



PUBLIC DISCLOSURE

April 15, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Pana

Charter 13478

306 South Locust Street
Pana, IL 625570

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 Lending Test rating is based on the First National Bank of Pana's (FNB Pana or the bank) performance in the State of Illinois. The major factors that support this rating include:

- FNB Pana's distribution of loans to individuals of different income levels and businesses of different sizes within its assessment areas (AAs) is reasonable.
- FNB Pana's distribution of loans among geographies of different income levels within in its AAs is reasonable.
- FNB Pana originated or purchased a majority of its loans from inside its AAs.
- FNB Pana's loan-to-deposit ratio is reasonable.
- FNB Pana did not receive any complaints regarding its CRA performance during the evaluation period.

Loan-to-Deposit Ratio

Considering FNB Pana's size and financial condition, and the credit needs of its AAs, the bank's loan-to-deposit ratio was reasonable. The bank's loan-to-deposit-ratio averaged 79.9 percent over the past 19 quarters. The timeframe used for this calculation represents the first quarter-end after the start of the bank's last CRA evaluation, through December 31, 2023. Over this period, the bank's quarterly loan-to-deposit ratio ranged from a low of 74.0 percent to a high of 87.4 percent.

We compared FNB Pana's average quarterly loan-to-deposit-ratio to the ratios of four similarly situated federal- and state- chartered banks in the bank's AAs based on a combination of size, location, and lending opportunities. The similarly situated banks ranged in asset size from \$341 million to \$93 million and had a combined average quarterly loan-to-deposit-ratio of 64.0 percent during the same period. FNB Pana's loan-to-deposit-ratio was the highest in this group.

Lending in Assessment Area

FNB Pana originated or purchased a majority of its loans inside its AAs during the evaluation period. The bank originated and purchased 82.9 percent of its loans inside the AAs. This analysis was performed at the bank rather than the AA level.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2021-2022	16	80.0	4	20	20	1,944	83.8	376	16.2	2,320
2023	146	85.4	25	15.2	171	14,091	83.6	2,756	16.4	16,847
Subtotal	162	84.8	29	15.2	191	16,035	83.6	3,132	16.3	19,167
Commercial 2021-2023	13	65.0	7	35.0	20	1,298	60.0	866	40.0	2,164
Total	175	82.9	36	17.1	211	17,333	81.3	3,998	18.7	21,331

Source: 2023 Home Mortgage Disclosure Act data, sample of 20 home loans originated between 1/1/2021 and 12/31/2022, and sample of 20 business loans originated between 1/1/2021 and 12/31/2023.

Description of Institution

FNB Pana is a \$292 million (total assets) intrastate financial institution headquartered in Pana, Illinois. The bank operates six banking offices in Assumption, Blue Mound, Decatur, Pana, and Taylorville. All offices have non-deposit taking ATMs. The bank opened two branches during the evaluation period, both in Decatur. FNB Pana is a full-service bank that offers conventional deposit and loan products. In addition, the bank offers online and mobile banking.

FNB Pana designated two AAs in Illinois, the only rating area for this institution. The IL Non-MSA AA includes Christian County and a portion of Shelby County. The bank expanded its Decatur MSA AA to include all of Macon County in 2019.

As of December 31, 2023, FNB Pana's gross loan portfolio totaled \$233.6 million or 78.8 percent of its total assets. Tier 1 capital totaled \$32.8 million, and its leverage ratio was 11.3 percent. The following table shows the bank's loan portfolio mix.

Loan Portfolio Summary by Loan Product	
Loan Category	% of Outstanding Dollars
Business Loans, including Commercial Real Estate	50.2
Home Loans, including Multifamily Loans	25.7
Farm Loans, including farmland	19.5
Consumer loans	4.6

Source: December 31, 2023, Uniform Bank Performance Report (UBPR)

FNB Pana's mission statement is to remain a locally owned community bank offering a complete line of banking services that strives to build mutually beneficial relationships between staff, customers, and community by delivering sound financial solutions and exceptional customer service. The bank's primary business focus is on business and agriculture lending. There are no known impediments limiting the bank's ability to help meet the credit needs of its local community, including low- and moderate-income families and neighborhoods. FNB Pana received an "Outstanding" rating as a result of its previous CRA performance evaluation, dated May 28, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB Pana's CRA performance using Small Bank evaluation procedures, which assess the bank's record of meeting the credit needs of its AAs through lending activities. The evaluation period for this review was from January 1, 2021, to December 31, 2023.

