



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

November 17, 2025

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Cornerstone National Bank & Trust Company  
Charter Number: 24114

One West Northwest Highway  
Palatine, IL 60067

Office of the Comptroller of the Currency

2001 Butterfield Road  
Suite 400  
Downers Grove, IL 60515

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

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## **Overall CRA Rating**

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

**The Lending Test is rated: Satisfactory**

**The Community Development test is rated: Satisfactory**

The major factors that support this rating include:

- The Lending Test rating is based on a Satisfactory Lending Test performance in the State of Illinois.
- The majority of loans are inside the bank's designated assessment area (AA).
- The quarterly average loan-to-deposit (LTD) ratio is reasonable.
- The geographic distribution of home mortgage loans and business loans is excellent.
- The bank did not receive any Community Reinvestment Act (CRA) related complaints during the review period.
- The Community Development (CD) Test rating is based on Cornerstone's adequate responsiveness to its CD needs in the AA, evidenced by a reasonable volume of CD loans, investments, and services during the evaluation period.

### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and credit needs of the assessment area (AA), the bank's loan-to-deposit ratio was reasonable.

Cornerstone's quarterly average loan-to-deposit (LTD) ratio was 69.9 percent between January 1, 2021, and December 31, 2023, with a low of 61.5 percent and a high of 77.2 percent.

The bank ranked ninth out of 12 similarly situated FDIC-insured financial institutions that compete for deposits in Cook, DuPage, McHenry and Lake counties. The comparable institutions vary in size from \$818 million to \$2.0 billion in total assets and reported quarterly average LTD ratios ranging from 59.3 percent to 118.3 percent.

### **Lending in Assessment Area**

A majority of the bank's loans were inside its AA. During the evaluation period, Cornerstone originated or purchased 52.0 percent of its home mortgage and business loans from inside the AA. This analysis is performed at the bank rather than the AA level.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2021-2023	429	51.44	405	48.56	834	144,610	48.56	153,195	51.44	297,805
Small Business										
2021-2023	36	60.00	24	40.00	60	12,193	57.95	8,849	42.05	21,042
<b>Total</b>	<b>465</b>	<b>52.01</b>	<b>429</b>	<b>47.99</b>	<b>894</b>	<b>156,803</b>	<b>49.18</b>	<b>162,044</b>	<b>50.82</b>	<b>318,847</b>

*Due to rounding, totals may not equal 100.0% Source: Home mortgage data is from 1/1/2021 - 12/31/2023 Home Mortgage Loan Application Register. Small business data is from OCC's sample of loans.*

## Description of Institution

Cornerstone is a full-service intrastate bank headquartered in Palatine, Illinois. The bank is wholly owned by Cornerstone Bancorp, Inc., a single bank holding company also headquartered in Palatine. As of December 31, 2023, the bank had total assets of \$958.3 million, total net loans of \$641.1 million, and total deposits of \$857.6 million. Tier 1 capital as of year-end 2023 was \$95.9 million. According to the FDIC's 2023 market share data, Cornerstone's total deposit share in the AA was 0.2 percent, placing them 42 out of 135 total banks. Competition for deposits, commercial loans, and residential mortgages is strong. Refer to the Competition section for additional detail. In addition to the Palatine location, the bank has four branch offices located in the suburbs of Chicago, including two full-service branches in Crystal Lake and Deer Park and two limited-service banking centers in Naperville and Schaumburg, Illinois. Limited-service locations accept only non-cash deposits, and do not have ATMs. Throughout 2021-2023, Cornerstone was a member of the STAR network, which offers over 300 surcharge-free services at select ATM locations throughout the Chicago metropolitan area. Since the last CRA evaluation period, the bank opened its Deer Park branch in March of 2021, which was formerly located in Lake Zurich. Additionally, the bank moved its original Crystal Lake and Naperville offices in March of 2021 and May of 2022, respectively, to new locations in the same municipalities.

