



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

October 4, 2021

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Stillman BancCorp National Association  
Charter Number 14369  
101 East Main Street  
Stillman Valley, IL 61084

Office of the Comptroller of the Currency  
Downers Grove Field Office  
2001 Butterfield Road, Suite 400  
Downers Grove, IL 60515

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

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## Overall CRA Rating

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

**The Lending Test is rated: Satisfactory**

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

The Lending Test rating is based on Stillman BancCorp National Association's (Stillman or the bank) performance in the state of Illinois. The major factors that support the bank's rating include:

- The bank's quarterly average loan-to-deposit (LTD) ratio is reasonable given its volume of mortgage loan originations and sales, its size and financial condition, and the level of local banking competition.
- The bank originated or purchased a majority of its loans inside its assessment areas (AAs).
- The bank's distribution of loans across geographies of different income levels is reasonable.
- The bank's distribution of loans to individuals of different incomes and businesses and farms of different sizes is reasonable.
- The bank's combined community development (CD) loans, investments, and services reflect adequate responsiveness to the CD needs in the AA.
- The bank did not receive any Community Reinvestment Act (CRA) related complaints during the review period.

### Loan-to-Deposit Ratio

Considering Stillman's size and financial condition, the credit needs of its AAs, and other demographic and economic factors, the bank's LTD ratio is reasonable. The bank's quarterly average LTD ratio for the period of January 1, 2018, to December 31, 2020, was 40.5 percent. The LTD ratio does not reflect the mortgage loans that were originated and then sold on the secondary market. We compared the bank's LTD ratio to six similarly sized institutions in the Ogle and Winnebago counties of Illinois with total assets ranging from \$128 million to \$1.7 billion. The quarterly average LTD ratio of those banks is 74.3 percent, with a low of 66.6 percent and a high of 85.4 percent. Compared to the institutions in this group, Stillman had the lowest quarterly average LTD ratio. The bank's high quarterly LTD ratio was 43.8 percent (for the quarter ended September 30, 2018) and its lowest was 37.5 percent (for the quarter ended December 30, 2020). Stillman's LTD ratio is reasonable when considering the volume of mortgage loans that the bank originated and then sold on the secondary market, and the strong competition in its combined assessment area market (which limits lending opportunities).

### Lending in Assessment Area

A majority of Stillman's loans are inside its AAs. The bank originated or purchased 80.8 percent of its total loans inside its AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance factors.

Table D - 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		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	247	79.2	65	20.8	312	29,285	74.8	9,845	25.2	39,130
2019	313	80.3	77	19.7	390	39,945	73.8	14,215	26.2	54,160
2020	804	78.1	226	21.9	1,030	120,100	72.4	45,870	27.6	165,970
<b>Subtotal</b>	<b>1,364</b>	<b>78.8</b>	<b>368</b>	<b>21.2</b>	<b>1,732</b>	<b>189,330</b>	<b>73.0</b>	<b>69,930</b>	<b>27.0</b>	<b>259,260</b>
Small Business										
2018	168	81.2	39	18.8	207	22,527	81.9	4,979	18.1	27,506
2019	172	82.3	37	17.7	209	24,098	80.3	5,926	19.7	30,024
2020	349	85.5	59	14.5	408	33,261	82.1	7,272	17.9	40,533
<b>Subtotal</b>	<b>689</b>	<b>83.6</b>	<b>135</b>	<b>16.4</b>	<b>824</b>	<b>79,886</b>	<b>81.5</b>	<b>18,177</b>	<b>18.5</b>	<b>98,063</b>
Small Farm										
2018	90	91.8	8	8.2	98	10,462	93.8	691	6.2	11,153
2019	68	84.0	13	16.0	81	7,511	84.5	1,382	15.5	8,893
2020	74	80.4	18	19.6	92	9,046	82.5	1,924	17.5	10,970
<b>Subtotal</b>	<b>232</b>	<b>85.6</b>	<b>39</b>	<b>14.4</b>	<b>271</b>	<b>27,019</b>	<b>87.1</b>	<b>3,997</b>	<b>12.9</b>	<b>31,016</b>
<b>Total</b>	<b>2,285</b>	<b>80.8</b>	<b>542</b>	<b>19.2</b>	<b>2,827</b>	<b>296,235</b>	<b>76.3</b>	<b>92,104</b>	<b>23.7</b>	<b>388,339</b>
<i>Source: bank data</i>										
<i>Note: Due to rounding, totals may not equal 100.0%.</i>										

