Office of the
Comptroller of the Currency
Washington, DC 20219

SMALL BANK

PUBLIC DISCLOSURE

March 02, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Midland FS & LA
Charter Number: 704475

8929 S Harlem Ave
Bridgeview, IL 60455-1923

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.

Contents

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Needs to Improve.**

The Lending Test is rated: Needs to Improve

The major factors that support this rating include:

- The Lending Test rating was based on Midland FS & LA's (Midland or bank) performance in the state of Illinois. Some of the major factors supporting the rating are bank-wide assessed factors including the loan-to-deposit (LTD) ratio and lending within the assessment area.
- Midland's quarterly average LTD ratio was less than reasonable at 26.39 percent, significantly below similarly situated institutions. Additionally, a majority of the bank's loans originated were outside the assessment area (AA).
- The geographic distribution of home mortgage loans to low- and moderate-income (LMI) census tracts (CTs) was poor.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio was less than reasonable. Midland's LTD ratio improved over the four-year period from 2022 through 2025, but the quarterly average remains below peer institutions. Midland's LTD ratio improved from 23.33 percent to 44.20 percent, resulting in a quarterly average LTD ratio of 26.39 percent. However, Midland had the second lowest quarterly average LTD ratio compared to the nine banks in Cook County with total assets between $40 million and $150 million. During the same period, the eight similarly situated banks had average quarterly LTD ratios between 10.23 and 129.13 percent and the average of all nine banks' quarterly LTD ratios was 76.60 percent.

Midland's loan portfolio grew 87.80 percent during 2025, but the LTD ratio remains significantly below similarly situated institutions in the area. Loan growth in 2025 was related to the implementation of a new strategy which prioritized commercial lending and mortgage banking activities. The prior management team had allowed the loan portfolio to decline. The LTD ratio also grew through a decline in total deposits of 10.9 percent during the four-year period. During the last CRA evaluation, it was noted that deposits were inflated in 2020 and 2021 due to government stimulus packages related to COVID-19. With the addition of the mortgage banking unit, the bank sold 84 mortgage loans, totaling $33.9 million, to the secondary market in 2025 which adversely impacted their LTD ratio. If these mortgage loans had been held, the bank's LTD ratio would likely have been notably closer the average quarterly average LTD ratio of the similarly situated institutions.

Loan opportunities in the AA are available, demonstrated by the peer bank LTD ratios. There are no financial, legal, or other constraints prohibiting the bank from originating loans.

Lending in Assessment Area

A majority of the bank's loans were outside its AA.

The bank originated 23.33 percent of its total loans inside the bank's AA (Cook-Will) during the evaluation period based on a random sample of 60 loans. Part of the strategic changes that occurred at the end of 2024 included nationwide mortgage banking. Lending levels in 2025 were higher than levels observed in the prior two years. Our sample was representative of this, as 38 out of our 60 mortgage loans sampled originated during 2025. A majority of loans originated in 2025 originated outside of Illinois through the mortgage banking operation. The mortgage banking operation, established in 2025, included two loan production offices (LPOs), in New York and Florida, as well as remote workers processing loans across the nation, which impacted the in/out ratio. This analysis is performed at the bank, rather than the AA, level.

Table 1: Lending Inside and Outside of the Assessment Area										2023-2025
Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	14	23.33	46	76.67	60	1,758	8.97	17,847	91.03	19,605
Total	14	23.33	46	76.67	60	1,758	8.97	17,847	91.03	19,605

Source: 1/1/2023 - 12/31/2025 Sample of 60 loans.
Due to rounding, totals may not equal 100.0%

Description of Institution

Midland is a $117 million federal stock thrift institution, wholly owned by Midland Capital Holdings Corporation (MCHC). MCHC was acquired by MidFed Acquisition Corp (MidFed), on September 20, 2024. The bank has no affiliate organizations. Midland is headquartered in Bridgeview, IL, approximately 25 miles southwest of downtown Chicago. Additionally, Midland operates three full-service branch offices, including two branches on the southwest side of Chicago and one in Homer Glen, IL. The Chicago branch offices are in Brighton Park and Marquette Park neighborhoods. The Bridgeview head office, Brighton Park and Homer Glen branches have 24/7 ATMs, of which only the Bridgeview ATM accepts deposits. The Bridgeview head office, Brighton Park branch, and Marquette Park branch are in Cook County and the Homer Glen branch is located in Will County. Additionally, the Marquette Park and Brighton Park branches are in low- and moderate-income CTs, respectively. The head office and the Homer Glen branch are in middle-income CTs. There are no differences in product offerings between branches, and loan applications are accepted at all bank locations. The bank's marketing is limited to a sign at the main office.

