



PUBLIC DISCLOSURE

June 06, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Old Plank Trail Community Bank, National Association
Charter Number 24646

20012 Wolf Road
Mokena, IL 60448

Office of the Comptroller of the Currency

Midsized Bank Supervision
425 South Financial Place, Suite 2700
Chicago, Illinois 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 **Old Plank Trail Community Bank, National Association** (Old Plank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Old Plank 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:

- Based on the data in the Tables and applicable performance context discussed in this evaluation, the overall geographic distribution of loans was excellent and overall borrower distribution of loans was good.
- Community development (CD) loans offered were effective in helping the bank address community credit needs and had a significantly positive impact on the bank’s lending test rating. The bank is a leader in CD loans. Old Plank originated a significant volume of CD loans under various programs. In addition, flexible loan programs offered were very effective in helping the bank address additional community credit needs.
- Qualified investments were effective and responsive in helping the bank address CD needs. The bank made an adequate level of qualified investments, grants, donations and contributions to many local as well as regional qualified CD groups and programs.
- The bank’s retail locations and alternative delivery systems were reasonably accessible to essentially all parts of the bank’s community.
- The bank is a leader in providing CD services. CD services were effective and responsive in helping the bank address CD needs. The significant number of financial services provided by the bank serving CD service needs had a significantly positive impact in the community and was consistent with the bank’s capacity and financial expertise.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is 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 MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

Description of Institution

Old Plank is a \$1.4 billion interstate financial institution headquartered in Mokena, Illinois (IL). Old Plank is a subsidiary of Wintrust Financial Corporation (Wintrust). The bank was chartered in 2006 and currently has 14 offices and 15 ATMs. Since the previous CRA evaluation Old Plank acquired its fifteenth office in Markham, IL, and closed the Plainfield Bank and Trust location. Old Plank operates banking locations in Cook and Will Counties, IL, and Lake County, Indiana (IN).

Wintrust is a financial services holding company based in Rosemont, IL, with total assets of approximately \$30 billion. Wintrust's footprint is centered in the Chicago metropolitan area extending into southern Wisconsin and northwest Indiana. Wintrust operations consist of three primary segments: community banking; specialty financing; and wealth management. Under community banking Wintrust has 15 wholly-owned banking subsidiaries and operates a national mortgage operation to originate and sell residential mortgages into the secondary market. This nation-wide mortgage operation is conducted through a division of one of its banking subsidiaries. The community banking group accounts for 81.7 percent of Wintrust's total assets and operates 157 banking locations. Other specialty finance services include commercial insurance premium financing First Insurance Funding (FIFCO), lease financing and short-term accounts receivable financing offered through other Wintrust subsidiaries. Wintrust also offers a full range of wealth management services primarily to community banking customers through three separate subsidiaries. All products and services discussed are available to Old Plank's customers.

As of December 31, 2017, Old Plank reported total equity capital of \$153.4 million and Tier One Capital of \$138.4 million. The bank's primary business strategy is commercial lending with commercial and industrial loans representing 47.7 percent of bank's total loan portfolio and an additional 19.5 percent in non-farm non-residential real estate secured loans. One to four family residential lending represents 6.2 percent and consumer loans are 16.8 percent of the bank's total loan portfolio. The bank has elected not to take in to consideration any affiliate lending (primarily residential mortgages) for this evaluation period. It is noted that a full array of residential mortgage products and services are readily available to all consumers through referrals to the bank's affiliated full service mortgage originator. Wintrust has mortgage originators available to meet with any potential applicant at any office. With commercial lending being the bank's primary business strategy our review of the bank's lending performance weighted small business lending performance more than home mortgage lending.

