



## **PUBLIC DISCLOSURE**

July 29, 2024

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

Lake Forest Bank & Trust Company, National Association  
Charter Number: 25149

727 North Bank Lane  
Lake Forest, IL 60045

Office of the Comptroller of the Currency

Midsized & Trust Bank Supervision  
425 S. Financial Place, Suite 1700  
Chicago, IL 60605

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

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## Overall CRA Rating

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

The following table indicates the performance level of Lake Forest Bank and Trust Company, N.A. (LFBT or the bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Lake Forest Bank and Trust Company, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory		X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The Lending Test rating is based on excellent performance in the State of Illinois, which has a good geographical and adequate borrower distribution of loans. The bank’s lending levels reflect excellent responsiveness to AA credit needs. The bank is a leader in making community development (CD) loans which had a significantly positive impact on the Lending Test conclusion. The bank makes extensive use of innovative and flexible products to serve the credit needs of its assessment area (AA).
- The Investment Test rating is based on the performance in the State of Illinois and reflects a good responsiveness to credit and community economic development needs through the origination of qualified CD investment and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.
- The Service Test rating is based on the performance in the State of Illinois and reflects service delivery systems that were reasonably accessible to geographies and individuals of different income levels. The bank is a leader in providing CD services.

## Lending in Assessment Area

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

The bank originated and purchased 0.7 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. This percentage

does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	147	55.5	118	44.5	265	99,784	44.9	122,422	55.1	222,206
Small Business	4,398	0.6	672,797	99.4	677,195	329,686	1.3	24,513,777	98.7	24,843,463
Consumer	56	87.5	8	12.5	64	274	55.6	219	44.4	493
<b>Total</b>	<b>4,601</b>	<b>0.7</b>	<b>672,923</b>	<b>99.3</b>	<b>677,524</b>	<b>429,744</b>	<b>1.7</b>	<b>24,636,418</b>	<b>98.3</b>	<b>25,066,162</b>

Nationwide lending programs used by the bank impact the ratio of loans located inside the bank's AA. Barrington's affiliate, Wintrust Mortgage, has a nationwide presence, which results in a small number of loans being originated in the bank's AA. Refer to the Description of the Institution narrative below for more details relating to Wintrust Mortgage lending. Home mortgage and small loans to businesses are the bank's primary products based on volume of loans by number. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography. In addition, the bank's affiliate, First Insurance Funding (FIRST), offers a nationwide insurance lending program, which provides financing to insurance agents and businesses. FIRST loans are originated by LFBT and the majority are sold to other affiliate banks.

## Description of Institution

LFBT or the bank is an intrastate, federally chartered bank headquartered in Chicago, Illinois with assets of \$8.1 billion as of December 31, 2023. LFBT is a wholly owned subsidiary of Wintrust Financial Corporation (WFC). As of December 31, 2023, WFC is a \$56.3 billion financial services holding company located in Rosemont, Illinois. WFC's business strategy includes working with customers in the Chicago metropolitan area, southern Wisconsin, northwest Indiana, and southwest Florida by way of their 15 wholly owned banking subsidiaries and 176 bank locations.

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

WFC provides niche lending products across the nation within their community banks. These specialty products include wealth management advisory services, commercial insurance premium financing through FIRST, lease financing, short-term account receivable financing, administrative services, franchise lending, firm partnership loans, and financial solutions for mission-based organizations.

In 2021, LFBT completed its purchase of a loan portfolio totaling approximately \$581.6 million from the Allstate Corporation. Through the acquisition, Wintrust became the national preferred provider of loans to Allstate agents and expanded LFBT's existing nationwide insurance agency finance business. As of December 31, 2023, LFBT had net loans and leases of \$5.6 billion, total deposits of \$6.2 billion, and Tier 1 capital of \$804 million. The bank's loan portfolio is mainly comprised of 65.1 percent commercial and industrial loans, 17.0 percent real estate, 12.0 percent consumer loans, and 3.5 percent construction loans.

The bank operates nine full-service branches. There are seven branch locations in Illinois and two in Florida, with 15 full service Automated Teller Machines (ATMs). Since our last evaluation, LFBT opened a new branch in Bonita Springs, Florida in April 2023, which expanded the bank's footprint in a new market and added an additional AA. The Illinois locations are in Lake Forest, Lake Bluff, Highwood, Highland Park, North Chicago, and Waukegan. The Florida locations are in Naples and Bonita Springs. Each of these locations offer traditional weekday hours with the only difference being the Florida locations do not offer Saturday hours.

There were no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The bank received an "Outstanding" rating in its previous CRA evaluation dated June 7, 2021.

## **Scope of the Evaluation**

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

The evaluation period is January 1, 2021, through December 31, 2023. This performance evaluation assesses the bank's performance for all products and services, under the Large Bank CRA procedures for Lending, Investment, and Service Tests for the entirety of the evaluation period.

In evaluating lending performance, the OCC analyzed home mortgage loans that management reported under Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under CRA. At the bank's request, the OCC considered consumer loan products, which consist of secured and unsecured loans. Banks are not required to report data on consumer loans; therefore, no peer aggregate data was available to compare against consumer lending. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. The OCC did not consider small loans to farms, as the bank did not originate any small loans to farms throughout the evaluation period.

For the Lending Test, there are two analysis periods considered for this exam when evaluating geographical and borrower distribution of loans. The split analysis periods are due to updates in the U.S. Census 2015 American Community Survey (ACS) to the 2020 U.S. Census. The updates to the Census information changes the demographic and aggregate comparators for geographic and borrower distribution of loans, thus split analysis periods are needed to accurately assess performance in these two Lending Test components. The analysis periods for geographical and borrower distribution of loans are January 1, 2021, through December 31, 2021, and January 1, 2022, through December 31, 2023.

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

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

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

### **Ratings**

The bank’s overall rating is a blend of the state ratings.

Refer to the Scope section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The state of Illinois rating area carried the greatest weight in the conclusions because it represented the bank’s most significant market in terms of deposit concentration, branch distribution, and reportable loans. As of June 30, 2023, deposits in this rating area comprised 97.8 percent of LFBT’s total deposits. Additionally, 65.3 percent of originations and 78.6 percent of loan volume of all home mortgage, small business, and consumer loans were generated in this state. As of the report date, LFBT had 77.8 percent of its branches in the state of Illinois.

When determining our conclusions for geographical and borrower distribution of loans, we gave more weight to January 1, 2022, through December 31, 2023, analysis period due to the fact it represented 65.8 percent of originations and 64.5 percent of the loan volume of all home mortgage, small business, and consumer loans made within the bank’s AAs, throughout the evaluation period.

Additionally, we gave significantly more weight in determining our conclusions to performance in small business lending for geographical and borrower distribution of loans. This was due to the fact that small business lending made up 95.6 percent of originations and 76.7 percent of the loan volume of all home mortgages, small loans to businesses, and consumer loans made within the bank’s AAs, throughout the evaluation period.

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

number of loans rather than the dollar volume because it is a better indicator of the number of businesses and individuals served.

Due to restrictions in the publicly available data for the Peer Small Business Lending Data set, market share and peer aggregate data in the Chicago CSA are based on the full set of counties, instead of the partial counties within the AA.

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

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

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

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

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

## State Rating

### State of Illinois

<b>CRA rating for the State of Illinois:</b>	Outstanding
<b>The Lending Test is rated:</b>	Outstanding
<b>The Investment Test is rated:</b>	High Satisfactory
<b>The Service Test is rated:</b>	High Satisfactory

The major factors that support this rating include:

- Lending activity reflects excellent responsiveness to credit needs in its AA.
- The bank exhibits a good geographic and adequate borrower distribution of loans in its AA.
- The bank is a leader in making CD loans. The institution makes extensive use of innovative and/or flexible lending practices to serve credit needs.
- The institution has a significant level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.
- The bank is a leader in providing CD services.

### Description of Institution's Operations in the State of Illinois

LFBT designated one AA in the state of Illinois, which is the Chicago-Naperville IL-IN-WI CSA (Chicago CSA). The AA includes a portion of Cook County, in the Chicago-Naperville-Evanston MSA and a portion of Lake County in the Lake County-Kenosha County, IL-WI MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any low- and/or moderate-income (LMI) geographies. Please refer to Appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Based on the information from the 2020 U.S. Census, the AA is composed of 168 census tracts (CTs), of which 10 (6.0 percent) were low-income, 27 (16.1 percent) were moderate-income, 32 (19.0 percent) were middle-income, 94 (56.0 percent) were upper-income and five (3.0 percent) were with no income tract information. Of the 168 CTs in the AA, 103 CTs were in Cook County and the remaining 65 CTs were in Lake County. The area population was 743,971 with 38,686 (5.2 percent) residing in low-income CTs, and 132,427 (17.8 percent) residing in moderate-income CTs. The Chicago CSA represents 100.0 percent of statewide deposits and 100.0 percent of retail bank branches throughout the evaluation period.

