



## **PUBLIC DISCLOSURE**

July 1, 2024

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

**Buena Vista National Bank  
Charter Number 14479**

1309 Swanwick St.  
Chester, IL 62233

Office of the Comptroller of the Currency

500 North Broadway, Suite 1700  
St. Louis, MO 63102

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

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## Overall CRA Rating

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

**The Lending Test is rated: Satisfactory.**

The Lending Test is based on Buena Vista National Bank's (BVNB or bank) performance in the state of Illinois. The major factors that support this rating include:

- BVNB's loan-to-deposit ratio (LTD) ratio is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of the bank's loans are inside its assessment areas (AA).
- The distribution of loans throughout geographies of different income levels in the Decatur metropolitan statistical area (MSA) is reasonable.
- The distribution of loans to borrowers of different income levels is reasonable.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable. BVNB's quarterly LTD ratio averaged 56.2 percent over the 12-quarter evaluation period ending December 31, 2022. Over the same period, the LTD ratio ranged from a low of 50.7 percent to a high of 67.5 percent.

To assess the bank's performance, we compared the bank's average LTD ratio to local Federal Deposit Insurance Corporation (FDIC) insured financial institutions, which included seven banks with branches in the local area. The seven banks had total assets ranging from \$26.6 million to \$733.4 million, with a combined average LTD ratio of 50.8 percent over the same evaluation period. The lowest individual quarterly average was 34.2 percent, while the highest individual average was 69.2 percent. BVNB ranked third out of eight when comparing the average ratios. The table below lists similarly situated institutions, including BVNB, with the corresponding average LTD ratios.

Institution	Average Quarterly LTD Ratio	Total Assets (\$000s) as of 12/31/2022
Chester National Bank	69.2%	\$62,270
Hickory Point Bank and Trust	66.5%	\$733,423
<b>Buena Vista National Bank</b>	<b>56.2%</b>	<b>\$266,369</b>
The First National Bank of Sparta	51.0%	\$97,222
First National Bank of Steeleville	47.6%	\$238,076
North County Savings Bank	45.0%	\$65,541
The Gerber State Bank	42.2%	\$89,091
Peoples Bank of Macon	34.2%	\$26,586

*Source: Quarterly FFIEC Call Reports 01/01/2020 – 12/31/2022*

## Lending in Assessment Area

A majority of the bank's loans are inside its AAs. The bank originated 69.7 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2020	270	72.0	105	28.0	375	29,847	59.7	20,137	40.3	49,984
2021	228	69.7	99	30.3	327	23,359	54.3	19,643	45.7	43,002
2022	150	65.8	78	34.2	228	14,081	42.5	19,077	57.5	33,158
<b>Subtotal</b>	<b>648</b>	<b>69.7</b>	<b>282</b>	<b>30.3</b>	<b>930</b>	<b>67,287</b>	<b>53.3</b>	<b>58,857</b>	<b>46.7</b>	<b>126,144</b>
Consumer										
2020-2022	14	70.0	6	30.0	20	273	62.7	163	37.3	436
<b>Subtotal</b>	<b>14</b>	<b>70.0</b>	<b>6</b>	<b>30.0</b>	<b>20</b>	<b>273</b>	<b>62.7</b>	<b>163</b>	<b>37.3</b>	<b>436</b>
<b>Total</b>	<b>662</b>	<b>69.7</b>	<b>288</b>	<b>30.3</b>	<b>950</b>	<b>67,560</b>	<b>53.4</b>	<b>59,020</b>	<b>46.6</b>	<b>126,580</b>

Source: Evaluation Period: 01/01/2020 – 12/31/2022 Bank Data  
 Due to rounding, totals may not equal 100.0  
 Dollar amount of consumer loans in \$000s

## Description of Institution

BVNB is an intrastate financial institution headquartered in Chester, Illinois, and wholly owned by Buena Vista Bancorp, Inc, a one-bank holding company. There were no affiliate or subsidiary activities considered in this evaluation. During the evaluation period, BVNB operated eight branch locations in Illinois. Additionally, the bank operated eight cash-dispensing automated teller machines, all of which are located onsite at branch locations and do not have deposit-taking capabilities. The bank did not open or close any branch locations during the evaluation period and there have been no major changes in the bank's corporate structure, including merger or acquisition activities.