Old Plank delineated 391 census tracts in Will and Cook Counties, IL and 53 adjacent census tracts in Lake County, IN as the bank's AA. While the bank's AA did not change over the evaluation period, census tract income designations changed effective in 2017. There were 128 census tract income designation changes that impacted the bank's AA. Low-income census tracts net increase was 12 and moderate-income census tracts had a net decrease of one. Cook and Will Counties are part of the Chicago-Naperville-Arlington Heights, IL Metropolitan Division (MD) (Chicago MD.) Lake County, IN is part of the Gary, IN MD. Both the Chicago MD and the Gary, IN MD are part of the Chicago-Naperville-Elgin, IL-IN-WI MMSA (Chicago MMSA). Data presented in Appendix C is reflected on the Chicago MMSA level. We analyzed the bank's lending performance data separately for each MD. It is noted that

aggregate lending as shown in the tables for small business lending is skewed as the data is run on a county level and Old Plank delineated only 45.3 percent of the census tracts in Lake County, IN and only 26.6 percent of Cook and Will Counties, IL census tracts. As such, actual bank small business lending performance to the relative AA demographics was given a higher weight factor than the bank's Chicago MMSA aggregate small business lending performance.

Federal Deposit Insurance Corporation (FDIC) deposit market share data dated June 30, 2017, for the AA shows Old Plank had a 0.41 percent market share making it the 10th largest deposit holder out of 129 financial institutions (top 8 percent). JP Morgan Chase, Bank of America, and BMO Harris Bank NA had the three top deposit market share positions with a combined market share of 48.7 percent. Other national and regional banks were also present in the market place, making financial services competition very high.

There are no known financial hardships or legal restrictions for Old Plank that would negatively impact or impede CRA performance during this evaluation period. The bank was rated OUTSTANDING at the prior CRA evaluation dated June 30, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for this CRA assessment is June 1, 2014, through December 31, 2017. All CD activities and transactions between those dates were taken into consideration. Old Plank's performance under the lending test covers the time period January 1, 2014, through December 31, 2017. The bank's lending test performance for the years 2014, 2015, and 2016 were evaluated on a combined basis. Due to changes in census data effective in 2017, the 2017 lending performance was evaluated separately. As stated above, the bank's primary loan category is small business lending. With the low volume of reported home mortgage lending, loan types (home purchase, home improvement and refinancing) were combined to make the geographic and borrower home mortgage lending analysis more meaningful.

During a community tour of the bank's AA, we visited with seven different community representatives in the bank's AA. Our contacts included three organizations or associations which serve low- and moderate-income individuals with developmental disabilities; one birthing center; one crisis abuse center; one Habitat for Humanity center; as well as a leader from a local park district. Many credit needs were identified in the bank's AA especially for low- and moderate-income persons living in the AA. Affordable housing and job training were noted as predominate needs for the bank's AA. Healthcare and legal assistance were noted as needed CD services within the bank's AA. Gap financing for Medicaid recipients was also identified as a primary need.

Selection of Areas for Full-Scope Review

The Chicago MMSA was evaluated as a full-scope review.

Ratings

The bank's overall rating was based on those areas that received full-scope reviews.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution 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.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full Scope Reviews

The bank's performance under the lending test is rated Outstanding. Based on full-scope reviews, the bank's performance in the Chicago MMSA was excellent.

Lending Activity

Based on Table 1 Lending Volume in appendix C, along with the bank's deposit, home mortgage and small business lending market share data, Old Plank originated a significant volume of loans in the AA relative to its capacity and business strategy. Old Plank demonstrated a high response level to community needs.

- The proportion of small business loans equaled the proportion of bank deposits in the bank's AA. Old Plank was ranked 19th out of 178 or top 11 percent of financial institutions for market share of deposits. For small business loans market share, the bank was ranked 14th out of 127 (top 11 percent) small business lenders in the Chicago MMSA. The top three market share small business lenders were predominately credit card lenders with a combined total market share of 52.6 percent and an average loan size of \$12 thousand. Old Plank had a small business market share of 0.6 percent and an average loan size of \$66 thousand.
- The bank's volume of home mortgage lending was adequate during this evaluation period. It was also noted that the bank's affiliated mortgage lending financial institution was listed in the top ten of mortgage lenders for market share in the AA for both home purchase and home refinance lending.
- The bank's volume of community development lending was significant in the AA and represented 29.0 percent of Tier One Capital. The majority (68.0 percent) of the CD loans in the AA were to support CD qualified services, a known credit need in the AA.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Tables 2, 3, and 4 in appendix C, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation period was good.