Midland operates as a full-service thrift, offering traditional loan and deposit products. The bank's loan portfolio is centered in one-to-four-family mortgages. Their net loan portfolio totaled $46.5 million as of December 31, 2025, representing 30.9 percent of average assets. One-to-four-family residential real estate loans represent 68.6 percent of the total loan portfolio. Over the evaluation period, the composition of the loan portfolio shifted to include a greater percentage of commercial real estate and multifamily loans, representing 20.8 percent and 7.9 percent of the total loan portfolio as of December 31, 2025, respectively. Upon acquisition by MidFed, a new business strategy was implemented to focus on commercial lending and nationwide mortgage banking operations. In 2025 the bank opened LPOs in the states of New York and Florida. Additionally, there is a team of decentralized mortgage banking lenders that work remotely nationwide. Tier 1 capital totals $10.8 million with a tier 1 leverage ratio of 9.1 percent.

The last performance evaluation under the CRA was dated January 9, 2023, with an evaluation period of January 1, 2019, through December 31, 2021. The bank was evaluated using Small Bank CRA procedures and received an overall "Needs to Improve" rating. Midland possesses the financial capacity to meet the credit needs of Cook-Will. While loan competition is high within Cook-Will, lending opportunities are available. There are no legal, financial, or other factors impeding Midland's ability to meet the credit needs of Cook-Will.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation, using Small Bank CRA procedures, covered January 1, 2023, to December 31, 2025. The evaluation focused on home mortgage loans, the bank's primary product during this period.

Examiners relied on loan file samples, as Midland was not a Home Mortgage Disclosure act (HMDA) reporter during this evaluation period, as they did not meet the loan volume threshold. Examiners randomly selected a sample of 60 loans, from 2023-2025, and reviewed to determine the amount of credit extended inside and outside Cook-Will. Examiners then selected all home loans originated in Cook-Will during the evaluation period, which totaled 27, and analyzed the distribution of loans by borrower income and geography. During the evaluation examiners utilized various reports, including the Uniform Bank Performance Report as of December 31, 2025, the FDIC's Deposit Market Share Report as of June 30, 2025, and 2020 US Census data. Examiners conducted community contact interviews during the evaluation.

During the evaluation period, the Office of Management and Budget (OMB) revised the official title of the metropolitan division (MD) that Cook-Will is located in. Chicago-Naperville-Evanston, IL MD became the Chicago-Naperville-Schaumburg, IL MD. This change reflects a naming revision only and did not affect the geographic composition of the assessment area for purposes of this evaluation.

Selection of Areas for Full-Scope Review

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

Ratings

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

Midland has only one AA located in the state of Illinois, which was used for a full-scope review.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

While Cook-Will is within an MMSA, the MMSA is not a rating area, as the bank's headquarters and branches are all located within the state of Illinois.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Illinois

CRA rating for the State of Illinois[1]: Needs to Improve

The Lending Test is rated: Needs to Improve

The major factors that support this rating include:

- Midland's distribution of home mortgage loans to LMI CTs was poor, as no loans were made within low-income CTs in Cook-Will. With the majority of Cook-Will CTs designated as low or moderate CTs, examiners put more weight on this performance factor.
- Midland's distribution of home mortgage loans to LMI borrowers was reasonable.

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[1] This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Description of Institution's Operations in Illinois

Midland delineated portions of both Cook and Will Counties within the Chicago-Naperville-Schaumberg IL Metropolitan Division (MD) as their AA. The MD is part of the Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area (MMSA). Midland's AA contains 190 contiguous CTs located on the southwest side of Chicago and the adjacent southwest suburban communities. The majority of CTs (181 or 95.3 percent) are in Cook County, IL and nine, or 4.7 percent, are in Will County, IL. Of the 190 CTs located in Cook-Will, 26.8 percent are low-income geographies, 30 percent are moderate-income geographies, 30.5 percent are middle-income geographies, and 12.1 percent are upper-income geographies. Midland's delineation of Cook-Will as their AA meets the requirements of the CRA regulation.

Economy and Competition
Local economies in Cook and Will Counties have remained relatively stable over the evaluation period, evidenced by stable unemployment rates of 4.6 percent and 4.5 percent, respectively. The tables below indicate the elevated unemployment rate in 2020, according to US Census data. Poverty levels were also high in 2020, with 11.57 percent of families below the poverty rate. Competition in the AA was high as the bank competed with a multitude of national banks, thrifts, and credit unions, along with nontraditional lenders. For calendar year 2025, the bank's deposit market share was low at 0.02 percent, with Midland ranking 78 out of 95 financial institutions. Based on 2024 market share analysis of HMDA data, 13,138 loan applications were reported for Cook-Will, totaling $3.21 trillion dollars. These applications were reported by 390 institutions.

