the Chicago-Naperville, IL-IN-WI MMSA (Chicago MMSA). The Chicago MMSA consists of the two MDs, which were combined for analysis purposes. These MSAs are the Chicago-Naperville-Evanston MD and Gary MD. The Chicago-Naperville-Evanston MD consists of Cook and Will counties in Illinois and the Gary MD consists of Lake County in Indiana.

OPT has one AA which consists of 444 contiguous census tracts (CTs). There are 391 CTs in southern Cook County and Will County, Illinois and 53 CTs in the northwest portion of Lake County, Indiana. The bank's AA covers 26 townships in Illinois, a section of the city of Chicago, and two townships in Indiana. In Illinois, the CTs are located in 17 townships in Will County (Wheatland, DuPage, Plainfield, Lockport, Homer, Troy, Joliet, New Lenox, Frankfort, Channahon, Jackson, Manhattan, Green Garden, Monee, Crete, Florence and Wilton), and nine townships in Cook County (Lemont, Palos, Worth, Orland, Calumet, Bremen, Thornton, Rich and Bloom). In Indiana, the CTs are located in two townships in Lake County, Indiana (North and St. John's).

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 444 CTs, of which there are 50 low-income and 126 are moderate-income.

Chicago MMSA

Table A – Demographic Information of the Assessment Area Assessment Area: Chicago MMSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	444	11.3	28.4	34.5	25.5	0.5
Population by Geography	1,941,052	7.7	26.6	34.2	31.5	0.0
Housing Units by Geography	747,137	8.8	27.3	35.0	28.9	0.0
Owner-Occupied Units by Geography	503,219	4.0	21.9	37.3	36.9	0.0
Occupied Rental Units by Geography	174,416	18.2	39.0	30.8	12.1	0.0
Vacant Units by Geography	69,502	19.9	37.9	29.1	13.1	0.0
Businesses by Geography	118,594	5.7	21.1	34.8	38.4	0.0
Farms by Geography	2,064	4.1	18.4	35.7	41.8	0.0
Family Distribution by Income Level	474,969	23.0	16.9	20.0	40.1	0.0
Household Distribution by Income Level	677,635	25.3	15.4	17.9	41.4	0.0
Median Family Income MD - 16984 Chicago-Naperville-Evanston, IL		$75,024	Median Housing Value			$173,400
Median Family Income MD - 23844 Gary, IN		$64,075	Median Gross Rent			$962
			Families Below Poverty Level			10.8%

Source: 2015 ACS and 2020 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.

Community Contacts

The OCC made three community contacts in the AA, which included one global nonprofit housing agency and two Chicagoland nonprofit organizations focused on neighborhood revitalization and economic development in low- and moderate-income (LMI) areas. The OCC also reviewed a recent community contact conducted by a different regulatory agency with an economic development organization in Will County, Illinois. Community contacts indicated that the following are identified needs within the bank’s AA.

- Provide home improvement loans regardless of appraisal gaps,
- Willingness to accept a wide range of mortgage down payment and closing cost assistance,
- Providing financing to owners of multifamily buildings for acquisition and rehabilitation,
- Granting small loans to small businesses,
- Financing for small to medium size businesses for expansion,
- Serving on the boards of these organizations,
- Providing financial education for consumers and business owners, and
- Participating in homebuyer counseling programs.

Housing Characteristics

The housing market in the AA is challenged as demand exceeds housing supply, and prices continue to trend upwards. Rentals have also not been affordable for LMI families. The lack of affordable housing supply has increased rental costs, thereby making it difficult for LMI families to purchase homes in the AA.

The AA is a high cost housing area, limiting access to affordable home ownership among LMI borrowers. The 2020 FFIEC adjusted median family income (AMFI) in the AA is $87,100. According to Realtor.com data, the median housing value in the AA is $288,950 and $342,445 in 2018 and 2020, respectively, reflecting an 18.5 percent increase.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making $43,550 per year (or less than 50 percent of the 2020 FFIEC AMFI in the AA) could afford a $202,814 mortgage with a payment of $1,089 per month. A moderate-income borrower making $69,680 per year (or less than 80 percent of the 2020 FFIEC AMFI in the AA) could afford a $324,503 mortgage with a payment of $1,742 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of $1,838.

Scope of Evaluation in the Chicago MMSA

The Chicago MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

For the analysis of distribution of loans to geographies with different income levels, greater consideration was given to the bank's performance in moderate-income geographies due to the higher percentages of owner-occupied housing units (OOHUs) and businesses.