Based on our review of the number and dollar volume of loans originated or purchased during the evaluation period, the bank's primary lending products are business and home mortgage loans. The bank was subject to reporting requirements of the Home Mortgage Disclosure Act for 2023, and we included all 171 home mortgage loans originated in 2023 in this analysis after validating the accuracy of the loan data. We reviewed a random sample of 80 business loans and 40 home loans within the AAs for the geographic and income distribution tests.

Due to changes between the 2015 American Community Survey (ACS) U.S. Census and the 2020 U.S. Census, we performed separate analysis for the periods of 2021 and 2022-2023 to evaluate geographic distribution and borrower income criteria. Performance in Tables O, P, Q and R in Appendix C reflect data from both analysis periods.

For analysis purposes, we compared FNB Pana's lending performance with demographic data from the 2015 ACS U.S. Census, 2020 U.S. Census, 2021 and 2023 Dun and Bradstreet Data, and Federal Deposit Insurance Corporation (FDIC) deposit market share data as of June 30, 2021, and June 30, 2023. No affiliate activity was included in this analysis. Refer to the tables in Appendix A for more information on the scope of the review.

Selection of Areas for Full-Scope Review

FNB Pana has two AAs in the state of Illinois, and we completed full-scope reviews for both AAs. Community profiles for the AAs are provided in the "Scope" section of the State of Illinois rating.

Ratings

FNB Pana's overall rating is based on the State of Illinois rating. The State of Illinois rating is based on the Decatur MSA AA and the IL Non-MSA AA full-scope reviews. If performance varied among loan products, results were weighted according to the number of loans originated. Performance in the Decatur MSA AA and business lending received the most weight. Refer to the "Scope" section under the state rating section for details regarding how the areas and loan products were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, 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 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.

State Rating

State of Illinois

CRA rating for the State of Illinois: Satisfactory

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- FNB Pana's distribution of loans to individuals of different income levels and businesses of different sizes within its AAs is reasonable.
- FNB Pana's distribution of loans among geographies of different income levels within in its AAs is reasonable.

Description of Institution's Operations in Illinois

FNB Pana has two AAs within the State of Illinois rating area. The AAs include:

- IL Non-MSA AA - Christian County, and two adjacent CTs (9592 and 9596) in Shelby County.
- Decatur, IL MSA (MSA 19500) - Macon County.

FNB Pana operates six offices in the State of Illinois. The bank opened two new branches in Decatur during the evaluation period. The Baltimore branch was opened in May 2019 and is in a middle-income CT. The Downtown branch was opened in November 2021 and is located in a low-income CT. Both branches offer full services.

In response to the COVID-19 pandemic, the bank offered Paycheck Protection Plan (PPP) loans to commercial borrowers to provide relief from hardships caused by the pandemic. During the evaluation period, the bank originated 304 PPP loans totaling \$10.3 million. These PPP loans were small loans to businesses and are included in the primary product review for this evaluation period. Bank management also noted that limited housing inventory, supply chain disruptions, and construction delays during the pandemic negatively impacted the volume of home mortgage lending in the AAs.

Refer to the community profiles for the State of Illinois below for detailed demographics and other performance context information for AAs that received full-scope reviews.

Decatur MSA AA

The Decatur MSA AA consists of Macon County. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies. During the 2021 evaluation period there were eight low-income CTs and five moderate-income CTs in the AA. During the 2022-2023 evaluation period there were five low-income CTs and nine moderate-income CTs in the AA.

The bank has three branches (50.0 percent) located in Macon County in this AA. The Blue Mound and Baltimore branches are in middle-income CTs, and the Downtown branch is located in a low-income CT.

