



PUBLIC DISCLOSURE

March 27, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

GN Bank
Charter Number: 703395

4619 S. King Drive
Chicago, Illinois 60653

Office of the Comptroller of the Currency

2001 Butterfield Road, Suite 400
Downers Grove, Illinois 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.

Table of Contents

Overall CRA Rating.....	1
Description of Institution.....	2
Scope of the Evaluation.....	3
Discriminatory or Other Illegal Credit Practices Review.....	3
Lending Test	4
State Rating	4
State of Illinois.....	6
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Needs to Improve**.

The lending test is rated: Needs to Improve.

The major factors that support this rating include:

- A substantial majority of the bank's loans are outside its assessment area (AA).
- The bank did not originate a sufficient volume of loans to conduct a geographic or borrower distribution of loans.
- The bank's quarterly average loan-to-deposit (LTD) ratio is considered reasonable.
- The bank did not receive any CRA-related complaints 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 (LTD) ratio is reasonable. The bank's quarterly average LTD ratio since the end of the last performance evaluation period, June 30, 2018 to December 31, 2021, was 54.32 percent. During this period, the LTD ratio reached a low of 36.67 percent and a high of 90.59 percent. There are fourteen peer banks operating within the bank's AA with assets \$200 million or less. These peer banks had quarterly average LTD ratios ranging from a low of 13.30 percent to the highest at 113.26 percent during this same time frame.

Lending in Assessment Area

A substantial majority of the bank's loans are outside its AA. The bank originated and purchased 3.4 percent of its total loans inside the bank's AAs during the evaluation period. The OCC performed this analysis at the bank level rather than at the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

During 2021, the bank purchased 294 unsecured consumer loans totaling approximately \$15.1 million. The loans are primarily unsecured consumer related loans made to medical and healthcare professionals located nationwide.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Commercial	4	9.1	40	90.9	44	600	2.3	25,156	97.7	25,756
Consumer	8	2.6	305	97.5	313	86	0.6	15,186	99.4	15,272
Total	12	3.4	345	96.4	357	686	1.7	40,342	98.3	41,028

Description of Institution

GN Bank (the bank), formerly known as Illinois-Service Federal Savings and Loan Association, was acquired by Group Nduom in April 2016, with a name change effective July 2018. The bank is a minority-owned depository institution (MDI) organized as a privately owned Federal Savings Association, headquartered in Chicago, IL.

The bank delineated one AA consisting of 184 census tracts (CT) located in the southern portion of Cook County within the Chicago-Naperville-Evanston, IL Metropolitan Division (MD) of the Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area (MSA). The bank has one AA, referred to as the Chicago AA, which includes the southern portion of Cook County. The AA is comprised of 91 (49.5 percent) low-income tracts, 66 (35.9 percent) moderate-income tracts, 15 (8.2 percent) middle-income tracts, seven (3.8 percent) upper-income tracts, and five (2.7 percent) with unknown income information. GN Bank operates in a single state with the main office located in Chicago's Grand Boulevard community, in a middle-income census tract. The Chatham branch was closed in 2020. Customers have access to 24-hour automated teller machines (ATM).

The bank has seen a steady decline in total assets and deposits during the evaluation period. As of December 31, 2021, GN Bank reported total assets of \$84.7 million, total deposits of \$74.3 million, and net loans and leases of \$67.3 million. Total loans represented 78.2 percent of total assets. The bank's loan portfolio mix was comprised of 52.6 percent commercial loans, 27.3 percent residential and 20.3 percent consumer loans. As of December 31, 2021, the bank's Tier 1 capital was \$10.2 million. Total deposits as of December 31, 2019 were \$126 million and total assets were \$136.9 million; as of December 31, 2020 total deposits were \$85 million and total assets were \$99.7 million.

In response to the COVID-19 pandemic, the bank provided relief to its customers by modifying loans to delay payments and defer interest. Bank management developed a 90-day principal and interest payment deferral program for borrowers that were experiencing financial hardship. Borrowers had an option to extend payments for an additional 90 days and resumed payment once the 90 day deferral program ended.

Although not considered a primary loan product, during the evaluation period, the bank originated 34 real estate mortgages totaling \$19.4 million. Of the 34 originations, nine (26.5 percent) were in the bank's AA, and all were located in either low- or moderate-income CTs.

GN Bank is a consumer-driven bank, with products including checking and savings accounts, certificates of deposit, personal and consumer loans, and commercial and small business loans. Beyond lending and deposits, the bank offers account access alternatives such as online banking, mobile banking, as well as 24 hour ATMs at each location.

GN Bank's business strategy focuses on attracting loan participations with well established, larger banks and national lending organizations. The bank has a long-standing designation as a Community Development Financial Institution (CDFI). The goal for CDFI institutions is to provide financial services to distressed communities, such as the southside of Chicago, IL. Historically, the bank's primary lending has been retail-focused, including residential real estate lending.

