



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

September 17, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

CNB Bank & Trust, National Association
Charter Number: 14347

450 West Side Square
Carlinville, IL 62626

Office of the Comptroller of the Currency

500 N. Broadway, Suite 1700
St. Louis, MO 63102

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: Satisfactory

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

CNB Bank & Trust, National Association's (CNB) Community Reinvestment Act (CRA) performance is satisfactory. We based our conclusions on CNB's lending and community development (CD) activities. The major factors that support the rating for CNB include:

- CNB's quarterly average loan-to-deposit is reasonable given the bank's size, financial condition, local competition, and assessment area (AA) credit needs.
- A majority of CNB's loans are located inside the AAs.
- CNB has a reasonable distribution of lending to borrowers of various income levels, and businesses of different sizes.
- CNB's geographic distribution of loans across geographies of different income levels is reasonable throughout the AAs.
- There were no complaints with respect to CNB's CRA performance.
- CNB demonstrates adequate responsiveness to the CD needs of its AAs.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

Limited 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 are typically secured by either 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.

Common Equity 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.

Description of Institution

CNB Bank & Trust, National Association (CNB) is an interstate financial institution headquartered in Carlinville, Illinois. The bank is a wholly owned subsidiary of CNB Bank Shares, Inc., also headquartered in Carlinville, Illinois. There were no affiliate or subsidiary activities considered in this evaluation.

CNB operates 14 branches that offer a full range of banking products and services to its customers. This includes deposit and loan products, as well as ATM/Debit cards, overdraft protection, remote deposit capture, night depository, safe deposit boxes, wire transfers, internet banking (including bill pay), mobile banking, cash management, trust services and wealth management services. CNB opened a new branch in Palos Heights, Illinois on June 13, 2014 and a new branch in Tinley Park, Illinois on April 9, 2018. Since the evaluation period for lending and CD activities ends at December 31, 2017, we did not include any lending or CD activities from the Tinley Park branch in the analysis for this performance evaluation.

As of December 31, 2017, CNB had total assets of \$945 million, total loans of \$717 million, total deposits of \$821 million, and common equity tier 1 capital of \$79.5 million or 10.9 percent of total risk weighted assets. CNB's net loans and leases totaled \$708 million and represented 75 percent of total assets. Loan portfolio composition as of December 31, 2017, includes the following:

Loan Type	Dollars (000)	Percentage of Loan Portfolio
Commercial Loans	\$ 337,651	47%
Agriculture Loans	\$ 217,477	30%
Residential Loans	\$ 141,830	20%
Consumer Loans	\$ 14,192	2%
Other Loans	\$ 5,469	<1%
Total Loans	\$ 716,619	100%

Source: 12/31/2017 FFIEC Call Report

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its assessment areas (AAs). CNB's last CRA performance evaluation was on June 16, 2014. Utilizing Intermediate Small Bank CRA examination procedures, the OCC concluded that CNB's performance was "Satisfactory."

For CRA purposes, CNB has identified three (AAs) that include portions of the St. Louis, MO-IL Multistate Metropolitan Area (MMA) # 41180, Cook County in the Chicago-Naperville-Arlington Heights, IL Metropolitan Statistical Area (MSA) # 16974, and a Non-MSA AA in Illinois. CNB's identified AAs conform to regulatory requirements and do not arbitrarily exclude low- and moderate-income geographies.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of CNB under the Intermediate Small Bank performance criteria, which consists of a lending test and a community development (CD) Test. The lending test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities. The CD test evaluates the bank's record of responding to the CD needs of its AAs through CD lending and providing qualified investments, donations, and services.

The evaluation period for this examination is from June 17, 2014 to December 31, 2017. For the CD test, we used information from the entire evaluation period. We determined that loan data from January 1, 2015 to December 31, 2017 was representative of the evaluation period and we sampled loans from this period for the lending test. To provide perspective regarding the relative level of qualified CD loans and investments, we allocated a portion of the bank's common equity tier 1 capital to each AA based on its pro rata share of deposits as a means of comparative analysis.

Home mortgage lending and business lending accounts for 70 percent of the total dollar amount and 56 percent of the total number of all loans originated or purchased during the evaluation period. Based on this information, CNB's primary lending products for this evaluation are home mortgage loans and business loans.

Loan Originations by Loan Type from January 1, 2015 through December 31, 2017				
Loan Category	Dollars (000s)	% of Dollars	Number of Loans	% of Number of Loans
Commercial Loans	\$ 494,398	47%	1,881	31%
Agricultural Loans	\$ 310,027	29%	1,265	21%
Home Mortgage Loans	\$ 243,246	23%	1,484	25%
Consumer Loans	\$ 14,492	1%	1,361	23%
Total Originations	\$ 1,062,163	100%	5,982	100%

Source: Bank Records January 1, 2015 – December 31, 2017

To evaluate lending performance, we reviewed the bank submitted Home Mortgage Disclosure Act (HMDA) data from 2015, 2016, and 2017 for home mortgage loans. Additionally, we selected a random sample of business loans originated during the same period (20 loans originated during the period of 2015-2016, per AA; and 20 loans originated during 2017).

We completed two separate analyses of the bank's lending performance. For CNB's lending performance in 2015 and 2016, we used the comparators of demographic data from the 2010 United States (U.S.) Census and 2016 Home Mortgage Disclosure Act (HMDA) Aggregate Data. For the bank's lending performance in 2017, we used the comparators of demographic data from the 2015 American Community Survey (ACS) U.S. Census and 2017 HMDA Aggregate Data. The 2015 ACS provided an update to median family income, changing the income designation of some census tracts (CTs) in the AAs in 2017.

Data Integrity

On April 2, 2018, we tested the accuracy of CNB's HMDA data and determined it to be accurate. CNB is not required nor does it opt to collect and report data on business loans; therefore, business-lending performance was evaluated using data collected during our review of bank loan files. We verified that CD loans, investments, and services submitted by CNB meet the regulatory definition for qualified CD activities and excluded those activities that did not meet the definition.

Selection of Areas for Full-Scope Review

We selected CNB's St. Louis, MO-IL MMA AA and Illinois Non-MSA AA for full-scope reviews. During the evaluation period, 79 percent of the bank's home mortgage loans and 51 percent of the bank's business loans originated in the St. Louis, MO-IL MMA AA. Approximately 44 percent of CNB's deposits were located in the St. Louis, MO-IL MMA AA. During the same period, 15 percent of the bank's home mortgage loans and 32 percent of the bank's business loans originated in the Illinois Non-MSA AA. This is just over twice that of the home mortgage loans originated in the Chicago MSA AA (6 percent) and nearly twice that of the business loans originated in the Chicago MSA AA (18 percent). Additionally, 32 percent of CNB's deposits were located in the Illinois Non-MSA AA compared to 24 percent in the Chicago MSA AA. Based on this information and considering the high level of competition within, we selected the Chicago MSA AA for a limited-scope review.

Please refer to the table in Appendix A for more information pertaining to the scope of the evaluation.

Ratings

We based the bank's overall rating primarily on those areas that received full-scope reviews. The lending and CD tests received equal weight in arriving at the overall rating. We placed more weight on performance from business lending than home mortgage lending. Business loans represented the largest volume, by number (33 percent), of originated loans during the evaluation period and the largest volume, by dollars (52 percent), of originated loans during the same period.

Community Contacts

We contacted one new community contact and reviewed several recent contacts from within the same period of this evaluation. Contacts included three from the St. Louis, MO-IL MMA AA, two from the Illinois Non-MSA AA, and one from the Chicago-Naperville-Arlington Heights MD AA. The contacts identified many of the same types of CD needs for their respective areas, including:

- Affordable housing (including first time homebuyer programs and down payment and closing cost assistance)
- Financial education and literacy programming
- Small business lending

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 assessment area 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 Consumer Financial Protection Bureau, 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.

Conclusions with Respect to Performance Criteria

Loan-to-Deposit Ratio

CNB National Bank's loan-to-deposit ratio is reasonable. The bank's average loan-to-deposit ratio over the evaluation period of 15 quarters was 81.67 percent. Over the same evaluation period, the bank experienced a loan-to-deposit ratio low of 75.08 percent and a high of 86.27 percent.

