



## **PUBLIC DISCLOSURE**

July 9, 2018

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

Beverly Bank & Trust Company, National Association  
**Charter Number 24466**

10258 South Western  
Chicago, IL 60643

Office of the Comptroller of the Currency

Midsized Bank Supervision  
425 South Financial Place, Suite 2700  
Chicago, Illinois 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 **Beverly Bank & Trust Company, National Association** (Beverly) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Beverly 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 the following performance context considerations discussed below, the overall geographic distribution of the bank’s home mortgage, small business, and consumer loan originations and purchases was excellent, and the overall borrower distribution was adequate.
- Community development (CD) loans offered were effective in helping the bank address community credit needs and had a significantly positive impact on the bank’s lending test rating. The bank is a leader in CD loans. The bank originated a significant number of loans under various programs. In addition, the bank uses innovative or flexible loan programs to effectively serve additional community credit needs.
- Qualified investments were effective and very responsive in helping the bank address community credit needs. The bank made a significant level of qualified investments, grants, donations and contributions to many local as well as regional qualified CD groups and programs.
- The bank’s branches and alternative delivery systems were reasonably accessible to essentially all parts of the bank’s community.
- CD services were effective and responsive in helping the bank address community needs. The significant number of financial services addressing 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

Beverly is a \$1.2 billion intrastate financial institution headquartered in the Beverly neighborhood of Chicago, Illinois (IL). Beverly is a wholly owned subsidiary of Wintrust Financial Corporation (Wintrust), headquartered in Rosemont, IL. The bank was chartered on April 1, 2004, and currently has seven offices and 11 ATMs. Beverly acquired two branches in July 2015 through the acquisition of Suburban Bank & Trust by affiliate, Hinsdale Bank & Trust. Both branches were closed in November 2015 due to their proximity to existing Beverly branches on Western Avenue and in Oak Lawn. The closed branches were located in upper- and middle-income geographies.

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's operations consist of three primary segments: community banking; specialty financing; and wealth management. Under community banking Wintrust has 15 wholly-owned-banking subsidiaries. Specialty financing consists of a national mortgage operation to originate and sell residential mortgages into the secondary market. This nation-wide mortgage operation is conducted through a division of one of its banking subsidiaries. The community banking group accounts for 81.7 percent of Wintrust's total assets and operates 157 banking locations. Other specialty finance services include commercial insurance premium financing (First Insurance Funding (FIFCO)) and short term account receivable financing offered through other Wintrust banking subsidiaries. Wintrust Asset Finance (WAF), a wholly owned subsidiary of Beverly, provides lease and loan financing for commercial assets to direct and indirect customers through its three divisions: Wintrust Equipment Finance, Wintrust Capital, and Wintrust Commercial Finance. Wintrust also offers a full range of wealth management services primarily to community banking customers through three separate subsidiaries. All products and services discussed are available to Beverly customers

As of December 31, 2017, Beverly reported total equity capital of \$139.6 million and Tier One Capital of \$127.6 million. The bank's primary business strategy is commercial lending with commercial and industrial loans representing 43.07 percent of the bank's total loan portfolio and an additional 16.76 percent in non-farm non-residential real estate secured loans. Consumer loans represent 16.44 percent, one to four family residential lending represents 7.40 percent, and multifamily lending represents 6.76 percent of the bank's total loan portfolio. Beverly's niche leasing program offered through WAF represents 4.13 percent of the bank's total loan portfolio. Beginning in 2016, Beverly purchased a large volume of FIFCO loans from an affiliate. We took into consideration the nation-wide footprint of the WAF and FIFCO loans when assessing the bank's performance in regards to lending within its assessment area (AA) versus outside the AA. Beverly has elected not to take into consideration any affiliate lending (primarily residential mortgages) for this evaluation period. It is noted that a full array of residential mortgage products and services are readily available to all consumers through referrals to the bank's affiliated full service mortgage originator. Wintrust has mortgage originators available to meet with any potential applicant at any office. With commercial lending being the bank's primary business strategy, our review of the bank's lending performance weighted small business lending performance more than home mortgage and consumer lending.

The current AA for Beverly is all of Cook County, IL, consisting of 1,319 full census tracts (CTs). The area encompasses a portion of the Chicago-Naperville-Arlington Heights, Metropolitan Division (MD) (Chicago MD). The Chicago MD is also part of a larger MSA: Chicago-Naperville-Elgin, IL-IN-WI MSA (Chicago MSA). Our data presentation in Appendix C is reflected on the MSA level.

