



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

March 14, 2022

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Bankers Trust Company, National Association  
Charter Number 14564

1201 Broadway  
Quincy, Illinois 62301

Office of the Comptroller of the Currency

211 Fulton Street  
Suite 604  
Peoria, Illinois 61602

**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: Outstanding**

The major factors that support this rating include:

- The Lending Test rating for the state of Illinois is satisfactory.
- The CD Test rating for the state of Illinois is outstanding. The bank’s response to the Covid-19 pandemic with responsive flexible lending had a positive impact to the bank’s CD performance.
- The bank originates a majority of its loans within its Assessment Areas (AAs).
- The loan-to-deposit (LTD) ratio is reasonable.

## Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AAs, the bank’s loan-to-deposit ratio is reasonable.

The quarterly average LTD ratio is 58.2 percent for the period from March 31, 2019, to December 31, 2021, with a low quarterly LTD of 47.2 percent and a high quarterly LTD of 66.3 percent.

First Bankers Trust Company (FBTC or bank) ranked 10<sup>th</sup> out of 11 similarly situated FDIC insured financial institutions that compete with the bank for deposits in the AAs. The comparable institutions range in asset size from \$220.3 million to \$3.5 billion and reported quarterly average LTDs from 54.9 percent to 92.5 percent.

## Lending in Assessment Area

A majority of the bank’s loans are inside its AAs.

The bank originated and purchased 86.7 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,229	86.5	191	13.5	1,420	166,630	80.7	39,969	19.3	206,599
Business	18	90.0	2	10.0	20	2,628	73.1	9,691	26.9	3,597
<b>Total</b>	<b>1,247</b>	<b>86.6</b>	<b>193</b>	<b>13.4</b>	<b>1,440</b>	<b>169,258</b>	<b>80.5</b>	<b>40,938</b>	<b>19.5</b>	<b>210,196</b>

*Source: Sample of business loans originated or purchased from January 1, 2019, to December 31, 2021. HMDA data from January 1, 2019, to December 31, 2021.*

## Description of Institution

FBTC is an intrastate institution headquartered in Quincy, Illinois, near Interstate 172 and the Mississippi River, with assets of \$1.3 billion as of December 31, 2021.

The bank is wholly owned by First Bankers Trustshares, Inc., a holding company headquartered in Quincy, Illinois, with assets of \$1.3 billion at December 31, 2021. FBTC has no affiliates or subsidiaries.

FBTC's stated CRA mission is to continue to find ways to meet the needs of the community through its banking products and services and evolving those services to continue to meet the needs of the community into the future.

FBTC primarily originates loans in Illinois. FBTC offers agriculture, business, consumer installment, and home mortgage loans to meet the customer's credit needs in Illinois. Please refer to the public file for additional information on products and services offered.

The CRA evaluation has one rating area with two legal AAs: one MSA and one NonMSA. The NonMSA AA has eight branch locations and 18 automated teller machines (ATMs) serving Adams County, McDonough County, Hancock County, Schuyler County, and a portion of Pike County. The second AA is located within the Springfield MSA (Springfield MSA AA) and includes Sangamon County, which is served with one branch and one ATM. Each branch location is equipped with a drive-thru and offers banking services on Saturdays. None of FBTC's ATMs are deposit taking. There were no branch openings since the previous CRA evaluation. There was one branch closing in Macomb, Illinois, in October 2021. The closed branch was located in a middle-income census tract designated as distressed due to poverty. The branch was closed for financial reasons; however, there remains another existing branch in Macomb, Illinois, to serve customers in McDonough County.

Commercial loans represent the largest product of the loan portfolio with \$264.5 million, or 55.3 percent, followed by agricultural loans at \$87.4 million, or 18.3 percent, residential loans at \$72.3 million, or 15.1 percent, and consumer loans at \$54.4 million, or 11.4 percent per Call Report data at December 31, 2021. The bank originated over 8,100 loans totaling \$662.2 million between January 1, 2019, and December 31, 2021, per bank data. The bank is active in selling fixed rate residential loans into the secondary market.

The bank reported a net loans and leases to total assets of 38.1 percent as of December 31, 2021. The bank also reported tier 1 capital of \$98.9 million, as of December 31, 2021.

