



## **PUBLIC DISCLOSURE**

January 27, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Old Second National Bank  
Charter Number 4596

37-39 South River Street  
Aurora, IL 60506

Office of the Comptroller of the Currency

2001 Butterfield Road  
Suite 400  
Downers Grove, IL 60515

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.

## Table of Contents

Overall CRA Rating .....	1
Description of Institution .....	2
Scope of the Evaluation .....	3
Discriminatory or Other Illegal Credit Practices Review .....	4
State Rating.....	5
State of Illinois.....	5
Appendix A: Scope of Examination .....	Appendix A-1
Appendix B: Summary of MMSA and State Ratings .....	Appendix B-1
Appendix C: Definitions and Common Abbreviations .....	Appendix C-1
Appendix D: Tables of Performance Data.....	Appendix D-1

## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated **Outstanding**.

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

Performance Levels	Old Second National Bank Performance Tests		
	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 level of Community Development (CD) lending within the AA, the majority of the bank’s lending is inside of its assessments areas (AAs), borrower and demographic distribution of home mortgage and small business lending within the MSA AA is overall excellent. Moreover, the bank made significant efforts to assist LMI borrowers during the COVID pandemic through the use of innovative and flexible lending programs.
- The Investment Test rating is based on an excellent level of qualified CD investments, showing excellent responsiveness to credit and community development needs.
- The Service Test rating is based on the bank’s branch distribution and other delivery systems, including mobile banking, providing accessibility to individuals of different income levels within its AA’s.

### Lending in Assessment Area

A majority of the bank’s loans are in in its assessment area(s) (AA).

The bank originated and purchased 79.3 percent of its total loans inside the bank’s assessment area(s) (AAs) 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.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	3,143	85.5	532	14.5	3,675	724,187	84.5	132,968	15.5	857,155
Small Business	2,255	71.6	896	28.4	3,151	525,906	71.6	209,056	28.4	734,962
Total	5,486	79.3	1,429	20.7	6,195	1,267,137	78.7	324,322	21.3	1,609,459

OSNB continues to lend primarily within the assessment area. A substantial amount of residential lending is within OSNB's assessment area. Although, small business lending within the assessment area decreased from prior years, primarily due to the growth of OSNB's equipment leasing division, a majority remains within the assessment area. Beginning in 2018, OSNB expanded the lending in this area, hiring lenders from out of state locations. This has resulted in most of these originations being made outside of Illinois, which has driven down the in/out ratio from the past. The in/out ratio improved in 2020 due to the high number of SBA PPP loan originations of which the substantial majority were originated within the assessment area. Of the 1,156 small business loans originated within the assessment area, 719 of them (62.19 percent) were PPP loans. This demonstrates OSNB's commitment to meeting borrower needs, particularly in times of significant economic stress.

We utilized the performance context to perform the CRA evaluation, with consideration that 2020 may be an outlier due to factors outside of the bank's control. We recognized OSNB's efforts in meeting existing borrower needs and assisting them in weathering the economic hardships of the pandemic.

## Description of Institution

OSNB, a wholly owned subsidiary of Old Second Bancorp, Inc. is a full-service community bank headquartered in Aurora, Illinois. Old Second Bancorp is a one bank holding company, also located in Aurora. OSNB is an intrastate bank with 28 full-service branches and one limited service drive-up facility serving DuPage, Kane, Kendall, Cook, and portions of DeKalb, LaSalle, and Will Counties.

The banking offices are located in the Chicago-Naperville-Elgin metropolitan statistical area (Chicago MSA) and portions of LaSalle County, which is in a non-MSA area. The bank's assessment area is comprised of 1,781 census tracts and includes the entirety of Cook, DeKalb, DuPage, Kane, and Kendall counties, as well as portions of LaSalle and Will counties. Of these 1,781 census tracts, 564 are upper-income, 490 are middle-income, 445 are moderate-income, 268 are low-income, and 14 are N/A. The acquisition of ABC Bank in 2018 expanded the assessment area to all of Cook County. The expanded AAs materially increased the level of low- or moderate-income (LMI) tracts and shifted the overall demographics of the Chicago MSA AA. OSNB supplements its banking activities with ATMs at each of its 29 branches. Two branches have one additional ATM each, for a total of 31 branch ATMs. The branch ATMs are full-service, and there are 32 offsite ATMs located throughout the AA with four of the offsite ATMs accepting deposits.