During the evaluation period, there were 124 competitor banks with home offices located in CNB's AA, ranging from \$19.8 million to \$138.2 billion in assets. The average loan-to-deposit ratio for these institutions was 76.14 percent over the same evaluation period, ranging from a high of 121.68 percent to a low of 14.77 percent. From the 124 competitor banks, we analyzed the loan-to-deposit ratio from a group of 36 banks, comparable in size to and including CNB, with assets ranging from \$471.2 million to \$1.9 billion. When comparing the average loan-to-deposit ratios of the other 35 banks (ranging from 46.97 percent to 104.50 percent), CNB ranked 20th. The table below lists institutions from the group with assets ranging from \$700 million to \$1.4 billion in assets with corresponding average loan-to-deposit ratios

Institution	Total Assets (\$000s) as of 12/31/2017	Average Quarterly LTD Ratio
FCB Banks	\$ 1,395,480	91%
Glenview State Bank	\$ 1,259,331	47%
Beverly Bank & Trust Company, NA	\$ 1,224,392	89%
Bridgeview Bank Group	\$ 1,175,351	85%
Schaumburg Bank & Trust Company, NA	\$ 1,044,091	89%
CNB Bank & Trust, NA	\$ 944,904	82%
Amalgamated Bank of Chicago	\$ 939,162	50%
Liberty Bank For Savings	\$ 835,880	63%
Cass Commercial Bank	\$ 830,672	93%
Signature Bank	\$ 767,836	80%
Royal Banks of Missouri	\$ 713,089	96%
<small>Source: Quarterly Call Reports from June 30, 2014 to December 31, 2017. Note: The loan-to-deposit ratio is calculated on a bank-wide basis.</small>		

Lending in Assessment Area

CNB originated a majority of its primary loan products within the AAs. Our sample revealed 89 percent of the total number and 85 percent of the total dollar volume of these loans originated within the AAs.

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	1,323	89%	161	11%	1,484	205,714	85%	37,532	15%	243,246
Business Loans	19	95%	1	5%	20	3,136	98%	48	2%	3,184
Total	1,342	89%	162	11%	1,504	208,850	85%	37,580	15%	246,430

Source: 01/01/2015-12/31/2017 HMDA Data; 01/01/2015-12/31/2017 Sample of 20 business loans using bank data.

Note: The proportion of lending inside versus outside the bank's AAs is calculated on a bank-wide basis.

Multistate Metropolitan Area Rating

St. Louis, MO-IL MMA # 41180

CRA rating for the St. Louis, MO-IL MMA # 41180 AA¹: Satisfactory.

The lending test is rated: Satisfactory

The community development test is rated: Outstanding

CNB's performance in the St. Louis, MO-IL MMA #41180 AA meets the standards for satisfactory performance:

- The distribution of loans among borrowers of different income levels and businesses of different sizes reflects reasonable penetration.
- The geographic distribution of loans reflects reasonable dispersion.
- The CD activities reflect excellent responsiveness to the community needs of the AA.

Description of Institution's Operations in the St. Louis, MO-IL MMA # 41180

The St. Louis, MO-IL MMA AA represents CNB's primary AA and includes all of Jersey, Macoupin, and Madison Counties in Illinois and all of St. Louis City and St. Louis County in Missouri. The bank operates six branches and nine cash-dispensing ATMs in this AA. CNB operates one branch in each of the following cities: Alton, Brighton, Carlinville, Jerseyville, and Shipman in Illinois and Clayton in Missouri. One cash-dispensing ATM is located at each branch, except for the Clayton branch. Other cash-dispensing ATM locations include two Boente Shell gas stations in Carlinville, a Shell Food Mart in Brighton, and a Shell Food Mart in Girard. As of June 30, 2017, CNB reported \$362 million in deposits in the St. Louis, MO-IL MMA AA. This represents 44 percent of total bank deposits as of that date. According to FDIC market share information as of June 30, 2017, CNB ranked 30th in deposit market share in the AA with a market share of 0.43 percent. The St. Louis, MO-IL MMA AA is extremely competitive with 82 other deposit-taking institutions operating 521 branches. Competitors in the AA include many local banks and credit unions, several regional banks, and four large national banks (U.S. Bank, Bank of America, PNC Bank, and BMO Harris Bank).

CNB's opportunity to lend in these geographies is affected by the distance from CNB's closest banking office to these geographies and other closer financial institutions. The above factors also affect CNB's opportunities to make loans to low- and moderate-income borrowers, as more of these borrowers reside in the low- and moderate-income geographies compared to other geographies within this AA. See the narrative below for supporting information.

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

- **City of St. Louis:** The closest CNB branch to the city center is approximately six miles away, in Clayton, Missouri. Other financial institutions have approximately 50 branches within the City of St. Louis.
- **St. Louis County, Missouri:** The low- and moderate-income geographies are predominantly located in the northeast portion of the county between two and twenty miles from CNB's closest branch (Clayton). Approximately 20 offices of other financial institutions are closer to these geographies.
- **Madison County, Illinois:** The low- and moderate-income geographies are located in Granite City (5), Wood River (3), Venice (2), Collinsville (2), and Alton (8). They are approximately 20 miles, 7 miles, 21 miles, 25 miles, and 5 miles, respectively, from CNB's closest branch in Alton (middle-income geography). Other financial institutions have approximately 10 branches in Granite City, which is three miles from Venice. Additionally, other financial institutions have six, eight, and nine branches located in Wood River, Collinsville, and Alton, respectively. Six of the nine branches in Alton are located in moderate-income geographies.
- **Macoupin County, Illinois:** The moderate-income geographies are located in Palmyra (1) and Cahokia Township (2) between 15 and 18 miles from CNB's closest branch, in Carlinville. Other financial institutions have six branches in the three moderate-income geographies.

Refer to the community profiles in Appendix C for detailed demographics and other performance context information for the St. Louis, MO-IL MMA AA.

Scope of Evaluation in St. Louis, MO-IL MMA # 41180

The St. Louis, MO-IL MMA # 41180 AA received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. LOUIS, MO-IL MMA # 41180 AA

LENDING TEST

CNB's performance under the lending test in the St. Louis, MO-IL MMA is satisfactory.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Based on the data in Tables P and R of Appendix D, and the following performance context considerations, we concluded the borrower distribution of the bank's originations of home mortgage loans and business loans is reasonable and meets the standard for satisfactory performance.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans in the St. Louis, MO-IL MMA AA is reasonable. We noted reasonable distribution within both analyses when considering loans extended to low- and moderate-income borrowers, performance context information, and demographic comparators.

In evaluating the borrower distribution of home mortgage loans, we noted the number of families with incomes below the poverty level was 9.6 percent in 2016 and 10.4 percent in 2017. People living in poverty, including LMI families, often have difficulty qualifying for conventional home mortgage products without flexible terms or reduced closing costs. We also considered the median age of housing stock in 2016 (55 years overall) compared to 67 and 65 years in the low-income CTs and moderate-income CTs, respectively. The median age of housing stock remained relatively unchanged for 2017. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. All of these factors add to the overall cost of homeownership, which can affect the ability of LMI individuals to qualify for home mortgage loans.

2015-2016

Borrower distribution of home mortgage loans is reasonable. The bank originated 19.1 percent of loans to moderate-income borrowers, which exceeds both the percentage of moderate-income families (16.9 percent) and the 2016 HMDA aggregate lending to moderate-income borrowers data (14.9 percent). CNB originated 10.8 percent of loans to low-income borrowers. While this is significantly below the percentage of low-income families (22.7 percent), the bank's performance is reasonable as it exceeds the 2016 HMDA aggregate lending to low-income borrowers data (6.5 percent).

2017

Borrower distribution of home mortgage loans for 2017 was stronger than that of 2015-2016. The bank originated 26.1 percent of loans to moderate-income borrowers, which exceeds the percentage of moderate-income families (17.1 percent) and the 2017 HMDA aggregate lending to moderate-income borrowers data (17.1 percent). CNB originated 13 percent of loans to low-income borrowers. While this is significantly below the percentage of low-income families (23.2 percent), the bank's performance is reasonable as it exceeds the 2017 HMDA aggregate lending to low-income borrowers data (9.1 percent).

Business Loans

The overall distribution of loans to business of different sizes in the St. Louis, MO-IL MMA AA reflects reasonable penetration of the AA's small businesses. We noted reasonable distribution within both analyses when considering loans extended to businesses with gross annual revenues less than \$1 million and demographic comparators.

2015-2016

The distribution of loans to businesses of different sizes is reasonable. Eighty percent of CNB's originated business loans were to businesses with gross annual revenues less than \$1 million. While the number of originated loans is slightly higher than the percentage of small businesses in the AA (79.4 percent), we also considered the percentage of businesses with unknown revenue at 12.3 percent.