As of December 31, 2022, BVNB had total assets of \$266.4 million, total deposits of \$221.8 million, and tier 1 capital of \$29.7 million or 16.2 percent of total risk-weighted assets. The bank's total loans were \$151 million or 56.7 percent of total assets. The loan portfolio includes \$54.5 million (36.1 percent) in residential loans, \$67.9 million (45 percent) in commercial loans, \$15.3 million (10.1 percent) in consumer loans, \$12.8 million (8.5 percent) in agricultural loans, and \$508,000 (0.3 percent) in other loans and leases.

BVNB offers a variety of deposit products to businesses and consumers. Deposit products consist of checking, savings, and money market deposit accounts. Retail loan products include home mortgages (conventional and Veterans Affairs loans), home equity lines of credit, personal loans, and automobile loans. Business and agricultural loan products include term loans, lines of credit, and machinery and equipment loans.

For CRA purposes, BVNB identified two AAs: a portion of the Decatur IL MSA #19500 (Macon County) and the Illinois Non-MSA (Randolph County). Both AAs conform to regulatory requirements and do not arbitrarily exclude any low- or moderate-income (LMI) geographies.

The bank's last CRA performance evaluation was dated March 16, 2020. Utilizing Small Bank CRA examination procedures, the OCC concluded the bank's performance was rated "Satisfactory." There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs.

## **Scope of the Evaluation**

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

The scope of this evaluation includes an assessment of BVNB under the Small Bank performance criteria, which consists of the Lending Test. This test evaluates the bank's record of meeting the credit needs of its AA through lending activities. The evaluation period for the Lending Test is January 1, 2020 through December 31, 2022. Examiners determined BVNB's primary loan products by reviewing the number and dollar volume of loan originations during the evaluation period. The number and type of primary products varied by AA. Home mortgage loans were a primary product in both AAs with 31.7 percent by number for the Illinois Non-MSA AA and 61.1 percent by number for the Decatur MSA AA. Consumer loans were also a primary product for the Illinois Non-MSA AA with 56.6 percent by number originated.

Examiners relied on Home Mortgage Disclosure Act (HMDA) data to complete the analysis of home mortgage loans. We used demographic information from the 2015 American Community Survey (ACS) to analyze performance during the 2020-2021 evaluation period and demographic information from the 2020 U.S. Census to analyze performance for the 2022 evaluation period. Examiners selected an initial sample of 20 consumer loans for the Illinois Non-MSA AA. Additional loans were selected as needed to have sufficient information to analyze borrower and geographic distribution.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same 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 for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank's overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from the bank's observed performance under the CRA small bank Lending Test, as well as related performance context information from the bank's two AAs. With the exception of the LTD ratio (based on the bank's entire lending portfolio), all weight for performance under the CRA small bank Lending Test was based on the bank's lending performance in relation to its primary products of

home mortgage loans and consumer loans in the Illinois Non-MSA AA, and home mortgage loans in the Decatur MSA.

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

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

The OCC has not identified that this institution (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<sup>1</sup>:** Satisfactory.

**The Lending Test is rated:** Satisfactory.

The major factors that support this rating include:

- The distribution of loans throughout geographies of different income levels in the Decatur MSA is reasonable.
- The distribution of loans to borrowers of different income levels across both AAs is reasonable.
- The bank received no complaints regarding its CRA performance during the evaluation period.

### Description of Institution's Operations in Illinois

BVNB has two AAs within the state of Illinois. These AAs include the IL Non-MSA and a portion of the Decatur MSA. The IL Non-MSA consists of all of Randolph County, which is comprised of eight middle-income CTs, and one upper-income CT in both 2020-2021 and 2022. Within the IL Non-MSA AA, BVNB operates a main office and a separate limited-service drive-up facility in Chester, IL as well as four other branch locations. In 2021, there were five branches in middle-income CTs and one branch in an upper-income CT. In 2022, all six branch locations in the IL Non-MSA AA were in middle-income CTs.

The Decatur MSA AA consists of all of Macon County, which was comprised of 34 CTs in 2020-2021 that included eight low-income CTs, five moderate-income CTs, 11 middle-income CTs, and 10 upper-income CTs. In 2022, the AA was comprised of 37 CTs that included one CT with income not available, five low-income CTs, nine moderate-income CTs, 18 middle-income CTs, and four upper-income CTs. BVNB has two branches located within the Decatur MSA AA. In 2021, both branches were located in low-income CTs and in 2022 both branches were located in moderate-income CTs.