As of December 31, 2020, OSNB reported total assets of \$3.05 billion. The bank has \$2 billion in total loans, representing 66 percent of total assets. The bank's loan portfolio consists of \$1.48 billion or 73 percent in residential and commercial real estate loans, \$478 million or 23 percent in commercial and

industrial loans, \$5 million or less than one percent in agricultural loans, and \$75 million or 4 percent in consumer and other loans. Total deposits as of December 31, 2020 were \$2.58 billion, and tier 1 capital was \$318 million. OSNB is a full-service lender and its product offerings include a wide array of business loans, residential real estate mortgage loans, asset management, and deposit products. OSNB remains committed to working with LMI individuals and families by offering a variety of flexible and innovative LMI lending programs. The bank also funds LMI-affordable multifamily property construction and refinancing and provides loan programs to support the financing needs of non-profit organizations that provide services to LMI individuals throughout the two AAs. During the assessment period, the bank's strategic focus has experienced a significant shift as they acquired a new institution and dealt with unprecedented external factors.

With the acquisition of the Talmer-Chicago branch in 2016, management accelerated growth plans, which included adding new lending talent and bolstering the Bank's footprint in Chicago through additional strategic acquisitions. The acquisition of Greater Chicago Financial Corp. (ABC Bank) in 2018 helped grow the bank's footprint in Chicago and was instrumental to the bank's increased presence in Chicago. The bank was poised to continue this strategy, but COVID-19 hit in early 2020 and the bank had to shift its focus towards credit, liquidity, and capital preservation. This included dedicating most of the bank's resources (human and funding) to standing up several programs aimed at assisting customers directly and indirectly impacted by the virus and state mandated "stay at home" orders. There are no financial or legal impediments that affect the bank's ability to provide lending, investments, and services within its AAs. OSNB received a rating of "Outstanding" in the last CRA evaluation dated April 23, 2018.

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

This performance evaluation assessed the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed OSNB's small loans to businesses and residential mortgage loans subject to filing under the HMDA for the period beginning January 1, 2018, through December 31, 2020. Loans to small farms (1.64 percent) and consumer loans were not evaluated because these loans represent a very small percentage of the bank's total originated and purchased loans.

The evaluation of data was completed using one analysis period as there was only one change to the assessment area from the acquisition of ABC Bank in 2018. Small loans to businesses as well as residential mortgage loans originated during the evaluation period were assessed utilizing the 1,781 census tracts consisting of the bank's two assessment areas (Chicago MSA and the IL non-MSA).

The Investment Test included a review of investments, grants, and donations made in the AAs. We also considered branch distribution, hours of operation, branch openings and closings, alternative delivery systems, retail and commercial loans, deposit products and services, and CD services provided in the bank's AAs. We evaluated OSNB's CD services and retail services, investments, and CD lending for the period beginning January 1, 2018, through December 31, 2020.

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

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (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 section 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 ratings are primarily based on conclusions in the evaluation of OSNB’s performance in the full-scope review of the Chicago MSA. When determining conclusions for the Lending Test, home mortgage was given greater weight than small business loans. This is because there were more home mortgage loans originated during the evaluation period (despite 2020 being the outlier year for small business lending).

We did not evaluate the bank’s home improvement, multifamily, or small farm lending performance due to the low volume of these loan types originated during the evaluation period. Based on the geographic diversity within the bank’s AA’s, borrower distribution received greater weight in determining the bank’s overall lending test rating – again, with consideration of the economic environment from the COVID pandemic in 2020. We reached conclusions for the home lending and small business lending for the full scope AA. We then determined whether the limited scope AA’s CRA performance was consistent with, stronger, or weaker than performance for the full-scope AA.

Deposit market share was determined using the FDIC’s annual deposit market share reports. The most recent data was as of June 30, 2020. Community credit needs of the AA were determined through a review of community contacts conducted with OCC CRA examinations for neighboring banks in the same AA.

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

Pursuant to 12 C.F.R. §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 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 Bureau of Consumer Financial Protection, 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.

## **State Rating**

### **State of Illinois**

#### **CRA rating for the State of Illinois: 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:

- The Lending Test rating is based on the level of Community Development (CD) lending within the AA, the majority of the bank's lending is inside of its assessments areas (AAs), borrower and demographic distribution of home mortgage and small business lending within the MSA AA is overall excellent. Moreover, the bank made significant efforts to assist LMI borrowers during the COVID pandemic through the use of innovative and flexible lending programs.
- The Investment Test rating is based on an excellent level of qualified CD investments, showing excellent responsiveness to credit and community development needs.
- The Service Test rating is based on the bank's branch distribution and other delivery systems, including mobile banking, providing accessibility to individuals of different income levels within its AA's.