- For 2014, 2015, and 2016 combined, the proportion of home mortgage loans in low-income geographies was weaker than the percentage of owner-occupied housing units in those geographies. The proportion of home mortgage loans in moderate-income geographies

was significantly stronger than the percentage of owner-occupied housing units in moderate-income geographies.

- The bank’s overall performance in home mortgage lending in both low- and moderate-income geographies was stronger than the aggregate distribution of loans in those geographies.
- The volume of 2017 reported home mortgage lending for Old Plank was insufficient to perform a meaningful distribution analysis.

Small Loans to Businesses

Based on the data in Table 6 in appendix C, the bank’s overall geographic distribution of small business loan originations and purchases for this evaluation period was excellent.

- For 2014, 2015, and 2016, the distribution of the bank’s small business loans in both low- and moderate-income geographies was excellent. The proportion of small business loans in both low- and moderate-income geographies was significantly stronger than the percentage of AA businesses located in those low- and moderate-income census tracts.
- The bank’s performance for small business lending in low- and moderate-income geographies was consistent with the aggregate distribution of loans in those geographies.
- The bank’s small business lending in 2017 was consistent with 2014, 2015, and 2016 lending performance.

Lending Gap Analysis

We performed a lending gap analysis that included a review of reports and maps showing the distribution of branches, applications and loans. We did not identify any unexplained conspicuous lending gaps in the bank’s AA.

Inside/Outside Ratio

A high percentage of the number of Old Plank’s home mortgage loans were originated in the AA (79.0 percent). For small business lending, excluding the specialized national FIFCO lending, the bank reports a substantial majority of small business loans were originated inside the AA (82.9 percent). By dollar volume all of these loan categories have ratios higher than 50 percent for loans originated within the bank’s AA.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Tables 8, 9, and 10 in appendix C and the following performance context considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation period was good.

- High home costs in the bank's AA raises homeownership affordability hurdles, especially for low-income borrowers. The AA's median housing value was just above \$200 thousand. The maximum income level for low-income borrowers was under \$36 thousand making the median housing value more than five times greater than the maximum low-income level. The maximum income level for moderate-income borrowers was under \$58 thousand, making the median housing value more than three times greater than the maximum moderate-income level. Please refer to the AA Market Profile Table for further details.
- The proportion of loans to low-income borrowers compared to the proportion of low-income families was negatively impacted by the ratio of median housing value to income in the AA. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families.
- Overall the bank's home mortgage lending to low-income borrowers was consistent with aggregate lending reported for home mortgages for low-income borrowers in the AA. Overall the bank's home mortgage lending to moderate-income borrowers exceeded aggregate lending reported for moderate-income borrowers in the AA.

Small Loans to Businesses

Based on the data in Table 11 in appendix C, the bank's overall borrower distribution of small business loan originations and purchases for this evaluation period was good.

- Old Plank's distribution of small loans to businesses by revenue was adequate and consistent with the proportion of small businesses in the AA.
- The bank's performance exceeded the percentage of aggregate small business lending data for businesses with revenues of \$1 million or less.
- The bank's small business lending in 2017 was consistent with 2014, 2015, and 2016 lending performance.

Community Development Lending

Based on the data in Table 1 Lending Volume in appendix C, CD lending was excellent. CD lending had a significantly positive impact on the lending test conclusion in the Chicago MMSA.

- The bank is a leader in making CD loans, and the bank exhibits an excellent record of serving credit needs in the AA. Old Plank made 48 CD loans in its AA for a total of \$40.4 million, which represented 29.0 percent of Tier One Capital. Twenty five of these loans (52.1 percent) for a total of \$27.5 million (68.0 percent) were for the primary purpose of community services. Community services were defined as a critical CD need in the bank's AA. Another noted CD need for the AA was economic development. The bank extended

two CD loans for \$6.2 million for the primary purpose of economic development, as well as five CD loans (\$2.8 million) for revitalization and stabilization of the AA.