### Illinois Non-MSA

#### Competition

Competition for deposits is moderate amongst financial institutions within the area. According to the June 30, 2022, FDIC Deposit Market Share Report, the bank's deposits in the AA totaled \$204.2 million, representing 90.3 percent of the bank's total deposits. Randolph County has a total of eight deposit-taking institutions operating 21 branches. BVNB ranked third in the AA with a deposit market

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



share of 19.5 percent. Dieterich Bank and the First National Bank of Steeleville led with deposit market shares of 29.5 percent and 20.2 percent, respectively.

Employment and Economic Factors

According to the Bureau of Labor Statistics report, the unemployment rate for Randolph County continues to improve since the 2020 coronavirus pandemic. The state of Illinois and national averages noted similar trends.

<b>Annual Unemployment Rates</b>			
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Randolph County	7.1%	4.5%	3.8%
State of Illinois	9.3%	6.1%	4.6%
National	8.1%	5.4%	3.7%

*Source: U.S. Department of Labor: Bureau of Labor Statistics*

Based on information in the table below, low-income families in the AA earned less than \$32,900 (2020) and up to \$38,050 (2022), and moderate-income families earned from \$32,900 (2020) to \$60,880 (2022).

<b>Table B – Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>IL Non-MSA Median Family Income (99999)</b>				
2020 (\$65,800)	<\$32,900	\$32,900 to <\$52,640	\$52,640 to <\$78,960	≥\$78,960
2021 (\$66,700)	<\$33,350	\$33,350 to <\$53,360	\$53,360 to <\$80,040	≥\$80,040
2022 (\$76,100)	<\$38,050	\$38,050 to <\$60,880	\$60,880 to <\$91,320	≥\$91,320

*Source: FFIEC*

The AA economy is diverse and not heavily dependent on one major industry. Based on 2020 U.S. Census business demographic data, the primary industries in the area are health care and social assistance (17.3 percent), manufacturing (16.3 percent), and retail trade (11.5 percent). Major employers in the area include the Gilster-Mary Lee Corporation and the State of Illinois given there are two local prisons and a mental health facility located in Chester, IL where BVNB is headquartered.

Demographics

The following tables provide a summary of the demographics for the IL Non-MSA AA for both evaluation periods.

**2020-2021**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2020-2021 Illinois Non-MSA</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)	9	0.0	0.0	88.9	11.1	0.0
Population by Geography	33,069	0.0	0.0	85.0	15.0	0.0
Housing Units by Geography	13,762	0.0	0.0	85.4	14.6	0.0
Owner-Occupied Units by Geography	9,209	0.0	0.0	84.0	16.0	0.0
Occupied Rental Units by Geography	2,686	0.0	0.0	86.7	13.3	0.0
Vacant Units by Geography	1,867	0.0	0.0	90.7	9.3	0.0
Businesses by Geography	1,765	0.0	0.0	76.8	23.2	0.0
Farms by Geography	201	0.0	0.0	83.1	16.9	0.0
Family Distribution by Income Level	7,860	17.1	20.0	21.3	41.6	0.0
Household Distribution by Income Level	11,895	20.7	17.2	18.0	44.1	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$99,673
			Median Gross Rent			\$624
			Families Below Poverty Level			7.2%
<i>Source: 2015 ACS and 2021 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>						

**2022**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2022 Illinois Non-MSA</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)	10	0.0	0.0	90.0	10.0	0.0
Population by Geography	30,163	0.0	0.0	89.8	10.2	0.0
Housing Units by Geography	13,951	0.0	0.0	98.1	1.9	0.0
Owner-Occupied Units by Geography	8,848	0.0	0.0	97.8	2.2	0.0
Occupied Rental Units by Geography	3,199	0.0	0.0	98.1	1.9	0.0
Vacant Units by Geography	1,904	0.0	0.0	99.6	0.4	0.0
Businesses by Geography	1,962	0.0	0.0	97.7	2.3	0.0
Farms by Geography	214	0.0	0.0	98.1	1.9	0.0
Family Distribution by Income Level	7,875	18.7	17.6	22.0	41.7	0.0
Household Distribution by Income Level	12,047	23.0	14.9	18.7	43.4	0.0
Median Family Income Non-MSAs - IL		\$68,958	Median Housing Value			\$111,433
			Median Gross Rent			\$646
			Families Below Poverty Level			8.6%
<i>Source: 2020 U.S. Census and 2022 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>						

### Geographic Distribution of the Population

According to the 2015 ACS US Census data, the population in the bank's AA was 33,069 with 85 percent of the population residing in middle-income CTs and 15 percent residing in upper-income CTs. Randolph County did not have any LMI CTs during this evaluation period. According to the 2020 U.S. Census data, the population in the bank's AA was 30,163 with 89.8 percent of the population residing in middle-income CTs and 10.2 percent residing in upper-income CTs. Randolph County did not have any LMI CTs during this evaluation period.

