



PUBLIC DISCLOSURE

May 13, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Brookfield
14993

9136 Washington Avenue
Brookfield, IL 60513

Office of the Comptroller of the Currency

Downers Grove Office
2001 Butterfield Road
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 major factors that support this rating include:

- First National Bank of Brookfield's (FNBB or the bank) loan-to-deposit (LTD) ratio is more than reasonable.
- FNBB originated or purchased a majority of its loans within its assessment area (AA).
- FNBB's distribution of home mortgage loans across geographies of different income levels within the AA is good.
- FNBB's distribution of home mortgage loans to individuals of different income levels within the AA is poor.
- FNBB did not receive any complaints regarding its CRA performance during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is more than reasonable. During the eight-quarter period of the evaluation cycle, the bank's quarterly loan-to-deposit ratio averaged 97.9 percent.

The OCC compared FNBB's quarterly average loan-to-deposit-ratio to seven similarly situated banks headquartered in the AA with total assets between \$243.7 million and \$439.6 million. The similarly situated banks had a quarterly average of 69.5 percent ranging from 47.5 percent to 97.9 percent. FNBB ranked the highest amongst the eight banks.

Lending in Assessment Area

A majority of the bank's loans are inside its AA.

FNBB originated and purchased 68.8 percent of its loans inside the bank's AA during the evaluation period. This analysis is 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	191	63.5	110	36.5	301	76,945,000	66.8	38,170,000	33.2	115,115,000
2022	109	80.7	26	19.3	135	65,695,000	86.4	10,340,000	13.6	76,035,000
Total	300	68.8	136	31.2	436	142,640,000	74.6	48,510,000	25.4	191,150,000
<i>Source: Home Mortgage Disclosure Act (HMDA) data for 2021-2022</i>										

Description of Institution

FNBB is a \$331.4 million nationally chartered single-state bank located in the Village of Brookfield, Illinois, approximately 13 miles southwest of the City of Chicago. FNBB is a wholly owned subsidiary of Brookfield Bancshares, Inc., a one-bank holding company. The bank operates out of its sole office in Brookfield which is in an upper-income geography. FNBB maintains two deposit-taking automated teller machines (ATMs), one is located inside the bank is offset from the lobby area and the other is located across the street from the bank at the ATM Plaza. There have been no branch openings or closings since the prior CRA evaluation.

The bank offers traditional loan and deposit products, focusing on home loans. As of December 31, 2022, the bank's loan portfolio totaled \$286.4 million, or 86.4 percent of its total assets. Tier 1 capital was \$33.3 million with a tier 1 leverage ratio of 10.3 percent. The table below outlines the bank's loan portfolio mix.

According to FNBB, their business strategy is to utilize local deposits to fund the bank's two primary lending products: residential real estate and commercial loans. The bank also offers competitive HELOC products and bridge loans. In 2020, the bank added an experienced mortgage group to offer long-term fixed rate mortgages in the secondary market.

Loan Portfolio Summary by Loan Product	
Loan Category	% of Outstanding Dollars
Home Loans	62.9%
Business Loans, including Commercial Real Estate	29.5%
Consumer loans	7.6%
Farm Loans, including farmland	0.0%

Source: December 31, 2022, Uniform Bank Performance Report (UBPR)

The bank does not have any legal impediments that hinder their ability to meet the needs of the AA. The bank's prior CRA rating was "Satisfactory" as detailed in the performance evaluation dated March 15, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

FNBB's performance was evaluated using Small Bank CRA procedures. The evaluation period was January 1, 2021, through December 31, 2022. Examiners reviewed the bank's home mortgage loans, which is the primary product originated during the evaluation period. Examiners utilized the 2021 and 2022 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LAR) for this evaluation. The OCC previously validated the accuracy of this data. Other reports and sources utilized include the Report of Condition and Income (Call Report) dated December 31, 2022; the FDIC Deposit Market Share Report dated June 30, 2022; the 2015 and 2020 American Community Survey (ACS); 2021 and 2022 HMDA aggregate peer data; and June 2021 and 2022 Dun and Bradstreet reports.

Due to changes between the 2015 U.S Census American Community Survey (ACS) and the 2020 U.S. Census, examiners performed separate analysis periods for 2021 and 2022 to evaluate geographic

distribution and borrower income criteria. Performance in Tables O and P, in Appendix C reflect data from both analysis periods.

Selection of Areas for Full-Scope Review

FNBB has one AA, which received a full-scope review.

Ratings

FNBB's overall rating is based on the full-scope review of the AA in the State of Illinois.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank 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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Illinois

CRA rating for the State of Illinois: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- FNBB's distribution of home mortgages loans across geographies of different income levels within the AA is good.
- FNBB's distribution of home mortgage loans to individuals of different income levels within the AA is poor.
- FNBB did not receive any complaints regarding its CRA performance during the evaluation period.

