



PUBLIC DISCLOSURE

June 06, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Barrington Bank & Trust Company, National Association
Charter Number 23216

201 South Hough Street
Barrington, IL 60010

Office of the Comptroller of the Currency

Midsized Bank Supervision
425 South Financial Place, Suite 2700
Chicago, IL 60605

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Outstanding**.

The following table indicates the performance level of **Barrington Bank & Trust Company, National Association** (BBT) with respect to the Lending, Investment, and Service Tests:

Performance Levels	BBT Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		X	
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Based on the data in the Tables and performance context considerations, the overall geographic and borrower distribution of the bank’s home mortgage and small business loan originations and purchases was good.
- Community development (CD) loans offered were effective in helping the bank address community credit needs and had a significantly positive impact on the overall lending test rating. BBT originated a significant volume of loans under various programs, especially CD loans that supported affordable housing initiatives; a critical community credit need. In addition, BBT offered flexible loan programs to effectively serve additional community credit needs.
- Qualified investments were effective and responsive in helping the bank address community credit needs. The bank made a good level of qualified investments, grants and donations to many local as well as regional qualified CD groups and programs.
- The bank’s retail locations and alternative delivery systems were accessible to essentially all portions of the assessment area and responsive in helping the bank provide meaningful financial services across the community.
- The bank is a leader in providing CD services. CD services were effective and responsive in helping the bank address community needs. The significant number of financial services serving CD needs provided a significantly positive impact in the community and were consistent with the bank’s capacity and financial expertise.

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 typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

Tier One 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

BBT is a \$2.0 billion intrastate financial institution headquartered in Barrington, IL. BBT is a subsidiary of Wintrust Financial Corporation (Wintrust). The bank was chartered in 1996 and currently has one main office and six full service branches. BBT did not have any merger or acquisition activity during this evaluation period nor did the bank open or close any branches since the last CRA evaluation.

Wintrust is a financial services holding company based in Rosemont, IL, with total assets of approximately \$30 billion. Wintrust's footprint is centered in the Chicago metropolitan area extending into southern Wisconsin and northwest Indiana. Wintrust operations consist of three primary segments: community banking; specialty financing; and wealth management. Under community banking, Wintrust has 15 wholly-owned-banking subsidiaries. The community banking group accounts for 81.7 percent of Wintrusts' total assets and operates 157 banking locations. Specialty financial services include a national mortgage origination and service operation (Wintrust Mortgage), a division of BBT. Other specialty niche lending conducted by Wintrust affiliates include commercial insurance premium financing, First Insurance Funding (FIFCO), lease financing, and short-term accounts receivable financing. Wintrust also offers a full range of wealth management services primarily to community banking customers through three separate subsidiaries.

As of December 31, 2017, BBT reported total equity capital of \$251.9 million, Tier One Capital of \$229.3 million and a net loan-to deposit ratio of 114.0 percent. The bank's lending strategy continues to be focused on the business and residential lending needs in the community which represent 47.5 percent and 27.1 percent, respectively of the total loan portfolio. Consumer lending makes up the remaining 25.5 percent. In addition to Wintrust Mortgage, BBT has a commercial niche lending program, Community Advantage. Community Advantage provides financial services to condominium and townhome homeowners associations and the property management companies that serve them. Financial services include depository services, treasury management products, investment services and lending. Approximately 90 percent of loans made in this program are located in the Wintrust footprint that includes the bank's AA. We took into consideration the bank's significant nation-wide and regional niche lending programs when assessing the bank's performance in regards to lending within its AA versus outside AA lending. Our lending evaluation focused on the bank's small business and residential lending during the evaluation period.