The previous satisfactory CRA rating, which the OCC determined using the Intermediate-Small Bank evaluation procedures, was detailed in the Performance Evaluation (PE) dated January 28, 2019.

## **Scope of the Evaluation**

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

The evaluation period extends from the previous CRA PE dated January 28, 2019, to March 14, 2022. We evaluated FBTC under the Intermediate-Small Bank evaluation procedures, which includes a Lending Test and CD Test.

The Lending Test evaluated loans originated or purchased between January 1, 2019, and December 31, 2021, and were compared to the 2015 American Community Survey (ACS) Census Data. Lending performance for business loans is based on a sample of loans originated or purchased, not the full population of data, and is considered in context. Lending performance for home mortgage lending is based on the full population of originated or purchased HMDA reportable loans.

The CD Test evaluated eligible community development loans, investments, and services from January 1, 2019, to December 31, 2021.

The primary loan product for evaluation was business and home mortgage loans. Together these two product types represent 76.5 percent of total originations and purchases, by dollar, between January 1, 2019, and December 31, 2021.

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

In each state where the bank has an office, one or more of the 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, multistate metropolitan statistical area (MMSA), or CSA are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. 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, for a list of full- and limited-scope AAs.

### **Ratings**

The bank’s overall rating is based on the state of Illinois rating.

## **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 this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

# State Rating

## State of Illinois

**CRA rating for the state of Illinois:** Satisfactory

**The Lending Test is rated:** Satisfactory

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

The major factors that support this rating include:

- The borrower distribution of loans reflects reasonable performance.
- The geographic distribution of loans reflects reasonable performance.
- The CD lending and CD services reflect excellent responsiveness while CD investments reflect adequate responsiveness. The bank's response to the Covid-19 pandemic with responsive flexible lending had a positive impact to the bank's CD performance.

## Description of Institution's Operations in Illinois

FBTC serves its customers in Illinois with two legal AAs. The NonMSA AA has eight branch locations and 18 ATMs serving Adams County, McDonough County, Hancock County, Schuyler County, and a portion of Pike County. Another AA, the Springfield MSA AA, is located within the Springfield MSA and includes Sangamon County, which is served with one branch and one ATM. Each branch location is equipped with a drive-thru and offers banking services on Saturdays. None of FBTC's ATMs are deposit taking. Customers have additional banking access through online and mobile banking platforms.

FBTC primarily originates loans in Illinois. FBTC offers agriculture, business, consumer installment, and home mortgage loans to meet the customer's credit needs in Illinois.

FBTC competes with national banks, state banks, credit unions, farm credit unions, and non-bank lenders.

Competition for deposits is high among financial institutions. FBTC held the highest deposit market share position at 19.8 percent in the NonMSA AA among 34 FDIC insured financial institutions competing for \$4.6 billion in deposits as of December 31, 2021. In the Springfield MSA AA, FBTC held less than 1 percent of the deposit market share and ranked 22<sup>nd</sup> among 24 FDIC insured financial institutions competing for \$8.1 billion in deposits as of December 31, 2021.

The bank sources a majority of its deposits, 97.7 percent, from the NonMSA AA, while the Springfield MSA AA accounts for 2.3 percent, per FDIC deposit data as of December 31, 2021.

The annual unemployment rate in the state of Illinois had been declining in 2019 until 2020, due to the Covid-19 pandemic. The annualized unemployment rate for the state of Illinois in 2019 was 4.0 percent, 9.2 percent in 2020, and 6.1 percent in 2021. The counties within the AAs experienced high rates of unemployment in 2020, with the highest in April 2020, but have generally been on a downward trend with all counties ranging between 3.0 and 4.0 percent in December 2021.

In the NonMSA AA, there is one low-income census tract and seven moderate-income census tracts. The one low-income census tract primarily consists of a college in Macomb, Illinois, and contains zero owner-occupied housing units and very few opportunities for business lending with only 24 businesses

per demographic data. The moderate-income census tracts are located in the downtown areas of Quincy, Macomb, and a portion of McDonough County that includes Bushnell, Illinois.

In the Springfield MSA AA, there are 11 low-income census tracts and 10 moderate-income census tracts. These low- and moderate-income (LMI) geographies are primarily located in and around downtown Springfield, Illinois.