For the borrower distribution analysis, consideration was given to the impact that income and housing costs have on limiting homeownership opportunities of LMI individuals and families. Additionally, consideration was given to the impact of home affordability for LMI borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics. It is difficult for many LMI borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualification. As such, more emphasis was placed on the bank's lending results to LMI borrowers relative to the aggregate performance rather than the demographic data.

In performing the analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses. A significant portion of the bank's small loans to businesses did not contain revenue information, as permitted under the CRA reporting requirements. Many of these loans were acquired by FIFCO and for which revenue data was not provided, or the loans were originated under a loan product for which the business revenue is not considered in underwriting. We took into consideration the bank's significant nationwide niche lending programs when assessing the bank's performance regarding lending within its AA versus outside AA lending. More emphasis was placed on the bank's lending relative to aggregate performance.

In performing the analysis of investments, competition in the AA is high, with large interstate, regional, and community banks competing for qualified investments in the market.

The service test includes an evaluation of the availability and effectiveness of a bank's systems for delivering retail banking services, including the current distribution of the bank's branches among different income geographies.

A near to branch is a branch in a middle- or upper-income area that is proximate to an LMI area and serves that area. These branches are in a reasonable distance from LMI census tracts they are serving. The bank provided adequate evidence showing that the branch serves customers in the LMI area. The bank had three branches in middle or upper-income census tracts that were considered near to branches.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHICAGO MMSA

LENDING TEST

The bank's performance under the Lending Test in the Chicago MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Chicago MMSA is excellent.

Lending Activity

Lending levels reflect a good responsiveness to AA credit needs. The bank's rank in small business lending is greater than the bank's ranking in deposits and market share. We considered the substantial volume of loans originated through a subsidiary for insurance premium financing in the analysis. The rank for home mortgage lending is weaker than the ranking for deposits and market share.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Chicago MMSA	105	3117	0	59	3,311	100.0	100.0
State	-	-	-	38	-	-	-
Regional	-	-	-	1	-	-	-

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Chicago MMSA	$29,609	$235,107	$0	$64,753	$357,380	100.0	100.0
Statewide	-	-	-	$27,563	-	-	-
Regional	-	-	-	$348	-	-	-

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to FDIC Deposit Market Share data as of June 30, 2020, OPT had $1.6 billion in deposits with a deposit market share of 0.4 percent. The bank ranked 23rd or the top 18.9 percent in total deposits out of 122 banks in the AA.

According to 2019 peer mortgage data, OPT ranked 165th out of 604 lenders and in the top 27.3 percent of lenders, originating home mortgage loans in the AA. The bank's market share was less than 0.1 percent. The five largest mortgage lenders, which included national banks and large mortgage lenders, captured 26.8 percent of the market.

According to 2019 peer small business data, OPT ranked 19th out of 214 lenders originating small business loans in the AA. The bank was in the top 8.9 percent of lenders. The bank's market share of small loans to businesses was 0.76 percent. The five largest small business lenders were all large national banks and captured 67.1 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

The bank's geographic distribution of home mortgage loans in its AA is excellent.

Refer to Table O in the Chicago MMSA 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 proportion of loans in LMI geographies exceeds the proportion of owner-occupied housing units and the aggregate distribution.

Small Loans to Businesses

The bank's geographic distribution of small loans to business in its AA is excellent.

Refer to Table Q in the Chicago MMSA 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 businesses.

The proportion of small loans to businesses exceeds the percentage of businesses in LMI geographies and the aggregate distribution.

Consumer Loans

The bank's geographic distribution of consumer loans in its AA is excellent.

Refer to Table U in the Chicago MMSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The proportion of loans in LMI geographies exceeds the percent of households.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed OPT's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained, conspicuous lending gaps in the bank's AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

The bank's distribution of home mortgage loans to LMI borrowers is good.

Refer to Table P in the Chicago MMSA 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 high cost of housing and the negative impact on economic conditions caused by the pandemic in 2020 may have limited opportunities to the bank's ability to make home mortgage loans to LMI borrowers. These contexts are considered in the analysis.

The percentage of loans was significantly below the percentage of low-income families and below the aggregate distribution. The percentage of loans exceeds the percentage of moderate-income families and near to the aggregate distribution. OPT refers a significant portion of its home mortgage requests to WM while retaining commercial multifamily property loans, and as such, income or revenue information is not required to be reported. Per Table P, 45.7 percent of the home mortgage loans have no income data. This context was considered in the analysis.