According to the FDIC's June 30, 2023, Deposit Market Share report, LFBT held \$5.6 billion in deposits ranking 16<sup>th</sup> out of 422 institutions in the state and representing 0.8 percent deposit market share. The five largest competitors in the state include JP Morgan Chase Bank, BMO Harris Bank, Bank

of America, CIBC Bank USA, and Fifth Third Bank. These competitors’ deposits represented 50.6 percent of the total deposit market share. LFBT’s deposits in the state of Illinois represented 97.8 percent of the bank’s total bank-wide deposits. Small business lending in the state of Illinois accounted for 64.3 percent of originations and 77.8 percent of the loan volume of bank-wide small loans to businesses in LFBT’s AAs. The bank has seven bank branches in the state of Illinois, which accounted for 77.8 percent of the bank-wide total number of branches.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Chicago CSA 2022-2023</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)	168	6.0	16.1	19.0	56.0	3.0
Population by Geography	743,971	5.2	17.8	19.3	56.1	1.5
Housing Units by Geography	281,600	5.3	17.6	20.5	56.6	0.0
Owner-Occupied Units by Geography	192,811	3.0	12.1	19.4	65.5	0.0
Occupied Rental Units by Geography	72,317	10.5	31.7	24.3	33.5	0.0
Vacant Units by Geography	16,472	8.3	20.4	16.4	54.9	0.1
Businesses by Geography	104,664	2.5	9.8	16.6	71.0	0.1
Farms by Geography	1,580	3.2	18.2	23.6	54.9	0.1
Family Distribution by Income Level	188,523	18.4	14.0	16.8	50.7	0.0
Household Distribution by Income Level	265,128	21.6	13.6	15.1	49.8	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$92,622	Median Housing Value			\$387,375
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$105,876	Median Gross Rent			\$1,339
	Families Below Poverty Level			5.2%		

*Source: 2020 U.S. Census and 2023 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\* The NA category consists of geographies that have not been assigned an income classification.*

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Chicago CSA 2021</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)	166	7.2	16.3	18.7	55.4	2.4
Population by Geography	727,841	6.1	18.4	20.4	55.0	0.1
Housing Units by Geography	276,183	5.9	17.1	21.4	55.7	0.0
Owner-Occupied Units by Geography	189,038	2.9	11.9	20.3	64.9	0.0
Occupied Rental Units by Geography	69,217	12.4	28.9	24.9	33.8	0.0
Vacant Units by Geography	17,928	12.4	26.0	18.6	42.9	0.0
Businesses by Geography	76,467	2.2	10.4	17.4	70.0	0.0
Farms by Geography	1,239	4.0	15.7	23.4	56.9	0.0
Family Distribution by Income Level	187,114	18.1	14.2	16.1	51.6	0.0

Household Distribution by Income Level	258,255	20.6	13.6	15.3	50.5	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$352,267
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI		\$87,137	Median Gross Rent			\$1,184
			Families Below Poverty Level			6.7%
<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>						

## Employment and Economic Factors

According to the “Bureau of Labor Statistics” (BLS), the unemployment rate peaked at 7.9 percent in January 2021, reflecting the adverse economic impact of the COVID-19 pandemic. The unemployment rate at the end of the evaluation period in December 2023 dropped to 4.0 percent, which was lower than the statewide unemployment rate of 4.5 percent.

Based on information from the May 2024 Moody’s Analytics report, the Chicago-Naperville-Arlington Heights’ economy is performing below the national average and is trailing behind its large peers. Payroll employment has increased this spring but has yet to progress compared to a year earlier. Core drivers such as professional/business services, finance, and transportation/warehousing have been weak. healthcare serves as the backbone of job creation in the area, with additional support from manufacturing and public sectors.

A key strength of the area is its role as a large center for business, distribution, transportation, and finance, which provides numerous employment opportunities. Other strengths of the area include large talent pool, strong roster of well-regarded educational institutions, and budding high-tech center in River North neighborhood. Area weaknesses include state and local budget pressures, which could lead to reduced public services, such as education and infrastructure, and possible tax or fee increases. In addition, the area is experiencing a weak population trend, although recent Census Bureau data shows a slightly lower population decline. The total population decreased by 1.1 percent, 0.7 percent, and 0.2 percent over each of the three years from 2021 to 2023, respectively. Slow or negative population growth can lead to reduced economic activity, labor shortages, and a shrinking tax base, which can strain local governments and public services. These trends also contribute to declining housing markets and challenges in attracting businesses and investment, further hindering long-term regional growth. Top five employers in the area are federal, state, and local governments, Amazon.com Inc., Advocate Health Care System, Northwestern Memorial Healthcare, and University of Chicago. The Moody’s Analytics report projects that while finance and professional/business services will improve, the economy will rely on other industries to keep it moving forward.

## Housing

Based on information from the 2020 U.S. Census covering 2022 through 2023, 192,811 (68.4 percent) of the total housing units in the AA were owner-occupied, 72,317 (25.7 percent) were renter occupied, and 16,472 (5.9 percent) were vacant units. Of all owner-occupied units, 5,784 (3.0 percent) were located in low-income CTs, and 23,330 (12.1 percent) were located in moderate-income CTs. Of all occupied rental units, 7,593 (10.5 percent) were located in low-income CTs, and 22,924 (31.7 percent) were located in moderate-income CTs. Of all vacant units, 1,367 (8.3 percent) were located in low-income

CTs, and 3,360 (20.4 percent) were located in moderate-income CTs. The weighted average median housing value was \$387,375, and the weighted average monthly gross rent was \$1,339.

Based on information from the 2015 ACS covering 2021, 189,038 (68.4 percent) of the total housing units in the AA were owner-occupied, 69,217 (25.1 percent) were renter occupied, and 17,928 (6.5 percent) were vacant units. Of all owner-occupied units, 5,482 (2.9 percent) were located in low-income CTs, and 22,495 (11.9 percent) were located in moderate-income CTs. Of all occupied rental units, 8,583 (12.4 percent) were located in low-income CTs, and 20,004 (28.9 percent) were located in moderate-income CTs. Of all vacant units, 2,223 (12.4 percent) were located in low-income CTs, and 4,661 (26.0 percent) were located in moderate-income CTs. The weighted average median housing value was \$352,267, and the weighted average monthly gross rent was \$1,184.

According to Table A, the median housing value of owner-occupied housing units for the Chicago CSA was \$352,267 for 2021 (2015 ACS) and \$387,375 for 2022 through 2023 (2020 U.S. Census). Based on this data, housing values increased 10.0 percent over the evaluation period.

### **Affordability**

Based on data from the 2020 U.S. Census, low-income families within the Chicago CSA earned less than \$3,859 and moderate-income families earned less than \$6,175, monthly. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30.0 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,158 for low-income borrowers and \$1,852 for moderate-income borrowers. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the Chicago CSA median housing value would be \$2,080. Both LMI borrowers would be severely challenged to afford a mortgage loan in this AA.

Based on data from the 2015 ACS, low-income families earned less than \$3,126 and moderate-income families earned less than \$5,002, monthly. At a 30 percent debt-to-income (DTI) ratio, this calculated to a maximum monthly mortgage payment of \$938 for low-income borrowers and \$1,501 for moderate-income borrowers. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the Chicago CSA median housing value would be \$1,891. Both LMI borrowers would be severely challenged to afford a mortgage loan in this AA.

### **Community Contact**

As part of the CRA evaluation, the OCC conducted five community contacts which consisted of three affordable housing organizations and two economic development corporations to determine local economic conditions and community needs in the AA. During discussions with the OCC the community contacts indicated that the following are identified needs within the bank's AA:

- First time homebuyer programs and downpayment assistance,
- Improving availability of affordable housing,
- Financial literacy and foreclosure prevention counseling,
- Banking services for individuals with Individual Taxpayer Identification Number (as opposed to Social Security Numbers),

- Workforce development programs, and
- Flexible loan programs that are tailored to match the needs in the community.

## **Scope of Evaluation in the State of Illinois**

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

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

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

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

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

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF ILLINOIS**

### **LENDING TEST**

The bank's performance under the Lending Test in the state of Illinois is rated Outstanding.

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

## Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Consumer	Community Development	Total	%State Loans	%State Deposits
<b>Full-Scope</b>							
Chicago CSA	126	2,828	49	101	3,104	98.7	100.0
Statewide/Regional	0	0	0	41	41	1.3	0

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

Dollar Volume of Loans* (000's)							
Assessment Area	Home Mortgage	Small Business	Consumer	Community Development	Total	%State* Loans	%State Deposits
<b>Full-Scope</b>							
Chicago CSA	81,151	256,111	142	120,658	458,062	81.4	100.0
Statewide/Regional	0	0	0	104,839	104,839	18.6	0

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

Lending levels reflect excellent responsiveness to AA credit needs, primarily based on LFBT's small business lending activity in the AA. We considered the lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence.