## Description of Institution

Stillman is a full-service intrastate institution headquartered in Stillman Valley, Illinois, which is located approximately 15 miles southwest of Rockford, Illinois. The bank's holding company, Stillman BancCorp, Incorporated, is a one-bank holding company. Along with its main branch in Stillman Valley, the bank has five other full-service branches located in Byron, Oregon, Rochelle, Rockford, and Roscoe, Illinois. Full-service 24-hour automated teller machines (ATMs) are available at each branch location, and the bank has 12 additional ATMs that only dispense cash located at local businesses. There were no branch closures, new branch openings, mergers, or acquisitions during the evaluation period.

Stillman has two AAs within the state of Illinois that consist of contiguous, whole census tracts (CTs). One AA is the Boone/Winnebago AA, and the second is the Ogle AA. The Boone/Winnebago AA includes part of the Rockford Metropolitan Statistical Area (MSA) and contains two of the bank's six branches. The Ogle AA is a Non-MSA area and contains four of the six bank branches, including the bank's main office (Stillman branch). The AAs do not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income areas.

As of December 31, 2020, Stillman had \$553.3 million in total assets, \$175.2 million in gross loans, \$461.1 million in total deposits, and \$45.4 million in tier 1 capital. The bank's primary lending products are commercial, farm/agriculture, and residential mortgage loans, and the bank sells residential mortgage loans on the secondary market. Gross loans represented 31.6 percent of total assets, and the loan portfolio was comprised of commercial real estate (30.2 percent), residential real estate (22.7

percent), farm and agriculture (22.46 percent), commercial and industrial (16.58 percent), other loans (4.43 percent), and construction and land development loans (3.64 percent).

Stillman's business strategy focuses on home mortgage, business, and farm lending. There are no legal, financial, or other factors impeding Stillman's ability to help meet the community's credit needs. The bank received a "Satisfactory" rating under the Intermediate Small Bank Community Reinvestment Act (CRA) examination procedures during its last performance evaluation, dated July 30, 2018.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

Stillman was evaluated under Intermediate Small Bank examination procedures, which include a Lending Test and a CD Test, to assess compliance with the CRA. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities, while the CD Test evaluates the bank's responsiveness to CD needs in its AAs through CD lending, qualified investments, and CD services.

The evaluation period for this assessment is January 1, 2018, to December 31, 2020. The evaluation under the Lending Test analyzed the bank's primary loan products, consisting of home mortgage loans, small loans to businesses, and small loans to farms. No affiliate or subsidiary activity was considered in this review. The CD Test included CD loans, investments, and services from July 30, 2018 (the end of the last evaluation period) through December 31, 2020.

### **Selection of Areas for Full-Scope Review**

We performed a full scope review of the Rockford MSA AA and the Ogle Non-MSA AA.

### **Ratings**

Stillman's overall CRA rating is based solely on its performance in the state of Illinois, and the state of Illinois rating is based on the bank's performance under the CRA Intermediate Small Bank Lending Test, the Community Development Test, as well as related performance context information from the AAs. Except for the bank's LTD ratio, which is based on its entire loan portfolio, performance under the CRA Intermediate Small Bank Lending Test was based on the bank's lending performance within the AAs during the evaluation period.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 the bank 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 PE.

## State Rating

### State of Illinois

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

**The Lending Test is rated:** Satisfactory.

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

The major factors that support this rating include:

- The bank's average quarterly LTD ratio is reasonable.
- The bank originated a majority of its loans inside the AAs.
- The bank's geographic distribution of loans reflects reasonable performance.
- The bank's geographic distribution of loans reflects reasonable performance
- The bank's responsiveness to CD needs in the AAs is adequate.