BBT's AA consists of 80 contiguous census tracts located in the northwestern portion of Cook County, IL (67 census tracts) and the southwestern portion of Lake County, IL (13 census tracts). The AA consists of six townships that include Barrington, Palatine, Schaumburg, Elg, Hanover and Cuba. Cook County, IL is part of the Chicago-Naperville-Arlington Heights, IL Metropolitan Division (Chicago MD). Lake County, IL is part of the Lake County-Kenosha County IL-WI Metropolitan Division (Lake County MD). Combined, these areas are part of the Chicago-Naperville-Elgin, IL-IN-WI MSA (Chicago MSA). Our data presentation in Appendix C is reflected on the MSA level. We did analyze the bank's lending performance data separately for each MD. It is noted that aggregate lending as shown in the tables for small business lending is skewed as the data is run on a county level and BBT delineated only 5 percent of the census tracts in Cook County (67 out of 1,320 census tracts), and in Lake County the bank delineated only 8 percent of the census tracts (13 out of 154 census tracts). As such, actual

bank small business lending performance to the relative AA demographics was given a higher weight factor than the bank's Chicago MSA aggregate small business lending performance.

Federal Deposit Insurance Corporation (FDIC) deposit market share data dated June 30, 2017, for the AA shows BBT with 0.47 percent market share making it the 22nd largest deposit holder out of 123 financial institutions (top 18 percent). JP Morgan Chase, Bank of America and BMO Harris Bank, N.A. ranked as the top three deposit market share positions with a combined market share of 48.4 percent. Other national and regional banks were also present in the market place making financial services competition very high.

There are no known financial hardships or legal restrictions for BBT that would negatively impact or impede CRA performance during this evaluation period. The bank was rated SATISFACTORY at the prior CRA evaluation dated June 01, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for this CRA assessment is June 1, 2014, through December 31, 2017. All CD activities and transactions between those dates were taken into consideration. BBT's performance under the lending test covers the time period January 1, 2014, through December 31, 2017. The bank's lending test performance for the years 2014, 2015 and 2016 were evaluated on a combined basis. Due to changes in census data effective in 2017, the lending performance for 2017 was evaluated separately. As stated above, the bank's primary loan categories are home mortgage lending and small business lending.

In conjunction with our CRA evaluation, the OCC visited with six different community representatives in the bank's AA to help determine the credit needs in the community and opportunities for financial institutions to meet those needs. Our contacts included two non-profit community-based affordable housing advocates; one non-profit community-based service organization, one Chamber of Commerce Director representing each village of the four respective banks under the BBT charter (Barrington, Hoffman Estates, Palatine and Hanover Park); one community college; and a non-profit business development company certified by the Small Business Administration (SBA) to originate 504 SBA loans throughout the state of Illinois. While the AA is generally viewed as a wealthy suburban area, there were credit needs identified within the community. Affordable housing and down payment assistance are the greatest needs and biggest barriers, respectively, to low- and moderate-income residents becoming homeowners. Although incomes continue to increase overall in the AA, there are areas where incomes have declined, which has resulted in a greater need for basic health and financial educational services geared to low- and moderate-income individuals. Lastly, with the improved economic conditions, opportunities to provide small business financing, especially SBA 504 loans, and financial education for start-up businesses and existing small businesses was mentioned during our visit.

Selection of Areas for Full-Scope Review

The Chicago MSA was evaluated as a full-scope review.

Ratings

The bank's overall rating was based on the area that received the full-scope review.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c), in determining a national bank's 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated Outstanding. Based on a full-scope review, BBT's overall lending test performance in the Chicago MSA was excellent.

Lending Activity

Based on the data in Table 1 Lending Volume and the following performance context considerations, we concluded lending activity was excellent. BBT originated a significant volume of loans in the AA relative to its capacity based on deposits, competition and market presence. BBT demonstrated a high response level to community needs.