The OCC assigned GN Bank a "Satisfactory" rating in its last CRA evaluation dated October 1, 2018. The bank has been operating under a formal enforcement action due to the financial condition of the

bank; however, this action's capital constraints has not impeded the bank's lending capacity as demonstrated by significant consumer loan purchase activity during the review period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test was January 1, 2019 through December 31, 2021. Based on the bank's internal reports for lending activity and discussions with management, the OCC determined the primary loan products were consumer and small business loans. During the evaluation period, the bank did not originate a sufficient number of loans to provide a meaningful analysis for the Lending Test.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA are combined and evaluated as a single AA.

Ratings

The bank's overall rating is based on the state of Illinois state rating. The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination.

Under interagency small bank CRA procedures, a small bank's rating is determined through a blend of analyses. At the institution level, examiners assess the reasonableness of the bank's LTD ratio and the bank's record of lending within its AA compared to lending outside of its AA. Within each rating area, examiners assess the distribution of lending to geographies and to borrowers of different income levels. As GN Bank did not originate or purchase a sufficient volume of loans to conduct a meaningful analysis of lending to geographies and to borrowers of different income levels, the bank's CRA rating is based solely on its LTD ratio and record of lending in its AA compared to lending outside its AA.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this bank (or any affiliate whose loans have been considered as part of the bank'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: Needs to Improve.

The Lending Test is rated: Needs to Improve.

The major factors that support this rating include:

- The bank did not originate a sufficient volume of loans to conduct a geographic or borrower distribution of loans.
- The bank did not receive any CRA-related complaints during the evaluation period.

Description of Institution's Operations in Illinois

GN Bank operates two branches in the state of Illinois. The main office and stand-alone drive-thru are located in Chicago, IL, both in middle-income geographies. The main branch offers traditional banking hours by appointment only, and the drive-up is open Monday through Friday from 8:30 a.m. to 4:30 p.m. The Chatham office has a drive-up facility open Monday through Friday from 8:30 a.m. to 4:30 p.m. There were no changes in the AA during the examination period. The AA meets the requirements of the CRA and does not arbitrarily exclude low- or moderate-income geographies.

Competition among financial institutions in the bank's AA is very strong. GN Bank competes with several large, regional, and community banks that are well established throughout the community. According to the FDIC June 30, 2021, Deposit Market Share Report, GN Bank has a deposit market share of less than 1 percent and ranks 83rd out of 100 financial institutions within Cook County. The top four banks by deposit share within the AA include JPMorgan Chase Bank, N.A. (23.8 percent), BMO Harris Bank, N.A. (16.1 percent), Bank of America, N.A. (12.2 percent), and The Northern Trust Company (8.3 percent) with a combined deposit market share of 60.4 percent.

The bank is not subject to the reporting requirements of the Home Mortgage Disclosure Act (HMDA). However, based on 2021 peer mortgage data, market share data for all HMDA reporting institutions in the AA shows there were 367 lending institutions within the AA competing for mortgage loans. The four largest competitors were Guaranteed Rate Inc., Rocket Mortgage, U.S. Bank, N.A., and Loandepot.com, LLC. To illustrate competition within the AA for small business lending, 2021 peer small business data shows there were 293 lending institutions within the AA competing for small business loans. The largest competitor was JP Morgan Chase, N.A. who originated 37,824 loans with a market share of 20.1 percent. The second largest competitor was American Express National Bank, who originated 26,367 loans with a market share of 14 percent.

The median housing value of owner-occupied housing units for the Chicago AA was \$150,837 in 2021. Based on the information in the above table, low-income families earned less than \$37,512; and

moderate-income families earned less than \$60,019. One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculated to a maximum monthly mortgage payment of \$938 for low-income borrowers and \$1,500 for moderate-income borrowers. Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the Chicago AA median housing value would have been \$810. Examiners took into consideration families living below the poverty level who often have difficulty qualifying for home mortgage products without flexible terms or reduced closing costs. The percentage of families living below the poverty level is 26.8 percent.

Based on data from the U.S. Bureau of Labor Statistics, the annual unemployment rate for Cook County was 3.9 percent in 2019, 10.4 percent in 2020, and 7.0 percent in 2021. The highest unemployment rate was 19 percent in April 2020, which was the start of the pandemic. Major employers in the AA included: Advocate Health Care System; Northwestern Memorial Healthcare; Amita Health; University of Chicago; JPMorgan Chase & Co.; and Amazon.

Examiners conducted community contact interviews to determine general banking and credit needs within the community and opportunities for local financial institutions to meet those needs.

Examiners spoke with a contact from an organization that works to foster revitalization of low- to moderate-income communities such as Auburn Gresham, Englewood, and West Chatham. The pandemic had a significant impact on these communities. The contact stated there was a loss of basic service providers such as grocery stores, healthcare and pharmacies, and banking institutions. Commercial properties remain vacant, and residents are banking more through currency exchangers and payday lenders. Community needs include affordable housing, workforce development, and redevelopment of long vacant properties.

Examiners spoke with a contact from a citywide coalition that is focused on community development. The coalition is focused on the development and rehabilitation of housing for low-income community residents. The cost of housing and living has increased to the point where people in neighborhoods all over the city are struggling to find affordable housing. The contact stated there are properties available within communities, but potential home buyers continue to be out bid by local investors.