### Description of Institution's Operations in Illinois

The portion of the bank's AA within the Rockford MSA contains 81 CTs, including 13 low-income, 19 moderate-income, 25 middle-income, and 22 upper-income CTs. The remaining two CTs were not assigned an income classification. Neither of the bank's two branches in this AA are in a low- or moderate-income CT. However, the branches are within reasonable proximity of low- and moderate-income CT's. The Ogle AA contains 11 CTs, six of which are middle-income, five are upper-income, and none are low- or moderate-income.

According to Federal Deposit Insurance Corporation (FDIC) market share information, as of June 30, 2020, Stillman had \$443 million in total deposits, with \$301.3 million (68 percent) from within Ogle County and \$141.6 (32 percent) deposits from within Boone and Winnebago Counties in the Rockford MSA. The bank ranks first in deposit market share out of 11 FDIC-insured banks, with 23.43 percent of deposits in Ogle County. It ranks 11<sup>th</sup> out of 30 FDIC-insured banks with a 2 percent deposit market share in Boone and Winnebago Counties. Competition for deposits within the three counties is significant and includes large national and regional banks. There are over 17,000 branches operating in the counties. Banks with significant market share in Ogle County include Central Bank Illinois (21.72 percent) and Byron Bank (16.16 percent). Banks with the top market share in Boone and Winnebago Counties include Illinois Bank and Trust (15.27 percent), Midland States Bank (14.80 percent), JPMorgan Chase Bank N.A. (11.96 percent), and Associated Bank N.A (10.24 percent).

We spoke with a community contact in local government within the Rockford MSA. The contact described the current economic conditions as unfavorable. There are many job opportunities available, but not many individuals are willing to work. There are several affordable housing apartment units available within the community. The contact believes the area is adequately served by banks and credit unions that provide assistance to the general public. There have been several businesses that have opened in the area within the last year that local financial institutions have funded, which in turn has created more job opportunities.

**Rockford MSA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Rockford MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	81	16.0	23.5	30.9	27.2	2.5
Population by Geography	327,744	11.3	20.6	32.8	35.0	0.3
Housing Units by Geography	138,584	11.9	21.0	32.3	34.0	0.7
Owner-Occupied Units by Geography	84,834	5.4	16.9	35.7	42.0	0.0
Occupied Rental Units by Geography	40,859	21.8	28.4	26.6	21.4	1.7
Vacant Units by Geography	12,891	23.5	24.6	28.6	21.6	1.7
Businesses by Geography	17,045	9.2	16.1	29.9	42.5	2.3
Farms by Geography	571	4.0	13.7	41.3	40.3	0.7
Family Distribution by Income Level	83,869	22.7	17.1	20.4	39.8	0.0
Household Distribution by Income Level	125,693	25.3	15.8	18.3	40.6	0.0
Median Family Income MSA - 40420 Rockford, IL MSA		\$60,048	Median Housing Value			\$114,545
			Median Gross Rent			\$755
			Families Below Poverty Level			12.8%
<i>Source: 2015 ACS and 2019 D&amp;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>						

**Ogle Non-MSA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Ogle Non-MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	11	0.0	0.0	54.5	45.5	0.0
Population by Geography	52,397	0.0	0.0	53.2	46.8	0.0
Housing Units by Geography	22,583	0.0	0.0	54.0	46.0	0.0
Owner-Occupied Units by Geography	15,732	0.0	0.0	49.1	50.9	0.0
Occupied Rental Units by Geography	4,999	0.0	0.0	70.2	29.8	0.0
Vacant Units by Geography	1,852	0.0	0.0	52.4	47.6	0.0
Businesses by Geography	2,688	0.0	0.0	56.1	43.9	0.0
Farms by Geography	294	0.0	0.0	53.4	46.6	0.0
Family Distribution by Income Level	13,871	15.4	16.2	20.1	48.2	0.0
Household Distribution by Income Level	20,731	18.7	14.6	17.2	49.5	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$136,656
			Median Gross Rent			\$666
			Families Below Poverty Level			7.3%
<i>Source: 2015 ACS and 2019 D&amp;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>						