- The proportion of bank loans was significantly greater than the proportion of bank deposits in the AA. FDIC deposit market share data dated June 30, 2017, for the AA shows BBT had a 0.47 percent market share making it the 22nd largest deposit holder out of 123 financial institutions (top 18 percent). JP Morgan Chase, Bank of America, and BMO Harris Bank NA had the three top deposit market share positions with a combined market share of 48.4 percent. Other multi-national and regional banks were also present in the market place making financial services competition very high. BBT was ranked 5th out of 329 financial institutions or the top 1.5 percent for market share of home purchase loans and 7th out of 359 lenders or the top 1.9 percent for refinance loans. Likewise, for small business loans the bank was ranked 13th out of 192 or the top 6.8 percent of all small business lenders within all of Cook and Lake Counties. The top lenders were all large and regional banks.
- The bank's volume of community development lending was significant in the AA representing 47.3 percent of Tier One Capital. A substantial majority (73.8 percent) of CD loans in the AA were for affordable housing, a crucial credit need in the AA.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Tables 2, 3, 4 and 5 in appendix C, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation period was good.

- For 2014, 2015, and 2016 combined, the proportion of home purchase loans in the bank's sole low-income census tract was greater than the percentage of owner-occupied housing units in that geography. The combined proportion of home purchase loans in moderate-income geographies exceeded the percentage of owner-occupied housing units in moderate-income geographies. The proportion of home purchase loans in both low- and

moderate-income geographies exceeded the aggregate lending percentages for both geographies.

- For 2014, 2015, and 2016 combined, the proportion of home refinance loans in the bank's low-income geography was less than the percentage of owner-occupied housing units in that geography. The combined proportion of home purchase loans in moderate-income geographies was lower than the percentage of owner-occupied housing units in moderate-income geographies. The proportion of home refinance loans in both low- and moderate-income geographies were less than the aggregate lending percentages for both geographies.
- The bank's home purchase and home refinance lending in 2017 are consistent with performance in 2014, 2015, and 2016.

Small Loans to Businesses

Based on the data in Table 6 in appendix C, the overall geographic distribution of the bank's originations and purchases of small loans to businesses was excellent.

- For 2014, 2015, and 2016 overall, the distribution of the bank's small business loans in both low- and moderate-income geographies was excellent. The proportion of small business loans in both low- and moderate-income geographies was greater than the percentage of AA businesses located in those low- and moderate-income geographies.
- The bank's overall performance for small business lending in the bank's low- and moderate-income geographies was consistent with the aggregate distribution of loans in those geographies.
- The bank's small business lending in 2017 was consistent with performance in 2014, 2015, and 2016.

Lending Gap Analysis

We performed a lending gap analysis that included a review of reports and maps showing the distribution of branches, applications, and loans. We did not identify any unexplained conspicuous lending gaps in the bank's AA.

Inside/Outside Ratio

Taking into consideration the context of the bank's business strategy, lending inside the bank's AA is deemed adequate.

Due to the bank's nationwide mortgage operations, only a small percentage of mortgage loans were made in the bank's AA. As stated above in the Description of Institution, Wintrust Mortgage operates a full-service nationwide mortgage loan origination and servicing company and applications were reported from throughout the United States. Mortgage lending in the bank's AA was reported to be approximately 3 percent for the evaluation period.

For small business lending within the bank's AA, the bank extended 37.09 percent of all reported small business loans inside the AA over the evaluation period. Excluding the specialized niche lending programs, discussed in the Description of the Institution, the bank reports a substantial majority (81.3 percent) of small business loans originated inside the AA during this evaluation period.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Tables 8, 9, and 10 in appendix C and the following performance context considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation period was adequate.

- The high cost of homes in the bank's AA resulted in homeownership affordability difficulties, especially for low- and moderate-income borrowers. The AA's median housing value was just over \$281 thousand. The maximum income level for low-income borrowers was just under \$40 thousand, making the median housing value seven times greater than the maximum low-income level. The maximum income level for moderate-income borrowers was under \$63 thousand, making the median housing value four times greater than the maximum moderate-income level. Please refer to the AA Community Profile Table for further details.
- The proportion of both home purchase and home refinance loans to low-income borrowers compared to the proportion of low-income families was negatively impacted by the ratio of median housing value to income in the AA. The bank's performance was adequate given that context. The bank's proportion of home purchase loans to low-income borrowers exceeded home purchase aggregate lending to low-income borrowers. The bank's proportion of home refinance loans to low-income borrowers was comparable to home refinance aggregate lending to low-income borrowers.
- Overall, the bank's home purchase and home refinance loans to moderate-income borrowers exceeded the proportion of moderate-income families in the AA. The bank's proportion of home purchase loans to moderate-income borrowers was comparable to home purchase aggregate lending to moderate-income borrowers. The bank's proportion of home refinance loans to moderate-income borrowers exceeded the home refinance aggregate lending to moderate-income borrowers.
- The bank's home mortgage lending in 2017 was consistent with its lending performance in 2014, 2015, and 2016.