Examples of CD loans in the AA include:

- Old Plank provided over \$7.8 million in loans to four different AA community service facilities that predominately serve Medicaid residents with developmental disabilities. These loans allowed for the rehabilitation and expansion of facilities and available service programs. Furthermore, these organizations were able to retain trained staff at their facilities to serve the needs of low- and moderate-income individuals with developmental disabilities.
- The bank financed programs designed to enable small business expansion efforts. Through the Advantage Participation Program in Illinois, Old Plank provided long-term financing at below market interest rates to businesses seeking economic development in their moderate-income level communities.

Product Innovation and Flexibility

Old Plank used innovative and flexible lending programs in order to further serve AA credit needs. Under each of the programs discussed below the bank originated a significant number of loans during this evaluation period.

- Old Plank offered financing for the U.S. Small Business Administration (SBA). Wintrust has established a specialty SBA lending department within one of its financial subsidiaries. These specialized lending officers were shared with Old Plank and other lending affiliates. The SBA products offered include: 7A Program; 504 Program; Express Program; and SBA CAP Lines. Old Plank also offered in-house Small Business Micro Loans and Small Business Overdraft Protection Lines. These specific products were tailored to effectively meet the credit needs of small businesses with annual revenues of less than \$1 million.
- A full array of mortgage products, including Federal Housing Administration and Veterans Affairs loans were available through the mortgage origination operations of the bank's financial affiliate. In 2017, an innovative program to provide down payments, closing costs or escrow assistance to low- or moderate-income borrowers was implemented (Wintrust Community Bank Down Payment Program). For the 2017 program year, the maximum grant was \$2,000 per household. Funds were made available through multiple HUD-approved non-profit agencies across the Old Plank footprint. The assistance provided was in the form of a grant paid on behalf of the borrower at the time the borrower closed on a first mortgage for a home purchase and was fully forgiven at closing. The innovative segment of this grant program was that Wintrust did not mandate the borrower use a Wintrust mortgage loan product to qualify for the grant.
- Wintrust group also developed a couple of flexible small dollar fixed rate consumer loan programs in amounts up to \$2,500 with rates lower than most credit cards and other fast cash loans. The Everyday Loan programs were designed specifically for low- and moderate-income individuals in the bank's AA. The Everyday Small Dollar Loan product is an unsecured consumer installment loan for any personal purpose. The Certificate of

Deposit Secured Loan product is for individuals looking to establish or improve their credit reporting data.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated High Satisfactory. Based on the data in Table 14 in appendix C, demographic data in appendix B, and the following performance context considerations, the bank's level of qualified CD investments, contributions, and grants in its AA was good.

- CD investment opportunities were available in the bank's AA. Old Plank's AA had 8.8 percent low-income and 28.4 percent moderate-income census tracts. The market for qualified investments presented strong competition from a high number of financial institutions in the bank's AA.
- Over the CD evaluation period of 44 months, the bank's dollar amount of the investments in the Chicago MMSA represented 6.3 percent of the bank's Tier One Capital. Old Plank had an additional five investments representing 0.7 percent of Tier One Capital in unfunded commitments.
- The bank exhibited an excellent level of responsiveness to the CD needs in the AA. Old Plank had 405 current- and prior-period investments totaling \$8.8 million. These investments met community needs by investing in organizations that provided needed CD services to low- and moderate-income persons. These included community services and educational opportunities, as well as job and financial training to low- and moderate-income persons.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated High Satisfactory. Based on full-scope reviews, the bank's overall performance in the Chicago MMSA was good.

Retail Banking Services

Based on the data in Table 15 in appendix C and the following performance context considerations, the bank's retail service performance was adequate.

- Old Plank's delivery systems were reasonably accessible throughout the AA. The bank operated fourteen branch offices in the AA. The bank's distribution of branches in 2014, 2015, and 2016 in low-income census tracts was near to the percentage of the AA population in low-income census tracts. The bank's distribution of branches in moderate-

income geographies was below the percentage of the AA population living within those geographies.