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

The state of Illinois rating area consists of two AAs, the Chicago MSA and the IL non-MSA.

#### Chicago MSA

OSNB provides full-service consumer and commercial products and services, including deposit and savings accounts, IRAs, various lending products, including commercial, real estate, and consumer lending products, safe deposit operations, trust and investment products, a wide range of residential mortgage products, and a full complement of electronic banking services, including internet banking, mobile banking, and corporate cash management. As of 2020, the bank has 28 full-service and one limited service branch in Northeastern Illinois. For customer convenience, the bank offers ATMs at each branch location and 31 offsite ATMs throughout the assessment area.

The original strategic intent behind the 2019-2021 Strategic Plan was to grow the bank's presence in the Chicago market, growing the balance sheet and increasing deposits. To further this objective, OSNB added two lending teams dedicated to Senior Housing and Professional Services and continued to expand the Leasing Division. There was moderate loan growth through the evaluation period, with a peak of 90 percent loan to deposit ratio. However, once the COVID-pandemic hit in early 2020, the bank's strategy shifted towards credit, liquidity, and capital preservation, and meeting borrower needs as they were directly or indirectly impacted by the pandemic.

Deposit market share within the MSA was 0.53 percent. The top three deposit holding institutions within the assessment area were megabanks – JP Morgan Chase, BMO Harris, and Bank of America holding 48.9 percent of total deposits within the market area. OSNB ranks 20<sup>th</sup> out of 139 deposit holding institutions within the market, demonstrating despite a high level of competition in the local market, OSNB performs favorably.

A recent community contact provided context on Neighborhood Housing Services of Chicago (NHSC). Affordable housing and related services remain a need in the community. OSNB meets these needs through providing flexible loans to LMI borrowers and LMI census tracts, providing community development loans focused on affordable housing, and donations and service hours to organizations that meet these ends.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Chicago MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,770	15.1	25.1	27.4	31.6	0.8
Population by Geography	7,501,661	10.9	25.0	29.8	34.0	0.3
Housing Units by Geography	2,998,047	11.2	23.8	29.6	35.1	0.4
Owner-Occupied Units by Geography	1,689,797	4.9	19.1	33.5	42.3	0.2
Occupied Rental Units by Geography	1,026,772	18.2	30.1	24.8	26.1	0.7
Vacant Units by Geography	281,478	23.7	28.6	22.9	24.3	0.5
Businesses by Geography	558,411	5.3	16.5	27.8	49.9	0.6
Farms by Geography	7,672	3.8	16.1	37.3	42.7	0.1
Family Distribution by Income Level	1,751,195	24.2	16.3	18.4	41.1	0.0
Household Distribution by Income Level	2,716,569	26.0	15.3	16.9	41.7	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$246,173
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,049
			Families Below Poverty Level			11.0%
<i>Source: 2015 ACS and 2020 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						



IL non-MSA

We conducted a limited scope review of the IL non-MSA AA in this evaluation due to the limited number of deposits, branches and ATMs, and transaction volume conducted in this area. The IL non-MSA AA consists of 11 geographies within LaSalle County, IL. There are no low-income geographies. There is one moderate-income geography within the non-MSA AA, five middle-income and five upper-income geographies.

**Scope of Evaluation in Illinois**

The MSA AA currently includes 1,770 geographies in all or a portion of Cook, Will, Kendall, DeKalb, DuPage, and Kane Counties. Two hundred sixty-eight geographies are low-income, 444 are moderate-income, 490 are middle-income, 564 are upper-income, and 14 have no designated income level. This AA represents the bank's primary AA, accounting for 97.74 percent of the bank's lending activity and 97.70 percent of the bank's deposit activity. Therefore, we selected this AA for the full-scope review.

The geographies that make up the bank's AAs include those where the bank has its main office, branches, ATMs, and the majority of the loans originated or purchased during the evaluation period. The AA consists of whole geographies. The AA does not reflect any illegal discrimination and do not arbitrarily exclude any low- or moderate-income geographies.

**Conclusions with Respect to Performance Tests in Illinois****Lending Test**

The bank's performance under the lending test in Illinois is rated Outstanding .

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's performance in the Chicago MSA is excellent.

**Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs.

<b>Number of Loans</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
5,486	3,143	2,255	88	56	6,915

<b>Dollar Volume of Loans</b>					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
1,267,137	724,187	525,906	17,044	94,989	1,609,459

The volume of loan activity from the prior evaluation increased significantly for residential and small business lending from 2019 through 2020. This is largely COVID-driven. For residential lending, the increase in lending is from refinance activity due to the emergency rate cut in March 2020 as a response to the COVID pandemic being declared a national emergency. For small business lending, SBA PPP

loans were the primary reason behind the increase in lending in 2020 as the bank provided services to their borrowers.

Generally, market share within the assessment area has remained consistent. From a residential lending standpoint, the percent of market share throughout the evaluation period has remained stable, from 0.37 percent in 2018 to 0.38 percent in 2020. Based on the most recent ranking, OSNB was 49 out of 869 lenders, which is excellent lending performance, given the competitors ranking above OSNB include megabanks and financial institution with high capital and higher staffing levels, among others.

From a small business standpoint, the bank's rankings compared to peer have remained consistent during the evaluation period, hovering in the low 30s in ranking each year. While 2020 was an outlier in terms of market share, this was driven by PPP lending. OSNB ranked as 31 out of 325 financial institutions in the MSA demonstrating OSNB's ability to meet the market area lending needs.

Home improvement lending, multifamily lending, and small farm lending were not included in borrower or geographic distribution analysis due to the small volume of loans. Therefore, the analysis would not be relevant to this review.

### **Distribution of Loans by Income Level of the Geography**

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

#### ***Home Mortgage Loans***

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

The overall geographic distribution of home mortgage loans is excellent in the full-scope AA.

One of the primary factors in evaluating the bank's home mortgage lending performance in its AAs was the percentage of owner-occupied housing units (OOHUs) located in each AA. According to the 2015 ACS Census data, 4.9 percent OOHUs located in the assessment area were low-income, and 19.1 percent were moderate income.

The percentage of home mortgages in low-income census tracts is near both the aggregate and percentage of OOHUs. The percentage of home mortgages in moderate-income census tracts is equal to the percentage of OOHUs and above the aggregate.

OSNB lending to LMI geographies was stable in 2018 and 2019, though it showed a decline for 2020. The decline in 2020 is directly attributable to the effects of the pandemic. With the emergency rate cut in March 2020, refinance activity boomed, primarily for middle- and upper-income census tracts. Of the 1,744 in residential originations in 2020, 75 percent of them were refinances, and only 22.36 percent were purchases. The trend for refinances during the evaluation period have increased, but the inverse is true for home purchase activity. For borrowers receiving loan deferrals, they must make three monthly payments in order to complete a refinance. Another factor for the second half of 2020 is the scarcity of homes available for purchase which significantly increased list price and therefore reduced home affordability. The combination of these factors contributed to the majority of activity taking place in middle- and upper-income census tracts in 2020.

### ***Small Loans to Businesses***

Refer to Table Q in 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.

Loans to small businesses was excellent within the AA.

The percentage of small business loans in low-income census tracts exceeds both the percentage of businesses and the aggregate. The percentage of small business loans in moderate-income census tracts also exceeds both the percentage of businesses and the aggregate.

The level of small business lending more than doubled during the evaluation period. This is due to the expansion of the equipment leasing program as well as the volume of PPP loans made in 2020 as the bank sought to provide relief to their borrowers. The loans were originated in LMI census tracts; however, income documentation was not collected as income was not a factor in the underwriting decision.

### ***Lending Gap Analysis***

Maps and reports detailing OSNB's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an excellent distribution of loans among individuals of different income levels and business of different sizes.

### ***Home Mortgage Loans***

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

Borrower distribution for home mortgage loans is excellent. Home mortgage loans originated or purchased to low-income borrowers is lower than the percent of families in the AA; however, the bank's performance significantly exceeded the percentage of aggregate lending to low-income borrowers. Home mortgage loans originated or purchased to moderate-income borrowers exceeded the percentage of moderate-income families as well as the aggregate lending to moderate-income borrowers in the AA. Home prices increased significantly during the evaluation period, reaching a peak in 2020, due to high demand and very low supply, making homeownership affordability difficult for low-income borrowers. Median list price as of December 2020 was \$348,000 based on Realtor.com data for the Chicago market, which is nine times the annual income for low-income borrowers.