Major employers in the NonMSA AA include Blessing Health System, Quincy Public Schools, and Titan Internal, Inc. Major employers in the Springfield MSA AA include The State of Illinois, Memorial Health Systems, and HSHS St. John’s Hospital.

For the NonMSA AA, we reviewed one community contact interview performed during the Covid-19 pandemic with a community action agency. The contact noted the population growth is stagnant, and there is a need of workers in healthcare, manufacturing, and logistics. The contact noted some of the residents have moved to neighboring Missouri for lower taxes. The contact also noted the housing stock in Quincy is deteriorating. The contact noted opportunities in redevelopment of older homes as well as credit and grant funding for emergency housing assistance. The contact had no negative perceptions of the bank.

For the Springfield MSA AA, we reviewed one community contact interview performed during the Covid-19 pandemic with a community action agency. The community contact noted the area has a high level of poverty and suffered from job losses of manufacturing and government jobs. The contact noted the greatest needs are to include affordable housing, home energy efficiency, and financial assistance for education and utilities. The contact also noted rising rental rates raises concerns for affordable housing. The contact mentioned opportunities are available in affordable housing, providing financial assistance for education and utilities, as well as technical assistance, such as serving as a board member on a community group. The contact had no negative perceptions of the bank.

## NonMSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: NonMSA, 2015 ACS Census Data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	2.6	17.9	64.1	15.4	0.0
Population by Geography	127,673	2.0	15.0	62.5	20.5	0.0
Housing Units by Geography	58,321	0.3	16.3	63.1	20.3	0.0
Owner-Occupied Units by Geography	36,261	0.0	11.0	70.1	19.0	0.0
Occupied Rental Units by Geography	14,696	0.5	27.6	49.2	22.7	0.0
Vacant Units by Geography	7,364	1.5	19.6	56.9	22.0	0.0
Businesses by Geography	7,975	0.3	18.7	60.6	20.4	0.0
Farms by Geography	960	0.0	3.1	84.1	12.8	0.0
Family Distribution by Income Level	32,081	19.3	18.4	22.1	40.1	0.0
Household Distribution by Income Level	50,957	24.9	16.6	18.1	40.4	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$100,298
			Median Gross Rent			\$598



	Families Below Poverty Level	10.0%
<i>Source: 2015 ACS and 2021 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>		

## Springfield MSA AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Springfield MSA, 2015 ACS Census Data</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)	53	20.8	18.9	39.6	20.8	0.0
Population by Geography	199,016	15.9	14.6	40.8	28.7	0.0
Housing Units by Geography	90,433	16.3	16.9	40.0	26.8	0.0
Owner-Occupied Units by Geography	57,654	9.9	13.3	42.2	34.6	0.0
Occupied Rental Units by Geography	25,231	28.6	21.7	36.8	12.8	0.0
Vacant Units by Geography	7,548	24.2	28.7	33.9	13.2	0.0
Businesses by Geography	14,949	16.4	16.8	35.8	31.0	0.0
Farms by Geography	664	6.5	8.1	47.1	38.3	0.0
Family Distribution by Income Level	50,928	22.8	16.2	20.4	40.5	0.0
Household Distribution by Income Level	82,885	25.4	15.7	17.2	41.7	0.0
Median Family Income MSA - 44100 Springfield, IL MSA		\$73,402	Median Housing Value			\$126,507
			Median Gross Rent			\$737
			Families Below Poverty Level			10.8%
<i>Source: 2015 ACS and 2021 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>						

## Scope of Evaluation in Illinois

The NonMSA AA and Springfield MSA AA both received a full-scope review. The NonMSA AA received a greater weight as it accounts for a significant majority of the source of deposits. Home mortgage lending received a greater weight as the full population of HMDA data is available for analysis while a sample of loans was utilized for business lending. Please refer to Appendix A for more information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

### LENDING TEST

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

### Conclusions for Areas Receiving Full-Scope Reviews

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

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

The bank exhibits reasonable geographic distribution of loans in the state. The distribution of home mortgage lending is reasonable while the distribution of business lending is poor.

#### ***Home Mortgage Loans***

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

The distribution of home mortgage loans is reasonable.

NonMSA AA:

The distribution of home mortgage loans reflects reasonable distribution.

The proportion of lending in moderate-income geographies is near to the percentage of owner-occupied housing units and exceeds the aggregate distribution. An analysis for low-income geographies was not meaningful as there are no owner-occupied housing units.