According to the FDIC's June 30, 2023, Deposit Market Share report, LFBT had \$5.6 billion in deposits with a deposit market share of 1.3 percent. The bank's deposit market share ranked 15<sup>th</sup> out of 105 deposit taking institutions. LFBT's deposit market share ranked the top 14.3 percent of all deposit taking institutions within the Chicago CSA. The top five banks by deposit market share were JPMorgan Chase Bank, BMO Harris Bank, Bank of America, CIBC Bank USA, and The Northern Trust Company. These five banks had a combined deposit market share of 65.4 percent.

According to 2022 peer mortgage data, LFBT had 0.2 percent market share of home mortgage loan originations. The bank's market share of home mortgage loan originations was weaker than its deposit market share. LFBT ranked 78<sup>th</sup> out of 507 HMDA lenders, ranking it in the top 15.4 percent of all HMDA lenders in the AA. The bank's market share ranking of home mortgage loan originations was weaker than its deposit market share ranking. The top five home mortgage lenders by number of loans and market share were Guaranteed Rate, Inc., JPMorgan Chase Bank, Huntington National Bank, US Bank, and Wells Fargo Bank. These five banks had a combined home mortgage loan market share of 24.7 percent.

According to 2022 peer small business data, LFBT had 2.5 percent market share of small business loan originations. The bank's market share of small business loan originations was stronger than its deposit market share. LFBT ranked eighth out of 240 small business loan lenders, ranking it in the top 3.3 percent of all small business loan lenders in the AA. The bank's market share ranking of small business loan originations was stronger than its deposit market share ranking. The top five small business lenders by number of loans and market share were JPMorgan Chase Bank, American Express, Bank of America, Citi Bank, and US Bank. These five banks had a combined small business loan market share of 69.0 percent.

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

The bank exhibits a good geographic distribution of loans in its AA.

### ***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 geographic distribution of home mortgage loans is excellent.

For 2022 through 2023, the bank's percentage of home mortgage loans in both LMI geographies exceeded the percentage of owner-occupied housing units located in those geographies and the aggregate distribution of loans.

For 2021, the bank's performance was consistent with the 2022 through 2023 performance.

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

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

The geographic distribution of small loans to businesses is adequate.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses in those geographies but was well below the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in those geographies but was well below the aggregate distribution of loans.

For 2021, the bank's performance was weaker than the 2022 through 2023 performance. Weaker performance was due to a lower percentage of loans to low-income borrowers. The percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses in those geographies but was significantly below the aggregate distribution of loans. Weaker performance had a neutral impact on the conclusion.

### ***Consumer Loans***

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

The geographic distribution of the bank's consumer loans is excellent.

For 2022 through 2023, the bank's percentage of consumer loans in both LMI geographies exceeded the percentage of the population in those geographies.

For 2021, the bank's performance was consistent with the 2022 through 2023 performance.

***Lending Gap Analysis***

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

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

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

***Home Mortgage Loans***

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

The distribution of home mortgage loans among individuals of different income levels is adequate. The high cost of housing and slower market conditions due to the COVID-19 pandemic during the evaluation period limited opportunities to the bank's ability to make home mortgage loans to LMI borrowers.

For 2022 through 2023, the bank's percentage of home mortgage loans to low-income borrowers was below the percentage of low-income families but exceeded the aggregate distribution of loans. The bank's percentage of home mortgage loans to moderate-income borrowers approximated the percentage of moderate-income families and was near to the aggregate distribution of loans.

For 2021, the bank's performance was significantly weaker than the 2022 through 2023 performance. Weaker performance was due to a lower percentage to both LMI borrowers. The bank's percentage of home mortgage loans to both LMI borrowers was significantly below the percentage of those families and the aggregate distribution of loans. Weaker performance had a negative impact on the conclusion.

***Small Loans to Businesses***

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

The distribution of loans to businesses of different sizes is adequate.

For 2022 through 2023, the bank did not collect or consider the gross annual revenues in the underwriting of 22.9 percent of its small loans to businesses. For 2021, the bank did not collect or consider the gross annual revenues in the underwriting of 13.6 percent of its small loans to businesses.

Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but was near to the aggregate distribution of small loans to businesses.

For 2021, the bank's performance was stronger than the 2022 through 2023 performance. Stronger performance was due to a higher percentage compared to the aggregate distribution of small loans to businesses. The bank's percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses. Stronger performance had a neutral impact on the conclusion.

### ***Consumer Loans***

Refer to Table V in the state of 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 is excellent.

For 2022 through 2023, the bank's percentage of consumer loans to both LMI borrowers exceeded the percentage of those households.

For 2021, the bank's performance was consistent with the 2022 through 2023 performance.

### **Community Development Lending**

The institution is a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test conclusion.

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

The bank made 101 CD loans totaling \$120.1 million, which represented 15.3 percent of the bank's allocated Tier 1 capital. CD loans primarily supported affordable housing. By dollar volume, 73.8 percent of these loans funded affordable housing, 14.5 percent funded economic development, 8.5 percent funded revitalization and stabilization efforts, and 3.3 percent funded community services targeted to LMI individuals.

The following are examples of CD loans:

- The bank originated a \$1.8 million commercial mortgage to finance the acquisition and rehabilitation of a multifamily property located in a moderate-income tract. All 20 units, composed of 16 one-bedroom units and four two-bedroom units, offer rents below the Housing and Urban Development Division (HUD) fair market rents providing affordable housing to LMI individuals and families in the area.
- The bank originated an SBA 504 loan totaling \$2.6 million to support the expansion of a catering and dining business. The financing assisted the business with the purchase and rehabilitation of the subject property for relocation which enhanced its overall business operation. The expansion of the business supported job creation in the area.

- The bank's participation in the Paycheck Protection Program (PPP) resulted in 43 CD qualified loans totaling \$12 million. These PPP loans provided businesses with funds to pay the payroll costs and other eligible business expenses during the COVID-19 pandemic. Of the 43 PPP loans originated in the AA, 13 loans were made to businesses located in LMI geographies.

## **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. We considered the loan programs which provided opportunities with direct benefit to LMI borrowers and small businesses within the AA. Products used had a positive impact on the Lending Test conclusion for the Chicago CSA.

### PPP Loans

Due to the exigent circumstances related to the COVID-19 pandemic, the bank originated loans under the Small Business Administration (SBA) PPP. Banks were not required to collect revenue information as part of the underwriting process for PPP loans. When evaluating borrower distribution of small loans to businesses we considered the fact that 22.4 percent of the small loans to businesses the bank originated within the AAs in the 2021 analysis period were PPP loans that did not have revenue information.

LFBT demonstrated use of responsive, flexible lending during the COVID-19 pandemic by originating loans to stabilize small businesses and communities under the PPP which ended May 31, 2021. During the evaluation period, the bank originated 604 PPP loans totaling \$97 million nationally.

Within the Chicago CSA, the bank originated 387 PPP loans totaling \$35.4 million and a combined total of 517 PPP loans totaling \$70.6 million originated within the state of Illinois. This activity received positive consideration as it provided stabilization of small businesses and communities.

### *CD loans Nationwide*

The bank's nationwide CD loans consisted of six PPP loans totaling \$11 million. These loans supported two businesses in the state of Texas and four businesses in the state of California. These PPP loans provided businesses with funds to pay the payroll costs and other eligible business expenses during the COVID-19 pandemic. The bank's nationwide CD loan originations had a neutral impact on overall rating.

### *Qualified Investments Nationwide*

The bank made four nationwide grants totaling \$67,818 during the current evaluation period. These grants supported a college preparatory school and a university in Wisconsin for their tuition assistance programs for students from low-income households. The bank's nationwide qualified investments had a neutral impact on overall rating.

### Small Business Loan Programs

The bank offers small businesses small and micro loans through its Easy Access Line of Credit (LOC), Easy Access Installment, and Small Business Overdraft Protection (ODP) LOC programs. Small and

micro business loans are an identified need in the community. These programs target support for small businesses with less than \$1 million in revenue by providing short-term LOC for inventory and accounts receivable management, as well as access to secured and unsecured term loans. The bank originated 204 Easy Access LOCs totaling \$12.0 million, 6 Easy Access Installment loans totaling \$177,845, and 204 Small Business ODP LOCs totaling \$668,100. Of these, a combined total of 392 loans totaling \$11.2 million were originated within the bank's AAs.

The bank actively participates in SBA programs including the 504-loan program, 7A loan program, and the Express program. A total of 31 loans totaling \$26.5 million were originated under these programs during the evaluation period. Of these, a combined total of 18 loans totaling \$17.2 million were funded within the bank's AAs.

### Consumer Loan Programs

Money Smart Everyday Loan is an unsecured consumer loan product with credit amount up to \$2,500 for individuals with various needs. The loan product was developed to meet the small dollar or emergency needs of the bank's customers and is offered to the community as an alternative to payday loans. During the evaluation period, the bank originated 43 loans totaling \$90,185 within the AAs.