2017

The distribution of loans to businesses of different sizes for 2017 was stronger than that of 2015-2016. The bank originated 95 percent of business loans to businesses with gross annual revenue less than \$1 million. While the number significantly exceeds the percentage of small businesses in the AA (79.4 percent), we also considered the percentage of businesses with unknown revenue at 12.3 percent.

Geographic Distribution of Loans

CNB's overall geographic distribution of home mortgage loans and business loans in the St. Louis, MO-IL MMA reflects reasonable dispersion among different income tracts in the AAs. As part of our analysis, we considered the distance from CNB's closest branch to the low- and moderate-income geographies of the AA along with the considerably high level of competition from other financial institutions in closer proximity to those same geographies. We can conclude that both of these factors had an adverse effect on the bank's opportunity to lend in the low- and moderate-income geographies of the AA. Refer to Tables O and Q in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

We analyzed CNB's home mortgage loan and business loan originations over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous lending gaps in the AAs.

Home Mortgage Loans

2015-2016

Geographic distribution of home mortgage loans is reasonable given the distance from CNB's closest branch to low- and moderate-income geographies. The bank originated 1.8 percent of home mortgage loans in low-income CTs, which is below the percentage of owner-occupied housing units located in low-income CTs (5.5 percent); however, is within a reasonable range below the 2016 HMDA Aggregate lending in the low-income CTs (2.1 percent). CNB originated 10.4 percent of home mortgage loans in moderate-income CTs, which is well below the percentage of owner-occupied housing located in moderate-income CTs (20.9 percent); however, is within a reasonable range below the 2016 HMDA Aggregate lending in the moderate-income CTs (13.6 percent).

2017

The geographic distribution of home mortgage loans in 2017 is poor and weaker than that of 2015-2016. The bank originated no loans in low-income CTs, compared to both the percentage of owner-occupied housing units located in low-income CTs (6.4 percent) and the 2017 HMDA Aggregate lending to the low-income CTs (3 percent). CNB originated 11.4 percent of home mortgage loans in moderate-income CTs, which is much lower than both the percentage of owner-occupied housing units located in moderate-income CTs (19.7 percent) and 2017 HMDA Aggregate lending in the moderate-income CTs (16.2 percent).

Business Loans

2015-2016

The geographic distribution of business loans is poor. Based on our sample of 20 loans originated during this evaluation period, the bank did not originate any business loans in low-income CTs, compared to the percentage of businesses located in low-income CTs (7.2 percent). CNB originated 5 percent of business loans in moderate-income CTs, which is significantly lower than the percentage of businesses located in moderate-income CTs (18.7 percent).

2017

The geographic distribution of business loans is reasonable given the distance from CNB's closest branch to low- and moderate-income geographies. Based on our sample of 20 loans originated during this evaluation period, the bank originated 5 percent of business loans in low-income CTs, which is within a reasonable range below the percentage of businesses located in low-income CTs (7.4 percent). CNB originated 10 percent of business loans in moderate-income CTs, which is also within a reasonable range below the percentage of businesses in moderate-income CTs (18.5 percent).

Responses to Complaints

CNB nor the OCC received any complaints related to the CRA since the prior performance evaluation.

COMMUNITY DEVELOPMENT TEST

CNB's performance under the CD test in the St. Louis, MO-IL MMA AA is outstanding. Based on the full-scope review, the bank's CD performance in this AA reflects excellent responsiveness to the needs of the community. Many of the CD activities met an identified need of providing loans to small businesses and farms, affordable housing for low- and moderate-income individuals, and community services to low- and moderate-income individuals.

Number and Amount of Community Development Loans

CD loans demonstrated adequate responsiveness to CD needs and opportunities in the St. Louis, MO-IL MMA AA during the evaluation period. CNB originated 11 CD loans totaling \$3.3 million during the evaluation period. This represents 9.4 percent of the AA's allocated common equity tier 1 capital (\$35.2 million) as of December 31, 2017. CD loans consisted of the following:

- CNB originated four CD loans totaling \$1.9 million that promoted economic development through financing small businesses and farms that supported permanent job creation, retention, and/or improvement for persons who were low- and moderate-income.
- CNB originated two CD loans totaling \$870,000 for the acquisition and refinance of two multi-family apartment complexes, containing 41 units, primarily for low- and moderate-income individuals. CNB originated two loans totaling \$482,000 that provided financing to an organization that specializes in building affordable single-family homes for low- and moderate-income individuals.
- CNB originated three CD loans totaling \$80,000 that supported community services primarily for low- and moderate-income individuals. Loan proceeds provided for after school programs for students and daycare for children.

Number and Amount of Qualified Investments

CD investments demonstrated adequate responsiveness to CD needs and opportunities in the St. Louis, MO-IL MMA AA during the evaluation period. In aggregate, CD investments and donations totaled \$4 million during the evaluation period. This represents approximately 11.4 percent of the AA's allocated common equity tier 1 capital as of December 31, 2017. CD investments consisted of the following:

- CNB purchased or retained 10 school district bonds totaling \$3.3 million. These bonds provided critical funding for school districts where a majority of students qualify for free

or reduced-price meals under the U.S. Department of Agriculture's National School Lunch Program.

- CNB invested \$678,000 in an Affordable Housing Program Grant that facilitated the construction of affordable single-family homes for low- and moderate-income individuals. CNB also maintains a \$67,000 investment in a community development corporation, which provides start-up and gap funding for small businesses.
- CNB donated \$12,200 to 22 non-profit organizations that provide an array of community services primarily for low- and moderate-income individuals. These organizations supported food donations, health care, temporary shelter for the homeless and abused individuals, school supplies for children, job training and employment counseling, and transportation.

Extent to Which the Bank Provides Community Development Services

CNB provided CD services to ten organizations that provide community services primarily to low- and moderate-income individuals. CNB representatives provided financial and investment advice, assisted with managing budgets and finances of an organization, participated in fundraising activities, and taught financial literacy courses.

Responsiveness to Community Development Needs

CNB's CD activities demonstrated excellent responsiveness to community needs given abundant opportunities for CD activities, the bank's capacity for CD activities, and identified needs of the community.

State Rating

State of Illinois

CRA rating for Illinois: Satisfactory

The lending test is rated: Satisfactory

The community development test is rated: Satisfactory

CNB's performance in the state of Illinois meets the standards for satisfactory performance:

- The distribution of loans among borrowers of different income levels and businesses of different sizes reflects reasonable penetration.
- The geographic distribution of loans reflects reasonable dispersion.
- The CD activities reflect adequate responsiveness to the community needs of the AA.

Description of Institution's Operations in Illinois

The state of Illinois accounts for 56 percent (\$455 million) of CNB's total deposits and 42 percent of CNB's overall loans originated or purchased during the evaluation period. CNB has eight branches and nine cash-dispensing-only ATMs within the state of Illinois. CNB has no deposit-taking ATMs within the state.

CNB has two AAs in the state of Illinois: Cook County, which is part of the Chicago-Naperville-Arlington Heights, IL Metropolitan Division # 16974; and six non-MSA Illinois counties located in southwest Illinois. The eight branches are located in Christian, Cook, Greene, Montgomery, Morgan, and Pike counties. Even though CNB does not have a branch in Scott County, this county is part of the non-MSA AA because it is contiguous to some of the other counties. None of CNB's branches are located in low- or moderate-income geographies. Both AAs conform to regulatory requirements and do not arbitrarily exclude low- and moderate-income geographies.

Chicago-Naperville-Arlington Heights, IL MD #16974 AA (Cook County)

CNB operates three branches and three cash-dispensing ATMs in the Cook County AA. There is one branch located in each of the following cities, Oak Forest, Palos Heights and Tinley Park. One cash-dispensing ATM is located at each branch. As of June 30, 2017, CNB reported \$196 million in deposits in the Cook County AA. This represents 24 percent of total bank deposits as of that date. According to FDIC market share information as of June 30, 2017, CNB ranked 68th in deposit market share in the AA with a minimal market share of 0.07 percent. The Cook County AA is extremely competitive with 115 other deposit-taking institutions operating 1,413 branches. Competitors in the AA include many local banks and credit unions, regional banks (such as MB Financial, TCF National Bank, and Associated Bank), and many large national banks (such as JPMorgan Chase Bank, Bank of America, BMO Harris Bank, Citibank, U.S. Bank, Wells Fargo Bank, and PNC Bank).