Springfield MSA AA:

The distribution of home mortgage loans reflects excellent distribution.

The proportion of lending in low- and moderate-income geographies exceeds both the percentage of owner-occupied housing units and the aggregate distribution.

#### ***Small Loans to Businesses***

Refer to Table Q in the state of Illinois section of 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.

The distribution of business loans is poor.

NonMSA AA:

The distribution of business loans reflects poor distribution.

The proportion of lending in low-income geographies is substantially less than the percentage of businesses in the AA and the aggregate distribution. The proportion of lending in moderate-income geographies is less than the percentage of businesses in the AA and the aggregate distribution. The performance in moderate-income geographies received greater weight as the low-income geography contained too few opportunities for business lending.

Springfield MSA AA:

The distribution of business loans reflects poor distribution.

The proportion of lending in low- and moderate-income geographies is less than the percentage of businesses in the AA and the aggregate distribution.

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

We performed a lending gap analysis that included a review of density maps for HMDA and geocoded sampled business loans and compared the distribution to AA maps and location of branches. We did not identify any unexplained, conspicuous gaps in lending.

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

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses, given the product lines offered by the bank. The distribution of home mortgage loans is reasonable, while the distribution of business loans is excellent.

### ***Home Mortgage Loans***

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

The distribution of home mortgage loans reflects reasonable distribution.

NonMSA AA:

The distribution of home mortgage loans reflects reasonable distribution.

The proportion of lending to low-income families is less than the percentage of low-income families but near to the aggregate distribution. The proportion of lending to moderate-income families exceeds both the percentage of moderate-income families and the aggregate distribution.

Springfield MSA AA:

The distribution of home mortgage loans reflects reasonable distribution.

The proportion of lending to low-income families is less than the percentage of low-income families and the aggregate distribution. The proportion of lending to moderate-income families exceeds both the percentage of moderate-income families and the aggregate distribution.

### ***Small Loans to Businesses***

Refer to Table R in the state of Illinois section of 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.

The distribution of business loans reflects excellent distribution.

NonMSA AA:

The distribution of business loans reflects excellent distribution.

The proportion of lending to small businesses exceeds both the percentage of small businesses in the AA and the aggregate distribution.

Springfield MSA AA:

The distribution of business loans reflects excellent distribution.

The proportion of lending to small businesses is near to the percentage of small businesses in the AA but exceeds the aggregate distribution.

**Responses to Complaints**

FBTC did not receive any complaints about its performance in helping to meet the credit needs of its AAs during the evaluation period.

**COMMUNITY DEVELOPMENT TEST**

The bank’s performance under the Community Development Test in the state of Illinois is rated Outstanding.

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services considering the bank’s capacity and the need and availability of opportunities for community development in the bank’s assessment areas.

**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.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
NonMSA	11	57.9	7,277	84.0
Springfield MSA	7	36.8	1,271	14.7
Statewide PMF	0	0	0	0
Statewide	0	0	0	0
Regional	1	5.6	116	1.3

FBTC’s CD lending performance represents excellent responsiveness in the full-scope areas.

The NonMSA AA CD lending activity represents reasonable responsiveness. The CD activity includes 11 loans totaling \$7.3 million, representing 7.5 percent of allocated tier 1 capital based on deposit allocation by AA. Of the 11 CD loans, one benefits affordable housing and ten benefit community service. Ten of the 11 CD loans, totaling \$7.3 million are SBA Paycheck Protection Program (PPP) loans eligible for CD reporting.

Notable CD loans in the NonMSA AA include

- a \$2.4 million loan to an agency that provides substance abuse prevention and treatment, rehabilitation, and residential housing support to LMI persons.
- a \$1.5 million loan to an organization that provides mental health and rehabilitation services to LMI persons.
- two loans totaling \$153 thousand to organizations that provide childcare/day care services to children of LMI parents.

In addition to the AAs, the bank made one regional CD loan activity totaling \$116 thousand benefiting affordable housing in Marion County, Missouri, which is adjacent to Adams County in the NonMSA AA.