Competition for deposits in the AA is strong. According to the June 30, 2023 FDIC Deposit Market Share Report, FNB Pana's deposits in the AA totaled \$90.2 million, or 3.8 percent of the area's total market share. FNB Pana ranked seventh out of 13 deposit-taking institutions in the AA. The three largest institutions for deposit market share in the AA were Busey Bank, Hickory Point Bank and Trust, and First Mid Bank & Trust, National Association, and accounted for a combined 60.9 percent of total deposits in the AA.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate in Macon County was 6.0 percent as of December 31, 2023, which was higher than the state and national unemployment rates of 4.5 percent and 3.5 percent, respectively, for the same period.

Industries driving the local economy include healthcare and social assistance, manufacturing, and education. The largest employers in Macon County are Archers Daniels Midland Company, Caterpillar Inc, Decatur Memorial Hospital, St. Mary's Hospital and Decatur Public Schools. In 2021 there were 6,283 businesses in the AA, of which 4,977 (79.2 percent) were small businesses with gross annual revenues of \$1 million or less. There were 7,138 businesses in 2023, 7,138 of which 5,915 (82.8 percent) were small businesses with gross annual revenues of \$1 million or less.

Housing

According to the 2015 ACS U.S. Census, there were 53,967 housing units in the AA, with 61.7 percent owner-occupied, 27.0 percent rentals, and 11.3 percent vacant. The median monthly gross rent was \$661. The median age of the housing units in the AA was 57 years and the median value was \$101,697.

According to the 2020 U.S. Census, there were 50,364 housing units in the AA, with 60.1 percent owner-occupied, 26.9 percent rentals, and 13.0 percent vacant. The median monthly gross rent was \$689. The median age of the housing units in the AA was 61 years and the median value was \$104,961. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. These factors add to the overall cost of homeownership and can have a negative impact on home affordability for low- and moderate-income families.

Community Contact

We reviewed one community contact employed by a government agency. The contact identified small business and farm loans as local credit needs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Decatur MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	23.5	14.7	32.4	29.4	0.0
Population by Geography	109,193	18.5	11.6	34.5	35.4	0.0
Housing Units by Geography	50,391	20.4	12.5	33.3	33.8	0.0
Owner-Occupied Units by Geography	30,995	9.4	9.5	37.9	43.2	0.0
Occupied Rental Units by Geography	13,920	39.5	16.0	26.3	18.1	0.0
Vacant Units by Geography	5,476	33.9	20.7	25.3	20.0	0.0
Businesses by Geography	6,283	27.2	11.9	27.9	33.0	0.0
Farms by Geography	334	7.8	4.2	44.0	44.0	0.0
Family Distribution by Income Level	27,658	22.9	16.9	20.1	40.1	0.0
Household Distribution by Income Level	44,915	25.4	15.2	17.1	42.2	0.0
Median Family Income MSA - 19500 Decatur, IL MSA		\$60,745	Median Housing Value			\$89,013
			Median Gross Rent			\$646
			Families Below Poverty Level			13.6%
<i>Source: 2015 ACS and 2021 D&B data.</i>						
<i>Note: Due to rounding, totals may not equal 100.0%.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Decatur MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	37	13.5	24.3	48.6	10.8	2.7
Population by Geography	103,998	7.2	21.9	51.6	18.5	0.8
Housing Units by Geography	50,364	8.1	25.2	50.0	15.4	1.2
Owner-Occupied Units by Geography	30,265	4.3	15.6	58.7	21.1	0.3
Occupied Rental Units by Geography	13,545	13.3	41.5	35.4	6.8	2.9
Vacant Units by Geography	6,554	15.0	36.1	40.0	6.7	2.1
Businesses by Geography	7,567	16.6	22.0	40.5	20.0	0.9
Farms by Geography	392	4.3	7.7	62.8	24.7	0.5
Family Distribution by Income Level	26,176	21.2	17.2	21.4	40.2	0.0
Household Distribution by Income Level	43,810	24.5	16.2	17.8	41.5	0.0
Median Family Income MSA - 19500 Decatur, IL MSA		\$71,270	Median Housing Value			\$90,061
			Median Gross Rent			\$689
			Families Below Poverty Level			11.3%
<i>Source: 2020 U.S. Census and 2023 D&B data</i>						
<i>Note: Due to rounding, totals may not equal 100.0%.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

IL Non-MSA AA

The IL Non-MSA AA consists of all CTs in Christian County and two adjacent CTs in Shelby County. This AA is in central Illinois, approximately 30 miles from both Springfield and Decatur. It is appropriate that the AA does not include all of Shelby County, as the bank has no branches there. However, Pana is only two miles from the Shelby County border. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies. There are no low-income CTs in the AA, and two moderate-income CTs in the AA. Between the two evaluation periods, CT #9584 changed from moderate-income to middle-income and CT #9583 changed from middle-income to moderate-income.