Small Loans to Businesses

The bank's distribution of small loans to business by revenue is good.

Refer to Table R in the Chicago MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

During the analysis period, the bank's distribution of loans to small businesses, with revenues less than $1 million, compared to the percent of these businesses in the AA is very poor. The bank's proportion of small loans to business less than $1 million was near to the aggregate distribution of loans.

OPT originates a substantial volume of loans through a subsidiary for insurance premium financing, which is a nationwide product and are underwritten without the collection of revenue data. Per Table R, 40.1 percent of the small business loans have no revenue data. Given this context, the performance under this criterion is considered good.

Consumer Loans

The bank's distribution of consumer loans to LMI borrowers is excellent.

Refer to Table V in the Chicago MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The proportion of consumer loans originated or purchased to LMI borrowers exceeds the percentage of households located in those geographies.

Community Development Lending

The institution is a leader in making CD loans. The level of CD lending has a significantly positive impact on the lending test conclusion for the Chicago MMSA.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated 59 CD loans totaling $64.8 million, representing 40.1 percent of allocated tier 1 capital. The CD lending activity included 26 loans totaling $10.2 million supporting affordable housing, 11 loans totaling $23.0 million supporting revitalization and stabilization, 19 loans totaling $19.5 million supporting community services, and three loans totaling $12.1 million supporting economic development. Of the 59 CD loans, 41 totaling $30.7 million are new originations and 18 totaling $34.0 million are renewals. Additionally, of the 41 new originations, 16 totaling $19.0 million are Paycheck Protection Program (PPP) originations and one SBA loan for $480,000.

Examples of CD loans in the AA include:

- Two loans totaling $11.5 million to support working capital for an organization for revitalization and stabilization in a low-income CT.
- Three loans totaling $12.4 million loan to support community service through a myriad of programs and services for LMI individuals.
- Two revolving lines of credit totaling $1.5 million for working capital to support community services for individuals with developmental disabilities through housing, and development and vocation training.
- A $956,250 loan to support affordable housing through the purchase of a 25-unit multifamily property in a low-income area with below market rents.
- A $760,000 loan to support affordable housing through the purchase and renovation of two 6-unit apartment buildings in a moderate-income area with below market rents.

Statewide

CD lending in the broader statewide area of Illinois included 39 loans totaling $27.6 million benefiting affordable housing, two loans totaling $4.9 million benefiting revitalization and stabilization, and one loan totaling $1,100 benefiting economic development. Of the 39, two totaling $4.9 million are PPP originations.

Regional

CD lending in the broader regional area included one loan totaling $348,000 benefiting affordable housing.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Paycheck Protection Program (PPP)

The bank made use of responsive flexible lending during the pandemic in 2020 by originating loans to stabilize small businesses and communities through the Small Business Administration (SBA) PPP. During the evaluation period, the bank originated 557 PPP loans totaling $83.6 million in the AA and with a combined total of 663 PPP loans totaling $131.3 million originated within the state of Illinois. This activity received positive consideration as it provided stabilization of small businesses and communities.

Money Smart Everyday Loan is offered as an alternative to payday loans. These loans provide unsecured financing from $500 to $2,500 at much lower interest rates compared to payday lenders and up to 24-month repayment terms. The bank originated 190 loans totaling $427,920.

Money Smart Certificate of Deposit Secured Loan is offered to assist persons with very low credit scores and to those with non-established or blemished credit histories. The loan is secured by a certificate of deposit that grows as the loan is repaid in monthly installments. After payoff, customers receive use of the money from the certificate of deposit and reporting of credit history. During the evaluation period, the bank originated 21 loans totaling $31,100.

Easy Access Line of Credit (LOC) and Easy Access Installment programs are small and micro loans offered to small businesses, which are a noted need in the community. These programs are targeted to help meet the needs of small businesses with revenues of less than $1.0 million with short-term LOC funding to support inventory and accounts receivables as well as support with secured and unsecured term loans. During the evaluation period, the bank originated 328 Easy Access LOC totaling $18.4 million and 32 Easy Access Installment loans totaling $910,447.

The bank is active in participating in SBA programs including the 504-loan program, 7a loan program, and the Express program. A total of 16 loans totaling $10.1 million were originated under these programs.

INVESTMENT TEST

The bank's performance under the Investment Test in the Chicago MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Chicago MMSA is excellent. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.
The bank has an excellent level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative or complex investments to support CD initiatives.

Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$(000's)	#	$(000's)	#	% of Total #	$(000's)	% of Total $	#	$(000's)
Chicago MMSA	14	6,864	293	4,777	307	97.5	11,641	98.2	4	549
Regional	0	0	8	211	8	2.5	211	1.8	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Qualified investments totaled $11.6 million, with current period investments of $4.2 million, prior period investments of $6.9 million, and qualified grants of $624,437. Investments benefiting the AA during the evaluation represented 7.2 percent of allocated tier 1 capital. The bank also had $549,421 in unfunded commitments remaining at the end of the evaluation period. The unfunded commitments consisted of small business investment companies (SBICs) and other investment pools.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of $6.9 million primarily in bonds, (SBICs), and other investment pools.

A $575,000 equity equivalent investment product (EQ2) to a nonprofit Community Development Financial Institution (CDFI) demonstrated innovation and complexity. The CDFI is involved in affordable housing, social services, and economic development initiatives that benefit LMI families throughout the Chicagoland area. An EQ2 is an investment of equity in a nonprofit lender which enhances their flexibility to support LMI communities and small businesses.

The bank made a $1.0 million investment to a nonprofit organization that provides financing to buy and rehab multifamily apartment buildings with five units or more in the Chicago metropolitan area. This organization provided affordable housing and the investment by OPT demonstrates their responsiveness to the needs of the AA.

Grants made were to organizations providing community services and affordable housing benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- $109,000 to a nonprofit organization that provides private school scholarships to low-income students. The donation also qualifies for the Illinois Invest in Kids Scholarship Tax Credit Program.
- $57,143 to an organization with a focus on revitalizing underserved and distressed neighborhoods in southern Chicago. The organization coordinates resources, economic development, and neighborhood revitalization efforts in LMI neighborhoods.
- $31,000 to an organization that helps improve the quality of people’s lives through the assistance of abuse intervention programs, counseling, workforce training, and transitional living programs (affordable housing for two years). A majority of the clients are minority women that are considered low income.

Regional

OPT provided eight grants totaling $211,111 to a university that provides scholarships to first generation low-income students. This donation is part of a larger WFC pledge to provide the university with $5.5 million in donations over the course of ten years to support the scholarship fund.

SERVICE TEST

The bank’s performance under the Service Test in the state of Illinois is rated High Satisfactory.

Based on the full-scope review, the bank’s performance in the Chicago MMSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Chicago MMSA	100.0	15	100.0	6.7	6.7	40.0	46.6	7.7	26.6	34.2	31.5

The bank has 15 branches in the AA, with one in a low-income geography and one in a moderate-income geography. The percentage of branches located in low-income geographies is near to the percentage of the population residing in the geographies. The percentage of branches in moderate-income geographies is significantly below the percentage of population residing in the geographies. The bank provided additional data that three of its six middle-income branches are in proximity of less than one mile of LMI CTs. For the period of 2018-2020, the bank made good penetration in these LMI CTs with 214 small business loans totaling $12.1 million.

No branches were opened or closed in the AA during the evaluation period.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. OPT has 15 ATMs in the AA, of which two are deposit-taking in the LMI CTs of the AA. The alternative delivery systems have a neutral impact on the Service Test.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank is a leader in providing CD Services.

CD Services were effective and responsive in helping the bank address the community needs. OPT employees from various lines of business provided 5,426 hours of service to 72 different organizations. They included serving on committees, serving as board members, providing financial expertise to organizations that promote affordable housing, community service, and financial literacy in the bank’s assessment area.

CD services were effective and responsive in helping the bank address the community needs in a variety of different organizations and through the hours of service that employees participated in to support the LMI individuals and families. They included serving on committees and boards for organizations that promote affordable housing, community service, financial literacy, and economic development in the bank’s AA.

Examples of some of these services:

- An employee provided over 446 hours serving a nonprofit organization as a coordinator. In this position, the employee handles the budget, interviews recipients of the programs, and assists with resources regarding their finances. This organization also helps with utility bills, rent, transportation, and medical expenses for needy LMI families in the community.
- Bank employees volunteered 310 hours as financial literacy advisors and workforce outreach volunteers to a nonprofit organization. The organization provides emergency shelter, permanent housing, and supportive services to individuals and families that are homeless. The shelter also provides financial literacy training to elderly area residents.
- An employee provided 290 hours serving on the board and several committees of a nonprofit organization. This organization provides counseling and housing services to LMI families.
- An employee serves as an advisory board member for a nonprofit organization, which works with youth to assist them in realizing their full potential as productive, responsible, and caring citizens. They serve LMI youth offering mentorship, tutoring, computer literacy, and financial literacy.