Small Loans to Businesses

Based on the data in Table 11 in appendix C, the bank's overall borrower distribution of small business loans originations and purchases for this evaluation period was good.

- For 2014, 2015, and 2016 combined, the proportion of bank loans to small businesses was comparable to the proportion of small businesses operating in the AA. Despite the very

small portion of both Cook and Lake Counties in the bank's AA, the proportion of small business bank loans was significantly stronger than the aggregate distribution of small business loans.

- The bank's small business lending in 2017 was consistent with performance in 2014, 2015, and 2016.

Community Development Lending

Based on the data in Table 1 Lending Volume, we concluded the level and responsiveness of CD loans was excellent and had a significantly positive impact on the lending test conclusion in the Chicago MSA.

- BBT's level of CD lending in the bank's AA was excellent. The bank made 42 qualified CD loans in the AA totaling \$34.8 million and representing 15.2 percent of Tier One Capital. Thirty-one CD loans for \$14.1 million were centered in financing projects for affordable housing that benefited low- and moderate-income individuals, a critical credit need in the AA. Other CD loans originated included \$16.9 million with the primary purpose of economic development; \$2.8 million for revitalization/stabilization; and, \$994 thousand for community services.
- Due to the excellent responsiveness of meeting the CD credit needs within the AA, the bank received positive consideration for CD qualified loans made within a broader statewide regional area. These 44 additional supplementary loans totaled \$73.5 million and represented 32.0 percent of Tier One Capital. A majority of these loans were for revitalization and stabilization of low- and moderate-income geographies and for small business economic development purposes.

Examples of CD loans in the AA include:

- BBT addressed the need for economic development by extending a \$3.7 million CD loan to provide financing for renovations of a shopping center located in a distressed geography. The project was approved for tax increment financing by a local government agency for the redevelopment of the area. New tenants moved into the shopping center, most notably the Education and Work Center. The Education and Work Center is operated by two colleges in the AA and provides vocational and basic education training to low-and moderate-income individuals.
- Twenty-seven CD loans totaling \$3.8 million dollars were originated to a community-based non-profit affordable housing organization that in partnership with the National Community Stabilization Trust, acquired and rehabilitated distressed housing. The rehabilitation then provides affordable homeownership or rental housing for low-and moderate-income individuals while protecting communities from blight and destabilization. Affordable housing was identified as a critical need in the AA.

Product Innovation and Flexibility

The bank used innovative and flexible lending programs in order to further serve AA credit needs. Under each of the programs discussed below the bank originated a significant number of loans during the evaluation period.