- The bank offers alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. The bank had 15 ATMs in the AA of which 13 were full-service ATMs. These systems provided additional delivery availability and access to banking services to both retail and business customers.
- Old Plank's record of opening and closing of branches did not adversely affect the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals.
- The bank's hours and services did not vary in a way that inconvenienced certain portions of the AA, particularly low- and moderate-income individuals or low- and moderate-income geographies. Old Plank maintains standard business hours and offers traditional banking products, mortgage, consumer and small business lending and services at all branch locations in the AA.

Community Development Services

Based on the level of CD services and the following performance context considerations, the bank's provision of CD services was excellent.

- Old Plank was a leader in providing CD services in the AA. Bank representatives reported 6,536 hours dedicated to CD services during this evaluation period, representing over 150 hours per month. The bank supported over 50 different organizations that provided the AA with community services, economic development, as well as affordable housing options to low- and moderate-income persons and families. The bank also worked with three revitalization agencies in the AA to further assist with known community credit needs.

Notable examples include:

- Money Smart is a comprehensive financial education curriculum designed to help low- and moderate-income individuals outside the financial mainstream enhance their financial skills and create positive banking relationships. Money Smart has reached over 3 million consumers since 2001. Financial education fosters financial stability for individuals, families, and entire communities. The bank provided the Money Smart curriculum to consumers free of charge in several versions.
- Serving on the board and finance committee, bank representatives assisted Franciscan Alliance Foundation of South Suburban Chicago in providing funding for healthcare outreach, services, and counseling to poverty level individuals in low- and moderate-income census tracts. Franciscan Alliance is dedicated to addressing community healthcare needs through its not-for-profit hospitals, outpatient facilities, and community based programs throughout Indiana and South Suburban Chicago.
- Link Unlimited is a collaborative group of youth programs that promote family, school, and community partnerships to enhance academic and life skills of the economically

disadvantaged. The organization provides educational and college preparatory opportunities for disadvantaged youth in low- and moderate-income census tracts that assist them in succeeding at school, work, and relationships within their community. Bank representatives served as ongoing youth mentors and sponsors with the organization, providing members with sound financial life skills.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/2014 to 12/31/2017 Investment and Service Tests and CD Loans: 06/01/2014 to 12/31/2017	
Financial Institution	Products Reviewed	
Old Plank Trail Community Bank, NA (Old Plank) Mokena, Illinois	HMDA Small Business	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Chicago MMSA	Full Scope	

Appendix B: Community Profiles for Full-Scope Areas

Chicago MMSA

Demographic Information for Full-Scope Area: Chicago MMSA (2014 – 2016)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	443	8.80	28.44	34.76	27.77	0.23
Population by Geography	1,935,725	5.72	25.90	34.72	33.66	0.00
Owner-Occupied Housing by Geography	524,605	2.72	21.66	37.91	37.71	0.00
Businesses by Geography	87,547	3.99	20.04	35.31	40.65	0.00
Farms by Geography	1,689	2.78	14.33	36.18	46.65	0.06
Family Distribution by Income Level	483,841	21.03	17.31	21.29	40.37	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	185,497	10.42	38.13	34.13	17.31	0.00
Median Family Income	= \$71,384					
FFIEC Adjusted Median Family Income for 2016	= \$73,794					
Households Below the Poverty Level	= 10%					
				Median Housing Value	= \$203,309	
				Unemployment Rate	= 5.19%	

* The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 U.S. Census, and 2016 Federal Financial Institutions Examination Council (FFIEC) updated MFI.

Old Plank's AA consists of a total of 443 contiguous census tracts in the Chicago metropolitan area. Of the census tracts, 247 are in southern Cook County, IL, 143 are in Will County, IL, and 53 are in the northwest quadrant of Lake County, IN. The AA consists of 19 percent of all the tracts in Cook County, 73 percent of all the census tracts in Will County, and 45 percent of all the tracts in Lake County, IN. Cook, Will and Lake County are part of the Chicago-Naperville-Elgin, IL-IN-WI Multi-State Metropolitan Statistical Area. The AA meets regulatory requirements.