### ***Small Loans to Businesses***

Refer to Table R in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Small business lending demonstrates good lending performance. The percentage of small business loans originated or purchased by the bank during the evaluation period to small businesses is well below the percentage of small businesses within the AA; however, the bank's performance is above the aggregate percentage of loans made to small businesses within the AA.

Lending in 2020 skewed the evaluation period performance due to the significant volume of PPP loans. Of the 1,156 loans originated within the assessment area for 2020, 719 were PPP loans. Per SBA guidance, income was "NA" or "NR" since income was not used as part of the underwriting decision for these loans. This skewed the borrower analysis so that the majority of loans were not reportable for 2020, and therefore the level of lending to businesses with income less than \$1 million was lower than anticipated.

### **Community Development Lending**

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

We qualified \$116.7 million in community development loans during the assessment period, with 90 percent of those within the assessment area. This constitutes 31.90 percent of tier 1 capital as of December 31, 2020. The majority of loans were related to affordable housing to LMI individuals. The level of community development lending is higher than prior evaluation period performance, with \$33.90 million more in funds loaned for community development purposes.

See below for examples of community development lending during the evaluation period:

- A \$15 million loan to VNA Healthcare to consolidate all existing healthcare facility notes. The original purpose of the notes was to construct or rehabilitate all VNA Healthcare facilities located in Aurora, Elgin, and Romeoville, fund capital improvements, and for the acquisition of land in Joliet for future expansion. VNA Healthcare is a not-for-profit organization that provides health care services to low-income families primarily in the Aurora and Elgin area.
- A \$3 million loan to Carton Craft Inc., a packaging company to expand their line of business due to the addition of newly acquired contracts. This promotes job creation and economic development that meets eligibility requirements of the Small Business Administration's certified development company 504 loan program. The company supports job creation in the form of hourly wages, which primarily support LMI individuals.
- An \$8 million loan to Aspen Ridge, to purchase a 156-unit multifamily property located in Alsip and refinance a 253-unit multifamily property located in West Chicago. This provides affordable housing for LMI individuals as rents are 16.2 percent of the census tract's median family income, well below the 30 percent allowable for affordable housing.

- A \$12.5 million loan extension to The Fields Retail, LLC. The original purpose of the loan was to finance the construction and development of three parcels of land, two of which were preleased to Petco and Ross. The parcels are located in a predominantly low- and moderate-income area. The project will bring two anchor businesses to the area as well as several smaller retailers which will provide services and job opportunities to local residents. The project was awarded the Cook County Class 8 tax incentive which is awarded to projects that revitalize land parcels that have been unused for more than 24 continuous months and require substantial rehabilitation.

Of the 71 loans we qualified for community development purposes, 55 of them, or 77.46 percent, were for Affordable Housing for LMI households.

### **Product Innovation and Flexibility**

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs. OSNB's lending performance is enhanced by offering innovative loan products which include FHA, HARP, IHDA, and other programs that provide flexible underwriting guidelines, down payment assistance, and low interest rates, among other options. OSNB originated 1,307 innovative loans totaling \$247 million during the assessment period. In 2020, during a high degree of economic uncertainty due to the COVID-19 pandemic, OSNB originated a substantial amount of its loan volume from innovative loan programs, most notably the SBA Paycheck Protection Program (PPP) as 57.38 percent of total innovative lending product originations were for PPP loans. Innovative and flexible lending continues to be a key piece of OSNB's lending operation and a reliable way of helping community members throughout the assessment area.

### **Conclusions for Area Receiving Limited-Scope Review**

Based on the limited-scope review, the bank's performance under the Lending Test for CD lending in the non-MSA is weaker than the bank's performance in the MSA AA. We did not complete a geographic distribution analysis since there are no low-income geographies and only one moderate income census tract. Based on borrower distribution, the bank's performance in the limited-scope AA was satisfactory for residential lending, which is weaker than the MSA. For small business lending, performance was adequate, which is also weaker than the MSA. No CD loans were made in the non-MSA AA.

### **Investment Test**

The institution's performance under the Investment Test in Illinois is rated Outstanding.

### **Conclusions for Areas Receiving Full-Scope Reviews**

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

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full Review:</b>										
Chicago MSA	12	9,968	11	22,845	23	85.19	32,813	95.98	0	0
<b>Limited Review:</b>										
IL non-MSA	0	0	0	0	0	0	0	0	0	0
Midwestern Regional	4	1,375	0	0	4	14.81	1,375	4.02	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.*

The institution exhibits excellent responsiveness to credit and community economic development needs. For our review, we focused on the volume and types of investments, grants and donations made by the bank relative to the CD opportunities in the AA. Investment opportunities include affordable housing initiatives and opportunities to invest in loan pools. Although there are investment opportunities in the AA, the bank must compete with many larger regional and national financial institutions for these opportunities. The institution occasionally uses innovative and/or complex investments to support CD initiatives. The institution holds innovative and/or complex investments from the prior reporting period.