## Economic Conditions

According to U.S. Bureau of Labor Statistics (BLS) data, the unemployment rate in the counties (Winnebago, Boone, and Ogle) that the bank operates in, the State of Illinois, and the United States all declined from 2018 to 2019. However, in 2020 unemployment rates increased significantly, primarily due to the COVID-19 pandemic. Winnebago and Boone Counties' annual unemployment rate exceeded the State of Illinois and national rates in 2018, 2019, and 2020, but Ogle County's annual unemployment rate was below the State of Illinois and in line with the national rate in 2020.

<b>Annual Unemployment Rates (%)</b>			
<b>Area</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
Winnebago County	5.6	5.4	11.4
Boone County	5.7	5.4	11.2
Ogle County	4.9	4.6	8.1
State of Illinois	4.4	4.0	9.5
National	3.9	3.7	8.1

*Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted.*

## Scope of Evaluation in Illinois

We performed a full-scope review of the Rockford MSA AA and Ogle Non-MSA AA. We placed equal weight on the performance in each AA. Refer to Appendix A for more information.

## Conclusions With Respect To Performance Tests In the State of Illinois

### LENDING TEST

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

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

Based on full-scope reviews, the bank's lending performance in the state of Illinois is reasonable.

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

Stillman exhibits reasonable geographic distribution of loans in the state of Illinois. The conclusion is based on the geographic distribution performance in the Rockford MSA AA. A geographic distribution test was not performed on the Ogle Non-MSA AA, as it does not contain any low- or moderate-income CTs.

### *Home Mortgage Loans*

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

Stillman exhibits reasonable geographic distribution of home mortgage loans in the Rockford MSA AA.

Rockford MSA AA

Stillman's distribution of home mortgage loans to low-income CTs is reasonable. During the review period, the bank originated 1.7 percent of its home mortgage loans in low-income CTs, which is below the 5.4 percent of the AA's owner-occupied housing units that are located in low-income CTs, but near the 1.9 percent of aggregate lending that occurred in low-income CTs.

Stillman's distribution of home mortgage loans to moderate-income CTs is reasonable. The bank originated 7.4 percent of its home mortgage loans in moderate-income CTs, which is below the 16.9 percent of AA's owner-occupied housing units that are located in moderate-income CTs, but reasonably near the 10.8 percent of aggregate lending that occurred in moderate-income CTs.

***Small Loans to Businesses***

Refer to Table Q – Rockford MSA 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.

Stillman exhibits reasonable geographic distribution of small loans to businesses in the Rockford MSA AA.

Rockford MSA AA

Stillman's distribution of small loans to businesses within low-income CTs is reasonable. The bank originated 8.5 percent of its small loans to businesses within low-income CTs, which is near both the 9.2 percent of the AA's small businesses that are located in low-income CTs and the 9.8 percent of aggregate lending that occurred in low-income CTs.

Stillman's distribution of small loans to businesses within moderate-income CTs is excellent. The bank originated 19.0 percent of its small loans to businesses in moderate-income CTs, which exceeds the 16.1 percent of the AA's small businesses that are located in moderate-income CTs and the 16.6 percent of aggregate lending that occurred in moderate-income CTs.

***Small Loans to Farms***

Refer to Table S – Rockford MSA 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 farms.

Stillman exhibits reasonable geographic distribution of small loans to farms in the Rockford MSA AA considering performance context factors.

Stillman did not originate any small loans to farms in low- or moderate-income CTs during the review period. However, this is reasonable given limited opportunities to lend to small farms in low- and moderate-income CT's, based on the demographic and peer data. Only 4.0 percent of the AA's farms are located in low-income CTs, and there was no aggregate lending to farms in low-income CTs. While 13.7 percent of the AA's farms are located in moderate-income CTs, only 3.7 percent of aggregate lending occurred to farms in moderate-income CTs.