Description of Institution's Operations in Illinois

FNBB's 2021 AA includes all 1319 CTs in Cook County; 253 low-income CTs, 381 moderate-income CTs, 317 middle-income CTs, 355 upper-income CTs, and 13 CTs with unspecified income levels. According to 2015 American Community Service (ACS) data from the U.S. Census, there were 5.2 million persons residing in the AA, of which 14.5 percent live in low-income CTs, 29.9 percent live in moderate-income CTs, 26.9 percent live in middle-income CTs, 28.3 percent live in upper-income CTs, and 0.4 percent live in CTs with unspecified income levels. The AA contains 1.2 million families, of which 28.0 percent are low-income, 17.0 percent are moderate-income, 17.7 percent are middle-income, and 37.3 percent are upper-income. With the new mortgage group, the bank expanded their AA in 2022 to include all 216 CTs in DuPage County. The AA is located within the Chicago-Naperville-Evanston IL metropolitan division (MD).

As of 2022 the AA contains a total of 1551 CTs; 226 low-income CTs, 365 moderate-income CTs, 459 middle-income CTs, 485 upper-income CTs and 16 unspecified-income CTs. According to 2020 ACS data from the U.S. Census, there are 6.2 million persons residing in the AA, of which 11.4 percent live in low-income CTs, 23.8 percent live in moderate-income CTs, 32.1 percent live in middle-income CTs, 32.3 percent live in upper-income CTs and .4 percent live in unspecified-income CTs. The AA contains 1.4 million families, of which 25.0 percent are low-income, 16.4 percent are moderate-income, 18.3 percent are middle-income and 40.3 percent are upper-income. The AA is contiguous and does not arbitrarily exclude any low- or moderate-income areas.

Competition

Competition within the AA is strong, including local, regional, and nationwide financial institutions of all sizes that operate within Cook and DuPage County. The Federal Deposit Insurance Corporation (FDIC) deposit market share report from June 30, 2021, included 100 financial institutions taking deposits within the 2021 AA. The bank ranked 66-of-100 financial institutions with a deposit share of

0.05 percent. Further, the 2021 HMDA lending market share report reflected FNBB ranked 128-of-702 with a 0.08 percent market share in Cook County. As of June 30, 2022, the FDIC deposit market share report included 108 financial institutions taking deposits within the 2022 AA. The bank ranked 67-of-108 financial institutions with a deposit share of 0.05 percent. Further, the 2022 HMDA lending market share report reflected FNBB ranked 143-of-701 with a 0.08 percent market share in Cook and DuPage Counties.

State of Illinois

Table A – Demographic Information of the Assessment Area						
Assessment Area: Brookfield 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,319	19.2	28.9	24.0	26.9	1.0
Population by Geography	5,236,393	14.5	29.9	27.0	28.3	0.4
Housing Units by Geography	2,176,549	14.4	27.9	26.3	30.8	0.5
Owner-Occupied Units by Geography	1,107,485	6.9	24.2	32.0	36.7	0.2
Occupied Rental Units by Geography	835,474	20.8	32.1	20.9	25.3	0.9
Vacant Units by Geography	233,590	27.5	30.5	19.1	22.3	0.6
Businesses by Geography	474,429	8.6	21.7	24.6	44.3	0.7
Farms by Geography	4,567	7.2	23.4	29.2	40.0	0.2
Family Distribution by Income Level	1,184,857	28.0	17.0	17.7	37.2	0.0
Household Distribution by Income Level	1,942,959	29.2	15.8	16.7	38.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$245,250
			Median Gross Rent			\$1,038
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Brookfield AA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,551	14.6	23.5	29.6	31.3	1.0
Population by Geography	6,208,418	11.4	23.8	32.1	32.3	0.4
Housing Units by Geography	2,559,710	11.5	22.6	31.5	33.8	0.5
Owner-Occupied Units by Geography	1,391,239	6.0	19.5	35.4	38.8	0.2
Occupied Rental Units by Geography	944,549	17.1	26.6	27.7	27.7	0.9
Vacant Units by Geography	223,922	22.2	25.4	23.4	28.1	0.8
Businesses by Geography	749,946	7.1	17.9	30.0	44.4	0.6
Farms by Geography	7,258	6.8	19.7	32.5	40.7	0.3
Family Distribution by Income Level	1,424,186	25.0	16.5	18.3	40.3	0.0
Household Distribution by Income Level	2,335,788	27.0	15.4	16.4	41.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$92,622	Median Housing Value			\$293,663
			Median Gross Rent			\$1,245
			Families Below Poverty Level			9.1%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Population

According to the 2015 ACS Census data, the percentage of families living below the poverty level during the 2021 evaluation period and AA was 13.2 percent and families in the low- and moderate-income CTs that live below the poverty level total 52.6 percent.

According to the 2020 U.S. Census data, during the 2022 evaluation period 9.1 percent of families were living below the poverty level, and families in the low- and moderate- income CTs that live below the poverty level total 41.0 percent.