Old Plank's AA is part of the suburban region that lies south of the City of Chicago. The population of Old Plank's AA is 1.9 million people, 55 percent of whom live in Cook County, 34 percent of whom live in Will County, and 12 percent of whom live in Lake County, IN. Cook County, with a population of more than 5 million, is the largest county in the Chicago MMSA and in Illinois. Will County, with a population of 677,550, is the fourth most populous county in the Chicago MMSA and in Illinois. Lake County, IN, with a population of 496,000, is the sixth most populous county in the Chicago MMSA and the second most populous county in Indiana. The FFIEC 2017 estimated median family income (MFI) in the Chicago MMSA was \$77,500. Of the 71 LMI census tracts in the Old Plank AA, 46 are in Cook County, 20 are in Lake County, and five are in Will County.

As of June 30, 2017, Old Plank had a deposit market share in Cook, Will and Lake Counties of 0.41 percent, which ranked 24th out of 139 financial institutions gathering deposits in all three counties. JP Morgan Chase Bank, Bank of America and BMO Harris Bank held the top three market shares, which together constituted nearly 49 percent of the deposit market in the three counties. Of the 23 banks with larger deposit market shares than Old Plank, ten are large banks with operations in many states. In addition, five of Old Plank's competitors are regional

banks roughly comparable in size to the combined banks owned by Wintrust Financial Corporation. Sixty-seven percent of the deposits Old Plank holds are from eight branches in Will County, one of which is the bank's headquarters office. Twenty-nine percent of the bank's deposits are from five branches in Cook County, and four percent are from one office in Lake County, IN.

Old Plank's AA is in suburban communities where many industrial parks, shopping centers, offices, factories, and warehouse and distribution businesses are located, including many that would qualify as small businesses for the loan programs of the U.S. Small Business Administration. Reports show that the economic sectors providing the greatest numbers of jobs in Cook, Will and Lake, IN Counties are healthcare and social assistance; retail trade; professional, scientific and technical services; and manufacturing. Also according to Datausa.io, the economy of Will County is particularly specialized in transportation and warehousing; arts, entertainment, recreation; and construction, all three of which employ more people than would be expected in counties of similar size. The comparable concentrations in Cook County are transportation and warehousing; management of companies and enterprises; and professional, scientific, and technical services. Lake County, Indiana is specialized in manufacturing; transportation and warehousing; and healthcare and social assistance.

Old Plank's AA features predominantly lower-density, single-family housing, but according to housing market information published by the Metropolitan Planning Council, there are significant variations from place to place within the AA. Western Will County, for example, contains a number of newer communities with high rates of population growth, while several long-established communities in southern Cook County have experienced significant population losses. The AA also includes communities with high levels of educational attainment and predominantly middle- to upper-income families as well as communities with lower levels of educational attainment and predominantly low- to moderate- income families whose incomes have been declining. Likewise, owner-occupancy and renter-occupancy rates can vary significantly from place to place in the AA. Foreclosures afflicted the entire AA following the recession of 2008, but lower, recession-induced property values linger in significant portions of the AA while prices in other parts of the AA largely have recovered.

Altogether, these economic and housing conditions give rise to needs for planning strategic interventions in the housing market, for addressing troubled properties, preserving affordable housing and for increasing the number of affordable units available. Other responses to the housing market conditions in Old Plank's AA include financing for home renovations and improvements, including in conjunction with public sector support for such lending; homeowner and homebuyer counseling; down payment and closing cost assistance; flexible home mortgage products; and banks willing to help refinance underwater homeowners, often with assistance from the public sector. Other responses to conditions in the AA include donations of money and expertise for workforce development initiatives and to organizations that provide business planning and development services as well as financing for smaller businesses. Initiatives that increase the liquidity of small business micro loan organizations and enable them to produce more small business loans also would be responsive.