Cornerstone's primary focus is on commercial lending, with a secondary lending focus on home mortgage loans. As of December 31, 2023, over 80 percent of the bank's loan portfolio were commercial loans, and the remainder of the portfolio were largely 1-4 family residential mortgages. Cornerstone additionally provides wealth management services to the community. Cornerstone received a "Satisfactory" rating under the Intermediate Small Bank Community Reinvestment Act (CRA) examination procedures in the last performance evaluation dated January 10, 2022, and an evaluation period from 2018-2020. There are no legal, financial, or other factors impeding the bank's ability to help meet its community's credit needs.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated Cornerstone’s compliance with the CRA using the Intermediate Small Bank examination procedures, which includes a Lending Test and a Community Development (CD) Test. The Lending Test assesses the bank’s ability in meeting the credit needs of its AA through its lending activities, and the CD Test evaluates the bank’s responsiveness to CD through qualified lending, investments, and services. We considered the bank’s lending and CD activities from January 1, 2021, through December 31, 2023. There were no affiliate or subsidiary activities considered during this CRA assessment.

Cornerstone’s primary lending products include small loans to businesses and home mortgage loans. Per internally prepared bank information, in 2023 business loans represented 63.3 percent of the number of loans and 76.0 percent of the dollars committed for loan originations, while home mortgage and consumer loans represented 36.7 percent of the number of loans and 24.0 percent of the dollars of loan originations. Business and home mortgage loan origination activity in 2021 and 2022 were similar to 2023. Due to the bank primarily being a commercial lender and management not actively marketing home mortgage loans during the evaluation period, more weight was placed on small business loan performance for the Lending Test. Given the bank is not required to report CRA information, we reviewed a sample of 90 business loans from 2021 through 2023 and analyzed Home Mortgage Disclosure Act (HMDA) data for home mortgage loans originated during the evaluation period. We tested the accuracy of the bank’s 2021, 2022, and 2023 HMDA data in March of 2025, and determined the data was reliable for use during this CRA examination. For analysis purposes, we compared the bank’s lending performance to demographic and aggregate data for small business loans and home mortgages. Due to changes between the 2015 U.S Census American Community Survey (ACS) and the 2020 U.S. Census, we performed separate analysis periods for 2021 and 2022-2023 to evaluate the geographic and borrower loan distributions.

### Selection of Areas for Full-Scope Review

Cornerstone has one AA, and we completed a full-scope review on the AA. Refer to appendix A, Scope of Examination, for more information.

### Ratings

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

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Cornerstone’s overall rating is based solely on its performance in the State of Illinois, which mirrors the overall CRA rating. The State of Illinois rating is based on Cornerstone’s performance under the CRA Intermediate Small Bank Lending Test, the CD test, and relevant performance context information from the AA. The MMSA is not a rating area, as all of Cornerstone’s locations are within the state of Illinois.

## Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Illinois

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

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- As mentioned above, the institutional lending test criteria supports a satisfactory rating. The majority of the bank's loans are inside the AA and bank's quarterly average loan-to-deposit ratios is reasonable.
- The geographic distribution of small business and home mortgage loans is excellent. The geographic distribution criterion was weighed slightly more than the borrower distribution. The bank's exhibits a poor distribution of loans to businesses of different sizes and individuals with different income levels.
- The bank did not receive any CRA-related complaints during the evaluation period.
- The bank's total CD loans, investments, and services reflect adequate responsiveness to the CD needs of its AA.

## Description of Institution's Operations in Illinois

Cornerstone has one single AA located in the State of Illinois that includes all of DuPage County and parts of Cook, Kane, Lake, and McHenry counties. The bank did not change their AA from 2021 through 2023, however, due to the changes between the 2015 U.S. ACS and the 2020 U.S. Census, Cornerstone's 2022-2023 AA gained an additional 34 census tracts (CTs), which is described below.

Cornerstone’s 2021 AA consists of 503 CTs, including one low-income CT (0.2 percent), 49 moderate-income CTs (9.7 percent), 188 middle-income CTs (37.2 percent), and 265 upper-income CTs (52.9 percent). Their 2022-2023 AA consists of 537 CTs, including five low-income CTs (0.9 percent), 63 moderate-income CTs (11.7 percent), 215 middle-income CTs (40.0 percent), 253 upper-income CTs (47.1 percent), and one CT (0.2 percent) with no income designation. Cook, DuPage, and McHenry Counties are located within the Chicago-Naperville-Evanston Metropolitan Division (MD) 16984. Lake County is located within the Lake County Kenosha County IL-WI MD 29404. Kane County is located within the Elgin IL MD 20994. All three MDs are part of the Chicago-Naperville-Elgin IL-IN-WI Metropolitan Statistical Area (MSA) 16980, which is also referred to as the Chicago MSA. For the purpose of this report, the bank’s AA will be referred to as the Cornerstone MSA.