CNB's opportunity to lend in the low- and moderate-income geographies in Cook County is affected by CNB's limited presence in the county, the distance from the branches to low- and moderate-income geographies throughout the county, and the significant number of other financial institutions that are closer to the low- and moderate-income geographies. The above factors also affect CNB's opportunities to make loans to low- and moderate-income borrowers, as more of these borrowers reside in the low- and moderate-income geographies.

Illinois Non-MSA AA

The Illinois Non-MSA AA includes all of Christian, Greene, Montgomery, Morgan, Pike, and Scott Counties, located in southwest Illinois. CNB operates five branches and six cash-dispensing ATMs in the Illinois Non-MSA AA. CNB operates one branch in each of the following towns: Carrollton, Hillsboro, Jacksonville, Pittsfield, and Taylorville. One cash-dispensing ATM is located at each branch and one additional standalone ATM is located in Taylorville. As of June 30, 2017, CNB reported \$259 million in deposits in the Illinois Non-MSA AA. This represents 32 percent of total bank deposits as of that date. According to FDIC market share information as of June 30, 2017, CNB ranked second in deposit market share in the AA with a market share of 7.9 percent. Competition in the Illinois Non-MSA AA is considerable with 36 other deposit-taking institutions operating 83 branches. Competitors in the AA include many local banks and credit unions, and one large national bank (U.S. Bank).

Refer to the community profiles in Appendix C for detailed demographics and other performance context information for the AAs that received full-scope reviews.

Scope of Evaluation in Illinois

The Illinois Non-MSA AA received a full-scope review.

The Chicago-Naperville-Arlington Heights, IL MD # 16974 AA received a limited-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

The bank's performance under the lending test in the state of Illinois is rated satisfactory. Based on the full-scope review, the bank's lending test performance in the Illinois Non-MSA AA is satisfactory. Based on a limited-scope review, we did not identify any significant inconsistencies between the bank's lending test performance in the Chicago-Naperville-Arlington Heights, IL MD AA, when compared to the overall satisfactory lending performance test in the state of Illinois.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Based on the data in Tables P and R of Appendix D, and the following performance context considerations, we concluded the borrower distribution of the bank's originations of home mortgage loans and business loans is reasonable and meets the standard for satisfactory performance.

Illinois Non-MSA AA

Home Mortgage Loans

The overall borrower distribution of home mortgage loans in the Illinois Non-MSA AA is reasonable. We noted reasonable distribution within both analyses when considering loans extended to low- and moderate-income borrowers, performance context information, and demographic comparators.

In evaluating the borrower distribution of home mortgage loans, we noted the number of families with incomes below the poverty level was 11.4 percent in 2016 and 10.4 percent in 2017. People living in poverty, including LMI families, often have difficulty qualifying for conventional home mortgage products without flexible terms or reduced closing costs. We also considered the median age of housing stock in 2016 (57 years overall) compared to 63 in moderate-income CTs (there are no low-income CTs in this AA). The median age of housing stock remained relatively unchanged for 2017. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. All of these factors add to the overall cost of homeownership, which can affect the ability of LMI individuals to qualify for home mortgage loans.

2015-2016

Borrower distribution of home mortgage loans is reasonable. The bank originated 22.5 percent of loans to moderate-income borrowers, which exceeds both the percentage of moderate-income families (17.6 percent) and the 2016 HMDA aggregate lending to moderate-income borrowers data (19.4 percent). CNB originated 7.7 percent of loans to low-income borrowers. While this is significantly below the percentage of low-income families (20.6 percent), the bank's performance is reasonable, as it is equal to the 2016 HMDA aggregate lending to low-income borrowers data (7.7 percent).

2017

Borrower distribution of home mortgage loans for 2017 was stronger than that of 2015-2016. The bank originated 21.2 percent of loans to moderate-income borrowers, which exceeds the percentage of moderate-income families (18.6 percent) and the 2017 HMDA aggregate lending to moderate-income borrowers data (20.5 percent). CNB originated 11.6 percent of loans to low-income borrowers. While this is significantly below the percentage of low-income families (21.4 percent), the bank's performance is reasonable as it exceeds the 2017 HMDA aggregate lending to low-income borrowers data (9.3 percent).

Business Loans

The overall distribution of loans to business of different sizes in the Illinois Non-MSA AA reflects reasonable penetration of the AA's small businesses. We noted reasonable distribution within both analyses when considering loans extended to businesses with gross annual revenues less than \$1 million and demographic comparators.

2015-2016

The distribution of loans to businesses of different sizes is reasonable. Ninety-five percent of CNB's originated business loans were to businesses with gross annual revenues less than \$1 million. While the number of originated loans is significantly higher than the percentage of small businesses in the AA (74.6 percent), we also considered the percentage of businesses with unknown revenue at 19.7 percent.

2017

The distribution of loans to businesses of different sizes for 2017 was consistent with that of 2015-2016. The bank originated 95 percent of business loans to businesses with gross annual revenue less than \$1 million. While the number significantly exceeds the percentage of small businesses in the AA (73.8 percent), we also considered the percentage of businesses with unknown revenue at 20.2 percent.

Chicago-Naperville-Arlington Heights, IL MD #16974 AA – Limited Scope

We completed a limited scope review of the Chicago-Naperville-Arlington Heights, IL MD AA for the borrower distribution of home mortgage loans and business loans.

Home Mortgage Loans

Borrower distribution of home mortgage loans was weaker than the full scope AAs, for both the 2015-2016 and 2017 review periods.

Business Loans

Borrower distribution of business loans was slightly weaker than that of the full scope AAs, for both the 2015-2016 and 2017 review periods.

Geographic Distribution of Loans

CNB's overall geographic distribution of home mortgage and business loans reflects reasonable dispersion among different income tracts in the AAs. Refer to Tables O and Q in appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

We analyzed CNB's home mortgage and business lending originations over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous lending gaps in the AAs.

Illinois Non-MSA AA

CNB's geographic distribution of loans reflects reasonable dispersion in the Illinois Non-MSA AA. There are no low-income geographies in the AA for either analysis period. For the 2015-2016 analysis, we took into consideration the limited number of moderate-income geographies (4 CTs) and the location of these CTs in relation to CNB's branches. We found that CNB's opportunity to lend in these four moderate-income CTs was adversely affected by the amount of distance from their closest branch to these four CTs and the numerous competitors within the AA that were positioned much closer. In 2015, the U.S. Census Bureau completed the American Community Survey (ACS), which provided updates to income levels for a large number of CTs across the United States. The FFIEC applied this new data to all affected CTs in mid-2017, which in the case of CNB's Illinois Non-MSA AA, the same four moderate-income CTs remained in place and there were three CTs that shifted from middle-income to moderate-income. As a result, CNB's opportunity to lend in the moderate-income geographies improved in 2017.

Home Mortgage Loans

2015-2016

Geographic distribution of home mortgage loans is reasonable given the adverse affects on CNB's opportunity to lend in the moderate-income geographies as described above. The bank originated 1.2 percent of home mortgage loans in moderate-income CTs, which falls below the percentage of owner-occupied housing located in moderate-income CTs (6.8 percent) and the 2016 HMDA Aggregate lending in moderate-income CTs (7.2 percent).

2017

CNB's geographic distribution of home mortgage loans in 2017 improved significantly from that of 2015-2016. The bank originated 17.8 percent of home mortgage loans in the moderate-income geographies, which exceeds the percentage of owner-occupied housing located in moderate-income CTs (13.1 percent) and significantly exceeds the 2017 HMDA Aggregate lending in moderate-income CTs (11.9 percent).

Business Loans

2015-2016

The geographic distribution of business loans is poor. Based on our sample of 20 loans originated during this evaluation period, the bank did not originate any business loans in moderate-income CTs, compared to the percentage of businesses located in low-income CTs (9.2 percent).

2017

CNB's geographic distribution of business loans in 2017 improved significantly from that of 2015-2016. Based on our sample of 20 loans originated during this evaluation period, the bank originated 30 percent of business loans in moderate-income CTs, which exceeds the percentage of businesses located in moderate income CTs (15.3 percent).

Chicago-Naperville-Arlington Heights, IL MD #16974 AA – Limited Scope

We completed a limited scope review of the Chicago-Naperville-Arlington Heights, IL MD AA for the geographic distribution of home mortgage loans and business loans.

Home Mortgage Loans

Geographic distribution of home mortgage loans was stronger than the full scope AAs, for both the 2015-2016 and 2017 review periods.

Business Loans

Geographic distribution of business loans was stronger than that of the full scope AAs, for both the 2015-2016 and 2017 review periods.