- Wintrust Mortgage offered a full array of mortgage products that were available to BBT's AA, as well as throughout the Wintrust footprint and across the nation. To help meet the needs of low- and moderate-income individuals, the bank offered Federal Housing Administration (FHA), Veteran Administration (VA) and United States Department of Agriculture (USDA) mortgage loans. In addition, special first time home buyer programs, down payment assistance programs and other lending programs offered by Illinois Development Authority (IHDA) and Federal Home Loan Bank of Chicago were available to meet the affordable housing needs of low- and moderate-income individuals residing in the AA.
- Wintrust Mortgage partnered with the IHDA to offer low-cost financing programs for low-income homeowners. The purpose of the programs was to create and preserve affordable housing in Illinois. Features associated with the programs included down payment assistance up to \$7,500 and a competitive rate for a 30-year fixed-rate mortgage loan. During the evaluation period, Wintrust Mortgage originated 4,126 of these types of loans totaling \$298.7 million and was the top IHDA lender for each year during the evaluation period. In addition, Wintrust Mortgage, as a member of the Federal Home Loan Bank, was able to offer to income eligible homebuyer's easy access to down payment and closing costs assistance through the FHLB Down payment Plus programs. The assistance was provided in the form of forgivable grants paid on behalf of the borrower at the time the borrower closed on a mortgage loan. Grants were forgiven on a monthly basis over a five-year retention period. During the evaluation period, Wintrust Mortgage originated 201 of these loans totaling \$1.2 million.
- In 2016, BBT partnered with a local non-profit community-based affordable housing organization and developed BBT's Homebuyer Grant Program. The program provided down payment, closing cost or escrow assistance to qualified low- or moderate-income persons with intentions of purchasing a home in the bank's AA. The assistance was in the form of a grant paid on behalf of the borrower at the time of closing on a home purchase, first mortgage loan. The grant was fully forgiven at the time of loan closing. The maximum grant was \$2,000 per household and funds were administered through the non-profit affordable housing agency. The innovativeness feature of this grant program was that BBT did not mandate the borrower to use a Wintrust Mortgage loan product to qualify for the grant. Due to BBT's initial success with the program, Wintrust implemented this program in all of its financial subsidiaries. Similar to BBT's initial program, the grant will be administered through partnerships with various HUD approved non-profit housing organizations that serve Wintrust's footprint.
- BBT offered financing for U.S. SBA loans. Wintrust established a specialty SBA lending department within one its financial subsidiaries. These specialized lending officers were shared with BBT and other lending affiliates. The SBA products offered included: 504, 7A

and Express Programs. In addition to the SBA loan products, BBT offered in-house Small Business Micro Loans: Small Business Overdraft Protection, Easy Access Line of Credit and Easy Access Installment Loan.

- The Everyday Loan programs were targeted specifically for low- and moderate-income individuals in the bank's AA and included two flexible small dollar fixed rate consumer loan programs with maximum loan amounts of \$2,500 and rates lower than most credit cards and other fast cash loans. The Everyday Small Dollar Loan product was an unsecured consumer installment loan for any personal purpose. The Certificate of Deposit Secured Loan product was set for individuals looking to establish or improve their credit reporting data.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Chicago MSA was good.

Based on the data in Table 14 in appendix C and the following performance context considerations, the bank's level of qualified CD investments, contributions, and grants was good.

- CD investment opportunities were somewhat limited as the AA was primarily affluent with 90 percent of the geographies being middle- and upper-income census tracts. The market for qualified CD investments is very competitive and crowded with a high number of financial institutions vying for all qualified investments.
- The bank has a significant level of investments, grants and donations. Over the CD evaluation period of 42 months, the volume of qualified CD investments represented 5.66 percent of Tier One Capital. BBT had an additional four investments representing 0.84 percent of Tier One Capital in unfunded commitments.
- Qualified investments were effective and responsive in helping the bank address community credit needs. The bank exhibited an adequate level of responsiveness to the CD needs in the AA. In addition, due to the bank being responsive to the credit needs in its AA, we took into consideration broader regional and statewide investments with an additional nine in number totaling \$46 thousand.
- Demonstrating the bank's responsiveness to AA needs during the evaluation period, many CD investments were made to non-profit organizations whose primary focus met one of the definitions of community development. Specifically, investments totaling \$3.7 million were made to non-profit organizations involved in affordable housing initiatives; \$4.5 million towards economic development programs; \$4.0 million towards revitalization and stabilization of low- and moderate-income areas; and \$2.0 million toward community services.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test is rated Outstanding. Based on full-scope reviews, the bank's performance in the Chicago MSA was excellent.

Retail Banking Services

Based on the data in Table 15 in appendix C and the following performance context considerations, the bank's retail service performance was excellent.