The bank has three branches (50.0 percent) located in Christian County in this AA. All three branches, in Assumption, Pana, and Taylorville, are in middle-income CTs.

Competition for deposits in the AA is strong. According to the June 30, 2023 FDIC Deposit Market Share Report, FNB Pana's deposits in the AA totaled \$181 million, or 11.7 percent of the area's total market share. FNB Pana ranked third out of 18 deposit-taking institutions in the AA. The two largest institutions for deposit market share were Shelby County State Bank and Peoples Bank & Trust and accounted for 34.9 percent of total deposits in the AA.

Employment and Economic Factors

According to the Bureau of Labor Statistics, as of December 31, 2023, the unemployment rate in Christian County was 5.1 percent, which was higher than state and national averages. Shelby County was 4.4 percent. State and national unemployment rates were 4.5 percent and 3.5 percent, respectively, for the same period.

Industries driving the local economy include healthcare and social assistance, manufacturing, and retail. The largest employers in Christian County are Taylorville Memorial Hospital, Walmart, Taylorville Correctional Center, and GSI. In 2021 there were 2,035 businesses in the AA, of which 1,606 (78.9 percent) were small businesses with gross annual revenues of \$1 million or less. There were 2,468 businesses in 2023, of which 2,038 (82.6 percent) were small businesses with gross annual revenues of \$1 million or less.

Housing

According to the 2015 ACS U.S. Census, there were 18,512 housing units in the AA, with 67.8 percent owner-occupied, 21.1 percent rentals, and 11.0 percent vacant. The median monthly gross rent was \$595. The median age of housing units in the AA was 61 years, and the median value was \$86,693.

According to the 2020 U.S. Census, there were 18,719 housing units in the AA, with 66.6 percent owner-occupied, 21.7 percent rentals, and 11.7 percent vacant. The median monthly gross rent was \$659. The median age of housing units in the AA was 59 years, and the median value was \$105,134.

Community Contact

We performed one community contact with a regional economic development organization serving the AA. The contact indicated that the community credit needs include home and business property improvement loans, down payment assistance, and support for organizations providing community services and economic development, particularly leadership sponsors.

Table A – Demographic Information of the Assessment Area						
Assessment Area: IL Non-MSA AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	16.7	75.0	8.3	0.0
Population by Geography	40,288	0.0	16.1	78.3	5.6	0.0
Housing Units by Geography	18,512	0.0	17.5	77.5	5.0	0.0
Owner-Occupied Units by Geography	12,550	0.0	14.8	79.3	5.8	0.0
Occupied Rental Units by Geography	3,925	0.0	22.5	74.6	2.9	0.0
Vacant Units by Geography	2,037	0.0	24.6	71.8	3.6	0.0
Businesses by Geography	2,035	0.0	15.3	79.3	5.4	0.0
Farms by Geography	309	0.0	3.2	83.2	13.6	0.0
Family Distribution by Income Level	10,846	21.5	18.9	23.2	36.4	0.0
Household Distribution by Income Level	16,475	23.3	17.1	19.2	40.4	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$85,417
			Median Gross Rent			\$595
			Families Below Poverty Level			10.7%
<i>Source: 2015 ACS and 2021 D&B data.</i>						
<i>Note: Due to rounding, totals may not equal 100.0%.</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: IL Non-MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	16.7	66.7	16.7	0.0
Population by Geography	39,847	0.0	16.4	69.2	14.4	0.0
Housing Units by Geography	18,719	0.0	19.4	65.9	14.7	0.0
Owner-Occupied Units by Geography	12,466	0.0	15.8	69.5	14.7	0.0
Occupied Rental Units by Geography	4,061	0.0	32.6	50.4	17.0	0.0
Vacant Units by Geography	2,192	0.0	15.6	74.5	9.9	0.0
Businesses by Geography	2,468	0.0	17.6	70.0	12.4	0.0
Farms by Geography	359	0.0	6.4	74.4	19.2	0.0
Family Distribution by Income Level	10,048	18.0	18.2	24.6	39.1	0.0
Household Distribution by Income Level	16,527	23.7	16.5	19.1	40.7	0.0
Median Family Income Non-MSAs - IL		\$68,958	Median Housing Value			\$101,493
			Median Gross Rent			\$659
			Families Below Poverty Level			7.7%
<i>Source: 2020 U.S. Census and 2023 D&B data</i>						
<i>Note: Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Illinois