Money Smart Certificate of Deposit Secured Loans is a small dollar CD secured loan funded by the loan proceeds and there is no upfront deposit required from the borrower. This consumer loan product provides a pathway for those with low credit scores to establish a positive payment history. The monthly installment payments are reported to the credit bureau to help build or establish credit while helping the borrower save and earn interest. During the evaluation period, the bank originated nine loans totaling \$9,500 within the AAs.

### **Broader Statewide and Regional Lending**

Because LFBT was responsive to community development needs and opportunities in its AA, examiners considered CD loans in the broader statewide and regional areas that include the bank's AA but do not have a purpose, mandate, or function to specifically serve the AA. These loans totaled \$104.8 million to borrowers in the Chicago CSA which represented an additional 13.3 percent of Tier 1 capital. CD loans in the broader regional area included 18 loans totaling \$76.6 million supporting affordable housing, 18 loans totaling \$18.2 million supporting economic development, three loans totaling \$7.9 million benefiting community service, and two loans totaling \$2.1 million benefiting revitalization and stabilization. These CD loans had a neutral impact and supported the Lending Test conclusion for the state of Illinois.

## **INVESTMENT TEST**

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

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

The institution has a significant level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago CSA	19	25,037	313	32,005	332	95.1	57,041	88.1	2	2,136
Regional Area	4	3,693	8	2,879	12	3.4	6,572	10.2	6	4,288
National	0	0	5	1,135	5	1.4	1,135	1.8	0	0

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Qualified investments within the Chicago CSA totaled \$57 million, with current period investments of \$32 million. The dollar volume of current- and prior-period investments allocated to the AA represented 7.2 percent of Tier 1 capital. This did not include the two unfunded commitments totaling \$2.1 million, an additional 0.3 percent of allocated capital.

LFBT had 29 qualified investments and grants totaling \$27.2 million related to affordable housing, 32 qualified investments and grants totaling \$10.7 million for revitalization and stabilization efforts, 222 qualified investments and grants totaling \$9.9 million to community service organizations that provided needed services to LMI individuals and 45 qualified investments and grants totaling \$9.2 million related to economic development.

Examples of qualified investments in the AA include:

- The bank invested \$8 million in a low-income housing tax credits (LIHTC) fund to support the construction of a 34-unit senior residential property with affordable rents for individuals ages 55 and older earning up to 60.0 percent of area median income (AMI).
- The bank invested \$1.5 million in a Fannie Mae multi-family mortgage-backed security (MBS) secured by a low-income housing apartment subsidized by the Federal Government's HUD. The building has 203 apartment units all of which are allocated for low-income residents.
- The bank donated a total of \$625,000 over the evaluation period to a college preparatory school located in Waukegan catering to students from low-income households. All students participate in a work study program where they gain real-life work experience while studying to prepare for college.

### Broader Statewide or Regional Investments

Because the bank was responsive to community development needs and opportunities in its AA, examiners considered investments in the broader statewide and regional areas that include the bank's AA but do not have a purpose, mandate, or function to specifically serve the AA. These investments totaled \$6.6 million and supported economic development efforts through certificates of deposit with financial institutions designated as community development financial institution (CDFI) and equity investments with small business investment corporations (SBICs). These investments had a neutral impact and supported the Investment Test conclusion for the state of Illinois.

## SERVICE TEST

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

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

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits		Branches					Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Chicago CSA	100.0	7	100.0	14.3	0.0	14.3	71.4	5.2	17.8	19.3	56.1

The bank had seven branches in the Chicago CSA. The bank's distribution of branches in low-income geographies exceeded, but in moderate-income geographies was significantly below, the percentage of the population living within those geographies. The bank's Waukegan branch was previously in a moderate-income tract, but the tract is now designated as low-income, and the income tract of the Highwood branch changed from moderate- to middle-income under the 2020 census data. As a result, the bank lost two moderate-income branches, but gained one low-income branch.

The bank has several alternative delivery systems including debit cards, fee-less transactions at all ATMs in the Wintrust network, telephone and online banking, digital deposit and loan applications, electronic bill pay, and mobile banking options. The bank has 13 deposit-taking ATMs in the AA, of which two were in low-income tracts. These systems provided additional delivery availability and access to banking services to both retail and business customers and supported the Service Test conclusion.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Chicago CSA	0	2	-1	0	0	-1

The bank closed one branch in a low-income (North Chicago branch) and one branch in upper-income geographies due to operational reasons during the evaluation periods. The Waukegan branch, opened during the previous evaluation period, is in a low-income tract and is within 5 miles from the North

Chicago branch location. In addition, there are six low-income tracts and 13 moderate-income tracts within a 2.5 miles radius of the Waukegan branch.

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. The bank offered traditional banking products and services at all branch locations in the AA. Of the seven branches in the AA, six had lobbies with hours of 9:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 1:00 p.m. on Saturdays. One branch located in an upper-income CT is only accessible via drive-up or walk-up and does not have a lobby. There were five branch locations with drive-up facilities offering hours identical to their lobby hours.

## **Community Development Services**

The institution is a leader in providing CD services.

CD services were responsive in helping the bank address the community needs in a variety of different organizations and hours of service that employees participated in to support the LMI individuals and families. During the evaluation period, 41 bank employees conducted 74 financial education events totaling 192 hours in coordination with 30 different organizations. These events included financial literacy sessions for both students and adults, financial literacy for small business owners, first-time home buyer seminars, foreclosure prevention, and affordable housing seminars primarily targeted to LMI individuals and families. Many sessions were offered in both English and Spanish to cater to Spanish-speaking individuals within the AA. In addition, 13 bank employees spent 1,701 hours serving in leadership roles by participating on boards and committees for 31 different CD organizations. Finally, 18 employees provided over 5,950 hours of technical expertise for 14 different CD organizations that provide services to LMI individuals and families.

Examples of CD services in the AA include:

- One bank employee served on the board and financing committee of an organization focused on improving access to healthcare for LMI individuals and families within the AA. The organization helps individuals and families identify and maintain relationships with healthcare providers. The organization also offers scholarships to students from LMI families.
- A total of 11 bank employees provided over 4,690 service hours of combined on-the-job training and mentorship to students from a college preparatory school that primarily serves LMI families in communities with limited private educational options. The program focuses on combining rigorous academics with real-world job experience to help students succeed at the collegiate level and in post-collegiate life.
- A total of 18 bank employees provided over 42 hours of financial education for a nonprofit organization focused on providing affordable housing to LMI families within the AA. The course

topics included managing and monitoring credit, building an effective budget, an overview of the home-buying process, and preventing identity fraud.

## State Rating

### State of Florida

**CRA rating for the State of Florida:** Satisfactory  
**The Lending Test is rated:** High Satisfactory  
**The Investment Test is rated:** Outstanding  
**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending activity reflects excellent responsiveness to credit needs.
- The bank exhibits a good geographic and borrower distribution of loans.
- The institution has made an adequate level of CD loans.
- The institution has an excellent level of qualified CD investments and exhibits excellent responsiveness to credit and community development needs.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AAs.
- The bank is a leader in providing CD services.

### Description of Institution's Operations in the State of Florida

LFBT has two AAs in the state of Florida: Collier County in the Naples-Immokalee-Marco Island MSA (Naples MSA) and a portion of Lee County in the Cape Coral-Fort Myers MSA (Cape Coral MSA). The AAs met the requirements of the CRA and did not arbitrarily exclude any LMI geographies. Please refer to Appendix A for a complete listing of AAs, including type of review and description of AA boundaries.

Based on the information from the 2020 U.S. Census, the Naples MSA is composed of 109 CTs, of which eight (7.3 percent) were low-income, 21 (19.3 percent) were moderate-income, 44 (40.4 percent) were middle-income, 33 (30.3 percent) were upper-income, and three (2.8 percent) were with no income tract information. The area population was 375,752 with 26,678 (7.1 percent) residing in low-income CTs, and 81,914 (21.8 percent) residing in moderate-income CTs. The Naples MSA represents 81.7 percent of statewide deposits and 50.0 percent of retail bank branches throughout the evaluation period.