Affordable Housing
Median housing costs, during the evaluation period, were not affordable for low-income families. The median housing value in Cook-Will was $186,050, per the 2020 Census. However, housing costs in the area rose after 2020. Per the Federal Reserve of St. Louis, the median listing price for a house in the MMSA as of December 1, 2025, was $348,900, an increase of 6.55 percent compared to January 1, 2023. Examiners calculated a 30-year mortgage with a six percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any other additional expenses, the monthly mortgage payment based on the 2025 median list price was $1,873. A low-income family, defined as less than 50 percent of the FFIEC adjusted median family income for the MD, made a maximum of $58,700 in 2025. Based on this maximum income, these families could have afforded a $244,767 mortgage with monthly payments of $1,468. This was below the monthly mortgage payment based on the 2025 median listing price.

Additionally, some moderate-income families had difficulty affording a house based on median housing costs. A moderate-income family, defined as making at least 50 percent, but less than 80 percent of FFIEC adjusted median family income for the MD, made a maximum of $93,920 in 2025. Based on this income, moderate-income families could have afforded up to a $391,627 mortgage with monthly payments of $2,348. While this amount is greater than the monthly payments for the 2025 median listing price, we recognize that the calculation was assuming the maximum income for a moderate-income family in Cook-Will.

Community Contacts
Examiners contacted three affordable housing and community service organizations that support Cook-Will to better understand the credit needs and community development opportunities in the area. Credit needs identified in the community include affordable housing, downpayment assistance programs,

rehabilitation financing for houses, and small business lending, especially for start-up businesses. Contacts also noted there is a need for home ownership counseling in the community. Opportunities identified for financial institutions include qualified grants and donations to affordable housing organization to improve services and providing community services by providing financial and strategic planning expertise to community development organizations.

Cook-Will

Assessment Area(s) - Chicago MSA Midland 2023						
2023						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	190	26.84	30.00	30.53	12.11	0.53
Population by Geography	797,774	20.75	30.56	34.11	14.42	0.17
Housing Units by Geography	294,492	20.94	28.78	34.97	15.12	0.19
Owner-Occupied Housing by Geography	184,660	10.46	26.43	42.61	20.42	0.08
Occupied Rental Units by Geography	83,696	37.56	34.63	22.12	5.39	0.30
Vacant Units by Geography	26,136	41.69	26.63	22.18	8.81	0.69
Businesses by Geography	23,544	13.90	27.50	40.09	18.41	0.10
Farms by Geography	409	16.63	26.89	35.45	21.03	0.00
Family Distribution by Income Level	184,163	31.17	19.00	18.45	31.37	0.00
Household Distribution by Income Level	268,356	31.40	17.66	16.75	34.19	0.00
Unemployment rate (%)	9.01	17.02	10.20	6.06	4.48	32.26
Households Below Poverty Level (%)	13.22	25.99	14.45	9.08	4.85	40.05
Median Family Income (16984 – Chicago-Naperville-Evanston, IL MD)		$92,622	**Median Housing Value**			$186,050
Median Family Income (16984 – Chicago-Naperville-Evanston, IL MD) for 2023		$109,800	**Median Gross Rent**			$999
			Families Below Poverty Level			11.57

FFIEC File - 2020 Census
2023 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

Assessment Area(s) - Chicago MSA Midland 2025						
2024 - 2025						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	190	26.84	30.00	30.53	12.11	0.53
Population by Geography	797,774	20.75	30.56	34.11	14.42	0.17
Housing Units by Geography	294,492	20.94	28.78	34.97	15.12	0.19
Owner-Occupied Housing by Geography	184,660	10.46	26.43	42.61	20.42	0.08
Occupied Rental Units by Geography	83,696	37.56	34.63	22.12	5.39	0.30
Vacant Units by Geography	26,136	41.69	26.63	22.18	8.81	0.69
Businesses by Geography	20,851	13.25	28.55	40.16	17.96	0.09
Farms by Geography	356	14.61	28.65	36.24	20.51	0.00
Family Distribution by Income Level	184,163	31.17	19.00	18.45	31.37	0.00
Household Distribution by Income Level	268,356	31.40	17.66	16.75	34.19	0.00
Unemployment rate (%)	9.01	17.02	10.20	6.06	4.48	32.26
Households Below Poverty Level (%)	13.22	25.99	14.45	9.08	4.85	40.05
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)		$92,622	**Median Housing Value**			$186,050
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2025		$117,400	**Median Gross Rent**			$999
			Families Below Poverty Level			11.57