FNB Pana has two AAs, and we completed full-scope reviews of both AAs.

LENDING TEST

FNB Pana's performance under the Lending Test in the state of Illinois is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, FNB Pana's performance in the AAs is adequate.

Distribution of Loans by Income Level of the Geography

FNB Pana exhibits reasonable geographic distribution of loans in the State. We gave more weight to the bank's business lending performance, given its higher volume of originations compared to home mortgage loans. We did not identify any unexplained conspicuous lending gaps in the AAs.

Home Mortgage Loans

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

FNB Pana's distribution of home mortgage loans to geographies of different income levels within its AAs is reasonable.

Decatur MSA AA

FNB Pana's distribution of home mortgage loans to geographies of different income levels within the Decatur MSA AA was reasonable.

During the 2021 evaluation period, FNB Pana's distribution of home mortgage loans to geographies of different income levels within the Decatur MSA AA was reasonable. The bank's percentage of home mortgage loans in the low-income CTs significantly exceeded both the percentage of the AA's owner-occupied housing units located in low-income CTs and the percentage of aggregate home mortgage lending that occurred in the low-income CTs. While the bank's percentage of home mortgage loans sampled in moderate-income CTs was significantly below the percentage of the AA's owner-occupied housing units located in moderate-income CTs, it was near the percentage of aggregate home mortgage lending that occurred in moderate-income CTs.

During the 2022-2023 evaluation period, FNB Pana's distribution of home mortgage loans to geographies of different income levels within the Decatur MSA AA was reasonable. While the bank's percentage of home mortgage loans in the low-income CTs was significantly below the percentage of the AA's owner-occupied housing units located in low-income CTs, it exceeded the percentage of aggregate home mortgage lending that occurred in the low-income CTs. The bank's percentage of home mortgage loans in the moderate-income CTs significantly exceeded both the percentage of the AA's owner-occupied

housing units located in moderate-income CTs and the percentage of aggregate home mortgage lending that occurred in the moderate-income CTs.

IL Non-MSA AA

FNB Pana's distribution of home mortgage loans to geographies of different income levels within the IL Non-MSA AA was excellent for both the 2021 and 2022-2023 evaluation periods. The bank's percentage of home mortgage loans in the moderate-income CTs significantly exceeded both the percentage of the AA's owner-occupied housing units located in the moderate-income CTs and the percentage of aggregate home mortgage lending that occurred in the moderate-income CTs. There were no low-income CTs in the IL Non-MSA AA.

Small Loans to Businesses

Refer to Table Q in 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.

FNB Pana's distribution of small loans to businesses in geographies of different income levels within the AAs was reasonable. We placed more weight on lending in the Decatur MSA AA given the higher volume of business loan originations in this AA.

Decatur MSA AA

FNB Pana's distribution of small loans to businesses in geographies of different income levels within the Decatur MSA AA was reasonable.

During the 2021 evaluation period, FNB Pana's distribution of small loans to businesses in geographies of different income levels within the Decatur MSA AA was reasonable. While the bank's percentage of small loans to businesses in the low-income CTs was below both the percentage of the AA's businesses located in low-income CTs and the percentage of aggregate business lending that occurred in the low-income CTs, the bank's percentage of small loans to businesses in the moderate-income CTs significantly exceeded both the percentage of the AA's businesses located in moderate-income CTs and the percentage of aggregate business lending that occurred in the moderate-income CTs. We placed more weight on the performance in low-income CTs given the significantly higher percentage of businesses located in the low-income CTs compared to the moderate-income CTs.