OSNB's current and prior period level of CD investments held in the MSA AA during the evaluation period totaled \$34.2 million, which represents 10.7 percent of tier 1 capital. The bank's qualified investments were to purchase loan pools that focus on affordable housing in the bank's AA, which is a recognized need in the AA, and to support school districts that have a majority of LMI students. The level of CD investments held during this evaluation increased from the prior evaluation period when the bank held qualified investments in the AA of \$26.4 million, which represented 10.6 percent of tier 1 capital.

## Qualifying Grants and Donations

OSNB supported various community organizations with qualifying contributions totaling \$140,500. The level of donations made by the bank reflect a willingness to work with a variety of organizations within the AA to assist with various CD needs.

Some of the more significant donations made during the evaluation period were as follows:

- OSNB donated \$76,000 to a community service organization that provides healthcare to LMI individuals. This organization remains the largest recipient of bank donations from the prior evaluation period.
- OSNB donated \$11,000 to an organization that provides homeownership assistance by lending to individuals to buy or fix their homes, educating homeowners for success, and providing foreclosure intervention services.
- OSNB donated \$17,500 to two organizations to promote economic development within their assessment area.
- OSNB gave 11,000 to local food pantries.

## **Conclusions for Area Receiving Limited-Scope Review**

OSNB's performance under the Investment Test in the non-MSA is weaker than the bank's performance in the MSA AA. The bank made no CD investments or donations in the non-MSA AA.

### **Service Test**

The institution's performance under the Service Test in Illinois is rated High Satisfactory .

## **Conclusions for Areas Receiving Full-Scope Reviews**

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

### **Retail Banking Services**

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA(s). The bank's AA is comprised of 1,770 census tracts and includes the entirety of Cook, DeKalb, DuPage, Kane, and Kendall counties, as well as portions of Will county. Of these 1,770 census tracts, 559 are upper-income, 485 are middle-income, 444 are moderate-income, 268 are low-income, and 14 are N/A. The acquisition of ABC Bank in 2018 expanded the AA to all of Cook County. The bank operates 27 full-service branches and one limited service drive-up facility within the Chicago MSA. Of the 28 branch locations, two branches (7 percent), including the main headquarters, are located within low-income tracts, four branches (15 percent) within moderate-income tracts, eleven branches (39 percent) within middle-income tracts, and another eleven branches within upper-income tracts. The bank added four full-service branches with the acquisition of ABC Bank in April 2018. One of these branches is located in a low-income tract and the other three in middle-income tracts. Branch distribution and accessibility is highly satisfactory and proportionate to the income tracts within the bank's AA.

OSNB's banking services and business hours do not vary in a way that inconveniences geographies of the AA, particularly LMI individuals. Extended banking hours are available at all locations. Branch lobbies are open until 5 pm on weekdays and 12 pm on Saturdays. Drive-up services are available one hour after the branch closes for the day. OSNB offers a comprehensive line of retail banking products and services available to individuals of all income geographies. Multi-lingual services are available.

The distribution of ATMs is adequate. The bank has 31 branch ATMs and 32 offsite ATM locations in the AA. ATM distribution is proportionate to the income geographies within the AA. OSNB has nine ATMs in low-income areas. These ATMs adequately serve the low-income population within the assessment area (10.9 percent). OSNB has 15 ATMs located in moderate income areas and provides reasonable accessibility to the percentage of the moderate-income population within those geographies. The other 39 ATMs (61.9 percent of all ATMs) serve middle- and upper-income areas, accounting for 63.8 percent of the population. OSNB allows unlimited free ATM transactions to bank customers.

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
<b>Full Review:</b>											
Chicago MSA	97.7	28	96.55	7.23	14.29	39.29	39.29	10.9	25.0	29.8	34.0
<b>Limited Review:</b>											
IL non-MSA	2.3	1	3.45	0	0	100	0	0	4.8	50.9	44.2

The bank did not open or close branches during the evaluation period. During 2020, most branches experienced some sort temporary closure due to the pandemic. Temporary closures did not result in any full closures during the assessment period.