According to the FDIC's June 30, 2023, Deposit Market Share report, LFBT held \$126.8 million in deposits ranking 139<sup>th</sup> out of 188 institutions in the state and had less than 1.0 percent deposit market share. The five largest competitors in the state include Bank of America, Wells Fargo Bank, Truist

Bank, JPMorgan Chase Bank, and Raymond James Bank. These competitors’ deposits represented 54.9 percent of the total deposit market share. LFBT’s deposits in the state of Florida represent 2.2 percent of the bank’s total bank-wide deposits. Small business lending in the state of Florida accounted for 35.7 percent of originations and 22.2 percent of the loan volume of bank-wide small loans to businesses in LFBT’s AAs. The bank has two bank branches in the state of Florida, which accounts for 22.2 percent of the bank-wide total number of branches.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Naples MSA 2022-2023</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)	109	7.3	19.3	40.4	30.3	2.8
Population by Geography	375,752	7.1	21.8	40.2	29.8	1.2
Housing Units by Geography	218,348	3.8	16.3	41.5	37.3	1.2
Owner-Occupied Units by Geography	110,083	2.3	17.4	40.7	38.4	1.2
Occupied Rental Units by Geography	37,894	12.2	23.9	42.1	21.1	0.8
Vacant Units by Geography	70,371	1.6	10.5	42.3	44.2	1.3
Businesses by Geography	108,454	2.6	15.6	41.8	38.9	1.1
Farms by Geography	2,409	7.8	26.4	41.6	23.5	0.7
Family Distribution by Income Level	98,121	21.9	18.0	19.6	40.5	0.0
Household Distribution by Income Level	147,977	23.7	16.8	16.9	42.5	0.0
Median Family Income MSA - 34940 Naples-Marco Island, FL MSA		\$84,784	Median Housing Value			\$472,689
			Median Gross Rent			\$1,368
			Families Below Poverty Level			7.1%
<i>Source: 2020 U.S. Census and 2023 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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Naples MSA 2021</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)	74	8.1	20.3	35.1	35.1	1.4
Population by Geography	341,091	7.2	23.5	38.0	31.3	0.0
Housing Units by Geography	201,582	3.6	18.3	38.0	40.0	0.0
Owner-Occupied Units by Geography	93,733	2.3	16.3	41.3	40.1	0.0
Occupied Rental Units by Geography	36,155	9.5	28.3	37.8	24.5	0.0
Vacant Units by Geography	71,694	2.4	15.9	33.8	47.8	0.0
Businesses by Geography	81,803	2.8	14.3	37.9	45.1	0.0
Farms by Geography	1,969	5.6	21.3	42.9	30.2	0.0
Family Distribution by Income Level	87,665	20.8	17.7	19.3	42.2	0.0
Household Distribution by Income Level	129,888	22.3	17.1	18.4	42.2	0.0

Median Family Income MSA - 34940 Naples-Marco Island, FL MSA	\$66,264	Median Housing Value	\$347,465
		Median Gross Rent	\$1,087
		Families Below Poverty Level	9.1%
<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>			

## Employment and Economic Factors

According to the BLS, the unemployment rate peaked at 4.5 percent in January 2021, reflecting the adverse economic impact of the COVID-19 pandemic. The unemployment rate at the end of the evaluation period in December 2023 dropped to 2.7 percent, which was slightly lower than the statewide annual unemployment rate of 2.9 percent.

Based on information from the April 2024 Moody's Analytics report, the Naples-Immokalee-Marco Island's economy is stabilizing with job growth showing improvement since 2020, but it did noticeably slowdown in early 2024. The total employment percentages increased by 5.3 percent, 6.0 percent, and 4.1 percent from 2021 to 2023, with unemployment rates of 3.7 percent, 2.8 percent, and 2.7 percent, respectively. In 2024, the total employment percentage increased by 2.4 percent, with an unemployment rate of 3.6 percent. Most of the area's major industries have experienced fluctuations in its workforce but health services and construction stand out as positive aspects. The strengths of the area include tourism, population growth exceeding the state and the national averages, and high per capita income. Weaknesses of the area include a high cost of living and high home insurance costs. Top five employers in the area are local government, Naples Community Hospital Inc., Publix Super Markets Inc., Walmart Inc., and Ritz-Carlton Hotel Co. LLC. The Moody's Analytics report projects that tourism will remain supportive, and the growth of higher-paying industries will also be advantageous.

## Housing

Based on information from the 2020 U.S. Census covering 2022 through 2023, 110,083 (50.4 percent) of the total housing units in the AA were owner-occupied, 37,894 (17.4 percent) were renter occupied, and 70,371 (32.2 percent) were vacant units. Of all owner-occupied units, 2,532 (2.3 percent) were located in low-income CTs, and 19,154 (17.4 percent) were located in moderate-income CTs. Of all occupied rental units, 4,623 (12.2 percent) were located in low-income CTs, and 9,057 (23.9 percent) were located in moderate-income CTs. Of all vacant units, 1,126 (1.6 percent) were located in low-income CTs, and 7,389 (10.5 percent) were located in moderate-income CTs. The weighted average median housing value was \$472,689, and the weighted average monthly gross rent was \$1,368.

Based on information from the 2015 ACS covering 2021, 201,582 (65.1 percent) of the total housing units in the AA were owner-occupied, 36,155 (11.7 percent) were renter occupied, and 71,694 (23.2 percent) were vacant units. Of all owner-occupied units, 2,165 (2.3 percent) were located in low-income CTs, and 15,278 (16.3 percent) were located in moderate-income CTs. Of all occupied rental units, 3,435 (9.5 percent) were located in low-income CTs, and 10,232 (28.3 percent) were located in moderate-income CTs. Of all vacant units, 1,721 (2.4 percent) were located in low-income CTs, and 11,399 (15.9 percent) were located in moderate-income CTs. The weighted average median housing value was \$347,465, and the weighted average monthly gross rent was \$1,087.

According to Table A, the median housing value of owner-occupied housing units for the Naples MSA was \$347,465 for 2021 (2015 ACS) and \$472,689 for 2022 through 2023 (2020 U.S. Census). Based on this data, housing values increased 36.0 percent over the evaluation period.

### **Affordability**

Based on data from the 2020 U.S. Census, low-income families within the Naples MSA earned less than \$3,533 monthly and moderate-income families earned less than \$5,652, monthly. One method used to determine housing affordability assumed a maximum monthly principal and interest payment of no more than 30.0 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$1,060 for low-income borrowers and \$1,696 for moderate-income borrowers. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the Naples MSA median housing value would be \$2,537. The LMI borrowers would be severely challenged to afford a mortgage loan in this AA.

Based on data from the 2015 ACS, low-income families earned less than \$2,761 and moderate-income families earned less than \$4,418, monthly. This calculated to a maximum monthly mortgage, at 30.0 percent DTI, a payment of \$828 for low-income borrowers and \$1,325 for moderate-income borrowers. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the Naples MSA median housing value would be \$1,865. Both LMI borrowers would be severely challenged to afford a mortgage loan in this AA.

### **Community Contact**

As part of the CRA evaluation, the OCC held discussion with one community contact completed prior to the evaluation. The organization is a nonprofit, HUD-approved counseling agency that primarily provides homebuyer education. The organization also offers credit counseling and other education services to promote financial capability among families in the AA. The financial counseling includes working with families to create action plans for financial management, credit management and budgeting. The contact stated that opportunities for homeownership are a struggle especially for LMI individuals due to limited inventory and increasing housing prices.

The community contact indicated that the following are identified needs within the bank's AA:

- Technical assistance for affordable housing development,
- Flexible financing for housing development (commercial space that can convert to residential units),
- Financial education and counseling to LMI individuals, and
- Banking services in underbanked areas.

### **Scope of Evaluation in the State of Florida**

For the state of Florida, we completed a full-scope review of the Naples MSA and a limited-scope review of the Cape Coral MSA. Naples MSA accounted for 81.7 percent of deposits, and 92.9 percent of originations and 91.5 percent of loan volume of all home mortgage, small business, and consumer loans generated in this state.

For the analysis of distribution of loans to geographies with different income levels, greater consideration was given to the bank’s performance in moderate-income geographies due to the higher percentages of small businesses.

For the borrower distribution of loans to small businesses, we considered the competitive market condition in the AA. Large interstate banks, regional banks, and community banks compete for business in the AA. The large number of competing banks and dominance from the top five lenders nominally affects the bank’s ability to make small loans to businesses. A large portion of the bank’s small loans to businesses did not contain revenue information, as permitted under the CRA reporting requirements. Many of these loans were a result of the bank’s nationwide niche lending programs which revenue data was not provided or not considered in underwriting. We took into consideration the bank’s significant nationwide niche lending programs when assessing the bank’s performance regarding lending within its AAs versus outside AAs lending. More emphasis was placed on the bank’s lending relative to aggregate performance.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF FLORIDA

### LENDING TEST

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

Based on a full-scope review, the bank’s performance in the Naples MSA is good.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Consumer	Community Development	Total	% State Loans	% State Deposits
<b>Full-Scope</b>							
Naples MSA	20	1,460	6	1	1,487	92.9	81.7
<b>Limited-Scope</b>							
Cape Coral MSA	1	110	1	0	113	7.1	18.3
Statewide/Regional	0	0	0	1	1	0.1	0

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

Dollar Volume of Loans* (000’s) 1/1/2021 – 12/31/2023							
Assessment Area	Home Mortgage	Small Business	Consumer	Community Development	Total	% State* Loans	% State Deposits
<b>Full-Scope</b>							
Naples MSA	17,593	66,291	131	1,542	85,557	90.1	81.7
<b>Limited-Scope</b>							
Cape Coral MSA	1,040	6,784	1	0	7,825	8.2	18.3
Statewide/Regional	0	0	0	1,579	1,579	1.7	0

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

Lending levels reflect excellent responsiveness to AA credit needs based on LFBT's small business lending activity in the AA. We considered the lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence.