Responses to Complaints

CNB nor the OCC received any complaints related to the CRA since the prior performance evaluation.

COMMUNITY DEVELOPMENT TEST

CNB's performance under the CD test in the state of Illinois is rated satisfactory. Based on the full-scope review, the bank's CD performance in the six Non-MSA Illinois counties reflects adequate responsiveness to the needs of the community. The CD activities met an identified need of providing loans to small businesses and farms. Based on the limited-scope review, the bank's CD performance in Cook County reflects stronger performance than the overall CD rating in Illinois. The CD performance in Cook County demonstrates excellent responsiveness to the needs of the community given the volume of activity and the significance of Cook County to the bank as a whole.

Number and Amount of Community Development Loans

Illinois Non-MSA AA

CD loans demonstrated adequate responsiveness to CD needs and opportunities in the Illinois Non-MSA AA during the evaluation period. CNB originated seven CD loans totaling \$1.2 million during the evaluation period. This represents 4.9 percent of the AA's allocated

common equity tier 1 capital (\$25.2 million) as of December 31, 2017. CD loans consisted of the following:

- CNB originated four CD loans totaling \$945,000 that promoted economic development through financing small businesses that supported permanent job creation, retention, and/or improvement for persons who were low- and moderate-income.
- CNB originated three CD loans totaling \$284,000 for the acquisition and refinance of six single-family rental properties, primarily for low- and moderate-income individuals.

Chicago-Naperville-Arlington Heights, IL MD #16974 AA – Limited Scope

CD loans demonstrated excellent responsiveness to CD needs and opportunities in the Chicago-Naperville-Arlington Heights, IL MD AA during the evaluation period. CNB originated 10 CD loans totaling \$4.6 million during the evaluation period. This represents 24 percent of the AA's allocated common equity tier 1 capital (\$18.6 million) as of December 31, 2017. CD loans consisted of the following:

- CNB originated nine CD loans totaling \$4.3 million for the rehabilitation of multi-family apartment complexes containing 132 units, primarily for low- and moderate-income individuals.
- CNB originated one loan for \$275,000 that promoted economic development by financing a small business that retained six jobs for persons who were low- and moderate-income.

Number and Amount of Qualified Investments

Illinois Non-MSA AA

CD investments demonstrated adequate responsiveness to CD needs and opportunities in the Illinois Non-MSA AA during the evaluation period. In aggregate, CD investments and donations totaled \$478,000 during the evaluation period. This represents 1.9 percent of the AA's allocated common equity tier 1 capital as of December 31, 2017. CD investments consisted of the following:

- CNB retained one school district bond totaling \$460,000. This bond provided critical funding for a school district where a majority of students qualify for free or reduced-price meals under the U.S. Department of Agriculture's National School Lunch Program.
- CNB donated \$17,614 to 20 non-profit organizations that provide an array of community services primarily for low- and moderate-income individuals. These organizations supported food donations, health care, temporary shelter for the homeless and abused individuals, school supplies for children, job training and employment counseling, and transportation.

Chicago-Naperville-Arlington Heights, IL MD #16974 AA – Limited Scope

CD investments demonstrated adequate responsiveness to CD needs and opportunities in the Chicago-Naperville-Arlington Heights, IL MD AA during the evaluation period. CD investments consisted of the following:

- CNB donated \$3,920 to six non-profit organizations that provide an array of community services primarily for low- and moderate-income individuals. These organizations supported food donations, health care, temporary shelter for the homeless and abused individuals, school supplies for children, job training and employment counseling, and transportation.

Extent to Which the Bank Provides Community Development Services

Illinois Non-MSA AA

CNB provided CD services to three organizations that provide community services primarily to low- and moderate-income individuals. CNB representatives provided financial advice and participated in fundraising activities.

Responsiveness to Community Development Needs

In the Illinois Non-MSA AA, CNB's CD activities demonstrated adequate responsiveness to community needs given the moderate opportunities for CD activities, the bank's capacity for CD activities, and identified needs of the community.

In the Chicago-Naperville-Arlington Heights, IL MD AA, CNB's CD activities demonstrated excellent responsiveness to community needs given the volume of activity and the significance of Cook County to the bank as a whole.

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”).

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/15 – 12/31/2017 Community Development Test: 06/17/14 – 12/31/2017	
Financial Institution	Products Reviewed	
CNB Bank & Trust (CNB) Carlinville, IL	Home Mortgage Loans Business Loans Community Development Loans Qualified Investments Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
St. Louis MO-IL MMA #41180	Full-Scope	Jersey, Macoupin, Madison, and St. Louis Counties; St. Louis City
State of Illinois		
Chicago-Naperville-Arlington-Heights MD #16974	Limited-Scope	Cook County
Illinois Non-MSA AA	Full-Scope	Christian, Greene, Montgomery, Morgan, Pike, and Scott Counties

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

Overall Bank:	Lending Test Rating	Community Development Test Rating	Overall Bank/State/Multistate Rating
CNB Bank & Trust, National Association	Satisfactory	Satisfactory	Satisfactory
Multistate Metropolitan Area or State:			
St. Louis, MO-IL MMA # 41180	Satisfactory	Outstanding	Satisfactory
State of Illinois	Satisfactory	Satisfactory	Satisfactory

Appendix C: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area

Assessment Area: CNB St. Louis MO-IL MMA AA - 2016

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	385	15.3	23.9	33.5	27.0	0.3
Population by Geography	1,658,280	9.9	22.9	34.6	32.5	0.1
Housing Units by Geography	761,724	11.0	24.6	34.9	29.4	0.1
Owner-Occupied Units by Geography	461,314	5.5	20.9	37.5	36.2	0.0
Occupied Rental Units by Geography	218,766	17.9	29.8	32.4	19.8	0.2
Vacant Units by Geography	81,644	24.1	31.8	27.0	16.9	0.2
Businesses by Geography	103,758	7.2	18.7	31.0	43.0	0.2
Farms by Geography	2,557	2.3	15.7	41.5	40.4	0.1
Family Distribution by Income Level	423,430	22.7	16.9	20.2	40.2	0.0
Household Distribution by Income Level	680,080	26.3	16.4	17.5	39.8	0.0
Median Family Income		\$66,798	Median Housing Value			\$176,452
FFIEC Adjusted Median Family Income		\$70,000	Median Gross Rent			\$736
Unemployment Rate (2010 U.S. Census)		5.37%	Families Below Poverty Level			9.6%

Source: 2010 U.S. Census and 2016 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that do not have an assigned income classification.

Table A – Demographic Information of the Assessment Area

Assessment Area: CNB St. Louis MO-IL MMA AA - 2017

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	385	15.8	23.4	32.2	27.8	0.8
Population by Geography	1,656,002	11.3	22.1	33.4	32.8	0.4
Housing Units by Geography	763,123	12.9	23.0	33.7	30.1	0.4
Owner-Occupied Units by Geography	441,204	6.4	19.7	36.3	37.4	0.2
Occupied Rental Units by Geography	235,113	18.9	27.6	31.9	20.8	0.8
Vacant Units by Geography	86,806	29.0	27.2	25.3	18.1	0.4
Businesses by Geography	105,096	7.4	18.5	29.6	43.1	1.4
Farms by Geography	2,641	3.0	14.5	44.1	37.9	0.5
Family Distribution by Income Level	416,121	23.2	17.1	18.9	40.8	0.0
Household Distribution by Income Level	676,317	26.0	16.3	17.0	40.6	0.0
Median Family Income		\$70,718	Median Housing Value			\$168,411
FFIEC Adjusted Median Family Income		\$74,300	Median Gross Rent			\$829
Unemployment Rate (2015 ACS U.S. Census)		5.67%	Families Below Poverty Level			10.4%

Source: 2015 ACS Census and 2017 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that do not have an assigned income classification.

CNB has designated the counties of Jersey, Macoupin, and Madison in Illinois and St. Louis City and St. Louis County in Missouri as its St. Louis, MO-IL MMA AA. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. The 2010 U.S. Census recorded 385 census tracts in the AA, consisting of 59 (15.3 percent) low-income tracts, 92 (23.9 percent) moderate-income tracts, 129 (33.5 percent) middle-income tracts, 104 (27 percent) upper-income tracts, and 1 (0.3 percent) unassigned-income tract. According to the 2010 census data, the area population was 1,658,280 with 164,170 or 9.9 percent residing in low-income census tracts and 379,746 or 22.9 percent residing in moderate-income census tracts.