During the 2022-2023 evaluation period, FNB Pana's distribution of small loans to businesses in geographies of different income levels within the Decatur MSA AA was reasonable. The bank's percentage of small loans to businesses in the low-income CTs was near the percentage of the AA's businesses located in low-income CTs, but below the percentage of aggregate business lending that occurred in the low-income CTs. The bank's percentage of small loans to businesses in the moderate-income CTs was near the percentage of the AA's businesses located in moderate-income CTs and exceeded the percentage of aggregate business lending that occurred in the moderate-income CTs. In 2021 the Decatur MSA AA had eight low-income CTs and five moderate-income CTs. In 2022 there were only five low-income CTs and nine moderate-income CTs.

IL Non-MSA AA

FNB Pana's distribution of small loans to businesses in geographies of different income levels within the IL Non-MSA AA was reasonable. The bank's business lending performance during the 2021 evaluation period resulted in an overall rating for business lending in the IL Non-MSA AA of reasonable, despite poorer performance during the 2022-2023 evaluation period.

During the 2021 evaluation period, FNB Pana's distribution of small loans to businesses in geographies of different income levels within the IL Non-MSA AA was excellent. The bank's percentage of small loans to businesses in the moderate-income CTs significantly exceeded both the percentage of the AA's businesses located in moderate-income CTs and the percentage of aggregate business lending that occurred in the moderate-income CTs. There were no low-income CTs in the Non-MSA AA.

During the 2022-2023 evaluation period, FNB Pana's distribution of small loans to businesses in geographies of different income levels within the IL Non-MSA AA was poor. The bank's percentage of small loans to businesses in the moderate-income CTs was significantly below both the percentage of the AA's businesses located in moderate-income CTs and the percentage of aggregate business lending that occurred in the moderate-income CTs. There were no low-income CTs in the Non-MSA AA.

Distribution of Loans by Income Level of the Borrower

FNB Pana exhibits reasonable distribution of loans to individuals of different income levels and businesses different sizes, given the product lines offered by the bank. We gave more weight to the bank's business lending performance given the higher volume of originations compared to home mortgage loans. However, the bank's lower performance in home mortgage lending resulted in an overall rating of reasonable.

Based upon the data from tables from both evaluation periods, FNB Pana's distribution of small loans to businesses of different gross annual revenues was excellent in both AAs. The distribution of home mortgage loans by income level of borrower was poor in both AAs. Consideration was given to performance context factors including the elevated poverty and unemployment rates and the impact of the 2020-2023 COVID-19 pandemic during the evaluation period.

Home Mortgage Loans

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

FNB Pana's distribution of home mortgage loans to individuals of different income levels within its AAs was poor. Our analysis placed more weight on performance in the Decatur MSA AA given the higher volume of originations compared to the IL Non-MSA AA.

Decatur MSA AA

FNB Pana's distribution of home mortgage loans to individuals of different income levels within the Decatur MSA AA was poor.

During the 2021 evaluation period, FNB Pana's distribution of home mortgage loans individuals of different income levels within the Decatur MSA AA was poor. No home mortgage loans in our sample were originated to low-income borrowers, while 22.9 percent of the AA's families were low-income, and 8.7 percent of aggregate lending occurred to low-income families. The bank's percentage of home mortgage loans originated to moderate-income borrowers was near the percentage of the AA's families that were moderate-income and below the percentage of aggregate lending that occurred to moderate-income borrowers.

During the 2022-2023 evaluation period FNB Pana's distribution of home mortgage loans individuals of different income levels within the Decatur MSA AA was poor. While the bank's percentage of home mortgage loans originated to low-income borrowers was significantly below the percentage of the AA's families that were low-income, it was near the percentage of aggregate lending that occurred to low-income borrowers. The bank's percentage of home mortgage loans originated to moderate-income borrowers was significantly below both the percentage of the AA's families that were moderate-income and the percentage of aggregate lending that occurred to moderate-income borrowers.

In 2021, 39.8 percent of families were low- or moderate-income and 10.8 percent of families were below the poverty level. During the 2022-2023 evaluation period 38.4 percent of families were low- or moderate-income and 11.3 percent of families were below the poverty level. The unemployment rate in the Decatur MSA AA was higher than the state and national averages. The age and cost of housing in the Decatur MSA AA also presents challenges to home ownership.