## Economic Conditions

According to U.S. Bureau of Labor Statistics (BLS) data, unemployment rates across Cook, DuPage, Kane, Lake, and McHenry Counties, as well as the State of Illinois, generally improved from 2021 to 2023 as labor markets recovered from pandemic-related disruptions. Cook County experienced the largest decline, falling from 7.0 percent in 2021 to 4.5 percent in 2023. However, in 2023, Kane and Lake counties experienced a slight increase in unemployment, while Cook, DuPage, and McHenry Counties continued to show improvements.

Annual Unemployment Rates			
Area	2021	2022	2023
Cook	7.0%	5.0%	4.5%
DuPage	4.8%	3.7%	3.5%
Kane	5.7%	4.5%	5.0%
Lake	5.4%	4.4%	5.1%
McHenry	4.8%	3.9%	3.7%
State of Illinois	6.1%	4.6%	4.5%

*Source: U.S. Department of Labor, Bureau of Labor Statistics. Rates are not seasonally adjusted. Unemployment rates are as of December 31 of each year.*

## Housing Affordability

Cornerstone’s MSA is considered a high-cost housing market, which limits access to affordable home ownership. Lack of affordability, combined with competition in the MSA, limited housing supply, and poverty levels within the AA are constraints to low-income families wanting to become homeowners and qualify for a home loan. We performed the following analysis:

Assuming a 30-year mortgage with a six percent interest rate, and not accounting for down payment, homeowner’s insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$54,900 per year (or less than 50 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$228,921 mortgage with a monthly payment of \$1,373. A moderate-income borrower making \$87,480 per year (or less than 80 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$366,274 mortgage with a monthly payment of \$2,196. The median housing value in Cornerstone’s MSA from 2022-2023 is \$282,400. The analysis illustrates low-income

borrowers would not qualify for a home mortgage for a median valued home and some moderate-income borrowers may also face difficulties in qualifying.

## Competition

Competition for deposits, small business loans, and residential mortgages in the AA is strong, particularly with the larger financial institutions. Bank management highlighted larger institutions have vastly more resources and robust systems to compete for local business that provides wider accessibility and convenience to customers. Per the 2023 Federal Deposit Insurance Corporation's (FDIC) deposit market share report, Cornerstone's deposit share represented 0.2 percent of the total \$522 billion of deposits in the assessment area, placing them 42 out of 135 total banks. The top five banks are all large banks and held a combined 61.7 percent of total deposits. Due to their asset size, Cornerstone is not a CRA data reporter and there is no information on their ranking for small business loans. However, the market for commercial loans remains highly competitive. In 2023, the top five banks accounted for 73.2 percent of all CRA reportable loans. Additionally, an analysis of 2023 home mortgage loans show Cornerstone ranked 132 out of 631 total lenders, representing a market share of 0.09 percent.

## Community Contact

We utilized two established community contacts from the evaluation period to better understand the community's needs. One contact that provides civil rights-focused financial advocacy within the AA stated the community needs more flexible lending products that consider alternative credit histories for home mortgage loans. Additionally, the same contact stated there is a need for more micro lending and small dollar loans for small businesses, including loans under \$25 thousand. The contact believes this is a need that was previously offered by banks but is no longer an offering due to lack of profitability. Similarly, another established community contact that provides mentorship and investment opportunities to underserved entrepreneurs throughout Illinois and Northwest Indiana indicated the same credit need of small dollar business loans under \$100 thousand to fill in the credit gap for local businesses.