Employment and Economic Factors

According to the Bureau of Labor Statistics, as of December 31, 2021, unemployment rates in the 2021 AA was 7.0 percent, which is higher than the state and national unemployment rates of 5.8 percent and 3.6 percent, respectively. As of December 31, 2022, unemployment rates in Cook County significantly improved to 4.9 percent and DuPage County with an unemployment rate of 3.5 percent. Unemployment rates in the 2022 AA were comparable to the 4.6 percent and 3.6 percent state and national rates, respectively.

Annual Unemployment Rates			
Area	2021	2022	Peak
Cook	7.0%	4.9%	8.8%
DuPage	NA	3.5%	4.2%
State of Illinois	6.1%	4.6%	7.8%
National	5.5%	3.6%	6.4%

Source: U.S. Department of Labor, Bureau of Labor Statistics. Rates are not seasonally adjusted. Unemployment rates are as of December 31 of each year. Peak is as of March 1, 2023.

Community Contact

The OCC relied on information provided from a community contact, that is an affordable housing organization that serves Cook and DuPage counties, completed during the evaluation period. According to this community contact, affordable housing is a need throughout the Chicago metropolitan area. This community contact stated that banks should be more diligent and flexible, and tailor loans to match neighborhood needs related to the age of the housing stock and needs of the residents.

Scope of Evaluation in Illinois

Examiners utilized full-scope procedures to assess the bank's performance.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the AAs is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits Satisfactory geographic distribution of loans in the State.

More weight was placed on performance during the 2022 evaluation period due to the larger AA.

Home Mortgage Loans

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

FNBB's geographic distribution of home mortgage loans within its AA is good.

During the 2022 evaluation period, FNBB originated or purchased 7.3 percent of its home mortgage loans in low-income CTs, which is above the 6.0 percent of the AA's owner-occupied housing units

located in low-income CTs and above the 5.9 percent of aggregate home mortgage lending that occurred in low-income CTs. FNBB originated or purchased 18.3 percent of home mortgage loans in moderate-income CTs, which is below the 19.5 percent of the AA's owner-occupied housing units located in the moderate-income CTs and near to the 18.1 percent of aggregate home mortgage lending that occurred in moderate-income CTs. Although below the percentage for owner-occupied housing in the moderate-income CTs, FNBB is 93.8 percent of the comparator which is reasonable for the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans to individuals of different income levels given the product lines offered by the bank.

Home Mortgage Loans

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

FNBB exhibits poor distribution of home mortgage loans in the AA. During the most current evaluation period there was no lending to low-income borrowers. The bank originated or purchased 7.3 percent of its home mortgage loans to moderate-income borrowers which is significantly below the 16.5 percent of families that are moderate-income and the 20.6 percent of aggregate home mortgage lending that occurred to moderate-income borrowers.

The OCC evaluated the disparity between median family incomes of families in the AA and the cost of housing. Based upon the information in table A above, low-income families earned less than \$46,311 and moderate-income families earned less than \$74,097. One method used to determine housing affordability, assumed a maximum monthly principal and interest payment of no more than 30 percent of the borrower income. Using the U.S.C 2020 Median Family Income for the Chicago MSA, a maximum monthly principal and interest payment of \$1,158 for low-income borrowers and a maximum principal and interest payment of \$1,852 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, not considering any downpayment, homeowners' insurance, real estate taxes or additional monthly expenses, the mortgage loan amount for a home at the MSA median value would be \$215,714 for low-income borrowers and \$344,994 for moderate-income borrowers. Both low-income and moderate-income borrowers would be challenged to afford a loan in the AA.

The median housing age of housing stock in the low- and moderate-income CTs was 70 years. 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 individuals,

Responses to Complaints

FNBB received no 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:	1/1/2021-12/31/2022	
Bank Products Reviewed:	Home mortgage, small business, small farm, consumer loans) (Community development loans, qualified investments, community development services)	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Illinois	Full-Scope	2021- All of Cook County, 2022 All of Cook and DuPage Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS		The First National Bank of Brookfield	
Overall Bank:		Lending Test Rating	
The First National Bank of Brookfield		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 the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

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

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

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

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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table 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 Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Brookfield 2021	191	76,945	100.0	241	6.9	2.6	5.4	24.2	11.0	19.3	32.0	26.7	29.7	36.7	59.2	45.4	0.2	0.5	0.2	
<i>Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Brookfield 2022	109	65,695	100.0	146	6.0	7.3	5.9	19.5	18.3	18.1	35.4	27.5	33.8	38.8	46.8	41.8	0.2	0.0	0.3	
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Brookfield 2021	191	76,945	100.0	241	28.0	4.7	5.9	17.0	5.8	15.6	17.7	11.5	20.6	37.2	52.4	41.4	0.0	25.7	16.4
<i>Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Brookfield 2022	109	65,695	100.0	146	25.0	0.0	9.6	16.5	7.3	20.6	18.3	6.4	19.6	40.3	13.8	32.9	0.0	72.5	17.4
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.