### Household Distribution by Income Level

According to the 2015 ACS US Census Data, there were 11,895 households in the bank's IL Non-MSA AA. Approximately 2,462 (20.7 percent) of those households were low income, 2,046 (17.2 percent) were moderate income, 2,141 (18 percent) were middle income, and 5,246 (44.1 percent) were upper income. The percentage of households in the AA living below the poverty level was 11.4 percent. According to the 2020 U.S. Census data, there were 12,047 households in the AA. Approximately 2,771 (23 percent) of those households were low income, 1,795 (14.9 percent) were moderate income, 2,253 (18.7 percent) were middle income, and 5,228 (43.4 percent) were upper income. The percentage of households in the AA living below the poverty level was 11.6 percent.

### Family Distribution by Income Level

According to the 2015 ACS Census data, there were 7,860 families in the AA. The distribution of families by income level was 1,344 (17.1 percent) low income, 1,572 (20 percent) moderate income, 1,674 (21.3 percent) middle income, and 3,270 (41.6 percent) upper income. There were 7.2 percent of families living below the poverty level. According to the 2020 U.S. Census data, there were 7,875 families in the AA. The distribution of families by income level was 1,473 (18.7 percent) low income, 1,386 (17.6 percent) moderate income, 1,732 (22 percent) middle income, and 3,284 (41.7 percent) upper income. There were 8.6 percent of families living below the poverty level.

### Housing Characteristics and Home Affordability

The 2015 ACS Census reported total housing units of 13,762 in the AA. Of the total number of housing units, 9,209 (66.9 percent) were owner-occupied, 2,686 (19.5 percent) were renter occupied, and 1,867 (13.6 percent) were vacant. The 2020 U.S. Census data reported total housing units of 13,951 in the AA. Of the total number of housing units, 8,848 (63.4 percent) were owner occupied, 3,199 (22.9 percent) were renter occupied, and 1,904 (13.6 percent) were vacant.

Throughout the 2020-2021 evaluation period, the weighted average of median year build for houses was 1967 and during the 2022 evaluation period, the weighted average of median year build for houses was 1969, approximately 50 years. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. These factors add to the overall cost of homeownership and can have a negative impact on home affordability for LMI individuals.

According to Realtor.com data, the median housing value in the AA ranged from \$109,900 in January 2020 to \$123,500 in January 2022, an increase of 12.4 percent.

Assuming a 30-year mortgage with a 5 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 \$38,050 per year (or less than 50 percent of the 2021 Federal Financial Institutions Examination Council adjusted median family income in the AA) could afford a \$177,200 mortgage with a payment of \$951 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$663, once you consider the additional housing expenses associated with homeownership.

### Community Contacts

We reviewed two community contacts within the AA. The contacts identified a lack of creditworthiness, collateral, and assistance with down payments and closing costs for first time homebuyers as the primary needs of the community.

## **Decatur MSA**

### Competition

Competition for deposits is strong amongst financial institutions within the area. According to the June 30, 2022, FDIC Deposit Market Share Report, the bank’s deposits in the AA totaled \$21.8 million, representing 9.7 percent of the bank’s total deposits. Macon County has a total of 13 deposit-taking institutions operating 35 branches. BVNB ranked 12<sup>th</sup> in the AA with a deposit market share of only 0.84 percent. The leading four banks alone represent 74.8 percent of the deposit market share. These banks include Busey Bank (25.1 percent), Hickory Point Bank and Trust (19.7 percent), First Mid Bank & Trust, N.A. (16 percent), and Regions Bank (14 percent). While BVNB operates two branch locations within Macon County, the branches sit on the outskirts of the city of Decatur, in less frequented and more rural areas.

### Employment and Economic Factors

According to the Bureau of Labor Statistics report, the unemployment rates for the Decatur MSA continues to improve since the 2020 coronavirus pandemic. The state of Illinois and national averages noted similar trends.

<b>Annual Unemployment Rates</b>			
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
Decatur MSA	10.0%	7.8%	5.8%
State of Illinois	9.3%	6.1%	4.6%
National	8.1%	5.4%	3.6%

*Source: U.S. Department of Labor: Bureau of Labor Statistics*

Based on information in the table below, low-income families in the AA earned less than \$34,350 (2021) and up to 42,050 (2022), and moderate-income families earned from \$34,350 (2021) to \$67,280 (2022).