## Cornerstone MSA

Assessment Area(s) - Cornerstone MSA (2021)						
						2021
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	503	0.20	9.74	37.18	52.88	0.00
Population by Geography	2,465,227	0.04	10.30	38.16	51.49	0.00
Housing Units by Geography	943,523	0.04	9.87	39.18	50.90	0.00
Owner-Occupied Housing by Geography	667,765	0.02	6.81	36.63	56.55	0.00
Occupied Rental Units by Geography	222,555	0.11	18.05	45.54	36.30	0.00
Vacant Units by Geography	53,203	0.09	14.08	44.65	41.17	0.00
Businesses by Geography	125,073	0.05	8.71	34.70	56.54	0.00
Farms by Geography	2,804	0.00	8.99	39.98	51.03	0.00
Family Distribution by Income Level	636,391	15.02	14.67	19.41	50.89	0.00
Household Distribution by Income Level	890,320	17.21	13.97	17.19	51.64	0.00
Unemployment rate (%)	6.85	8.79	8.45	7.37	6.14	0.00
Households Below Poverty Level (%)	7.11	19.61	14.21	8.22	4.94	0.00
Median Family Income (16984 - Chicago-Naperville-Evanston, IL MD)		\$75,024		Median Housing Value		\$257,100
Median Family Income (20994 - Elgin, IL MD)		\$80,899		Median Gross Rent		\$1,175
Median Family Income (29404 - Lake County Kenosha County, IL-WI MD)		\$87,137		Families Below Poverty Level		5.45

Assessment Area(s) - Cornerstone MSA (2021)						
						2021
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Median Family Income (16984 - Chicago-Naperville-Evanston, IL MD) for 2021		\$87,100				
Median Family Income (20994 - Elgin, IL MD) for 2021		\$94,600				
Median Family Income (29404 - Lake County Kenosha County, IL-WI MD) for 2021		\$102,500				
FFIEC File - 2010 Census 2021 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Cornerstone MSA (2023)						
						2022 - 2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	537	0.93	11.73	40.04	47.11	0.19
Population by Geography	2,503,381	0.85	11.91	40.92	46.24	0.08
Housing Units by Geography	954,163	0.80	11.76	41.98	45.34	0.12
Owner-Occupied Housing by Geography	675,791	0.59	9.03	39.85	50.36	0.16
Occupied Rental Units by Geography	231,685	1.40	19.38	47.93	31.28	0.01
Vacant Units by Geography	46,687	0.92	13.37	43.27	42.44	0.00
Businesses by Geography	110,535	0.95	8.94	39.26	50.79	0.05
Farms by Geography	2,459	0.45	12.89	38.59	47.74	0.33
Family Distribution by Income Level	644,122	15.55	15.36	20.46	48.64	0.00
Household Distribution by Income Level	907,476	17.92	14.16	17.48	50.44	0.00
Unemployment rate (%)	4.20	6.85	5.10	4.32	3.82	0.00
Households Below Poverty Level (%)	6.73	18.86	12.96	7.28	4.41	7.46
Median Family Income (16984 - Chicago-Naperville-Evanston, IL MD)		\$92,622			<b>Median Housing Value</b>	\$282,400
Median Family Income (20994 - Elgin, IL MD)		\$97,326			<b>Median Gross Rent</b>	\$1,385
Median Family Income (29404 - Lake County Kenosha County, IL-WI MD)		\$105,876			<b>Families Below Poverty Level</b>	4.57
Median Family Income (16984 - Chicago-Naperville-Evanston, IL MD) for 2023		\$109,800				
Median Family Income (20994 - Elgin, IL MD) for 2023		\$113,500				
Median Family Income (29404 - Lake County Kenosha County, IL-WI MD) for 2023		\$124,600				
FFIEC File - 2020 Census 2023 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

## **Scope of Evaluation in Illinois**

Cornerstone's single AA received a full-scope review.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS**

### **LENDING TEST**

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

### **Conclusions for Area Receiving a Full Scope Review**

Our analysis placed more weight on the bank's performance on loans to small businesses since commercial lending is the bank's primary focus. We also placed an emphasis on 2022-2023 performance, as it excludes additional noise from the COVID-19 Pandemic and is more reflective of the bank's regular lending activity, particularly with home mortgages. However, it is important to note the bank was an active participant in the Small Business Administration's (SBA) Paycheck Protection Program (PPP) in 2021 that supported small businesses during the pandemic. Per the bank's internal analysis, Cornerstone originated 547 PPP loans in 2021 for a total of \$113 million. For the 2021 evaluation period, we did not assess the distribution of home mortgage loans or small loans to businesses in the AA's low-income census tract as the analysis would not be meaningful. Only one of the AA's 503 CTs is designated low-income and contains very few owner-occupied housing units or small businesses.

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

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

The bank exhibited excellent geographic distribution of loans in the state.

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

Refer to Table 9 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.