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

Overall, we did not identify any unexplained, conspicuous gaps in the lending distribution. We reviewed internal bank reports and maps to identify potential significant gaps in the distribution of loans over the evaluation period.

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

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes.

### ***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.

Stillman exhibits reasonable borrower distribution of home mortgage loans in the AAs.

#### **Rockford MSA AA**

Stillman's distribution of home mortgage loans to low-income borrowers is reasonable. The bank originated 5.2 percent of its home mortgage loans to low-income borrowers, which is significantly below the 22.7 percent of AA families that are low-income but near the 7.3 percent of aggregate home mortgage lending that occurred to low-income borrowers.

Stillman's distribution of home mortgage loans to moderate-income borrowers is also reasonable. The bank originated 15.3 percent of its home mortgage loans to moderate-income borrowers, which is near both the 17.1 percent of AA families that are moderate-income and the 17.9 percent of aggregate home mortgage lending that occurred to moderate-income borrowers.

#### **Ogle Non-MSA AA**

Stillman's origination of home mortgage loans to low-income borrowers is reasonable. The bank originated 4.0 percent of its home mortgage loans to low-income borrowers, which is significantly below the 15.4 percent of AA families that are low-income but exceeds the 3.6 percent of aggregate home mortgage lending that occurred to low-income borrowers. The percentage of families in the AA living below the poverty rate, and home ownership affordability issues for many low-income families, contribute to this low penetration.

Stillman's origination of home mortgage loans to moderate-income borrowers is excellent. The bank originated 17.4 percent of its home mortgage loans to moderate-income borrowers, which exceeds both the 16.2 percent of AA families that are moderate-income and the 15.2 percent of aggregate home mortgage lending that occurred to moderate-income borrowers.

### ***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.

Stillman exhibits reasonable borrower distribution of small loans to businesses in the AAs.

#### Rockford MSA AA

Stillman's distribution of loans to businesses of different sizes is reasonable. The bank originated 47.8 percent of its loans to small businesses (those businesses with \$1 million or less in annual revenue). While this is below than the 79.8 percent of businesses in the AA that are small businesses, it exceeds the 45.1 percent of aggregated lending that occurred to small businesses.

#### Ogle Non-MSA AA

Stillman's distribution of loans to businesses of different sizes is reasonable. The bank originated 63.9 percent of its loans to small businesses, which is below the 80.1 percent of businesses in the AA that are small businesses but exceeds the 50.6 percent of aggregate lending that occurred to small businesses.

#### ***Small Loans to Farms***

Refer to Table T 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 farms.

Stillman exhibits reasonable borrower distribution of small loans to farms in the AAs.

#### Rockford MSA AA

Stillman's distribution of loans to small farms is reasonable. The bank originated 65.7 percent of its loans to small farms, which is below the 95.3 percent of AA farms that are small farms but near the 68.6 percent of aggregate farm lending that occurred to small farms.

#### Ogle Non-MSA AA

Stillman's distribution of loans to small farms is reasonable. The bank originated 77.7 percent of its loans to small farms, which is below the 98.3 percent of AA farms that are small farms but exceeds the 56.3 percent of aggregate farm lending that occurred to small farms.

#### **Responses to Complaints**

Stillman did not receive any written complaints regarding its performance in helping to meet the credit needs within its AAs during the evaluation period. The OCC has not received any consumer complaints or comments regarding the bank's CRA performance during this evaluation period.

## COMMUNITY DEVELOPMENT TEST

Stillman's performance under the CD Test in the state of Illinois is rated Satisfactory.