According to the 2015 ACS Census, the total number of census tracts remained the same. The 2015 ACS Census recorded 385 census tracts in the AA, of which 61 (15.8 percent) are low-income tracts, 90 (23.4 percent) are moderate-income tracts, 124 (32.2 percent) are middle-income tracts, 107 (27.8 percent) are upper-income tracts, and three (0.8 percent) are unassigned-income tracts. Population was slightly down from the 2010 census at 1,656,002 with 187,128 or 11.3 percent residing in low-income census tracts and 365,976 or 22.1 percent residing in moderate-income census tracts.

According to 2015 ACS Census data, the median income for a household in the MSA was \$58,701, and for a family was \$70,718. The distribution of families by income level was 23.2 percent low-income, 17.1 percent moderate-income, 18.9 percent middle-income, and 40.8 percent upper-income. The percentage of households and the percentage of families in the AA living below the poverty level was 13.6 percent and 10.4 percent, respectively. The 2017 FFIEC adjusted median family income for the AA was \$74,300. Low-income families earned annual income of less than \$36,100, and moderate-income families earned annual income in the range from \$36,100 to \$57,760.

Table B – Median Family Income Ranges 2015-17

Assessment Area: CNB St. Louis MO-IL MMA AA

Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2015 (\$72,200)	<\$36,100	\$36,100 to <\$57,760	\$57,760 to <\$86,640	≥\$86,640
2016 (\$70,000)	<\$35,000	\$35,000 to <\$56,000	\$56,000 to <\$84,000	≥\$84,000
2017 (\$74,300)	<\$37,150	\$37,150 to <\$59,440	\$59,440 to <\$89,160	≥\$89,160

Source: FFIEC

As of June 30, 2017, there were 83 total depository institutions in the AA operating 527 branches. CNB has six branches in the AA. According to the June 30, 2017 FDIC Summary of Deposits Report, CNB’s deposits in the AA totaled \$362 million, representing only 0.43 percent of the market. CNB ranks 30th in the AA. The top five depository institutions by market share in the AA were Scottrade Bank (18.37 percent), Stifel Bank and Trust (14.20 percent), U.S. Bank National Association (14.11 percent), Bank of America, National

Association (11.72 percent), and Commerce Bank (6.40 percent). These institutions accounted for a combined \$55 billion in deposits for a 65 percent share of the market.

Jersey County, Illinois

Jersey County has a population of 22,441 as of the 2010 census. Healthcare & Social Assistance is the largest industry in the county followed by Manufacturing, and Retail Trade. The largest university in Jersey County is Principia College, awarding 136 degrees in 2015.

Macoupin County, Illinois

Macoupin County has a population of 46,482 as of the 2010 census. Healthcare & Social Assistance is the largest industry in the county followed by Retail Trade, and Manufacturing. The largest university in Macoupin County is Blackburn College, awarding 117 degrees in 2015.

Madison County, Illinois

Madison County has a population of 265,759 as of the 2010 census. Healthcare & Social Assistance is the largest industry in the county followed by Manufacturing, and Retail Trade. The largest universities in Madison County are Southern Illinois University-Edwardsville with 2,984 graduates in 2015 and Lewis & Clark Community College with 1,569 graduates in 2015.

St. Louis City, Missouri

St. Louis City has a population of 311,404 as of the 2010 census. Healthcare & Social Assistance is the largest industry in the city followed by Educational Services, and Accommodation & Food Service. The largest universities in St. Louis City by number of graduates in 2015 were Saint Louis University (3,857), Saint Louis Community College (2,525), and Ranken Technical College (907).

St. Louis County, Missouri

St. Louis County has a population of 998,581 as of the 2010 census. Healthcare & Social Assistance is the largest industry in the county followed by Retail Trade, and Manufacturing. The largest universities in St. Louis County by number of graduates in 2015 were Webster University (6,336), Washington University in St. Louis (4,774) and University of Missouri-St. Louis (3,267).

Employment and Economic Factors

According to Moody's Analytics, St. Louis' solid first half run bodes well for the rest of 2018, but risks are rising as goods producers and transporters face tariffs and trade concerns will persist. The future is bright for professional and technical services, but poor population trends will cap long-term growth. The top five employment sectors in the St. Louis MSA are Education and Health Services, Professional and Business Services, Government, Leisure and Hospitality Services, and Retail Trade. The top five employers in St. Louis are BJC Healthcare, Wal-Mart Stores Inc., SSM Health Care System, Washington University in St. Louis, and Boeing Defense, Space and Security.

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, the unemployment rate for this area as of December 2015 and 2017 was 4.2 percent and 3.4

percent, respectively. The national unemployment rate as of the same dates was 5 percent (December 2015) and 4.1 percent (December 2017). Unemployment information for the counties and states that make up the St. Louis MO-IL MMA AA are in the table below.

Unemployment Rates 2015-17			
Assessment Area: CNB St. Louis MO-IL MMA AA			
	2015	2016	2017
Jersey County	6.6%	5.3%	4.3%
Macoupin County	6.4%	5.5%	4.5%
Madison County	5.9%	5.2%	4.0%
State of Illinois	6.0%	5.3%	4.7%
St. Louis City	4.8%	4.4%	3.9%
St. Louis County	3.6%	3.5%	3.1%
State of Missouri	4.0%	3.9%	3.3%
National	5.0%	4.7%	4.1%

Source: U.S. Department of Labor; Bureau of Labor Statistics

Housing

The 2010 US Census reported total housing units of 761,724 for the St. Louis, MO-IL MMA AA. Of the total number of housing units, 461,314 or 60.6 percent of the total housing units in the AA are owner occupied, 218,766 or 28.7 percent are renter occupied, and 81,644 or 10.7 percent are vacant. Of all owner occupied units, 25,372 or 5.5 percent were located in low-income census tracts and 96,415 or 20.9 percent were located in moderate-income census tracts. Of all occupied rental units, 39,159 or 17.9 percent were located in low-income census tracts and 65,192 or 29.8 percent were located in moderate-income census tracts. Of all vacant units, 19,676 or 24.1 percent were located in low-income census tracts and 25,963 or 31.8 percent were located in moderate-income census tracts. Additionally, of all single-family homes, 66,378 or 10.5 percent were located in low-income census tracts and 158,871 or 25.2 percent were located in moderate-income census tracts. For multifamily housing units, 16,871 or 13.6 percent were located in low-income census tracts and 26,361 or 21.4 percent were located in moderate-income census tracts. The 2010 U.S. Census indicates that the weighted average median housing value was \$176,452, and the weighted average monthly gross rent was \$736.

The 2015 ACS Census Survey reported total housing units of 763,123 for the St. Louis, MO-IL MMA AA. Of the total number of housing units, 441,204 or 57.8 percent of the total housing units in the AA are owner occupied, 235,113 or 30.8 percent are renter occupied, and 86,806 or 11.4 percent are vacant. Of all owner occupied units, 28,237 or 6.4 percent were located in low-income census tracts and 86,917 or 19.7 percent were located in moderate-income census tracts. Of all occupied rental units, 44,436 or 18.9 percent were located in low-income census tracts and 64,891 or 27.6 percent were located in moderate-

income census tracts. Of all vacant units, 25,174 or 29 percent were located in low-income census tracts and 23,611 or 27.2 percent were located in moderate-income census tracts. Additionally, of all single-family homes, 80,582 or 12.7 percent were located in low-income census tracts and 147,242 or 23.2 percent were located in moderate-income census tracts. For multifamily housing units, 16,786 or 13.8 percent were located in low-income census tracts and 25,893 or 21.3 percent were located in moderate-income census tracts. The 2010 U.S. Census indicates that the weighted average median housing value was \$168,411 and the weighted average monthly gross rent was \$829.

Affordability

We conducted an affordability analysis in this AA to determine if the overall affordability of housing for LMI borrowers was an impediment to CNB's home mortgage lending to LMI borrowers within this AA. To determine affordability, we assumed a 30-year mortgage based on the median list price of homes for sale at an interest rate of 5 percent and determined a monthly payment amount (no down payment and no accounting for homeowner's insurance, real estate taxes, or any additional monthly expenses). We compared this with a payment based on an LMI family utilizing no more than 30 percent of their income for the same term of 30-years at 5 percent.

A low-income family making \$37,149 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$ 173,004 mortgage with a payment of \$929 per month. A moderate-income borrower making \$59,439 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$276,809 mortgage with a payment of \$1,486 per month. According to Zillow.com data, the median list price in the AA in 2017 was \$211,848. Borrowing \$211,848 for 30 years at an interest rate of 5 percent yields a monthly payment amount of \$1,137. Based on these results, it would appear difficult for a low-income family to afford a home in this area; however, it would be well within reach for a moderate-income family.

