



## **PUBLIC DISCLOSURE**

June 13, 2022

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Forest Park National Bank and Trust Company  
Charter Number 14566

7348 West Madison Street  
Forest Park, IL 60130

ADC – Downers Grove Field Office (8308)  
Office of the Comptroller of the Currency  
2001 Butterfield Road, Suite 400  
Downers Grove, IL 60515

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

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## Overall CRA Rating

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

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

- The Lending Test rating is based upon Forest Park National Bank and Trust Company (FPNBT) lending performance in its one assessment area (AA). For this evaluation, we analyzed the bank's record of commercial lending as this is the bank's strategic focus and this portfolio is approximately 77 percent of all extended loans.

The major factors supporting the rating include:

- FPNBT's average loan-to-deposit ratio is reasonable considering the bank's size, financial condition, and strong competition for loans and deposits within its assessment area (AA).
- A substantial majority of the loans originated or purchased by the bank were inside the AA.
- The distribution of small business loans in geographies of different income levels is reasonable.
- The bank exhibited an excellent distribution of loans to small businesses.
- There were no complaints with respect to the bank's CRA performance.

### Loan-to-Deposit Ratio (LTD)

Considering the bank's size, financial condition, and credit needs of its AA, the bank's LTD ratio is reasonable.

The LTD is calculated at a bank-wide basis. Since the last CRA examination, the bank's average 12-quarter period LTD ratio averaged 83 percent.

To assess the bank's performance, we analyzed the LTD ratios of eight comparable institutions. Comparable institutions are defined as state and national banks and thrifts located in the bank's AA with total assets between \$250 million and \$450 million. These banks ranged from a low LTD of 49 percent to a high LTD at 102 percent. FPNBT was right in the middle, ranking the 5<sup>th</sup> highest of all competitors.

### Lending in Assessment Area

The bank originated and purchased 85 percent of its total loans inside the bank's AA 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 criteria.

We evaluated the bank’s lending inside and outside of its AAs using a sample of 60 commercial loans originated from 2019 through 2021. Commercial loans were selected for the analysis as they represented the largest percentage of loan originations during the period given the bank’s strategic focus. The results are displayed in Table D below.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total</b> \$(000s)
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Small Business	51	85.0	9	15.0	60	19,582	82.0	4,430	18.0	24,012

*Source: OCC sample of 60 commercial loans.  
Due to rounding, totals may not equal 100.0%*

## Description of Institution

FPNBT is an intrastate financial institution headquartered in Forest Park, Illinois and wholly owned by First Forest Park Corporation, a one-bank holding company also located in Forest Park, Illinois. There are two subsidiaries of the bank, First Forest Park Capital Trust II, and First Forest Park Capital Trust III, both located in Forest Park, Illinois. No affiliate activities were included in this evaluation. There have been no mergers or bank acquisitions since the prior CRA evaluation.

As of December 31, 2021, FPNBT reported assets totaling \$322 million and tier one capital of \$22.9 million. The net loan portfolio totaled \$210 million, representing 66 percent of total assets. The bank’s strategic focus is commercial loans which represented 78 percent of net loans.

The bank has one AA which includes all of Cook County, Illinois. The main bank location and its one branch are full-service locations, both in Forest Park, Illinois. Each location has a deposit taking ATM. FPNBT belongs to the Allpoint Network, a surcharge-free ATM network with 55,000 participating ATMs nationwide. The AA conforms to regulatory requirements and does not arbitrarily exclude low- and moderate-income (LMI) geographies.

FPNBT received an “Satisfactory” at their last CRA evaluation dated April 29, 2019. There are no legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its AA.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation assessed the bank’s CRA performance, using Small Bank Examination Procedures. These procedures only include the Lending Test. We performed a full-scope review of the bank’s one AA for the years 2019-2021.

Based on our review of all loans originated and purchased in the evaluation period, we determined the bank's primary loan products to be commercial loans. Our small business analysis was based upon a random sample of 60 commercial loans originated during this review period.

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

Examiners completed a full-scope review of the bank's one AA, which consists of all of Cook County. Refer to Appendix A for more information.

### **Ratings**

The bank's overall rating is based on the state rating. FPNBT's rating is based upon commercial lending performance in its one AA.

## **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 major factors that support this rating include:

- The bank's average LTD ratio is reasonable considering the bank's size, financial condition, and strong competition for loans and deposits within AA.
- A substantial majority of the loans originated or purchased by the bank were inside the AA.
- The distribution of small business loans in geographies of different income levels is reasonable.
- The bank exhibited an excellent distribution of loans to small businesses.

## **Description of Institution's Operations in Illinois**

FPNBT's primary focus is commercial lending. FNBT has one main bank location and one branch, both in Forest Park, Illinois. Each location has a deposit taking ATM. The bank also belongs to the Allpoint Network allowing their customers to withdraw cash without surcharges at any of Allpoint's 55,000 locations.

The bank designated all of Cook County, Illinois as its AA which includes 1,310 Census Tracts (CTs). According to the 2015 American Community Survey (ACS), the AA is composed of 19.2 percent low-income CTs, 28.9 percent moderate-income CTs, 24.0 percent middle-income CTs, 26.9 percent upper income CTs, and one percent of the CTs have no designated income level.