- BBT's branches and alternative delivery systems were accessible to essentially all portions of the AA. Retail banking services were effective and responsive in helping the bank provide banking services across the community. All seven offices have deposit-taking ATMs and drive-up facilities.
- Although the bank had no offices in the low-income geography for 2014 through 2016 less than 2 percent of the AA's population resided in that geography. This one low-income geography was reclassified as a moderate-income geography effective in 2017. In 2015, a branch located in a middle-income geography was re-designated to a moderate-income geography. The percentage of branches located in moderate-income geographies exceeded the percentage of population residing in moderate-income geographies. There were no branches that opened or closed during the evaluation period.
- BBT's alternative delivery systems supported accessibility to all persons residing in and businesses throughout the AA. The bank offers ATM/MasterCard Debit Cards free of charge for any ATM transactions conducted at Money Pass, All Point and SUM ATMs providing access to an additional 65,000 ATM locations. Other no-cost alternative delivery systems included telephone, online and mobile banking, online bill pay and peer-to-peer payments.
- The bank's hours and services did not vary in any way that inconvenienced certain portions of the AA, particularly low- and moderate-income individuals or low- and moderate-income geographies. BBT maintained standard business hours and offered traditional as well as specialized credit products, mortgage, consumer, small business lending and services at all branch locations in the AA.

Community Development Services

Based on the level of CD services and performance context considerations, the bank's provision of CD services was excellent

- The bank is a leader in providing CD services. CD services were effective and responsive in helping the bank address community needs. The bank was involved with a significant number of CD services, consistent with its capacity and financial expertise. Bank staff were

active in official capacities, including leadership positions, in non-profit organizations whose primary purpose was CD.

- During the evaluation period, 41 bank employees provided 4,630 hours and served 51 organizations whose missions or a specific activity met the CD definition. During the evaluation period, bank employees served non-profit community-based organizations involved in assisting low- and moderate-income individuals with affordable housing needs; provided basic health and other services to low- and moderate-income people; and, economic development support for small businesses. Bank staff used their financial expertise by serving on finance, budget, fundraising and loan committees, as well as assisted in fundraising and grant opportunities. In addition, bank staff provided mentoring and financial literacy training targeted to low- and moderate-income individuals and to small business owners residing within the AA. These programs included topics on budgeting, financial planning, first-time home buying, credit scores and the importance for saving for the future. Based on our contacts, the need for financial literacy was identified as a critical credit need in the AA.

Notable examples include:

- BBT employees provided 299 hours in 64 training sessions of financial literacy education to low- and moderate-income individuals and small businesses. The bank uses the FDIC Financial Education Money Smart Programs, a comprehensive financial education curriculum designed to help low- and moderate-income individuals to enhance their financial skills. Small business sessions provide a practical introduction to topics such as starting and managing a business. Multiple employees provided the training sessions in both English and Spanish.
- SomerCor 504, Inc. is a non-profit business development company certified by the SBA to originate 504 SBA loans throughout the state of Illinois. The 504 SBA Loan Program is designed for small businesses by providing low-interest secured rates as well as long-term business loan financing. SomerCor 504, Inc., partnered with community banks to bring needed funding to support economic development in the AA. The flexible lending requirements and strong financial institutions partnership allow businesses to grow and preserve working capital. During the evaluation period, a bank employee served a non-profit organization by reviewing and approving small business loan requests.
- One Million Degrees is a community development service program that provides mentoring services to low-income community college students. The program provides a solid system of support with skills necessary to help them reach their full potential in school, in work, and in life. One Million Degrees Scholars have graduated at roughly three times the national average. During the evaluation period, two bank employees served as mentors for students that attended Harper College.