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

Based on full-scope reviews, the bank exhibits adequate responsiveness to community development needs in the state of Illinois through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

### Number and Amount of Community Development Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Rockford MSA	3	100%	\$1,432	100%

Stillman's level of CD lending reflects adequate responsiveness to the credit needs of its AAs. During the evaluation period, the bank originated three CD loans totaling \$1.43 million (representing 3.2 percent of the bank's tier one capital). All three loans were made within the Rockford MSA AA. The loans were to organizations whose primary purpose is to serve low- and moderate-income (LMI) individuals within the community. The funds from two loans were used to lend money to small businesses for the purpose of job creation and increased homeownership in LMI neighborhoods. The third loan was to finance a 36-unit townhome property in an LMI CT that offers affordable housing to LMI individuals.

### Number and Amount of Qualified Investments

Community Development Investments										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments **	
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)
Rockford MSA AA	0	\$0	2	\$1,250	2	15.4	\$1,250	33.5	0	\$0
Ogle Non-MSA AA	2	\$750	9	\$1,735	11	84.6	\$2,485	66.5	0	\$0
Total	2	\$750	11	\$2,985	13	100	\$3,735	100	0	\$0

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

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

The Qualified Investment Table shown above sets forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investments, including prior period investments that remain outstanding as of the examination date.

The volume of Stillman's CD investments represents excellent responsiveness to the CD needs of the bank's AAs. The bank made a total of \$3.74 million in CD investments (representing 8.2 percent of the bank's tier one capital). The bank purchased \$1.25 million of qualified bonds in the Rockford MSA and \$2.45 million of qualified bonds in the Ogle Non-MSA AA during the evaluation period. Two additional bonds totaling \$750,000 were purchased during the prior evaluation period but were outstanding during this evaluation period. All of the qualified bonds purchased in the AAs were school district bonds and included Boone, McHenry, and DeKalb counties CUSD #100, Ogle County CUSD #200, and Ogle and Lee County CUSD #231. As of 2021, each of the three school districts had more than 50 percent of their students eligible for the free lunch program and deemed low-income individuals. Specifically, CUSD #100 had approximately 58.75 percent eligible, CUSD #200 had 56.43 percent eligible, and CUSD #231 had 63.43 percent eligible.

During the evaluation period, Stillman made \$55,798 in qualified donations to 40 organizations within its AAs. These organizations focus on serving LMI individuals within the community in addition to emphasizing overall community development. The donations made by the bank are to organizations such as food pantries, shelters, schools, childhood centers, and non-profit organizations that focus on job development and CD for LMI individuals. Furthermore, donations made by the bank aim to provide a safe, supportive, and positive social environment for veterans and their families, specifically targeting LMI individuals.

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

Stillman's level of CD services reflect adequate responsiveness given the size of the bank and the credit needs of the AAs. During the evaluation period, 11 bank officers or employees provided financial or technical expertise to 21 different organizations by serving as directors, treasurers, or members, or by otherwise offering their services. The organizations that bank officers or employees are involved with have the purpose of providing services such as food donation, consumer and financial education, economic development, small business development, and affordable housing to LMI individuals. Furthermore, the bank provides its branch lobbies on an annual basis for organized food drives.

Although all of the bank's branch offices are located within middle- to upper-income CT, the offices are all easily accessible to LMI individuals and CTs within the AA. In addition, all bank products and services are available at all locations, and bank hours do not vary between branch locations.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	January 1, 2018, to December 31, 2020	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, small farm, and Community Development loans, qualified investments, and community development services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Illinois</b>		
Rockford MSA	Full-Scope	Portions of Boone and Winnebago counties
Ogle Non-MSA	Full-Scope	All of Ogle County

## Appendix B: Summary of State Ratings

<b>RATINGS: Stillman BancCorp National Association</b>			
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>Community Development Test Rating</b>	<b>Overall Bank/State Rating</b>
Stillman BancCorp National Association	Satisfactory	Satisfactory	Satisfactory
<b>State:</b>			
Illinois	Satisfactory	Satisfactory	Satisfactory

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



## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet 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:** An individual whose income 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 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

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### Content of Standardized Tables