According to the FDIC's June 30, 2023, Deposit Market Share report, LFBT had \$103.6 million in deposits with a deposit market share of 0.5 percent. The bank's deposit market share ranked 22<sup>nd</sup> out of 35 deposit taking institutions. LFBT's deposit market share ranked the top 62.9 percent of all deposit taking institutions within the Naples MSA. The top five banks by deposit market share were Bank of America, Fifth Third Bank, Wells Fargo Bank, JPMorgan Chase Bank, and First Horizon Bank. These five banks had a combined deposit market share of 58.2 percent.

For both 2021 and 2022 through 2023 analysis periods, the bank did not make the minimum number of home mortgage loans to have it considered as a primary product for the evaluation.

According to 2022 peer small business data, LFBT had 2.83 percent market share of small business loan originations. The bank's market share of small business loan originations was stronger than its deposit market share. LFBT ranked ninth out of 139 small business loan lenders, ranking it in the top 6.5 percent of all small business loan lenders in the AA. The bank's market share ranking of small business loan originations was stronger than its deposit market share ranking. The top five small business lenders by number of loans and market share were American Express, JPMorgan Chase Bank, Bank of America, Capital One, and Citi Bank. These five banks had a combined small business loan market share of 64.3 percent.

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

The bank exhibits a good geographic distribution of loans in its AA.

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

Refer to Table O in the state of Florida 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.

For both 2021 and 2022 through 2023 analysis periods, the bank did not make the minimum number of home mortgage loans to have it considered as a primary product for evaluation.

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

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good.

For 2022 through 2023, the bank's percentage of small loans to businesses in low-income geographies exceeded the percentage of businesses in those geographies and the aggregate distribution of loans. The percentage of small loans to businesses in moderate-income geographies was below the percentage of businesses in those geographies and the aggregate distribution of loans.

For 2021, the bank's performance was consistent with the 2022 through 2023 performance.

### ***Consumer Loans***

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

For both 2021 and 2022 through 2023 analysis periods, the bank did not make the minimum number of home mortgage loans to have it considered as a primary product for evaluation.

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

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

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

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

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

Refer to Table P in the state of state of Florida 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.

For both 2021 and 2022 through 2023 analysis periods, the bank did not make the minimum number of home mortgage loans to have it considered as a primary product for evaluation.

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

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

The distribution of loans to businesses of different sizes is good.

For 2022 through 2023, the bank did not collect or consider the gross annual revenues in the underwriting of 24.3 percent of its small loans to businesses. For 2021, the bank did not collect or consider the gross annual revenues in the underwriting of 24.1 percent of its small loans to businesses.

Based on those businesses with known revenues, the bank's percentage of small loans to businesses with revenues of \$1 million or less was well below the percentage of businesses with gross annual revenues of \$1 million or less but exceeded the aggregate distribution of small loans to businesses.

For 2021, the bank's performance was consistent with the 2022 through 2023 performance.

### ***Consumer Loans***

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

For both 2021 and 2022 through 2023 analysis periods, the bank did not make the minimum number of consumer loans to have it considered as a primary product for evaluation.

### **Community Development Lending**

The institution has made an adequate level of CD loans. CD lending had a neutral impact on the Lending Test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans. The bank made one CD loan for \$1.5 million. This loan assisted with the purchase of a one-story office building in designated persistent poverty census tract in downtown Naples. The financing will support revitalization and stabilization of the area by bringing in a business and residents into the subject property after rehabilitation.

### **Product Innovation and Flexibility**

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

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. We considered the loan programs which provided opportunities with direct benefit to LMI borrowers and small businesses within the AA. Products used have a positive impact on the Lending Test conclusion for the Chicago CSA.

#### ***Paycheck Protection Program (PPP) loans***

Due to the exigent circumstances related to the COVID-19 pandemic, the bank originated loans under the Small Business Administration (SBA) PPP. Banks were not required to collect revenue information as part of the underwriting process for PPP loans. When evaluating borrower distribution of small loans to businesses we considered the fact that 22.4 percent of the small loans to businesses the bank originated within the AAs in the 2021 analysis period were PPP loans that did not have revenue information.

#### **PPP Loans**

LFBT demonstrated use of responsive, flexible lending during the COVID-19 pandemic by originating loans to stabilize small businesses and communities under the PPP which ended May 31, 2021. During the evaluation period, the bank originated 604 PPP loans totaling \$97 million nationally.

Within the Naples MSA, the bank originated nine PPP loans totaling \$361,035 and a combined total of 28 PPP loans totaling \$5.3 million originated within the state of Florida. This activity received a positive consideration as it provided stabilization of small businesses and communities.

### Small Business Loan Programs

The bank offers small businesses small and micro loans through its Easy Access Line of Credit (LOC), Easy Access Installment, and Small Business Overdraft Protection (ODP) LOC programs. Small and micro business loans are an identified need in the community. These programs are targeted to help meet the needs of small businesses with revenues of less than \$1 million with short-term LOC funding to support inventory and accounts receivable as well as support with secured and unsecured term loans. The bank originated 204 Easy Access LOCs totaling \$12.0 million, 6 Easy Access Installment loans totaling \$177,845, and 204 Small Business ODP LOCs totaling \$668,100. Of these, a combined total of 392 loans totaling \$11.2 million were originated within the bank's AAs.

The bank actively participates in SBA programs including the 504-loan program, 7A loan program, and the Express program. A total of 31 loans totaling \$26.5 million were originated under these programs during the evaluation period. Of these, a combined total of 18 loans totaling \$17.2 million were funded within the bank's AAs.

### Consumer Loan Programs

Money Smart Everyday Loan is an unsecured consumer loan product with credit amount up to \$2,500 for individuals with various needs. The loan product was developed to meet the small dollar or emergency needs of the bank's customers and is offered to the community as an alternative to payday loans. During the evaluation period, the bank originated 43 loans totaling \$90,185 within the AAs.

Money Smart Certificate of Deposit Secured Loans is a small dollar CD secured loan funded by the loan proceeds and there is no upfront deposit required from the borrower. This consumer loan product provides a pathway for those with low credit scores to establish a positive payment history. The monthly installment payments are reported to the credit bureau to help build or establish credit while helping the borrower save and earn interest. During the evaluation period, the bank originated nine loans totaling \$9,500 within the AAs.

## **Broader Statewide and Regional Lending**

Because LFBT was responsive to community development needs and opportunities in its AA, examiners considered CD loans in the broader statewide and regional areas that include the bank's AA but do not have a purpose, mandate, or function to specifically serve the AA. CD lending in the broader state area consisted of one PPP loan in the amount of \$1.6 million. The PPP loan provided funding to a business in a moderate-income tract. The loan contributed for stabilization of the area by allowing the business to stay viable and retain its employees. This CD loan had a neutral impact and supported the Lending Test conclusion for the state of Florida.

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

Based on a limited-scope review, the bank's performance under the Lending Test in the Cape Coral MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. Weaker performance was due to the bank's adequate distribution of loans among businesses of different sizes and very poor level of CD lending in the AA.

Refer to Tables O through V in the state of Florida section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The bank's performance under the Investment Test in the state of Florida is rated Outstanding.

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

The institution has an excellent level of qualified CD investment and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full-Scope</b>										
Naples MSA	1	82	40	1,526	41	89.1	1,608	77.0	0	0
<b>Limited-Scope</b>										
Cape Coral MSA	0	0	5	481	5	10.9	481	23.0	0	0

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The dollar volume of current- and prior-period investments represented 11.0 percent of Tier 1 capital allocated to the AA.

LFBT had three qualified investments and grants totaling \$1.4 million related to affordable housing, 27 qualified investments and grants totaling \$179,140 to community service organizations that provided needed services to LMI individuals, and 11 qualified investments and grants totaling \$26,500 related to economic development.

Examples of qualified investments in the AA include:

- The bank made a total of \$1 million investment in MBS of which the proceeds were used to finance a portion of the cost of acquisition, construction, installation and equipping of a multifamily rental housing facility. Approximately 12.0 percent of the units will be reserved for households earning up to 30.0 percent of AMI, with the rest reserved for households earning up to 60.0 percent AMI. The project is qualified under the LIHTC Program.
- The bank made a \$320,000 investment into a bond of which the proceeds will make funds available to eligible LMI persons or families to finance the purchase of single family, owner-occupied residences to aid with affordable housing in Collier County.

- The bank donated \$150,000 to a foundation that supports charitable programs that improve the physical, emotional, and educational lives of underprivileged and at-risk children in Collier County. The foundation provides children with shelter, learning programs medical and healthcare needs, and afterschool development programs.

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

Based on a limited-scope review, the bank’s performance under the Investment Test in the Cape Coral MSA is consistent with the bank’s overall performance under the Investment Test in the full-scope area.

**SERVICE TEST**

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

Based on a full-scope review, the bank’s performance in the Naples MSA is good.