The Springfield MSA AA CD lending activity represents excellent responsiveness. The CD activity includes seven loans totaling \$1.3 million, representing 54.7 percent of allocated tier 1 capital based on deposit allocation by AA. Of the seven CD loans, one benefits affordable housing, three benefit community service, and three benefit economic development. Two of the seven CD loans, totaling \$48 thousand are PPP loans eligible for CD reporting.

Notable CD loans in the Springfield MSA AA include

- a \$563 thousand loan to support the expansion of a small business in a low-income area that primarily services LMI persons.
- a \$110 thousand loan to support affordable housing.
- a \$78 thousand loan to an organization that provides childcare/day care services to children of LMI parents.

FBTC made use of responsive flexible lending during the Covid-19 pandemic by originating loans to stabilize small businesses and communities through the PPP. The bank originated 816 PPP loans in 2020 and 2021 totaling \$39.7 million, representing 40.2 percent of tier 1 capital as of December 31, 2021. The bank originated 779 totaling \$36.1 million in Illinois and 37 totaling \$3.6 million outside Illinois. This activity received positive consideration as it provided stabilization of small businesses and communities.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
NonMSA	0	0	106	5,126	106	77.4	5,126	99.3	0	0
Springfield MSA	0	0	21	31	21	15.3	31	0.6	0	0
Statewide PMF	0	0	8	2	8	5.8	2	0	0	0
Statewide	0	0	2	1	2	1.5	1	0	0	0
Regional	0	0	0	0	0	0	0	0	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.

FBTC's CD investment performance represents adequate responsiveness.

The NonMSA AA CD investment activity represents adequate responsiveness. The NonMSA AA's investments include 106 activities, consisting of one qualifying investment totaling \$5 million and 105 activities consisting of cash donations totaling \$126 thousand. NonMSA AA CD investment activity represents 5.3 percent of allocated tier 1 capital based on deposit allocation by AA at December 31, 2021.

Notable CD investments and donations in the NonMSA AA include

- a \$5 million bond to support a workforce development program and capital improvements at a local community college that primarily benefits LMI persons.
- a \$15,000 donation to a local housing authority that supports low-income persons by providing affordable housing in the Quincy area.
- a total of \$6,000 in donations to organizations that provide emergency services to LMI persons including food banks and homeless shelters.

The Springfield MSA AA CD investment activity represents adequate responsiveness. The Springfield MSA AA's investments included 21 activities and consisted entirely of cash donations, totaling \$31 thousand. Springfield MSA AA CD investment activity represents 1.3 percent of allocated tier 1 capital based on deposit allocation by AA as of December 31, 2021.

Notable CD donations in the Springfield MSA AA include

- a total of \$13,770 to organizations that provide emergency services to LMI persons including food banks and homeless shelters.
- a total of \$6,000 to an organization that supports children of LMI parents by providing after school programs including tutoring and college prep services.
- a total of \$5,000 to an organization that builds affordable housing for LMI persons.

In addition to the AAs, the bank made eight cash donations totaling \$2,100 to organizations in the statewide area with Purpose, Mandate or Function (PMF) to serve the bank's AAs. An additional two cash donations were made in the statewide area totaling \$975.

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

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

FBTC's CD service performance represents excellent responsiveness in the full-scope areas. FBTC provided service hours totaling 1,563 hours of which 1,134 hours were in leadership capacities.

In the NonMSA AA, performance represents excellent responsiveness with 1,413 service hours, including leadership hours totaling 1,134 hours. In the Springfield MSA AA, performance represents adequate responsiveness with 150 service hours.

These are examples of notable service hours:

- One bank officer provided 60 hours by serving as an executive committee member of an organization that promotes economic development and revitalization of LMI areas.
- Two bank officers provided 120 hours by serving as a board member and executive committee member of an organization that provides mental health and rehabilitation services to LMI persons.
- Several bank employees, including a bank officer serving as a board member, provided 234 hours helping to provide financial literacy to area youths as part of an organization targeting LMI persons.

The bank's delivery systems are reasonably accessible to individuals of different incomes and businesses of different sizes via branches, ATMs, mobile and online banking. In the NonMSA AA there is one ATM in a low-income geography, one in a moderate-income geography, and one in a middle-income distressed geography.