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): 01/01/2014 to 12/31/2017 Investment and Service Tests and CD Loans: 06/01/2014 to 12/31/2017	
Financial Institution	Products Reviewed	
Barrington Bank & Trust Co., NA (BBT) Barrington, IL	HMDA Small Business	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Chicago MSA	Full Scope	

Appendix B: Community Profiles for Full-Scope Areas

Chicago MSA

Demographic Information for Full-Scope Area: Chicago MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	80	0.00	10.00	33.75	56.25	0.00
Population by Geography	427,299	0.00	9.23	34.49	56.28	0.00
Owner-Occupied Housing by Geography	115,211	0.00	4.71	31.95	63.34	0.00
Businesses by Geography	26,174	0.00	13.85	25.25	60.90	0.00
Farms by Geography	472	0.00	5.93	23.94	70.13	0.00
Family Distribution by Income Level	110,181	13.31	14.46	19.95	52.28	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	30,598	0.00	16.66	41.30	42.04	0.00
Median Family Income (MDI)	= \$76,299					
FFIEC Adjusted Median Family Income for 2017	= \$78,635					
Households Below the Poverty Level	= 6%					
				Median Housing Value	= \$281,306	
				Unemployment Rate	= 3.74%	

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

Source: 2010 U.S. Census, and 2017 Federal Financial Institutions Examination Council (FFIEC) updated MFI.

BBT's AA consists of 67 census tracts in northern Cook County, IL, and 13 contiguous census tracts in southwestern Lake County, IL. The AA consists of 5 percent of all the tracts in Cook County and 8 percent of all the census tracts in Lake County. Cook County is part of the Chicago-Naperville-Arlington Heights, IL MD. Lake County, IL is part of the Lake County-Kenosha County, IL-WI MD. The AA meets regulatory requirements.

BBT's AA is part of the suburban region that lies north of the city of Chicago. The population of BBT AA is 427,299, with 85 percent in Cook County and 15 percent in Lake County. Cook County, with a population of more than 5 million, is the largest county in the Chicago MSA and in Illinois. Lake County, with a population of more than 703,000, is the third most populous county in the Chicago MSA and in Illinois. The FFIEC 2017 estimated median family income (MFI) in Cook County was \$70,076, which was 6 percent lower than for the Chicago MSA. The 2017 MFI in Lake County was \$91,600, which was 18 percent higher than for the Chicago MSA. Of the 8 LMI census tracts in the BBT AA, all are in Cook County.

As of June 30, 2017, BBT had a deposit market share in Lake and Cook Counties of 0.47 percent, which ranked 22nd out of 123 financial institutions gathering deposits in both counties. JP Morgan Chase Bank, Bank of America and BMO Harris Bank, N.A., held the top three market shares, which together constituted nearly 50 percent of the deposit market in the two counties. Of the 21 banks with larger deposit market shares than BBT, eight are large banks headquartered out of state and with operations in many states. In addition, six of BBT's competitors are regional banks comparable in size to the combined banks owned by Wintrust Financial Corporation. Seventy-three percent of the deposits that BBT holds are from two branches in the southwestern quadrant of Lake County, one of which is the bank's

headquarters office. Twenty-seven percent of the bank's deposits are from five branches in the adjacent northwest quadrant of Cook County.

Large employers headquartered in BBT's AA include Fortune 500 companies such as Walgreens Company, pharmaceutical manufacturers Abbott Labs and Baxter International, snack food maker Mondelez International, Discover Financial Services, and Sears Holdings. Other large employers include St. Alexius Medical Center and CDK Global, a supplier of computer technology to the automotive industry, and, collectively, many smaller retail, manufacturing and commercial businesses that constitute an important share of the economy in the AA. The largest industry sectors providing employment in the AA include Professional, Scientific, and Technical Services; Construction; Other Services; and Retail Trade.

BBT's AA is predominantly affluent and the housing and employment markets function well. Education attainment levels and incomes are high and unemployment is low throughout the AA. Relatively little subsidized housing is available in BBT's AA. The Cook County portion of the AA, however, contains some LMI census tracts in several suburban communities whose housing stock, while predominantly high-cost, does include a mix of higher-density rental housing as well as segments with lower levels of homeownership. According to housing market data published by the Metropolitan Planning Council, these portions of BBT's AA – all in Cook County – have experienced some foreclosures and distressed sales, and while the private market continues to operate well, there are some pockets where home values have not kept pace with the rest of the suburban region or have declined. Incomes have declined in these areas as well.