From 2022-2023, the bank's geographic distribution of small loans to businesses is excellent. The bank originated 1.7 percent of its small loans to businesses located in low-income CTs, which exceeds the 0.9 percent of the AA's businesses that are located in low-income CTs and the 1.1 percent of aggregate lending that occurred in the low-income CTs. The bank also originated 8.3 percent of its small loans to businesses located in moderate-income CTs, which is near the 8.9 percent of businesses that are located in moderate-income CTs and the 9.2 percent of aggregate lending that occurred in moderate-income CTs.

Cornerstone's distribution of loans to moderate-income CTs in 2021 was below both demographic and aggregate though remains within a reasonable range of both comparators.

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

Refer to Table 7 in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

During the 2022-2023, the bank exhibits excellent geographic distribution of home mortgage loans. Lending in both low-income CTs and moderate-income CTs exceeds both the demographic comparator and the aggregate lending comparator in the AA.

In 2021, the bank originated 2.8 percent of home mortgage loans in the moderate-income CTs, which is below both the demographic comparator and the aggregate of 6.8 percent and 5.3 percent, respectively.

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

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. Examiners reviewed summary reports maps and analyzed the bank's lending activity over the evaluation periods 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 exhibited a poor distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

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

Refer to Table 10 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

For both the 2021 and 2022-2023 evaluation periods, Cornerstone's distribution of loans to businesses of different sizes is poor.

During the 2022-2023 evaluation period the bank originated 16.7 percent of its loans to small businesses with \$1 million or less in annual revenue, which is below the 77.6 percent of businesses in the AA that are small businesses and below the 53.9 percent of aggregate lending that occurred to small businesses.

During the 2021 evaluation period the bank originated 26.7 percent of its loans to small businesses with \$1 million or less in annual revenue, which is below the 79.1 percent of businesses in the AA that are small businesses and below the 46.2 percent of aggregate lending that occurred to small businesses.

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

Refer to Table 8 in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

For both the 2021 and 2022-2023 evaluation periods, Cornerstone exhibits poor distribution of home mortgage loans to LMI borrowers.

During the 2022-2023 evaluation period, the bank originated 5.7 percent of its home mortgage loans to low-income borrowers, which reasonably compares to the 8.0 percent of aggregate home mortgage lending to low-income borrowers. Additionally, 9.3 percent of the bank's home mortgage loans were to moderate-income borrowers, which is significantly below the 20.7 percent of aggregate home lending.

During the 2021 evaluation period, the bank originated 2.4 percent of its home mortgage loans to low-income borrowers, which is below the 6.3 percent of aggregate home mortgage lending. The bank also originated 11.1 percent of its home mortgage loans to moderate-income borrowers, which is near the 15.8 percent of aggregate home mortgage lending that occurred to moderate-income borrowers.

Both bank and aggregate home mortgage lending is well below the demographic data in 2021 and 2022-2023. As referred to earlier in the report, this is due to lack of home affordability for low-income borrowers and some moderate-income borrowers.

### **Responses to Complaints**

Cornerstone did not receive any complaints regarding its performance in helping to meet the credit needs within its AA during the evaluation periods.

## **COMMUNITY DEVELOPMENT TEST**

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

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

Based on a full scope review, the bank exhibited adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

Throughout the evaluation period, Cornerstone made \$21.4 million of qualified CD loans and investments, representing 22.4 percent of tier 1 capital as of December 31, 2023. CD loans and investments were used for affordable housing, promoting economic development through the SBA's PPP and 504 loan programs, and supporting community service organizations targeting LMI individuals.

### **Number and Amount of Community Development Loans**

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Cornerstone MSA	6	50.0	11,902	61.5
Statewide/Regional	6	50.0	7,454	38.5
Total	12	100.0	19,356	100.0

The level of Cornerstone's CD lending reflects excellent responsiveness to the credit needs of its AA. The bank originated 12 CD loans for a total of \$19.4 million, representing 20.2 percent of tier 1 capital. Half of the bank's CD loans were inside the AA, including a majority of the loan dollars at \$11.9 million. The remaining six CD loans were outside the bank's AA but still located within the Chicago-Naperville-Elgin, IL-IN-WI MSA.

The following are examples of CD loans the bank originated or purchased in the Cornerstone MSA:

- Three of the six CD loans were to organizations that provided community services for LMI individuals and families. One of the organizations is located in an LMI CT and provides autism therapy support services primarily for LMI individuals. Another organization provides shelter and other social support services to families at risk of becoming homeless, and the loan proceeds were used to construct a new facility for shelter sites.
- Two CD loans totaling \$4.6 million provided affordable housing to LMI families.
- The last CD loan in the Cornerstone MSA of \$1.9 million was an SBA PPP loan that helped promote economic development and support job creation or retention.