Competition within the AA is very strong, including local, regional, and nationwide financial institutions of all sizes that operate within Cook County. The Federal Deposit Insurance Corporation (FDIC) deposit market share report from June 30, 2021 included 100 financial institutions, with 1,230 offices taking deposits within the AA. FPNBT ranked 61st out of these 100 financial institutions. Bank competitors include large financial institutions, with the top 10 operating 697 branches in the AA and holding 83 percent of the market share. This compares to FPNBT's two offices and market share of 0.07 percent. These significantly larger institutions have a much higher capacity to lend.

The following table depicts demographic information on Cook County, Illinois.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cook County, IL AA</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)	1,319	19.2	28.9	24.0	26.9	1.0
Population by Geography	5,236,393	14.5	29.9	27.0	28.3	0.4
Housing Units by Geography	2,176,549	14.4	27.9	26.3	30.8	0.5
Owner-Occupied Units by Geography	1,107,485	6.9	24.2	32.0	36.7	0.2
Occupied Rental Units by Geography	835,474	20.8	32.1	20.9	25.3	0.9
Vacant Units by Geography	233,590	27.5	30.5	19.1	22.3	0.6
Businesses by Geography	474,429	8.6	21.7	24.6	44.3	0.7
Farms by Geography	4,567	7.2	23.4	29.2	40.0	0.2
Family Distribution by Income Level	1,184,857	28.0	17.0	17.7	37.2	0.0
Household Distribution by Income Level	1,942,959	29.2	15.8	16.7	38.2	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$245,250
			Median Gross Rent			\$1,038
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS and 2021 D&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>						

The OCC used recent community contacts made in conjunction with other local bank's CRA examinations. Community contacts stated that Cook County has many needs. Specifically for commercial loans, needs are for small business loans of less than \$100,000, financing to owners of multifamily buildings for acquisition and rehabilitation, and business capital loans to support growth.

### **Scope of Evaluation in Illinois**

Examiners completed a full-scope review of the bank's one AA, which consists of all of Cook County. Refer to Appendix A for more information.

## **LENDING TEST**

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

### **Conclusions For Cook County, Illinois Full Scope Review**

Based on a full scope review, the bank's performance in the Cook County, Illinois AA is good.

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

The bank exhibits reasonable geographic distribution of loans in Illinois. The examiners analyzed the bank's geographic distribution based on our sample of 51 loans extended in the AA during the evaluation period and separately, small business Paycheck Protection Program (PPP) loans extended in their AA area's low and moderate-income census tracts. There were no PPP loans counted that were also included as part of the 51 commercial loan sample.

##### ***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.

FPNBT's distribution of loans to small businesses by income level of the geography is reasonable.

Based on the loan sample, the bank performance in the low-income CTs is poor. The bank did not extend any loans in these CTs which have 9 percent of the businesses, and 7 percent aggregate peer lending. The bank's performance in the moderate-income CTs is reasonable at 16 percent. While this is lower than the 22 percent of businesses and 21 percent of aggregate lenders, it is reasonable in light of the high level of competition.

In addition to the steep competition, we considered the bank's record of PPP lending. The review included only loans extended to small businesses, located in the bank's LMI CTs, and under \$100,000. These PPP loans were not counted in our original commercial loan sample. During this evaluation period, FPNBT extended eight loans, totaling \$276,000. The lowest loan amount was \$5,000, with the highest loan amount of \$75,000.

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

The bank exhibits an excellent distribution of loans to businesses of different sizes.

##### ***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 small loans to businesses of different sizes is excellent. The percentage of small business loans originated or purchased to small businesses (businesses with gross annual revenues equal or less than \$1 million) was 86 percent. While it was slightly below the percentage of small businesses in the AA at 87 percent, it greatly exceeded the aggregate percentage of all reporting lenders at 37 percent.

### **Responses to Complaints**

The bank did not receive any CRA-related complaints during the evaluation period.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas 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>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Small Business Loans	
<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>		
Chicago-Naperville-Evanston, IL MD #16984	Full Scope	Cook County, IL

## Appendix B: Summary of State Ratings

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<b>RATINGS: Forest Park National Bank and Trust Company</b>	
<b>Overall Bank:</b>	<b>Lending Test Rating:</b>
Forest Park National Bank and Trust Company	Satisfactory
<b>State:</b>	
Illinois	Satisfactory

## 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 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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
FPNBT AA	51	19,581	100.0	157,442	8.6	0.0	7.3	21.7	16.0	21.3	24.6	37.0	26.4	44.3	45.0	44.5	0.7	2.0	0.5	
<b>Total</b>	<b>51</b>	<b>19,581</b>	<b>100.0</b>	<b>157,442</b>	<b>8.6</b>	<b>0.0</b>	<b>7.3</b>	<b>21.7</b>	<b>16.0</b>	<b>21.3</b>	<b>24.6</b>	<b>37.0</b>	<b>26.4</b>	<b>44.3</b>	<b>45.0</b>	<b>44.5</b>	<b>0.7</b>	<b>2.0</b>	<b>0.5</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
 OCC sample of 51 commercial loans.  
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
FPNBT AA	51	19,581	100.0	157,442	87.5	86.3	37.4	4.7	13.7	7.8	0.0		
<b>Total</b>	<b>51</b>	<b>19,581</b>	<b>100.0</b>	<b>157,442</b>	<b>87.5</b>	<b>86.3</b>	<b>37.4</b>	<b>4.7</b>	<b>13.7</b>	<b>7.8</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.  
 OCC sample of 51 commercial loans.  
 Due to rounding, totals may not equal 100.0%