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

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

- Table 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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal

to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography Rockford MSA</b>																				<b>2018-20</b>
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	% 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	
Rockford MSA	811	113,505	100.0	13,472	5.4	1.7	1.9	16.9	7.4	10.8	35.7	25.2	35.2	42.0	65.7	52.0	0.0	0.0	0.1	
<b>Total</b>	<b>811</b>	<b>113,505</b>	<b>100.0</b>	<b>13,472</b>	<b>5.4</b>	<b>1.7</b>	<b>1.9</b>	<b>16.9</b>	<b>7.4</b>	<b>10.8</b>	<b>35.7</b>	<b>25.2</b>	<b>35.2</b>	<b>42.0</b>	<b>65.7</b>	<b>52.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.1</b>	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography Ogle Non-MSA</b>																				<b>2018-20</b>
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	% 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	
Ogle Non-MSA	553	75,825	100.0	2,594	0.0	0.0	0.0	0.0	0.0	0.0	49.1	42.3	41.8	50.9	57.7	58.2	0.0	0.0	0.0	
<b>Total</b>	<b>553</b>	<b>75,825</b>	<b>100.0</b>	<b>2,594</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>49.1</b>	<b>42.3</b>	<b>41.8</b>	<b>50.9</b>	<b>57.7</b>	<b>58.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower Rockford MSA</b>																			<b>2018-20</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	
Rockford MSA	811	113,505	100.0	13,472	22.7	5.2	7.3	17.1	15.3	17.9	20.4	27.1	20.6	39.8	49.9	32.8	0.0	2.5	21.4	
<b>Total</b>	<b>811</b>	<b>113,505</b>	<b>100.0</b>	<b>13,472</b>	<b>22.7</b>	<b>5.2</b>	<b>7.3</b>	<b>17.1</b>	<b>15.3</b>	<b>17.9</b>	<b>20.4</b>	<b>27.1</b>	<b>20.6</b>	<b>39.8</b>	<b>49.9</b>	<b>32.8</b>	<b>0.0</b>	<b>2.5</b>	<b>21.4</b>	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower Ogle Non-MSA</b>																			<b>2018-20</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	
Ogle Non-MSA	553	75,825	100.0	2,594	15.4	4.5	3.6	16.2	17.4	15.1	20.1	25.5	22.1	48.2	49.2	45.1	0.0	3.4	14.0	
<b>Total</b>	<b>553</b>	<b>75,825</b>	<b>100.0</b>	<b>2,594</b>	<b>15.4</b>	<b>4.5</b>	<b>3.6</b>	<b>16.2</b>	<b>17.4</b>	<b>15.1</b>	<b>20.1</b>	<b>25.5</b>	<b>22.1</b>	<b>48.2</b>	<b>49.2</b>	<b>45.1</b>	<b>0.0</b>	<b>3.4</b>	<b>14.0</b>	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*



<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography Rockford MSA</b>																				<b>2018-20</b>	
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	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending		
Rockford MSA	448	56,010	100.0	4,678	9.2	8.5	9.8	16.1	19.0	16.6	29.9	28.8	27.8	42.5	42.4	42.9	2.3	1.3	2.9		
<b>Total</b>	<b>448</b>	<b>56,010</b>	<b>100.0</b>	<b>4,678</b>	<b>9.2</b>	<b>8.5</b>	<b>9.8</b>	<b>16.1</b>	<b>19.0</b>	<b>16.6</b>	<b>29.9</b>	<b>28.8</b>	<b>27.8</b>	<b>42.5</b>	<b>42.4</b>	<b>42.9</b>	<b>2.3</b>	<b>1.3</b>	<b>2.9</b>		