The remaining six CD loans totaling \$7.5 million were all located outside Cornerstone's MSA but were still located in the greater statewide region of the Chicago MSA. Four of the CD loans totaling \$6.1 million were to local businesses and promoted economic development and revitalization efforts through the SBA's PPP and 504 loan programs. The final two loans in the statewide region totaling \$1.3 million provided affordable housing for LMI families through the purchase or refinance of a multi-family unit property. One of the properties was specifically used for Section 8 Housing.

## Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cornerstone MSA	2	1,989	62	\$102	64	100.0	2,090	100.0	0	0

The level of Cornerstone's qualified investments reflect adequate responsiveness to the CD needs of its AA. Total qualified investments totaled \$2.09 million, representing 2.2 percent of tier 1 capital as of December 31, 2023. The bank made 61 qualified CD donations during the current evaluation period of \$101,642. The large dollar of qualified investments was from prior investments (\$2.0 million total), including a mutual fund backed by residential mortgages supporting LMI families and a mortgage-

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

backed security that also provides affordable housing for LMI. Both investments remain outstanding as of the evaluation period.

The following are examples of qualified investments in the AA:

- Approximately 71 percent of donations totaling \$71,957 (51 donations) benefited organizations that provide community services within Cornerstone's AA. Community service organizations include healthcare, food pantries, and other support services for LMI individuals with disabilities, the elderly, children and families in need, and domestic violence victims.
- The remaining 29 percent of donations was comprised of eleven donations totaling \$29,685 (11 donations) that benefited organizations that provide affordable housing. These organizations focused on housing for LMI families, families experiencing homelessness, and domestic violence victims.

### **Extent to Which the Bank Provides Community Development Services**

Cornerstone's level of CD services reflects adequate responsiveness given the bank's size and the CD needs in its AA. A total of eleven (11) bank officers and employees provided qualified CD services to thirteen (13) different organizations located in the bank's AA. Bank officers and employees primarily provide their services either by serving on the organization's board of directors or financing committee or is acting as the organization's treasurer or trustee. Additionally, some of the employee service hours come from fundraising activities. The majority of service hours relate to organizations focused on community services for LMI individuals, including healthcare and other social support services for children, families experiencing or nearing homelessness, the elderly, and domestic violence victims. Additionally, a bank officer contributed leadership for an organization that provides affordable housing for LMI families. There was also a bank employee who served on the board for an organization that assists and supports small business owners in LMI geographies. Throughout 2021-2023 qualified service hours totaled 2,762.

# 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 MSA(s) and non-MSA(s) 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, small business.	
<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>		
Cornerstone MSA	Full-Scope	2021- 503 CTs portions of Cook, Kane, Lake and McHenry counties and all of DuPage County.  2022-2023- 537 CTs portions of Cook, Kane, Lake and McHenry counties and all of DuPage County.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS			
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>CD Test Rating</b>	<b>Overall Bank/State Rating</b>
Cornerstone National Bank & Trust Company	Satisfactory	Satisfactory	Satisfactory
<b>State:</b>			
Illinois	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a ‘male householder’ and no wife present) or ‘female householder’ (a family with a ‘female householder’ and no husband present).