These conditions give rise to needs in workforce development, small business development and financing, homeowner and homebuyer counseling, down payment and closing cost assistance, flexible home mortgage products, financial education, additional affordable housing, and a variety of social services.

While qualified investments are limited, opportunities and partners for responding to these needs in BBT's AA are available. They include non-profit, municipal and county-level business development and workforce training initiatives; active SBA 504 certified development companies; a non-profit micro lender to small businesses that serves the region; many non-profit organizations devoted to affordable housing development; organizations engaged in housing counseling and financial education; multiple regional community development financial institutions that meet a wide range of community development financing needs in conjunction with banks; and many non-profit social service organizations.

Appendix C: Tables of Performance Data

Content of Standardized 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 and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - 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. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. 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 8. Borrower Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - 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. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - 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. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME												
Geography: ILLINOIS												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016												
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Chicago MSA	100.00	1,369	334,000	1,323	98,285	3	51	42	34,786	2,737	467,122	100.00
Broader Regional Area (CD Loans)								44	73,455	44	73,455	

^{*} Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from June 01, 2014 to December 31, 2017.

^{***} Deposit Data as of July 11, 2018. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Chicago MSA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2016.

*** Deposit Data as of July 11, 2018. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016	
Assessment Area (2016):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
Chicago MSA	0	0	0	0	

* The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2016.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income [*]			
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MSA	852	100.00	0.85	1.06	4.09	4.34	38.09	35.45	56.97	59.15	0.61	4.00	39.68	55.71

^{*} Based on 2016 Peer Mortgage Data -- US and PR

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	%BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MSA	13	100.00	0.85	0.00	4.09	0.00	38.09	23.08	56.97	76.92	0.46	2.52	35.09	61.93

* Based on 2016 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income [†]								
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
Chicago MSA	502	100.00	0.85	0.20	4.09	1.39	38.09	30.28	56.97	68.13	0.40	2.56	30.85	66.20					

[†] Based on 2016 Peer Mortgage Data -- US and PR

^{**} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MSA	2	100.00	6.94	0.00	14.89	50.00	47.39	50.00	30.78	0.00	10.00	20.00	58.00	12.00

* Based on 2016 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*								
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
Chicago MSA	1,323	100.00	0.88	2.65	13.07	11.64	30.56	26.00	55.50	59.71	4.55	17.24	33.38	44.83					

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
Chicago MSA	3	100.00	0.66	0.00	5.96	0.00	28.26	0.00	65.12	100.00	3.45	16.55	33.10	46.90

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Chicago MSA	852	100.00	13.72	7.32	14.35	19.76	19.51	22.56	52.41	50.37	6.62	21.28	25.66	46.44

* Based on 2016 Peer Mortgage Data -- US and PR

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 27.3% of loans originated and purchased by BANK.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families ²	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
Chicago MSA	13	100.00	13.72	0.00	14.35	7.69	19.51	38.46	52.41	53.85	5.00	9.52	21.43	64.05

* Based on 2016 Peer Mortgage Data -- US and PR

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp	
Full Review:															
Chicago MSA	502	100.00	13.72	3.11	14.35	16.36	19.51	16.36	52.41	64.18	3.70	11.40	20.24	64.66	

* Based on 2016 Peer Mortgage Data -- US and PR

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 31.3% of loans originated and purchased by BANK.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago MSA	1,323	100.00	80.65	75.59	83.67	6.50	9.83	147,405	58,864

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2016).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.90% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ILLINOIS			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago MSA	3	100.00	93.38	100.00	100.00	0.00	0.00	148	58

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago MSA 2014-2016	7	4,039	296	8,888	303	12,927	94	4	1,934
Broader Regional			19	46	19	46	6		

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings / Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS / CLOSINGS																	
Geography: ILLINOIS																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Chicago MSA	100.00	7	100	0.00	14.29	28.57	57.14	0	0	0	0	0	0	0	9.23	34.49	56.28