Table A – Demographic Information of the Assessment Area
Assessment Area: CNB Illinois Non-MSA AA – 2016

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	0.0	10.0	80.8	10.0	0.0
Population by Geography	136,122	0.0	8.0	80.8	11.1	0.0
Housing Units by Geography	61,028	0.0	8.4	80.5	11.1	0.0
Owner-Occupied Units by Geography	40,972	0.0	6.8	80.8	12.4	0.0
Occupied Rental Units by Geography	13,441	0.0	12.3	77.4	10.4	0.0
Vacant Units by Geography	6,615	0.0	10.6	85.1	4.4	0.0
Businesses by Geography	6,423	0.0	9.2	78.6	12.3	0.0
Farms by Geography	1,080	0.0	2.1	87.7	10.2	0.0
Family Distribution by Income Level	36,205	20.6	17.6	21.7	40.2	0.0
Household Distribution by Income Level	54,413	24.1	17.0	18.0	40.9	0.0
Median Family Income		\$54,499	Median Housing Value			\$82,717
FFIEC Adjusted Median Family Income		\$58,000	Median Gross Rent			\$542
Unemployment Rate (2015 ACS U.S. Census)		4.12%	Families Below Poverty Level			11.4%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

(* The NA category consists of geographies that do not have an assigned income classification.

Table A – Demographic Information of the Assessment Area
Assessment Area: CNB Illinois Non-MSA AA - 2017

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	0.0	17.5	70.0	12.5	0.0
Population by Geography	133,521	0.0	14.0	72.9	13.0	0.0
Housing Units by Geography	60,484	0.0	15.1	72.0	12.9	0.0
Owner-Occupied Units by Geography	39,514	0.0	13.1	72.3	14.5	0.0
Occupied Rental Units by Geography	13,568	0.0	19.1	70.3	10.7	0.0
Vacant Units by Geography	7,402	0.0	18.5	73.3	8.2	0.0
Businesses by Geography	6,245	0.0	15.3	72.7	12.0	0.0
Farms by Geography	1,056	0.0	9.3	77.7	13.0	0.0
Family Distribution by Income Level	35,099	21.4	18.6	21.1	38.8	0.0
Household Distribution by Income Level	53,082	23.9	17.3	18.1	40.8	0.0
Median Family Income		\$59,121	Median Housing Value			\$87,149
FFIEC Adjusted Median Family Income		\$60,400	Median Gross Rent			\$589
Unemployment Rate (2010 U.S. Census)		3.83%	Families Below Poverty Level			10.4%

Source: 2015 ACS Census and 2017 D&B Data

Due to rounding, totals may not equal 100.0

(* The NA category consists of geographies that do not have an assigned income classification.

CNB has designated the counties of Christian, Greene, Montgomery, Morgan, Pike, and Scott as its Illinois Non-MSA AA. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. The 2010 U.S. Census recorded 40 census tracts in the AA, consisting of four (10 percent) moderate-income tracts, 32 (80 percent) middle-income tracts, and four (10 percent) upper-income tracts. According to the 2010 census data, the area population was 136,122 with 10,856 or eight percent residing in moderate-income census tracts.

According to the 2015 ACS Census, the total number of census tracts remained the same. The 2015 ACS Census recorded 40 census tracts in the AA, of which seven (17.5 percent) are moderate-income tracts, 28 (70 percent) are middle-income tracts, and five (12.5 percent) are upper-income tracts. Population was slightly down from the 2010 census at 133,521 with 18,744 or 14 percent residing in moderate-income census tracts.

According to 2015 ACS Census data, the median income for a household in the MSA was \$46,410 and for a family was \$59,121. The distribution of families by income level was 21.4 percent low-income, 18.6 percent moderate-income, 21.1 percent middle-income, and 38.8 percent upper-income. The percentage of households and the percentage of families in the AA living below the poverty level was 13.7 percent and 10.4 percent, respectively. The 2017 FFIEC adjusted median family income for the AA was \$60,400. Low-income families earned annual income of less than \$30,200 and moderate-income families earned annual income in the range from \$30,200 to \$48,320.

Table B – Median Family Income Ranges 2015-17				
Assessment Area: CNB Illinois Non-MSA AA				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2015 (\$60,100)	<\$30,050	\$30,050 to <\$48,080	\$48,080 to <\$72,120	≥\$72,120
2016 (\$58,000)	<\$29,000	\$29,000 to <\$46,400	\$46,400 to <\$69,600	≥\$69,600
2017 (\$60,400)	<\$30,200	\$30,200 to <\$48,320	\$48,320 to <\$72,480	≥\$72,480

Source: FFIEC

As of June 30, 2017, there were 37 FDIC insured depository institutions in the AA operating 88 branches. CNB has five branches in the AA. According to the June 30, 2017 FDIC Summary of Deposits Report, CNB’s deposits in the AA totaled \$259 million, representing 7.9 percent of the market. CNB ranks 2nd in the AA. The top depository institution by market share in the AA was Jacksonville Savings Bank (8.06 percent). To round out the top five, the next three banks by market share after CNB were Peoples Bank & Trust (7.2 percent), Farmers State Bank (6.04 percent) and The Farmers State Bank and Trust Company (5.38 percent). The top five institutions accounted for a combined \$1.1 billion in deposits for a 35 percent share of the market.

Christian County

Christian County had a population of 33,888 as of the 2010 census. Healthcare & Social Assistance is the largest industry in the county followed by Manufacturing, and Retail Trade. The largest university in Christian County is Lincoln Land Community College, awarding 2,200 certificates and degrees in 2015.

Greene County

Greene County had a population of 13,390 as of the 2010 census. Healthcare & Social Assistance is the largest industry in the county followed by Retail Trade, and Manufacturing. There are no colleges or universities located in Greene County; however, several adjacent counties offer opportunities for higher education.

Montgomery County

Montgomery County had a population of 29,301 as of the 2010 census. Healthcare & Social Assistance is the largest industry in the county followed by Educational Services, and Retail Trade. The largest university in Montgomery County is Tri-County Beauty Academy, with 12 graduates in 2015.

Morgan County

Morgan County had a population of 34,801 as of the 2010 census. Healthcare & Social Assistance is the largest industry in the city followed by Educational Services, and Manufacturing. The largest universities in Morgan County are Illinois College, with 260 graduates in 2015 and MacMurray College, with 126 graduates in 2015.

Pike County

Pike County had a population of 16,054 as of the 2010 census. Healthcare & Social Assistance is the largest industry in the county followed by Retail Trade, and Manufacturing. The largest universities in Pike County are John Wood Community College, with 537 graduates in 2015 and Quincy University, with 372 graduates in 2015.

Scott County

Scott County had a population of 5,169 as of the 2010 census. Healthcare & Social Assistance is the largest industry in the county followed by Retail Trade, and Manufacturing. There are no colleges or universities located in Scott County; however, several adjacent counties offer opportunities for higher education.

Employment and Economic Factors

For the state of Illinois, according to Moody's Analytics, *Illinois' economy will gain ground in the coming year. The state budget offers short-term fiscal certainty. Tourism and manufacturing will prove reliable drivers, but escalating trade tensions could be costly. Longer term, IL will underperform as fiscal pressures and worsening demographics limit its potential.* The top five employment sectors in the State of Illinois are Professional and Business Services, Education and Health Services, Government, Retail Trade and Manufacturing. The top five employers in the state of Illinois are University of Illinois, Abbott Laboratories, Advocate Health Care System, University of Chicago, and Walgreen Co.

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, the unemployment rate for the state of Illinois as of December 2015 and 2017 was six percent and 4.7 percent, respectively. The national unemployment rate as of the same dates was five percent (December 2015) and 4.1 percent (December 2017). Unemployment information for the counties that make up the Illinois Non-MSA AA are in the table below.