FBTC participates in lending programs to help meet the credit needs of LMI borrowers and small businesses:

- The bank participates in the FHLB's down payment assistance program where LMI borrowers can receive forgivable grants that can be applied to closing costs and down payments. FBTC helped 46 borrowers receive a total of \$273 thousand in down payment assistance through this program. This program is available in all AAs.
- The bank participates in the USDA Rural Housing Loan program that helps LMI borrowers purchase homes in rural areas. FBTC helped 36 customers receive assistance through this program. This program is available in all AAs.

## 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 and non-MSA that received comprehensive examination review, designated by the term “full-scope.”

<b>Time Period Reviewed:</b>	Lending Test: January 1, 2019 to December 31, 2021 CD Test: January 1, 2019 to December 31, 2021	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, community development loans, qualified investments, 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: Illinois</b>		
NonMSA	Full-Scope	Adams County, Hancock County, McDonough County, Schuyler County, Portion of Pike County
Springfield MSA	Full-Scope	Sangamon County



## Appendix B: Summary of MMSA and State Ratings

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RATINGS First Bankers Trust Company, NA			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First Bankers Trust Company, NA	Satisfactory	Outstanding	Satisfactory
State:			
Illinois	Satisfactory	Outstanding	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:** Individual income that is less than 50 percent of the area median income.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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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.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
NonMSA	1,151	159,008	93.7	3,144	0.0	0.0	0.0	11.0	9.5	8.2	70.1	66.3	70.2	19.0	24.2	21.6	0.0	0.0	0.0
Springfield MSA	78	7,622	6.3	11,013	9.9	21.8	3.7	13.3	16.7	9.5	42.2	37.2	40.0	34.6	24.4	46.8	0.0	0.0	0.0
<b>Total</b>	<b>1,229</b>	<b>166,630</b>	<b>100.0</b>	<b>14,157</b>	<b>6.1</b>	<b>1.4</b>	<b>2.9</b>	<b>12.4</b>	<b>9.9</b>	<b>9.2</b>	<b>53.0</b>	<b>64.4</b>	<b>46.7</b>	<b>28.6</b>	<b>24.2</b>	<b>41.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NonMSA	1,151	159,008	93.7	3,144	19.3	7.0	7.4	18.4	19.7	18.8	22.1	19.9	20.3	40.1	46.8	37.5	0.0	6.6	16.0
Springfield MSA	78	7,622	6.3	11,013	22.8	5.9	8.8	16.2	17.9	17.9	20.4	11.5	21.3	40.5	37.2	36.6	0.0	30.8	15.4
<b>Total</b>	<b>1,229</b>	<b>166,630</b>	<b>100.0</b>	<b>14,157</b>	<b>21.5</b>	<b>6.7</b>	<b>8.5</b>	<b>17.1</b>	<b>19.6</b>	<b>18.1</b>	<b>21.1</b>	<b>19.4</b>	<b>21.1</b>	<b>40.4</b>	<b>46.2</b>	<b>36.8</b>	<b>0.0</b>	<b>8.1</b>	<b>15.5</b>

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			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			
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
NonMSA	37	3,996	62.7	1,869	0.3	0.0	0.1	18.7	8.1	16.5	60.6	64.9	66.9	20.4	27.0	16.5	0.0	0.0	0.0	
Springfield MSA	22	3,106	37.3	2,685	16.4	9.1	13.7	16.8	9.1	15.7	35.8	27.3	37.5	31.0	54.5	33.1	0.0	0.0	0.0	
<b>Total</b>	<b>59</b>	<b>7,072</b>	<b>100.0</b>	<b>4,554</b>	<b>10.8</b>	<b>3.4</b>	<b>8.1</b>	<b>17.5</b>	<b>8.5</b>	<b>16.1</b>	<b>44.4</b>	<b>50.8</b>	<b>49.6</b>	<b>27.3</b>	<b>37.3</b>	<b>26.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
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			
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
NonMSA	37	3,996	62.7	1,869	78.5	78.4	58.9	5.4	8.1	16.1	13.5		
Springfield MSA	22	3,106	37.3	2,685	78.9	68.2	51.3	5.3	13.6	15.8	18.2		
<b>Total</b>	<b>59</b>	<b>7,072</b>	<b>100.0</b>	<b>4,554</b>	<b>78.7</b>	<b>74.6</b>	<b>54.4</b>	<b>5.3</b>	<b>10.2</b>	<b>15.9</b>	<b>15.3</b>		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%