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography Ogle Non-MSA</b>																				<b>2018-20</b>	
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	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending	% of Families	% of Bank Loans	% of Aggregate Lending		
Ogle Non-MSA	241	23,876	100.0	504	0.0	0.0	0.0	0.0	0.0	0.0	56.1	58.5	51.8	43.9	41.5	48.2	0.0	0.0	0.0		
<b>Total</b>	<b>241</b>	<b>23,876</b>	<b>100.0</b>	<b>504</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>56.1</b>	<b>58.5</b>	<b>51.8</b>	<b>43.9</b>	<b>41.5</b>	<b>48.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues Rockford MSA</b>												<b>2018-20</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Farms	% of Bank Loans	
Rockford MSA	448	56,010	100.0	4,678	79.8	47.8	45.1	7.4	50.2	12.9	2.0	
<b>Total</b>	<b>448</b>	<b>56,010</b>	<b>100.0</b>	<b>4,678</b>	<b>79.8</b>	<b>47.8</b>	<b>45.1</b>	<b>7.4</b>	<b>50.2</b>	<b>12.9</b>	<b>2.0</b>	
<i>Source: 2019 D&amp;B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%.</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues Ogle Non-MSA</b>												<b>2018-20</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Farms	% of Bank Loans	
Ogle Non-MSA	241	23,876	100.0	504	80.1	63.9	50.6	5.1	28.2	14.8	7.9	
<b>Total</b>	<b>241</b>	<b>23,876</b>	<b>100.0</b>	<b>504</b>	<b>80.1</b>	<b>63.9</b>	<b>50.6</b>	<b>5.1</b>	<b>28.2</b>	<b>14.8</b>	<b>7.9</b>	
<i>Source: 2019 D&amp;B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%.</i>												

<b>Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography Rockford MSA</b>																			<b>2018-20</b>	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Aggregate Lending	
Rockford MSA	32	4,996	100.0	137	4.0	0.0	0.0	13.7	0.0	3.7	41.3	37.5	46.7	40.3	71.9	48.2	0.7	0.0	1.5	
<b>Total</b>	<b>32</b>	<b>4,996</b>	<b>100.0</b>	<b>137</b>	<b>4.0</b>	<b>0.0</b>	<b>0.0</b>	<b>13.7</b>	<b>0.0</b>	<b>3.7</b>	<b>41.3</b>	<b>37.5</b>	<b>46.7</b>	<b>40.3</b>	<b>71.9</b>	<b>48.2</b>	<b>0.7</b>	<b>0.0</b>	<b>1.5</b>	

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*

<b>Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography Ogle Non-MSA</b>																			<b>2018-20</b>	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Aggregate Lending	
Ogle Non-MSA	148	22,023	100.0	126	0.0	0.0	0.0	0.0	0.0	0.0	53.4	56.1	52.4	46.6	77.0	47.6	0.0	0.0	0.0	
<b>Total</b>	<b>148</b>	<b>22,023</b>	<b>100.0</b>	<b>126</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>53.4</b>	<b>56.1</b>	<b>52.4</b>	<b>46.6</b>	<b>77.0</b>	<b>47.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Rockford MSA</b>											<b>2018-20</b>	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Farms	% of Bank Loans	
Rockford MSA	35	4,996	100.0	137	95.3	65.7	68.6	3.0	22.9	1.8	11.4	
<b>Total</b>	<b>35</b>	<b>4,996</b>	<b>100.0</b>	<b>137</b>	<b>95.3</b>	<b>65.7</b>	<b>68.6</b>	<b>3.0</b>	<b>22.9</b>	<b>1.8</b>	<b>11.4</b>	

*Source: 2019 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data "--" data not available.  
Due to rounding, totals may not equal 100.0%.*

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Ogle Non-MSA</b>											<b>2018-20</b>	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% of Farms	% of Bank Loans	% of Aggregate Lending	% of Farms	% of Bank Loans	% of Farms	% of Bank Loans	
Ogle Non-MSA	197	22,023	100.0	126	98.3	77.7	56.3	1.4	16.8	0.3	5.6	
<b>Total</b>	<b>197</b>	<b>22,023</b>	<b>100.0</b>	<b>126</b>	<b>98.3</b>	<b>77.7</b>	<b>56.3</b>	<b>1.4</b>	<b>16.8</b>	<b>0.3</b>	<b>5.6</b>	

*Source: 2019 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*