Unemployment Rates 2015-17			
Assessment Area: CNB Illinois Non-MSA AA			
	2015	2016	2017
Christian County	7.1%	6.1%	4.8%
Greene County	6.3%	5.7%	4.5%
Montgomery County	8.3%	6.8%	5.3%
Morgan County	5.3%	4.9%	4.0%
Pike County	5.7%	5.5%	4.3%
Scott County	6.9%	6.8%	6.1%
State of Illinois	6.0%	5.3%	4.7%
National	5.0%	4.7%	4.1%

Source: U.S. Department of Labor; Bureau of Labor Statistics

Housing

The 2010 US Census reported total housing units of 61,028 for the Illinois Non-MSA AA. Of the total number of housing units, 40,972 or 67.1 percent of the total housing units in the AA are owner occupied, 13,441 or 22 percent are renter occupied, and 6,615 or 10.8 percent are vacant. Of all owner occupied units, 2,786 or 6.8 percent were located in moderate-income census tracts. Of all occupied rental units, 1,653 or 12.3 percent were located in moderate-income census tracts. Of all vacant units, 701 or 10.6 percent were located in moderate-income census tracts. Additionally, of all single-family homes, 4,219 or 7.9 percent were located in moderate-income census tracts. For multifamily housing units, 326 or 11.8 percent were located in moderate-income census tracts. The 2010 U.S. Census indicates that the weighted average median housing value was \$82,717, and the weighted average monthly gross rent was \$542.

The 2015 ACS Census Survey reported total housing units of 60,484 for the Illinois Non-MSA AA. Of the total number of housing units, 39,514 or 65.3 percent of the total housing units in the AA are owner occupied, 13,568 or 22.4 percent are renter occupied, and 7,402 or 12.2 percent are vacant. Of all owner occupied units, 5,176 or 13.1 percent were located in moderate-income census tracts. Of all occupied rental units, 2,591 or 19.1 percent were located in moderate-income census tracts. Of all vacant units, 1,369 or 18.5 percent were located in moderate-income census tracts. Additionally, of all single-family homes, 8,039 or 15.2 percent were located in moderate-income census tracts. For multifamily housing units, 340 or 11.5 percent were located in moderate-income census tracts. The 2010 U.S. Census

indicates that the weighted average median housing value was \$87,149, and the weighted average monthly gross rent was \$589.

Affordability

We conducted an affordability analysis in this AA to determine if the overall affordability of housing for LMI borrowers was an impediment to CNB's home mortgage lending to LMI borrowers within this AA. To determine affordability, we assumed a 30-year mortgage based on the median list price of homes for sale at an interest rate of 5 percent and determined a monthly payment amount (no down payment and no accounting for homeowner's insurance, real estate taxes, or any additional monthly expenses). We compared this with a payment based on an LMI family utilizing no more than 30 percent of their income for the same term of 30-years at 5 percent.

A low-income family making \$30,199 per year (or less than 50 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$140,638 mortgage with a payment of \$755 per month. A moderate-income borrower making \$48,319 per year (or less than 80 percent of the 2017 FFIEC adjusted median family income in the AA) could afford a \$225,024 mortgage with a payment of \$1,208 per month. According to Zillow.com data, the median list price in the AA in 2017 was \$185,474. Borrowing \$185,474 for 30 years at an interest rate of 5 percent yields a monthly payment amount of \$996. Based on these results, it would appear difficult for a low-income family to afford a home in this area; however, it would be well within reach for a moderate-income family.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 loans are treated as originations/purchases, (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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 MA/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 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) throughout those geographies. Because 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 (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of

businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer 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. Because 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 (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.

Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout those geographies.

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle Income Tracts			Upper Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% 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
St. Louis MO-IL MMA AA	444	65,825	46.3	66,975	5.5	1.8	2.1	20.9	10.4	13.6	37.5	71.4	36.2	36.2	16.4	48.1	0.0	0.0	0.0
Illinois Non-MSA AA	414	44,361	43.2	2,556	0.0	0.0	0.0	6.8	1.2	7.2	80.8	95.7	76.3	12.4	3.1	16.5	0.0	0.0	0.0
Chicago MSA AA	101	33,831	10.5	158,980	6.0	11.9	4.2	22.4	16.8	16.8	37.9	43.6	35.2	33.7	27.7	43.7	0.0	0.0	0.0
Total	959	144,017	100.0	228,511	5.7	2.1	3.6	21.6	7.1	15.8	38.8	78.9	36.0	33.8	11.9	44.7	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle Income Tracts			Upper Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% 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
St. Louis MO-IL MMA AA	184	35,254	50.5	54,887	6.4	0.0	3.0	19.7	11.4	16.2	36.3	82.6	36.8	37.4	6.0	43.8	0.2	0.0	0.2
Illinois Non-MSA AA	146	11,921	40.1	2,254	0.0	0.0	0.0	13.1	17.8	11.9	72.3	76.7	70.1	14.5	5.5	18.0	0.0	0.0	0.0
Chicago MSA AA	34	14,522	9.3	135,518	7.0	8.8	5.5	24.1	26.5	20.9	32.3	29.4	31.0	36.4	32.4	42.4	0.2	2.9	0.2
Total	364	61,697	100.0	192,659	6.7	0.8	4.7	22.6	15.4	19.4	34.4	75.3	33.1	36.1	8.2	42.5	0.2	0.3	0.2

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower**2015-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle Income Borrowers			Upper Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
St. Louis MO-IL MMA AA	444	65,825	46.3	66,975	22.7	10.8	6.5	16.9	19.1	14.9	20.2	23.2	17.1	40.2	36.3	39.3	0.0	10.6	22.2
Illinois Non-MSA AA	414	44,361	43.2	2,556	20.6	7.7	7.7	17.6	22.5	19.4	21.7	25.8	23.6	40.2	39.6	35.8	0.0	4.3	13.5
Chicago MSA AA	101	33,831	10.5	158,980	26.8	5.0	5.1	17.8	5.0	13.3	18.7	9.9	19.4	36.7	21.8	47.5	0.0	58.4	14.8
Total	959	144,017	100.0	228,511	25.6	8.9	5.5	17.6	19.1	13.8	19.1	22.9	18.8	37.7	36.2	45.0	0.0	12.9	16.9

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower**2017**

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle Income Borrowers			Upper Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
St. Louis MO-IL MMA AA	184	35,254	50.5	54,887	23.2	13.0	9.1	17.1	26.1	17.1	18.9	19.0	18.4	40.8	25.5	34.6	0.0	16.3	20.8
Illinois Non-MSA AA	146	11,921	40.1	2,254	21.4	11.6	9.3	18.6	21.2	20.5	21.1	24.7	23.4	38.8	37.7	31.7	0.0	4.8	15.1
Chicago MSA AA	34	14,522	9.3	135,518	28.0	0.0	5.5	17.0	2.9	15.9	17.7	11.8	20.3	37.2	29.4	42.5	0.0	55.9	15.8
Total	364	61,697	100.0	192,659	26.6	11.3	6.6	17.1	22.0	16.3	18.1	20.6	19.8	38.2	30.8	40.1	0.0	15.4	17.2

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 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 2015-16

Assessment Area:	Low Income Tracts		Moderate-Income Tracts		Middle Income Tracts		Upper Income Tracts		Not Available-Income Tracts	
	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
St. Louis MO-IL MMA AA	7.2	0.0	18.7	5.0	31.0	80.0	43.0	15.0	0.2	0.0
Illinois Non-MSA AA	0.0	0.0	9.2	0.0	78.6	100.0	12.3	0.0	0.0	0.0
Chicago MSA AA	6.4	0.0	18.6	30.0	31.0	50.0	43.7	20.0	0.2	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank 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 2017

Assessment Area:	Low Income Tracts		Moderate-Income Tracts		Middle Income Tracts		Upper Income Tracts		Not Available-Income Tracts	
	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
St. Louis MO-IL MMA AA	7.4	5.0	18.5	10.0	29.6	80.0	43.1	5.0	1.4	0.0
Illinois Non-MSA AA	0.0	0.0	15.3	30.0	72.7	65.0	12.0	5.0	0.0	0.0
Chicago MSA AA	7.0	10.0	20.4	45.0	26.6	25.0	45.3	20.0	0.8	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank 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					2015-16	
Assessment Area:	Businesses with Revenues <= 1MM		Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
St. Louis MO-IL MMA AA	79.4	80.0	8.2	20.0	12.3	0.0
Illinois Non-MSA AA	74.6	95.0	5.7	5.0	19.7	0.0
Chicago MSA AA	80.8	80.0	8.3	20.0	10.9	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank 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					2017	
Assessment Area:	Businesses with Revenues <= 1MM		Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
St. Louis MO-IL MMA AA	79.4	95.0	8.3	5.0	12.3	0.0
Illinois Non-MSA AA	73.8	95.0	6.0	5.0	20.2	0.0
Chicago MSA AA	80.9	75.0	8.3	25.0	10.8	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0