<b>Table B – Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>Decatur MSA Median Family Income (19500)</b>				
2020 (\$71,300)	<\$35,650	\$35,650 to <\$57,040	\$57,040 to <\$85,560	≥\$85,560
2021 (\$68,700)	<\$34,350	\$34,350 to <\$54,960	\$54,960 to <\$82,440	≥\$82,440
2022 (\$84,100)	<\$42,050	\$42,050 to <\$67,280	\$67,280 to <\$100,920	≥\$100,920
<i>Source: FFIEC</i>				

According to Moody's Analytics, *Decatur's economy will trail its peers by a wide margin in the near term. Manufacturing will be of little help in adding jobs because of weak demand for durable jobs, and logistics will remain sluggish. Longer term, population losses and an overreliance on manufacturing will hold DEC back, even compared with slow-growing Illinois.*

The AA economy is diverse and not heavily dependent on one major industry. Based on 2020 U.S. Census business demographic data, the primary industries in the area are manufacturing (22.1 percent), education and health services (14.9 percent), and government (12 percent). Major employers in the area include Archer Daniels Midland Co., Decatur Memorial Hospital, and Caterpillar Inc.

### Demographics

The following tables provide a summary of the demographics for the Decatur MSA AA for both evaluation periods.

**2020-2021**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2020-21 Decatur MSA</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)	34	23.5	14.7	32.4	29.4	0.0
Population by Geography	109,193	18.5	11.6	34.5	35.4	0.0
Housing Units by Geography	50,391	20.4	12.5	33.3	33.8	0.0
Owner-Occupied Units by Geography	30,995	9.4	9.5	37.9	43.2	0.0
Occupied Rental Units by Geography	13,920	39.5	16.0	26.3	18.1	0.0
Vacant Units by Geography	5,476	33.9	20.7	25.3	20.0	0.0
Businesses by Geography	6,283	27.2	11.9	27.9	33.0	0.0
Farms by Geography	334	7.8	4.2	44.0	44.0	0.0
Family Distribution by Income Level	27,658	22.9	16.9	20.1	40.1	0.0
Household Distribution by Income Level	44,915	25.4	15.2	17.1	42.2	0.0
Median Family Income Decatur MSA		\$60,745	Median Housing Value			\$89,013
			Median Gross Rent			\$646
			Families Below Poverty Level			13.6%
<i>Source: 2015 ACS and 2021 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>						

**2022**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2022 Decatur 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)	37	13.5	24.3	48.6	10.8	2.7
Population by Geography	103,998	7.2	21.9	51.6	18.5	0.8
Housing Units by Geography	50,364	8.1	25.2	50.0	15.4	1.2
Owner-Occupied Units by Geography	30,265	4.3	15.6	58.7	21.1	0.3
Occupied Rental Units by Geography	13,545	13.3	41.5	35.4	6.8	2.9
Vacant Units by Geography	6,554	15.0	36.1	40.0	6.7	2.1
Businesses by Geography	7,073	17.5	22.1	40.2	19.4	0.8
Farms by Geography	358	4.5	8.1	62.8	24.3	0.3
Family Distribution by Income Level	26,176	21.2	17.2	21.4	40.2	0.0
Household Distribution by Income Level	43,810	24.5	16.2	17.8	41.5	0.0
Median Family Income Decatur MSA		\$71,270	Median Housing Value			\$90,061
			Median Gross Rent			\$689
			Families Below Poverty Level			11.3%
<i>Source: 2020 U.S. Census and 2022 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>						

### Geographic Distribution of the Population

According to the 2015 ACS U.S. Census data, the population in the bank's Decatur MSA AA was 109,193. The population is broken down into 18.5 percent considered low income, 11.6 percent moderate income, 34.5 percent middle income, and 33.8 percent upper-income geographies. According to the 2020 U.S. Census data, the population in the bank's AA was 103,998. The population is broken down into 7.2 percent considered low income, 21.9 percent moderate income, 51.6 percent middle income, 18.5 percent upper income geographies, and 0.8 percent listed as unknown.