**Retail Banking Services**

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full-Scope</b>											
Naples MSA	100.0	1	100.0	0.0	0.0	0.0	100.0	7.1	21.8	40.2	29.8
<b>Limited-Scope</b>											
Cape Coral MSA	100.0	1	100.0	0.0	100.0	0.0	0.0	0.0	4.1	40.6	55.3

The bank has one branch in an upper-income tract in the Naples MSA. The bank’s distribution of branches in LMI geographies was significantly below the percentage of the population living within those geographies.

The bank has several alternative delivery systems including debit cards, fee-less transactions at all ATMs in the Wintrust network, telephone and online banking, digital deposit and loan applications, electronic bill pay, and mobile banking options. These systems provided additional delivery availability and access to banking services to both retail and business customers and supported the Service Test conclusion.

The bank did not close or open branches during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. The bank offered traditional banking products and services at the branch located in the AA. The lobby hours and drive-up hours of the branch were Monday through Friday 9:00 a.m. to 5:00 p.m. with no Saturday hours.

## **Community Development Services**

The institution is a leader in providing CD services.

During the evaluation period, six bank employees conducted 30 financial education events totaling 54 hours in coordination with nine different organizations. Approximately 315 participants attended these classes. These events included financial literacy for both students and adults, income and expense management, debt management, understanding tax forms, and guidance on developing financial goals. In addition, five bank employees spent 96 hours serving in leadership roles by participating on boards and committees of four different CD organizations. Additionally, nine employees provided 143 hours of technical expertise for two different CD organizations that provide services to LMI individuals and families.

Examples of CD services in the AA include:

- One bank employee provided 14 hours of financial education through six separate courses for an organization focused on providing food, shelter, and clothing to LMI individuals and families. The sessions focused on budgeting, managing debt, and building confidence in using banking services. There were 22 attendees across the six sessions.
- Three bank employees provided services to a nonprofit organization whose mission is to provide English literacy classes to students from non-English speaking families within the AA. The organization places special focus on providing services to those individuals within LMI tracts. Two bank employees served on the board, contributing 40 service hours, and one bank employee contributed nine service hours serving on the finance committee.
- Seven bank employees provided 114 hours of service to a local organization focused on providing food security to children and families in low-income geographies. The organization collects, transports, and distributes food and other grocery products to the families they serve. The bank employees participated in fundraising, collecting, and packing food products for distribution to the community during the COVID-19 pandemic.

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

Based on a limited-scope review the bank's performance under the Service Test in the Cape Coral MSA is stronger than the bank's overall performance under the Service Test in the full-scope area. Stronger performance is due to a higher proportion of bank branches in moderate-income geographies as compared to the percentage of the population living within those geographies.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	1/1/2021-12/31/2023	
<b>Bank Products Reviewed:</b>	Home mortgage loans, small loans to businesses, and consumer loans Community development loans, qualified investments, and community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<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>		Counties
Chicago-Naperville IL-IN-WI CSA	Full-Scope	Cook County* and Lake County*
<b>Florida</b>		
Naples-Immokalee-Marco Island MSA	Full-Scope	Collier County
Cape Coral-Fort Myers MSA	Limited-Scope	Lee County*

\*Partial county

## Appendix B: Summary of State Ratings

LAKE FOREST BANK & TRUST COMPANY, N.A. RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
LFBT	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State:				
State of Illinois	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State of Florida	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory

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

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

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 U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

**Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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.

State of Illinois

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2022-2023</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		
Chicago CSA	95	52,267,876	100.0	19,931	3.0	8.4	3.0	12.1	13.7	11.2	19.4	10.5	18.8	65.5	67.4	67.0	0.0	0.0	0.0		
<b>Total</b>	<b>95</b>	<b>52,267,876</b>	<b>100.0</b>	<b>19,931</b>	<b>3.0</b>	<b>8.4</b>	<b>3.0</b>	<b>12.1</b>	<b>13.7</b>	<b>11.2</b>	<b>19.4</b>	<b>10.5</b>	<b>18.8</b>	<b>65.5</b>	<b>67.4</b>	<b>67.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2021</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		
Chicago CSA	31	28,883,287	100.0	45,387	2.9	16.1	1.7	11.9	16.1	7.9	20.3	9.7	17.6	64.9	58.1	72.8	0.0	0.0	0.0		
<b>Total</b>	<b>31</b>	<b>28,883,287</b>	<b>100.0</b>	<b>45,387</b>	<b>2.9</b>	<b>16.1</b>	<b>1.7</b>	<b>11.9</b>	<b>16.1</b>	<b>7.9</b>	<b>20.3</b>	<b>9.7</b>	<b>17.6</b>	<b>64.9</b>	<b>58.1</b>	<b>72.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

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

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022-2023**

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
Chicago CSA	95	52,267,876	100.0	19,931	18.4	11.6	9.3	14.0	13.7	14.8	16.8	4.2	16.8	50.7	45.3	44.8	0.0	25.3	14.2
<b>Total</b>	<b>95</b>	<b>52,267,876</b>	<b>100.0</b>	<b>19,931</b>	<b>18.4</b>	<b>11.6</b>	<b>9.3</b>	<b>14.0</b>	<b>13.7</b>	<b>14.8</b>	<b>16.8</b>	<b>4.2</b>	<b>16.8</b>	<b>50.7</b>	<b>45.3</b>	<b>44.8</b>	<b>0.0</b>	<b>25.3</b>	<b>14.2</b>

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2021**

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
Chicago CSA	31	28,883,287	100.0	45,387	18.1	0.0	6.2	14.2	3.2	11.4	16.1	6.5	16.3	51.6	38.7	53.7	0.0	51.6	12.4
<b>Total</b>	<b>31</b>	<b>28,883,287</b>	<b>100.0</b>	<b>45,387</b>	<b>18.1</b>	<b>0.0</b>	<b>6.2</b>	<b>14.2</b>	<b>3.2</b>	<b>11.4</b>	<b>16.1</b>	<b>6.5</b>	<b>16.3</b>	<b>51.6</b>	<b>38.7</b>	<b>53.7</b>	<b>0.0</b>	<b>51.6</b>	<b>12.4</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022-2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago CSA	1,703	157,110	100.0	25,892	2.5	3.7	6.3	9.8	10.0	19.3	16.6	18.1	31.8	71.0	68.2	41.9	0.1	0.0	0.7
<b>Total</b>	<b>1,703</b>	<b>157,110</b>	<b>100.0</b>	<b>25,892</b>	<b>2.5</b>	<b>3.7</b>	<b>6.3</b>	<b>9.8</b>	<b>10.0</b>	<b>19.3</b>	<b>16.6</b>	<b>18.1</b>	<b>31.8</b>	<b>71.0</b>	<b>68.2</b>	<b>41.9</b>	<b>0.1</b>	<b>0.0</b>	<b>0.7</b>

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago CSA	1,125	99,501	100.0	29,419	2.2	4.4	9.2	10.4	12.6	23.6	17.4	16.4	27.1	70.0	66.6	39.4	0.0	0.0	0.6
<b>Total</b>	<b>1,125</b>	<b>99,501</b>	<b>100.0</b>	<b>29,419</b>	<b>2.2</b>	<b>4.4</b>	<b>9.2</b>	<b>10.4</b>	<b>12.6</b>	<b>23.6</b>	<b>17.4</b>	<b>16.4</b>	<b>27.1</b>	<b>70.0</b>	<b>66.6</b>	<b>39.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.6</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2022-2023**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago CSA	1,703	157,110	100.0	25,892	90.1	49.7	54.0	3.9	27.4	6.0	22.9
<b>Total</b>	<b>1,703</b>	<b>157,110</b>	<b>100.0</b>	<b>25,892</b>	<b>90.1</b>	<b>49.7</b>	<b>54.0</b>	<b>3.9</b>	<b>27.4</b>	<b>6.0</b>	<b>22.9</b>

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago CSA	1,125	99,501	100.0	29,419	86.7	58.4	43.4	5.5	28.0	7.8	13.6
<b>Total</b>	<b>1,125</b>	<b>99,501</b>	<b>100.0</b>	<b>29,419</b>	<b>86.7</b>	<b>58.4</b>	<b>43.4</b>	<b>5.5</b>	<b>28.0</b>	<b>7.8</b>	<b>13.6</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2022-2023**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago CSA	29	75	100.0	5.1	17.2	17.4	41.4	20.7	10.3	56.7	31.0	0.0	0.0
<b>Total</b>	<b>29</b>	<b>75</b>	<b>100.0</b>	<b>5.1</b>	<b>17.2</b>	<b>17.4</b>	<b>41.4</b>	<b>20.7</b>	<b>10.3</b>	<b>56.7</b>	<b>31.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.  
Due to rounding, totals may not equal 100.0%*