FFIEC File - 2024 Census
2025 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification

Scope of Evaluation in Illinois

This evaluation consisted of a full-scope review of Cook-Will, Midland's singular assessment area. As mentioned earlier, the bank's primary loan product was home mortgages, so our evaluation of the performance in the state is based on our review of all home mortgages originated by the bank in Cook-Will during the evaluation period. Based upon the demographic data, there was a slightly higher percentage of CTs identified as low-or moderate-income compared to the percentage of families by income level; therefore, examiners did weigh the geographic distribution more than the borrower distribution.

LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in Cook-Will was poor.

Distribution of Loans by Income Level of the Geography

The bank exhibited poor geographic distribution of loans in the State. This is primarily a result of a lending gap in low-income CTs.

Home Mortgage Loans

Refer to Table 7 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.

Midland's distribution of loans to low-income CTs in the evaluation period was poor. The bank did not originate any loans in low-income CTs during the evaluation period. This is significantly lower than both the demographic comparators and the aggregate lending comparators in Cook-Will of 10.46 percent and 11.74 percent, respectively. Midland's distribution of loans to moderate-income CTs of 22.22 percent is reasonable at just below the demographic and aggregate lending comparators of 26.43 and 23.33 percent, respectively.

Lending Gap Analysis

The bank had an unexplained lending gap as the bank had no lending penetration within the low-income CTs in Cook-Will. Over one-quarter of the CTs in Cook-Will are low-income, and one of the bank's branches is located within a low-income CT. While less than eleven percent of owner-occupied housing units are in low-income CTs, there are still 19,315 total owner-occupied units. Based upon the aggregate data presented in Table 7, other institutions were able to lend in these low-income CTs. No other unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table 8 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.

Midland's distribution of home mortgage loans by income level of the borrowers is reasonable. Midland's distribution of loans to low-income borrowers in the evaluation period was reasonable at 11.11 percent and just above the aggregate lending comparator of 10.58 percent. Both the bank and aggregate are significantly below demographic data. As previously mentioned, low-income borrowers cannot afford a median priced home in Cook-Will. Midland's distribution of loans to moderate-income borrowers was reasonable at 18.52 percent, near the demographic comparator of 19 percent and below the aggregate lending comparator of 23.69 percent.

Responses to Complaints

There were no written complaints regarding Midland's CRA performance submitted to the bank or the OCC since the last evaluation.

Appendix A: Scope of Examination

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

Time Period Reviewed:	(01/01/2023 to 12/31/2025)	
Bank Products Reviewed:	Home mortgage	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
Illinois		
Cook-Will	Full-scope	190 contiguous census tracts. Partial counties of Cook and Will Counties in Illinois.

Appendix B: Summary of MMSA and State Ratings

RATINGS	
Overall Bank:	Lending Test Rating
Midland FS & LA	Needs Improvement
MMSA or State:	
Illinois	Needs Improvement

Appendix C: Definitions and Common Abbreviations

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

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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 the 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 low- and moderate-income 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): 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 CD loans and qualified investments, branch distribution, and CD services).

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

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

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**.**

Multistate Metropolitan Statistical Area (MMSA): 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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table 7. **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 8. **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/AA. The table also presents aggregate peer data for the years the data is available.

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023-2025
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	$	% of Total Number	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
Cook-Will	27	5,948	100	13,142	10.46	0.00	11.74	26.43	22.22	23.33	42.61	44.44	43.76	20.42	33.33	21.05	0.08	0.00	0.11
Total	27	5,948	100	13,142	10.46	0.00	11.74	26.43	22.22	23.33	42.61	44.44	43.76	20.42	33.33	21.05	0.08	0.00	0.11
Source: FFIEC File – 2024 Census; 1/1/2023 - 12/31/2025 Bank Loan Files																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2023-2025
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Cook-Will	27	5,948	100	13,142	31.17	11.11	10.58	19.00	18.52	26.56	18.45	14.81	23.69	31.37	44.44	22.14	--	11.11	17.04
Total	27	5,948	100	13,142	31.17	11.11	10.58	19.00	18.52	26.56	18.45	14.81	23.69	31.37	44.44	22.14	--	11.11	17.04
Source: FFIEC File - 2024 Census; 1/1/2023 - 12/31/2025 Bank Loan Files "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			