### Household Distribution by Income Level

According to the 2015 ACS U.S. Census data, there were 44,915 households in the bank's AA. Approximately 11,408 (25.4 percent) of those households were low income, 6,827 (15.2 percent) were moderate income, 7,680 (17.1 percent) were middle income, and 18,954 (42.2 percent) were upper income. The percentage of households in the AA living below the poverty level was 16.5 percent. According to the 2020 U.S. Census data, there were 43,810 households in the AA. Approximately 10,733 (24.5 percent) of households were low income, 7,097 (16.2 percent) were moderate income, 7,798 (17.8 percent) were middle income, and 18,181 (41.5 percent) were upper income. The percentage of households in the AA living below the poverty level was 14.7 percent.

### Family Distribution by Income Level

According to the 2015 ACS Census data, there were 27,658 families in the AA. The distribution of families by income level was 6,334 (22.9 percent) low income, 4,674 (16.9 percent) moderate income, 5,559 (20.1 percent) middle income, and 11,091 (40.1 percent) upper income. Families living below the poverty level was 13.6 percent. According to the 2020 U.S. Census data, there were 26,176 families in the AA. The distribution of families by income level was 5,549 (21.2 percent) low income, 4,502 (17.2 percent) moderate income, 5,602 (21.4 percent) middle income, and 10,523 (40.2 percent) upper income.

### Housing Characteristics and Home Affordability

The 2015 ACS Census reported total housing units of 50,391 in the AA. Of the total number of housing units, 30,995 (61.5 percent) were owner-occupied, 13,920 (27.6 percent) were renter occupied, and 5,476 (10.9 percent) were vacant. In the AA, 9.4 percent (2,914) of owner-occupied housing units were in low-income CTs and 9.5 percent (2,944) of owner-occupied housing units were in moderate-income CTs. The 2020 U.S. Census data reported total housing units of 50,364 in the AA. Of the total number of housing units, 30,265 (60.1 percent) were owner occupied, 13,545 (26.9 percent) were renter occupied, and 6,554 (13 percent) were vacant. In the AA, 4.3 percent (1,301) of owner-occupied housing units were in low-income CTs and 15.6 percent (4,721) of owner-occupied housing units were in moderate-income CTs.

Throughout the evaluation period, the weighted average of median year build for houses was 1962, approximately 60 years. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. These factors add to the overall cost of homeownership and can have a negative impact on home affordability for LMI individuals.

According to Realtor.com data, the median housing value in the AA ranged from \$89,900 in December 2020 to \$98,897 in December 2021, an increase of 10 percent year-over-year. By December 2022 the median housing value increased even further to \$119,900, an increase of 21.2 percent year-over-year, illustrating that low-income borrowers would be challenged to afford a mortgage given the large inflation increase in the housing market throughout the evaluation period.

### Community Contacts

We reviewed two community contacts within the AA. The contacts identified affordable rental housing, flexible loan programs for small and new businesses, and increased financial awareness and counseling as the primary needs of the community.

## **Scope of Evaluation in Illinois**

We conducted full-scope reviews for both the Illinois Non-MSA and the Decatur MSA. Greater weight was placed on the Illinois Non-MSA, where the majority of the bank's deposits (90.3 percent) and loan originations (90.2 percent) were located during the evaluation period. Primary products reviewed for the Lending Test were home mortgage loans and consumer loans in the Illinois Non-MSA AA and only home mortgage loans in the Decatur MSA.

## **LENDING TEST**

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

Based on a full-scope review, the bank's performance in the state of Illinois is reasonable.

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

The bank exhibits reasonable geographic distribution of loans in the state. Our analysis is based solely on the bank's performance in the Decatur MSA. A geographic distribution analysis of the Illinois Non-MSA is not meaningful as there are no LMI CTs in the AA.

### **Decatur MSA**

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

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

The overall geographic distribution of home mortgage loans is reasonable.

#### 2020-2021

The geographic distribution of home mortgage loans in the 2020-2021 evaluation period was reasonable. The proportion of the bank's home mortgage loans in low-income geographies was in line with the percentage of owner-occupied housing and significantly exceeded the aggregate industry distribution of home mortgage loans in those geographies. The proportion of the bank's home mortgage loans in



moderate-income geographies was below the percentage of owner-occupied housing and exceeded the aggregate industry distribution of home mortgage loans in those geographies.

## 2022

The geographic distribution of home mortgage loans in 2022 was excellent. The proportion of the bank's home mortgage loans in low-income geographies was below the percentage of owner-occupied housing and was in line with the aggregate industry distribution of home mortgage loans in those geographies. The proportion of the bank's home mortgage loans in moderate-income geographies significantly exceeded the percentage of owner-occupied housing and the aggregate industry distribution of home mortgage loans in those geographies.