Services, including business hours, are tailored to the convenience and needs of the various portions of its AA(s), particularly low- and moderate-income geographies and/or individuals. OSNB utilizes alternative banking systems to expand its reach and increase accessibility for their customers. OSNB offers online banking, online bill-pay, mobile banking, and mobile deposit, all through its website and mobile banking app. Mobile banking and mobile deposit usage has increased significantly due to the continued rise in smart phone usage, personally and professionally. Customers of all income tracts are becoming increasingly reliant on online and mobile banking. For many LMI individuals, mobile banking is the most convenient and affordable way to bank. OSNB tracks mobile banking usage by income tract. In 2020, 38.4 percent of low-income customers used mobile banking. Mobile banking usage among low-income customers has grown 150.7 percent since 2017, when mobile banking started to become widely available. The bank does not charge customers for online or mobile banking services.

On March 11, 2020, the World Health Organization declared COVID-19 a pandemic and two days later, on March 13, 2020, President Trump declared a national emergency. On March 20, 2020 Governor J.B Pritzker issued an executive order to shelter-in-place in an effort to limit the spread of the virus. Because of the shelter-in-place orders, certain businesses deemed non-essential were shut down or limited in operations. This disproportionately affected blue-collar jobs, of which LMI individuals are primarily employed in. To assist their borrowers, OSNB offered the following services/relief to its borrowers:

- Debt forgiveness options
- Loan deferrals and modifications
- Waived all late fees on loans through 2020 and did not report past due notes to the credit bureaus
- Extended the timeframe customers could repay their deposit overdrafts before charging the account off and stopped reporting charge-offs to the credit bureaus
- Waived early redemption fees on CDs and waived overdraft and insufficient funds fees
- Provided non-customer transactions through the drive-up lanes
- Increased cash out limits on ATM machines

These services provided necessary assistance to borrowers experiencing financial difficulty to the pandemic.



## Community Development Services

The institution is a leader in providing CD services. Bank employees serve and develop the communities within their AA through a variety of activities. Employees volunteer frequently and even hold leadership positions in community organizations and local not-for-profits. During the review period, 85 bank employees provided 2,360 hours in CD services to the communities that OSNB serves. OSNB provided qualified CD services to 41 organizations that provide LMI individuals with affordable housing, home repairs, food assistance, health care assistance, financial education, and tax preparation. Bank employees provided services that include serving as board members, committee members, treasurers, advisors, mentors, and volunteers for these community development organizations.

Major highlights of CD service activities in the AA during the evaluation period include:

- An OSNB officer serves as the Vice Chairman of a not-for-profit organization that promotes economic development and stability as well as benefiting the community through increased employment.
- An OSNB officer serves as a board member for an organization whose mission is to make a positive impact for residents of a low-income Chicago suburb, who are facing economic, educational, social, and safety barriers.
- An OSNB officer serves as a board member for an organization that provides affordable housing to individuals in the bank's AA. Providing housing assistance to LMI individuals and families is the primary focus of the organization.
- An OSNB officer serves as a board member and treasurer for an organization that provides LMI homeowners in Aurora with critical home repairs, home safety modifications, and energy efficiency upgrades.
- Many OSNB employees volunteer at a school located near the bank's main Aurora branch. Volunteers teach school kids skills to prepare them for success in the real world.

## Conclusions for Area Receiving Limited-Scope Review

OSNB's performance under the Service Test in the IL non-MSA AA is weaker than the bank's performance in the full scope AA. Community Development service performance is poor in the non-MSA, with only one branch and limited activity.

# Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	(01/01/18 to 12/31/20)	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans Community development loans, qualified investments, community development services	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Illinois</b>		
Chicago MSA	Full Scope	Cook, DuPage, DeKalb, Kendall, Kane and Will Counties
IL non-MSA	Limited Scope	Lasalle County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS (OSNB)				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
OSNB	Outstanding	Outstanding	High Satisfactory	Outstanding
MMSA or State:				
Illinois	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

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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:** 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.