FDIC Money Smart

The bank leverages the FDIC Money Smart financial education program, which helps individuals of all ages enhance their financial skills and create positive banking relationships. The Money Smart program provides basic financial concepts to students in kindergarten through 12th grade and training for adults in many different life stages and financial situations. The program reaches adults new to the country, adults with disabilities, adults starting or changing careers, and adults going through significant life events such as expanding their families or purchasing or renting their first homes. Curriculum includes education on preventing elder financial exploitation and for small businesses related to starting and managing a business. Bank employees provided 158 hours, 8 hours, and 54 hours for the periods of 2018, 2019 and 2020, respectively using the FDIC Money Smart Financial Program for small businesses and LMI individuals in the AA.

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".

Time Period Reviewed:	01/01/2018 to 12/31/2020	
Bank Products Reviewed:	Home mortgage, small business, consumer loans CD loans, qualified investments, and CD services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
NA		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
Chicago MMSA	Full Scope	Partial Counties of Cook and Will in Illinois and Lake in Indiana

Appendix B: Summary of MMSA and State Ratings

OLD PLANK TRAIL COMMUNITY BANK, N.A. RATINGS				
Overall Bank:	**Lending Test Rating***	**Investment Test Rating**	**Service Test Rating**	**Overall Bank Rating**
OPT	Outstanding	Outstanding	Satisfactory	Outstanding
MMSA:				
Chicago MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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 (MD): 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 (MSA): 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**.**

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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 loans are treated the same 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 30th 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 Q. **Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. **Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to: 1) the percentage distribution of businesses with revenues of greater than $1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table U. **Assessment Area Distribution of Consumer 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 households in those geographies.

Table V. **Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018-2020

	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Chicago MMSA	105	29,609	100.0	4.0	7.6	2.3	21.9	27.6	15.2	37.3	31.4	37.0	36.9	33.3	45.5	0.0	0.0	0.0
Total	**105**	**29,609**	**100.0**	**4.0**	**7.6**	**2.3**	**21.9**	**27.6**	**15.2**	**37.3**	**31.4**	**37.0**	**36.9**	**33.3**	**45.5**	**0.0**	**0.0**	**0.0**

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018-2020

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago MMSA	105	29,609	131.3	65,968	23.0	4.8	6.6	16.9	17.1	19.0	20.0	3.8	22.6	40.1	28.6	32.0	0.0	45.7	19.8
Total	105	29,609	131.3	65,968	23.0	4.8	6.6	16.9	17.1	19.0	20.0	3.8	22.6	40.1	28.6	32.0	0.0	45.7	19.8

Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018-2020

	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago MMSA	3,117	235,107	100.0	5.7	7.2	4.6	21.1	21.4	18.7	34.8	37.1	34.2	38.4	34.3	42.5	0.0	0.0	0.0
Total	**3,117**	**235,107**	**100.0**	**5.7**	**7.2**	**4.6**	**21.1**	**21.4**	**18.7**	**34.8**	**37.1**	**34.2**	**38.4**	**34.3**	**42.5**	**0.0**	**0.0**	**0.0**

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018-2020

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago MMSA	3,117	235,107	100.0	38,736	86.0	41.1	49.0	4.6	18.7	9.4	40.2
Total	**3,117**	**235,107**	**100.0**	**38,736**	**86.0**	**41.1**	**49.0**	**4.6**	**18.7**	**9.4**	**40.2**

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2018-2020

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago MMSA	329	1,279	100.0	7.6	15.2	26.3	30.1	35.6	35.9	30.5	18.8	0.0	0.0
Total	**329**	**1,279**	**100.0**	**7.6**	**15.2**	**26.3**	**30.1**	**35.6**	**35.9**	**30.5**	**18.8**	**0.0**	**0.0**

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.
Due to rounding, totals may not equal 100.0%

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2018-2020

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago MMSA	329	1,279	100.0	25.3	51.1	15.4	23.1	17.9	15.8	41.4	7.0	0.0	3.0
Total	**329**	**1,279**	**100.0**	**25.3**	**51.1**	**15.4**	**23.1**	**17.9**	**15.8**	**41.4**	**7.0**	**0.0**	**3.0**

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.
Due to rounding, totals may not equal 100.0%