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2021**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago CSA	20	67	100.0	5.4	35.0	16.4	35.0	21.6	15.0	56.6	15.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>67</b>	<b>100.0</b>	<b>5.4</b>	<b>35.0</b>	<b>16.4</b>	<b>35.0</b>	<b>21.6</b>	<b>15.0</b>	<b>56.6</b>	<b>15.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2015 ACS; 01/01/2021 - 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 2022-2023**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago CSA	29	75	100.0	21.6	62.1	13.6	13.8	15.1	3.4	49.8	6.9	0.0	13.8
<b>Total</b>	<b>29</b>	<b>75</b>	<b>100.0</b>	<b>21.6</b>	<b>62.1</b>	<b>13.6</b>	<b>13.8</b>	<b>15.1</b>	<b>3.4</b>	<b>49.8</b>	<b>6.9</b>	<b>0.0</b>	<b>13.8</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 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 2021**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Chicago CSA	20	67	100.0	20.6	60.0	13.6	15.0	15.3	0.0	50.5	20.0	0.0	5.0
<b>Total</b>	<b>20</b>	<b>67</b>	<b>100.0</b>	<b>20.6</b>	<b>60.0</b>	<b>13.6</b>	<b>15.0</b>	<b>15.3</b>	<b>0.0</b>	<b>50.5</b>	<b>20.0</b>	<b>0.0</b>	<b>5.0</b>

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

State of Florida

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2022-2023</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		
Naples MSA	19	16,237,100	94.0	16,107	2.3	0.0	1.1	17.4	31.6	18.5	40.7	36.8	44.7	38.4	31.6	34.5	1.2	0.0	1.2		
Cape Coral MSA	1	1,040,000	6.0	--	0.0	0.0	--	3.9	0.0	--	36.4	0.0	--	59.7	100.0	--	0.0	0.0	--		
<b>Total</b>	<b>20</b>	<b>17,277,100</b>	<b>100.0</b>	<b>16,107</b>	<b>1.8</b>	<b>0.0</b>	<b>0.9</b>	<b>14.6</b>	<b>30.0</b>	<b>15.6</b>	<b>39.8</b>	<b>35.0</b>	<b>42.9</b>	<b>42.8</b>	<b>35.0</b>	<b>39.6</b>	<b>1.0</b>	<b>0.0</b>	<b>1.0</b>		

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2021</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		
Naples MSA	1	1,356,000	100.0	27,642	2.3	0.0	1.2	16.3	0.0	14.3	41.3	0.0	42.4	40.1	100.0	42.1	0.0	0.0	0.0		
<b>Total</b>	<b>1</b>	<b>1,356,000</b>	<b>100.0</b>	<b>27,642</b>	<b>2.3</b>	<b>0.0</b>	<b>1.2</b>	<b>16.3</b>	<b>0.0</b>	<b>14.3</b>	<b>41.3</b>	<b>0.0</b>	<b>42.4</b>	<b>40.1</b>	<b>100.0</b>	<b>42.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

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

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022-2023**

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
Naples MSA	19	16,237,100	94.0	16,107	21.9	0.0	4.2	18.0	5.3	12.0	19.6	10.5	18.6	40.5	84.2	52.3	0.0	0.0	12.9
Cape Coral MSA	1	1,040,000	6.0	--	11.2	0.0	--	15.3	0.0	--	17.3	0.0	--	56.2	100.0	--	0.0	0.0	--
<b>Total</b>	<b>20</b>	<b>17,277,100</b>	<b>100.0</b>	<b>16,107</b>	<b>19.8</b>	<b>0.0</b>	<b>3.8</b>	<b>17.5</b>	<b>5.0</b>	<b>11.5</b>	<b>19.1</b>	<b>10.0</b>	<b>17.8</b>	<b>43.5</b>	<b>85.0</b>	<b>54.4</b>	<b>0.0</b>	<b>0.0</b>	<b>12.5</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2021**

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
Naples MSA	1	1,356,000	100.0	27,642	20.8	0.0	3.2	17.7	0.0	12.4	19.3	0.0	17.6	42.2	100.0	53.7	0.0	0.0	13.0
<b>Total</b>	<b>1</b>	<b>1,356,000</b>	<b>100.0</b>	<b>27,642</b>	<b>20.8</b>	<b>0.0</b>	<b>3.2</b>	<b>17.7</b>	<b>0.0</b>	<b>12.4</b>	<b>19.3</b>	<b>0.0</b>	<b>17.6</b>	<b>42.2</b>	<b>100.0</b>	<b>53.7</b>	<b>0.0</b>	<b>0.0</b>	<b>13.0</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022-2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Naples MSA	1,008	49,199	87.9	17,446	2.6	5.4	2.1	15.6	11.7	15.9	41.8	44.7	45.9	38.9	37.3	35.0	1.1	0.9	1.1
Cape Coral MSA	110	6,784	12.1	--	0.0	0.0	--	6.0	18.2	--	36.4	34.5	--	57.7	47.3	--	0.0	0.0	--
<b>Total</b>	<b>1,118</b>	<b>55,983</b>	<b>100.0</b>	<b>20,568</b>	<b>2.2</b>	<b>4.5</b>	<b>2.0</b>	<b>14.1</b>	<b>12.9</b>	<b>19.7</b>	<b>41.0</b>	<b>43.0</b>	<b>46.2</b>	<b>41.8</b>	<b>38.9</b>	<b>31.2</b>	<b>0.9</b>	<b>0.7</b>	<b>0.9</b>

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Naples MSA	452	17,092	100.0	17,665	2.8	7.1	2.9	14.3	10.2	12.7	37.9	31.0	39.9	45.1	51.8	44.1	0.0	0.0	0.4
<b>Total</b>	<b>452</b>	<b>17,092</b>	<b>100.0</b>	<b>17,665</b>	<b>2.8</b>	<b>7.1</b>	<b>2.9</b>	<b>14.3</b>	<b>10.2</b>	<b>12.7</b>	<b>37.9</b>	<b>31.0</b>	<b>39.9</b>	<b>45.1</b>	<b>51.8</b>	<b>44.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.4</b>

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2022-2023**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Naples MSA	1,008	49,199	87.9	17,446	94.0	62.7	50.6	1.5	13.0	4.5	24.3
Cape Coral MSA	110	6,784	12.1	--	93.0	45.5	--	1.7	12.7	5.2	41.8
<b>Total</b>	<b>1,118</b>	<b>55,983</b>	<b>100.0</b>	<b>17,466</b>	<b>93.8</b>	<b>60.4</b>	<b>51.4</b>	<b>1.5</b>	<b>12.8</b>	<b>4.6</b>	<b>26.8</b>

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Naples MSA	452	17,092	100.0	17,665	93.5	61.9	48.0	2.0	13.9	4.4	24.1
<b>Total</b>	<b>452</b>	<b>17,092</b>	<b>100.0</b>	<b>17,665</b>	<b>93.5</b>	<b>61.9</b>	<b>48.0</b>	<b>2.0</b>	<b>13.9</b>	<b>4.4</b>	<b>24.1</b>

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2022-2023**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Naples MSA (2022-2023)	3	78	98.7	4.8	0.0	19.1	0.0	41.0	0.0	33.9	100.0	1.1	0.0
Cape Coral MSA (2023)	1	1	1.3	0.0	0.0	4.6	0.0	38.6	0.0	56.8	100.0	0.0	0.0
<b>Total</b>	<b>4</b>	<b>79</b>	<b>100.0</b>	<b>3.9</b>	<b>0.0</b>	<b>16.3</b>	<b>0.0</b>	<b>40.6</b>	<b>0.0</b>	<b>38.3</b>	<b>100.0</b>	<b>0.9</b>	<b>0.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.  
 Due to rounding, totals may not equal 100.0%

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2021**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Naples MSA	3	53	100.0	4.3	0.0	19.6	0.0	40.4	33.3	35.7	66.7	0.0	0.0
<b>Total</b>	<b>3</b>	<b>53</b>	<b>100.0</b>	<b>4.3</b>	<b>0.0</b>	<b>19.6</b>	<b>0.0</b>	<b>40.4</b>	<b>33.3</b>	<b>35.7</b>	<b>66.7</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2021 - 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 2022-2023**

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
Naples MSA (2022-2023)	3	78	98.7	23.7	0.0	16.8	0.0	16.9	0.0	42.5	66.7	0.0	33.3
Cape Coral MSA (2023)	1	1	1.3	14.6	0.0	12.5	100.0	18.6	0.0	54.3	0.0	0.0	0.0
<b>Total</b>	<b>4</b>	<b>79</b>	<b>100.0</b>	<b>22.0</b>	<b>0.0</b>	<b>16.0</b>	<b>25.0</b>	<b>17.2</b>	<b>0.0</b>	<b>44.8</b>	<b>50.0</b>	<b>0.0</b>	<b>25.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 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 2021**

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
Naples MSA	3	53	100.0	22.3	66.7	17.1	0.0	18.4	0.0	42.2	33.3	0.0	0.0
<b>Total</b>	<b>3</b>	<b>53</b>	<b>100.0</b>	<b>22.3</b>	<b>66.7</b>	<b>17.1</b>	<b>0.0</b>	<b>18.4</b>	<b>0.0</b>	<b>42.2</b>	<b>33.3</b>	<b>0.0</b>	<b>0.0</b>

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