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. 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 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – Compares 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 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 AA.
- Table 10. 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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Cornerstone MSA 2021	289	85,045	100.00	162,495	0.02	--	--	6.81	2.77	5.34	36.63	25.26	34.82	56.55	71.97	59.84	--	--	--
<b>Total</b>	<b>289</b>	<b>85,045</b>	<b>100.00</b>	<b>162,495</b>	<b>0.02</b>	<b>--</b>	<b>--</b>	<b>6.81</b>	<b>2.77</b>	<b>5.34</b>	<b>36.63</b>	<b>25.26</b>	<b>34.82</b>	<b>56.55</b>	<b>71.97</b>	<b>59.84</b>	<b>--</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, -- HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Cornerstone MSA 2023	140	59,565	100.00	119,601	0.59	0.71	0.43	9.03	10.00	9.09	39.85	29.29	40.16	50.36	58.57	50.03	0.16	1.43	0.30
<b>Total</b>	<b>140</b>	<b>59,565</b>	<b>100.00</b>	<b>119,601</b>	<b>0.59</b>	<b>0.71</b>	<b>0.43</b>	<b>9.03</b>	<b>10.00</b>	<b>9.09</b>	<b>39.85</b>	<b>29.29</b>	<b>40.16</b>	<b>50.36</b>	<b>58.57</b>	<b>50.03</b>	<b>0.16</b>	<b>1.43</b>	<b>0.30</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table 8: 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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Cornerstone MSA 2021	289	85,045	100.00	162,495	15.02	2.42	6.34	14.67	11.07	15.83	19.41	19.72	21.12	50.89	58.48	43.55	--	8.30	13.16
<b>Total</b>	<b>289</b>	<b>85,045</b>	<b>100.00</b>	<b>162,495</b>	<b>15.02</b>	<b>2.42</b>	<b>6.34</b>	<b>14.67</b>	<b>11.07</b>	<b>15.83</b>	<b>19.41</b>	<b>19.72</b>	<b>21.12</b>	<b>50.89</b>	<b>58.48</b>	<b>43.55</b>	<b>--</b>	<b>8.30</b>	<b>13.16</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, -- HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table 8: 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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Cornerstone MSA 2023	140	59,565	100.00	119,601	15.55	5.71	7.96	15.36	9.29	20.72	20.46	14.29	22.37	48.64	49.29	35.32	--	21.43	13.63
<b>Total</b>	<b>140</b>	<b>59,565</b>	<b>100.00</b>	<b>119,601</b>	<b>15.55</b>	<b>5.71</b>	<b>7.96</b>	<b>15.36</b>	<b>9.29</b>	<b>20.72</b>	<b>20.46</b>	<b>14.29</b>	<b>22.37</b>	<b>48.64</b>	<b>49.29</b>	<b>35.32</b>	<b>--</b>	<b>21.43</b>	<b>13.63</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, -- HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table 9: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Cornerstone MSA 2021	30	6,572	100.00	98,576	0.05	--	0.06	8.71	6.67	9.36	34.70	46.67	37.13	56.54	46.67	53.45	--	--	--
<b>Total</b>	<b>30</b>	<b>6,572</b>	<b>100.00</b>	<b>98,576</b>	<b>0.05</b>	<b>--</b>	<b>0.06</b>	<b>8.71</b>	<b>6.67</b>	<b>9.36</b>	<b>34.70</b>	<b>46.67</b>	<b>37.13</b>	<b>56.54</b>	<b>46.67</b>	<b>53.45</b>	<b>--</b>	<b>--</b>	<b>--</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 sample of 30 loans, 2021 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table 9: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Cornerstone MSA 2023	60	21,520	100.00	178,030	0.95	1.67	1.12	8.94	8.33	9.20	39.26	46.67	40.61	50.79	43.33	49.02	0.05	--	0.06
<b>Total</b>	<b>60</b>	<b>21,520</b>	<b>100.00</b>	<b>178,030</b>	<b>0.95</b>	<b>1.67</b>	<b>1.12</b>	<b>8.94</b>	<b>8.33</b>	<b>9.20</b>	<b>39.26</b>	<b>46.67</b>	<b>40.61</b>	<b>50.79</b>	<b>43.33</b>	<b>49.02</b>	<b>0.05</b>	<b>--</b>	<b>0.06</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 sample of 60 loans, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table 10: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cornerstone MSA 2021	30	6,572	100.00	98,576	79.12	26.67	46.19	12.14	56.67	8.74	16.67
<b>Total</b>	<b>30</b>	<b>6,572</b>	<b>100.00</b>	<b>98,576</b>	<b>79.12</b>	<b>26.67</b>	<b>46.19</b>	<b>12.14</b>	<b>56.67</b>	<b>8.74</b>	<b>16.67</b>

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, 2021 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

Table 10: 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cornerstone MSA 2023	60	21,520	100.00	178,030	77.61	16.67	53.86	13.30	78.33	9.08	5.00
<b>Total</b>	<b>60</b>	<b>21,520</b>	<b>100.00</b>	<b>178,030</b>	<b>77.61</b>	<b>16.67</b>	<b>53.86</b>	<b>13.30</b>	<b>78.83</b>	<b>9.08</b>	<b>5.00</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%