Opportunities and partners for responding to these needs in Old Plank's AA are available. They include an active regional association of municipal officials in south suburban Chicago; an affiliate of the NeighborWorks network; many social service organizations; nonprofit,

municipal and county-level business development and workforce training initiatives; active SBA 504 certified development companies; nonprofit regional micro lenders to small businesses; multiple nonprofit organizations devoted to affordable housing development in the region as a whole and in suburban parts of the region; organizations engaged in housing counseling and financial education; multiple regional community development financial institutions that meet a wide range of community development financing needs in conjunction with banks; and many nonprofit social service organizations.

Appendix C: Tables of Performance Data

Content of Standardized 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 as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and

purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: CHICAGO MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Chicago MMSA 2014-16	100.00	69	11,460	1,247	76,272	2	378	48	40,377	1,318	88,110	100.00

^{*} Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from June 01, 2014 to December 31, 2017.

^{***} Deposit Data as of July 11, 2018. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: CHICAGO MMSA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Chicago MMSA 2014-16	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of July 11, 2018. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: CHICAGO MMSA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016	
Assessment Area (2016):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
Chicago MMSA 2014-16	0	0	0	0	

* The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2016.

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CHICAGO MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA 2014-16	28	100.00	2.72	3.57	21.66	25.00	37.91	17.86	37.71	53.57	0.97	13.54	40.09	45.40

* Based on 2016 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: CHICAGO MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	%BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA 2014-16	3	100.00	2.72	0.00	21.66	66.67	37.91	33.33	37.71	0.00	2.38	18.24	31.81	47.58

* Based on 2016 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: CHICAGO MMSA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA 2014-16	31	100.00	2.72	0.00	21.66	22.58	37.91	32.26	37.71	45.16	0.92	9.72	31.94	57.42

* Based on 2016 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CHICAGO MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA 2014-16	7	100.00	9.97	0.00	32.56	28.57	41.30	71.43	16.18	0.00	8.82	29.41	51.47	10.29

* Based on 2016 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: CHICAGO MMSA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA 2014-16	1,247	100.00	3.99	4.33	20.04	27.43	35.31	34.96	40.65	33.28	4.80	17.06	32.98	45.16

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 7a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS Geography: CHICAGO MMSA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016														
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA 2014-16	2	100.00	2.78	0.00	14.33	0.00	36.18	0.00	46.65	100.00	2.38	11.43	38.57	47.62

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CHICAGO MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA 2014-16	28	100.00	21.03	3.70	17.31	51.85	21.29	7.41	40.37	37.04	10.22	26.59	28.36	34.83

* Based on 2016 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 27.3% of loans originated and purchased by BANK.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: CHICAGO MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data [*]			
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Low	Mod	Mid	Upp
Full Review:														
Chicago MMSA 2014-16	3	100.00	21.03	0.00	17.31	100.00	21.29	0.00	40.37	0.00	8.86	17.04	24.25	49.85

^{*} Based on 2016 Peer Mortgage Data -- US and PR

^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE														Geography: CHICAGO MMSA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016	
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*						
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Families***	% BANK Loans****	Low	Mod	Mid	Upp	
Full Review:																	
Chicago MMSA 2014-16	31	100.00	21.03	12.00	17.31	24.00	21.29	28.00	40.37	36.00	6.18	13.46	24.64	55.71			

* Based on 2016 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 31.3% of loans originated and purchased by BANK.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: CHICAGO MMSA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago MMSA 2014-16	1,247	100.00	82.52	69.21	86.05	6.82	7.14	148,387	58,690

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.90% of small loans to businesses originated and purchased by the bank.

Table 12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: CHICAGO MMSA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016									
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago MMSA 2014-16	2	100.00	92.54	50.00	0.00	100.00	0.00	215	86

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CHICAGO MMSA				Evaluation Period: JUNE 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago MMSA 2014-17	16	3,739	389	5,040	414	8,779	100.00	5	995

* 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings / Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS / CLOSINGS																	
Geography: CHICAGO MMSA																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Chicago MMSA 2017	100.00	14	100.00	7.14	7.14	42.86	42.86	1	1	0	0	0	0	7.81	26.41	34.08	31.70