IL Non-MSA AA

FNB Pana's distribution of home mortgage loans to individuals of different income levels within the IL Non-MSA AA was reasonable. Our analysis placed more weight on performance in the 2022-2023 evaluation period given the higher volume of originations compared to the 2021 evaluation period, as well as considering performance context factors including poverty and unemployment rates and the impact of the COVID 19 pandemic.

During the 2021 evaluation period, FNB Pana's distribution of home mortgage loans to individuals of different income levels within the IL Non-MSA AA was poor. No home mortgage loans in our sample were originated to low-income borrowers, and the bank's percentage of home mortgage loans originated to moderate-income borrowers was significantly below both the percentage of the AA's families that were moderate-income and the percentage of aggregate lending that occurred to moderate-income borrowers.

During the 2022-2023 evaluation period, FNB Pana's distribution of home mortgage loans individuals of different income levels within the IL Non-MSA AA was reasonable. The bank's percentage of home mortgage loans originated to low-income borrowers was below the percentage of the AA's families that were low-income, but it exceeded the percentage of aggregate lending that occurred to low-income borrowers. The bank's percentage of sampled home mortgage loans originated to moderate-income borrowers was near the percentage of the AA's families that were moderate-income, while it was significantly lower than the percentage of aggregate lending that occurred to moderate-income borrowers.

In 2021 40.4 percent of families were low- or moderate income and 10.7 percent of families were below the poverty level. During the 2022-2023 evaluation period 36.2 percent of families were low- or moderate-income and 7.7 percent of families were below poverty levels. The unemployment rate in the IL Non-

MSA AA was higher than the state and national averages. The age and cost of housing in the Decatur MSA AA also presents challenges for homeownership.

Small Loans to Businesses

Refer to Table R in 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.

FNB Pana's distribution of loans to businesses of different sizes within its AAs is excellent.

Decatur MSA AA

FNB Pana's distribution of loans to businesses of different sizes during both the 2021 and 2022-2023 evaluation periods in the Decatur MSA AA was excellent. The percentage of loans the bank originated to businesses with \$1 million or less in annual gross revenue exceeded the percentage of AA businesses with \$1 million or less in annual gross revenue and significantly exceeded the percentage of aggregate lending that occurred to businesses with \$1 million or less in annual gross revenue.

IL Non-MSA AA

FNB Pana's distribution of loans to businesses of different sizes during both the 2021 and 2022-2023 evaluation periods in the IL Non-MSA AA was excellent. The percentage of loans the bank originated to businesses with \$1 million or less in annual gross revenue exceeded the percentage of AA businesses with \$1 million or less in annual gross revenue and significantly exceeded the percentage of aggregate lending that occurred to businesses with \$1 million or less in annual gross revenue.

RESPONSES TO COMPLAINTS

FNB Pana did not receive any complaints regarding its CRA performance during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/1/2021-12/31/2023	
Bank Products Reviewed:	Home mortgage, small business.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Illinois		
IL Non-MSA AA	Full-scope	
Decatur MSA AA	Full-scope	

Appendix B: Summary of MMSA and State Ratings

Overall Bank:	Lending Test Rating
First National Bank of Pana	Satisfactory
State:	
Illinois	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Low-Income Geography: A census tract with a median family income that is less than 50 percent of the area median family income.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: 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 Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending
Decatur MSA	20	2,844	100.0	3,390	9.4	20.0	4.2	9.5	5.0	5.1	37.9	5.0	37.9	43.2	70.0	52.7	0.0	0.0	0.0
IL Non-MSA	20	1,354	100.0	863	0.0	0.0	0.0	14.8	40.0	15.8	79.3	60.0	77.9	5.8	0.0	6.4	0.0	0.0	0.0

Source: 2015 ACS Census, 01/01/2021 - 12/31/2021 bank data, 2021 HMDA aggregate data.
 Note: Due to rounding, totals may not equal 100.0%.