**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

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### 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 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 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.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2018-20</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% 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	
MSA AA	3,042	706,461	100.0	380,709	4.9	2.5	3.0	19.2	14.5	13.0	33.5	38.5	30.7	42.3	44.4	53.2	0.2	0.1	0.1	
<b>Total</b>	<b>3,042</b>	<b>706,461</b>	<b>100.0</b>	<b>380,709</b>	<b>4.9</b>	<b>2.5</b>	<b>3.0</b>	<b>19.2</b>	<b>14.5</b>	<b>13.0</b>	<b>33.5</b>	<b>38.5</b>	<b>30.7</b>	<b>42.3</b>	<b>44.4</b>	<b>53.2</b>	<b>0.2</b>	<b>0.1</b>	<b>0.1</b>	
NonMSA AA	101	17,726	100.0	2,157	0.0	0.0	0.0	3.3	2.0	1.9	46.5	35.6	43.7	50.2	62.4	54.3	0.0	0.0	0.0	
<b>Total</b>	<b>101</b>	<b>17,726</b>	<b>100.0</b>	<b>2,157</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>3.3</b>	<b>2.0</b>	<b>1.9</b>	<b>46.5</b>	<b>35.6</b>	<b>43.7</b>	<b>50.2</b>	<b>62.4</b>	<b>54.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2018-20</b>	
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
MSA AA	3,042	706,461	100.0	380,709	24.2	10.3	4.3	16.3	20.2	14.2	18.4	25.3	20.3	41.1	39.9	45.5	0.0	4.3	15.6	
<b>Total</b>	<b>3,042</b>	<b>706,461</b>	<b>100.0</b>	<b>380,709</b>	<b>24.2</b>	<b>10.3</b>	<b>4.3</b>	<b>16.3</b>	<b>20.2</b>	<b>14.2</b>	<b>18.4</b>	<b>25.3</b>	<b>20.3</b>	<b>41.1</b>	<b>39.9</b>	<b>45.5</b>	<b>0.0</b>	<b>4.3</b>	<b>15.6</b>	
NonMSA AA	101	17,726	100.0	2,157	15.9	4.0	2.5	16.9	16.8	13.9	18.9	22.8	23.0	48.3	53.5	47.3	0.0	3.0	13.3	
<b>Total</b>	<b>101</b>	<b>17,726</b>	<b>100.0</b>	<b>2,157</b>	<b>15.9</b>	<b>4.0</b>	<b>2.5</b>	<b>16.9</b>	<b>16.8</b>	<b>13.9</b>	<b>18.9</b>	<b>22.8</b>	<b>23.0</b>	<b>48.3</b>	<b>53.5</b>	<b>47.3</b>	<b>0.0</b>	<b>3.0</b>	<b>13.3</b>	

*Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2020 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 2018-20**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
MSA AA	2,233	521,628	100.0	227,166	5.3	8.6	5.5	16.5	18.7	17.0	27.8	34.8	29.2	49.9	37.9	47.9	0.6	0.0	0.3
<b>Total</b>	<b>2,233</b>	<b>521,628</b>	<b>100.0</b>	<b>227,166</b>	<b>5.3</b>	<b>8.6</b>	<b>5.5</b>	<b>16.5</b>	<b>18.7</b>	<b>17.0</b>	<b>27.8</b>	<b>34.8</b>	<b>29.2</b>	<b>49.9</b>	<b>37.9</b>	<b>47.9</b>	<b>0.6</b>	<b>0.0</b>	<b>0.3</b>
Non MSA AA	7	1,500	100.0	524	0.0	0.0	0.0	16.4	14.3	14.3	42.8	28.6	42.6	40.9	57.1	43.1	0.0	0.0	0.0
<b>Total</b>	<b>7</b>	<b>1,500</b>	<b>100.0</b>	<b>524</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>16.4</b>	<b>14.3</b>	<b>14.3</b>	<b>42.8</b>	<b>28.6</b>	<b>42.6</b>	<b>40.9</b>	<b>57.1</b>	<b>43.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2018-20</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
MSA AA	2,233	521,628	100.0	227,166	84.9	27.7	37.1	6.0	32.1	9.1	40.2	
<b>Total</b>	<b>2,233</b>	<b>521,628</b>	<b>100.0</b>	<b>227,166</b>	<b>84.9</b>	<b>27.7</b>	<b>37.1</b>	<b>6.0</b>	<b>32.1</b>	<b>9.1</b>	<b>40.2</b>	
NonMSA AA	22	4,278	100.0	503	80.0	27.3	30.4	6.1	36.4	13.9	36.4	
<b>Total</b>	<b>22</b>	<b>4,278</b>	<b>100.0</b>	<b>503</b>	<b>80.0</b>	<b>27.3</b>	<b>30.4</b>	<b>6.1</b>	<b>36.4</b>	<b>13.9</b>	<b>36.4</b>	
<i>Source: 2020 D&amp;B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i>												