Examiners spoke with a contact from a local CDFI that provides financing and technical assistance for community stabilization and development that benefit low- to moderate-income neighborhoods, families, and individuals in metropolitan Chicago. The contact stated the closure of many larger big box stores had a devastating impact on the southside and westside communities of Chicago. The contact stated that banking services and products are available to individuals; but many individuals have part-time employment, and their income hinders the ability to qualify for a loan.

Examiners utilized a community contact from a community development corporation that builds affordable, single-family homes for low-income families on the westside of Chicago. The organization provides programs that equip participants with basic skills for entry level employment, trade programs, and GED programs. The contact stated that larger banks have a competitive advantage in originating loans from low- to moderate-income buyers. The contact commented that local community banks offer higher savings rates and that tends to encourage community members to save money and build wealth.

The OCC also considered information provided by another regulatory agency in a recent community contact with a representative of organization that provides homeowner counseling including first-time

homebuyer, pre-purchase, rental, and foreclosure prevention. The organization provides financial coaching, workforce development, and other community services. The contact stated there is a significant demand for affordable housing. Individuals have banking and credit needs that are going unmet due to language and documentation issues.

Chicago AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago, IL AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	184	49.5	35.9	8.2	3.8	2.7
Population by Geography	469,265	47.7	40.0	7.8	3.1	1.4
Housing Units by Geography	229,321	49.3	37.7	8.4	2.8	1.8
Owner-Occupied Units by Geography	68,222	31.9	52.1	11.5	3.6	0.9
Occupied Rental Units by Geography	115,186	55.0	32.0	8.0	2.4	2.5
Vacant Units by Geography	45,913	60.7	30.7	5.0	2.4	1.1
Businesses by Geography	35,371	40.3	43.2	10.6	3.9	2.0
Farms by Geography	213	37.1	51.2	8.0	1.9	1.9
Family Distribution by Income Level	100,414	49.0	18.3	14.7	18.0	0.0
Household Distribution by Income Level	183,408	49.1	17.1	14.7	19.1	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$150,837
			Median Gross Rent			\$859
			Families Below Poverty Level			26.8%
<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>						

Scope of Evaluation in Illinois

The bank has only one AA, which was used for a full-scope review.

LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Needs to Improve. The bank originated a minimal number of small business and consumer loans in the AA during the three year evaluation period. Given the low volume of lending within the AA, examiners were unable to perform a meaningful analysis of the geographic and borrower distribution.

Distribution of Loans by Income Level of the Geography

Examiners were unable to conclude on the Distribution of Loans by Income Level of the Geography.

Small Loans to Businesses

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

Consumer Loans

Refer to Table U in appendix D for the facts and data about the geographic distribution of the bank's consumer loan originations and purchases.

Lending Gap Analysis

Examiners were unable to perform a lending gap analysis based on the low volume of lending during the evaluation period.

Distribution of Loans by Income Level of the Borrower

Examiners were unable to conclude on the Distribution of Loans by Income Level of the Borrower.

Small Loans to Businesses

Refer to Table R in appendix D for the facts and data about the borrower distribution of the bank's originations and purchases of small loans to businesses.

Consumer Loans

Refer to Table V in appendix D for the facts and data about the borrower distribution of the bank's consumer loan originations and purchases.

Responses to Complaints

The bank did not receive any CRA-related complaints 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 that received comprehensive examination review, designated by the term “full-scope.”

Time Period Reviewed:	January 1, 2019 through December 31, 2021	
Bank Products Reviewed:	Small Business and Consumer Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None.	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Illinois		
Chicago-Naperville-Elgin, IL-IN-WI MSA (Partial)	Full-scope	Southern Portion of Cook County with includes 184 census tracts.

Appendix B: Summary of State Ratings

RATINGS		GN Bank
Overall Bank:	Lending Test Rating	
GN Bank	Needs to Improve	
State:		
Illinois	Needs to Improve	

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.

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.

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.

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.

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.

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Chicago, IL AA	4	600	100.0	15,393	40.3	50.0	42.3	43.2	25.0	44.9	10.6	0.0	9.0	3.9	25.0	2.3	2.0	0.0	1.5	
Total	4	600	100.0	15,393	40.3	50.0	42.3	43.2	25.0	44.9	10.6	0.0	9.0	3.9	25.0	2.3	2.0	0.0	1.5	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Chicago, IL AA	4	600	100.0	15,393	94.3	100.0	28.7	1.4	0.0	4.3	0.0		
Total	4	600	100.0	15,393	94.3	100.0	28.7	1.4	0.0	4.3	0.0		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-21	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Chicago, IL AA	8	86	100.0	46.4	12.5	39.5	75.0	9.3	12.5	2.9	0.0	1.9	0.0	
Total	8	86	100.0	46.4	12.5	39.5	75.0	9.3	12.5	2.9	0.0	1.9	0.0	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-21	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Chicago, IL AA	8	86	100.0	49.1	12.5	17.1	25.0	14.7	12.5	19.1	50.0	0.0	0.0	
Total	8	86	100.0	49.1	12.5	17.1	25.0	14.7	12.5	19.1	50.0	0.0	0.0	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

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.