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

We reviewed summary reports and maps and analyzed home mortgage data. We did not identify any unexplained conspicuous gaps in lending.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank. Our analysis of home mortgage lending is based on the bank's performance in both the Illinois Non-MSA and the Decatur MSA. Our analysis of consumer loans is based solely on the bank's performance in the Illinois Non-MSA AA, as consumer loans were not a primary product within the bank's Decatur MSA AA. Within the Illinois Non-MSA AA, we placed greater weight on our analysis of the distribution of consumer loans by borrower income level, as 56.6 percent of the number of loans originated during the evaluation period were consumer loans, while 31.7 percent of originations by number were mortgage loans.

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

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

The borrower distribution of home mortgage loans is reasonable. We considered the fact that home mortgage loans were less affordable to low-income borrowers throughout the evaluation period and were increasingly unaffordable throughout 2022 for moderate-income borrowers due to increasing home prices and higher mortgage loan interest rates. Therefore, we placed more weight to the aggregate industry distribution of loans during our analysis.

### **Illinois Non-MSA**

## 2020-2021

The borrower distribution of home mortgage loans in the 2020-2021 evaluation period was poor. The proportion of the bank's home mortgage loans to low-income borrowers was well below the percentage of low-income families and below the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those borrowers.

2022

The borrower distribution of home mortgage loans in 2022 was reasonable. The proportion of the bank's home mortgage loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and was below the aggregate industry distribution of home mortgage loans to those borrowers.

**Decatur MSA**2020-2021

The borrower distribution of home mortgage loans in the 2020-2021 evaluation period was reasonable. The proportion of the bank's home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeded the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers was in line with the percentage of moderate-income families and near to the aggregate industry distribution of home mortgage loans to those borrowers.

2022

The borrower distribution of home mortgage loans in 2022 was reasonable. The proportion of the bank's home mortgage loans to low-income borrowers was well below the percentage of low-income families and near to the aggregate industry distribution of home mortgage loans to those borrowers. The proportion of the bank's home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate industry distribution of home mortgage loans to those borrowers.

***Consumer Loans***

Refer to Table V in the state of Illinois 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 borrower distribution of consumer loans to LMI borrowers is excellent.

2020-2021

The borrower distribution of consumer loans to LMI borrowers in the 2020-2021 evaluation period was reasonable. The proportion of the bank's consumer loans to low-income borrowers aligned with the percentage of low-income households. The proportion of the bank's consumer loans to moderate-income borrowers exceeded the percentage of moderate-income households.

2022

The borrower distribution of consumer loans to LMI borrowers in 2022 was excellent. The proportion of the bank's consumer loans to low-income borrowers was well below the percentage of low-income households. The proportion of consumer loans to moderate-income borrowers significantly exceeded the percentage of moderate-income households.

## **Responses to Complaints**

BVNB did not receive any CRA-related complaints during the evaluation period.

# Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2020 to 12/31/2022	
<b>Bank Products Reviewed:</b>	Illinois Non-MSA: Home mortgage and consumer loans Decatur MSA: Home mortgage loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable	Not Applicable	Not Applicable
<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>Illinois</b>		
Illinois Non-MSA	Full-Scope	AA consists of all CTs within Randolph County
Decatur MSA	Full-Scope	AA consists of all CTs within Macon County

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS: Buena Vista National Bank</b>	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
Buena Vista National Bank	Satisfactory
<b>State:</b>	
Illinois	Satisfactory

## 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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.



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

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

## Appendix D: Tables of Performance Data

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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 are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2020-21</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	
20-21 Illinois Non-MSA	388	43,017,146	77.9	681	0.0	0.0	0.0	0.0	0.0	0.0	84.0	72.7	74.3	16.0	27.3	25.7	0.0	0.0	0.0	
2020-21 Decatur MSA	110	10,189,403	22.1	3,341	9.4	9.1	4.2	9.5	6.4	5.1	37.9	35.5	37.9	43.2	49.1	52.9	0.0	0.0	0.0	
<b>Total</b>	<b>498</b>	<b>53,206,549</b>	<b>100.0</b>	<b>4,022</b>	<b>7.2</b>	<b>2.0</b>	<b>3.5</b>	<b>7.4</b>	<b>1.4</b>	<b>4.2</b>	<b>48.4</b>	<b>64.5</b>	<b>44.1</b>	<b>37.0</b>	<b>32.1</b>	<b>48.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