Table O: 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 Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending	% of Owner-Occupied Housing Units	% of Bank Loans	% of Aggregate Lending
Decatur MSA	96	12,074	100.0	2,123	4.5	3.1	2.4	13.1	29.2	11.7	60.3	39.6	63.1	21.9	28.1	22.5	0.3	0.0	0.4
IL Non-MSA	90	8,591	100.0	576	0.0	0.0	0.0	15.8	26.7	18.8	69.5	62.1	62.0	14.7	12.2	19.3	0.0	0.0	0.0

Source: 2020 U.S. Census, 01/01/2022 - 12/31/2023 bank data, 2022 HMDA aggregate data.
 Note: Due to rounding, totals may not equal 100.0%.

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	# of Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending
Decatur MSA	20	2,844	100.0	3,390	22.9	0.0	8.7	16.9	15.0	20.5	20.1	5.0	21.4	40.1	75.0	30.6	0.0	5.0	18.8
IL Non-MSA	20	1,354	100.0	863	21.5	0.0	10.4	18.9	10.0	22.4	23.2	25.0	20.3	36.4	65.0	27.1	0.0	0.0	19.8

*Source: 2015 ACS Census, 01/01/2021 - 12/31/2021 bank data, 2021 HMDA aggregate data.
Note: Due to rounding, totals may not equal 100.0%.*

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	# of Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending	% of AA Families	% of Bank Loans	% of Aggregate Lending
Decatur MSA	96	12,010	100.0	2,180	21.2	13.5	14.4	17.2	11.5	24.1	21.3	6.3	19.2	40.8	38.5	21.5	0.0	30.2	20.8
IL Non-MSA	90	8,591	100.0	576	18.0	14.4	13.9	18.2	15.6	24.3	24.6	17.8	21.7	39.1	50.0	20.3	0.0	2.2	19.8

*Source: 2020 U.S. Census, 01/01/2022 - 12/31/2023 bank data, 2022 HMDA aggregate data.
Note: Due to rounding, totals may not equal 100.0%.*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	# of Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending
Decatur MSA	20	4,530	100.0	1,301	27.2	20.0	26.8	11.9	15.0	8.7	27.9	15.0	29.2	33.0	50.0	35.3	0.0	0.0	0.0
IL Non-MSA	20	2,224	100.0	297	0.0	0.0	0.0	15.3	20.0	14.1	79.3	75.0	79.5	5.4	5.0	6.4	0.0	0.0	0.0

*Source: 2021 D&B data, 01/01/2021 - 12/31/2021 bank data, 2021 CRA aggregate data.
Note: Due to rounding, totals may not equal 100.0%.*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	# of Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending
Decatur MSA	20	2,830	100.0	1,190	16.6	15.0	20.2	22.0	20.0	18.9	40.5	50.0	40.0	20.0	15.0	20.6	0.9	0.0	0.3
IL Non-MSA	20	1,100	100.0	334	0.0	0.0	0.0	17.6	10.0	15.6	70.0	85.0	70.1	12.4	5.0	14.4	0.0	0.0	0.0

*Source: 2023 D&B data, 01/01/2022 - 12/31/2023 bank data, 2022 CRA aggregate data.
Note: Due to rounding, totals may not equal 100.0%.*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available		
	# of Bank Loans	\$(000s) of Bank Loans	% of Total Bank Loans	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of AA Businesses	% of Bank Loans	
Decatur MSA	20	4,530	100.0	1,301	79.2	95.0	50.4	5.4	5.0	15.4	0	
IL Non-MSA	20	2,224	100.0	297	78.9	95.0	54.2	4.7	5.0	16.4	0	

*Source: 2021 D&B data, 01/01/2021 - 12/31/2021 bank data, 2021 CRA aggregate data.
Note: Due to rounding, totals may not equal 100.0%.*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available		
	# of Bank Loans	\$(000s) of Bank Loans	% of Total Bank Loans	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of AA Businesses	% of Bank Loans	
Decatur MSA	20	2,830	100.0	1,190	82.6	90.0	55.0	4.3	10.0	13.1	0	
IL Non-MSA	20	1,100	100.0	334	82.6	95.0	57.8	3.7	5.0	13.7	0	

*Source: 2023 D&B data, 01/01/2022 - 12/31/2023 bank data, 2022 CRA aggregate data.
Note: Due to rounding, totals may not equal 100.0%.*