*Buena Vista National Bank (10000014479) excluded from Aggregate*

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2022</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	
2022 Illinois Non-MSA	103	10,104,603	68.7	395	0.0	0.0	0.0	0.0	0.0	0.0	97.8	95.1	99.7	2.2	4.9	0.3	0.0	0.0	0.0	
2022 Decatur MSA	47	3,976,478	31.3	2,133	4.3	2.1	2.3	15.6	21.3	13.2	58.7	57.4	62.2	21.1	19.1	21.9	0.3	0.0	0.4	
<b>Total</b>	<b>150</b>	<b>14,081,081</b>	<b>100.0</b>	<b>2,528</b>	<b>3.4</b>	<b>0.7</b>	<b>1.9</b>	<b>12.1</b>	<b>6.7</b>	<b>11.2</b>	<b>67.6</b>	<b>83.3</b>	<b>68.0</b>	<b>16.8</b>	<b>9.3</b>	<b>18.6</b>	<b>0.2</b>	<b>0.0</b>	<b>0.3</b>	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

*Buena Vista National Bank (10000014479) excluded from Aggregate*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2020-21**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
20-21 Illinois Non-MSA	388	43,017,146	77.9	681	17.1	2.8	9.3	20.0	12.4	19.7	21.3	22.2	23.5	41.6	61.6	29.7	0.0	1.0	17.9
2020-21 Decatur MSA	110	10,189,403	22.1	3,341	22.9	9.1	8.7	16.9	16.4	20.5	20.1	23.6	21.4	40.1	49.1	30.3	0.0	1.8	19.1
<b>Total</b>	<b>498</b>	<b>53,206,549</b>	<b>100.0</b>	<b>4,022</b>	<b>21.6</b>	<b>4.2</b>	<b>8.8</b>	<b>17.6</b>	<b>13.3</b>	<b>20.4</b>	<b>20.4</b>	<b>22.5</b>	<b>21.8</b>	<b>40.4</b>	<b>58.8</b>	<b>30.2</b>	<b>0.0</b>	<b>1.2</b>	<b>18.9</b>

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Buena Vista National Bank (10000014479) excluded from Aggregate

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2022 Illinois Non-MSA	103	10,104,603	68.7	395	18.7	7.8	9.6	17.6	18.4	24.1	22.0	28.2	23.3	41.7	42.7	24.6	0.0	2.9	18.5
2022 Decatur MSA	47	3,976,478	31.3	2,133	21.2	10.6	14.7	17.2	25.5	24.4	21.4	12.8	19.0	40.2	46.8	20.4	0.0	4.3	21.5
<b>Total</b>	<b>150</b>	<b>14,081,081</b>	<b>100.0</b>	<b>2,528</b>	<b>20.6</b>	<b>8.7</b>	<b>13.9</b>	<b>17.3</b>	<b>20.7</b>	<b>24.4</b>	<b>21.5</b>	<b>23.3</b>	<b>19.7</b>	<b>40.6</b>	<b>44.0</b>	<b>21.1</b>	<b>0.0</b>	<b>3.3</b>	<b>21.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Buena Vista National Bank (10000014479) excluded from Aggregate

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2020-21	
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	
20-21 Illinois Non-MSA	20	393	100.0	20.7	20.0	17.2	25.0	18.0	20.0	44.1	35.0	0.0	0.0	
2020-21 Decatur MSA	--	--	--	25.4	--	15.2	--	17.1	--	42.2	--	0.0	--	
<b>Total</b>	<b>20</b>	<b>393</b>	<b>100.0</b>	<b>24.4</b>	<b>20.0</b>	<b>15.7</b>	<b>25.0</b>	<b>17.3</b>	<b>20.0</b>	<b>42.6</b>	<b>35.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2020 - 12/31/2021 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													2022	
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	
2022 Illinois Non-MSA	20	306	100.0	23.0	10.0	14.9	45.0	18.7	25.0	43.4	20.0	0.0	0.0	
2022 Decatur MSA	--	--	--	24.5	--	16.2	--	17.8	--	41.5	--	0.0	--	
<b>Total</b>	<b>20</b>	<b>306</b>	<b>100.0</b>	<b>24.2</b>	<b>10.0</b>	<b>15.9</b>	<b>45.0</b>	<b>18.0</b>	<b>25.0</b>	<b>41.9</b>	<b>20.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.  
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.