Federal Deposit Insurance Corporation (FDIC) deposit market share data dated June 30, 2017, for Cook County shows Beverly has a 0.36 percent market share making it the 26<sup>th</sup> largest deposit holder out of 116 total financial institutions (top 22 percent). JP Morgan Chase, Bank of America, and BMO Harris Bank N.A., have the top three deposit market share positions with a combined market share of 49.8 percent. Other national and regional banks are also present in the market place making financial services competition very high.

There are no known financial hardships or legal restrictions for Beverly that would negatively impact or impede CRA performance during this evaluation period. The bank was rated OUTSTANDING at the prior CRA evaluation dated June 30, 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 community development activities and transactions between those dates were taken into consideration. Beverly's performance under the lending test covers the time period from January 1, 2014, to December 31, 2017. The bank's lending test performance for the years 2014, 2015, and 2016 was evaluated on a combined basis. Due to changes in census data effective in 2017, lending performance for 2017 was evaluated separately. As stated above, the bank's primary loan category is small business lending. In addition, the bank provided sufficient loan data on consumer lending to warrant analysis. With the low volume of reported home mortgage lending, we combined loan types (home purchase, home improvement, and home refinance) together making the geographic and borrower home mortgage lending analysis more meaningful.

During a community tour of the bank's AA we visited with eight different community representatives. Our contacts included two immigrant assistance organizations, a redevelopment organization, a job training organization, an affordable housing advocate, and one community center serving a predominately low- and moderate-income population. There are many credit needs identified within the community especially for the low- and moderate-income areas and for low- and moderate-income persons living in the AA. Affordable housing is a predominate need particularly in light of the very high cost of housing for the area. Educational services are needed to provide strong alternative opportunities to low- and moderate-income students. Small business development and training is needed to enable successful and sustainable economic redevelopment in low- and moderate-income areas. Assistance to new immigrants, including educational, health care and housing assistance, is also a needed CD service.

### **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 primarily on those areas that received full-scope reviews.

## **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 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 full-scope reviews, Beverly's performance in the Chicago MSA was excellent.

#### Lending Activity

Based on the data in Table 1 Lending Volume and Table 1 Other Products in appendix C, along with the bank's deposit, home mortgage and small business lending market share data, Beverly demonstrated excellent responsiveness to AA credit needs and originated a significant volume of loans in the AA relative to its capacity and business strategy.

- The proportion of small business loans was greater than the proportion of bank deposits for Cook County, IL. Beverly was ranked 26<sup>th</sup> out of 116 or the top 22 percent of financial institutions for market share for deposits and for small business was ranked 35<sup>th</sup> out of 184 or the top 19 percent of small business lenders. The top five market share small business lenders were predominately credit card lenders with a combined total market share of 65.9 percent and an average loan size of \$13 thousand. Beverly had a small business market share of 0.24 percent and an average loan size of \$132 thousand.
- The bank's volume of consumer and home mortgage lending was adequate during this evaluation period. It is noted that the bank's affiliated mortgage lending financial institution is listed in the top ten of mortgage lenders for market share in the AA for both home purchase and home refinance lending.
- The bank's volume of community development lending was significant in the AA and represented 69 percent Tier One Capital. The majority of loans by number (52 percent) in the AA were for affordable housing, a known 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 was excellent.

- For 2014, 2015, and 2016 combined, the proportions of home mortgage loans in low- and moderate-income geographies were significantly stronger than the percentages of owner-occupied housing units in those geographies, and significantly stronger than the aggregate distribution of loans in those geographies.

- For 2014, 2015, and 2016 combined, the proportion of multifamily loans in low-income geographies was significantly stronger than the percentage of multifamily units in those geographies. The proportion of multifamily loans in moderate-income geographies was comparable to the percentage of multifamily units in those geographies.
- The bank's performance in multifamily lending in low-income geographies was significantly stronger than the aggregate distribution of loans in those geographies. The bank's performance in multifamily lending in moderate-income geographies was weaker than the aggregate distribution of loans in those geographies.
- The bank's home mortgage lending in 2017 is consistent with the bank's combined lending 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.

- The distribution of the bank's small loans to businesses in low- and moderate-income geographies is generally excellent. The proportion of loans in low-income geographies was significantly stronger than the proportion of businesses in those geographies, and significantly stronger than the aggregate distribution of loans in those geographies. The proportion of loans in moderate-income geographies was near to the proportion of businesses in those geographies, and near to the aggregate distribution of loans in those geographies.
- The bank's small business lending in 2017 was consistent with the bank's combined lending in 2014, 2015, and 2016.

### **Consumer Loans**

Based on the data in Table 13 in appendix C, the bank's geographic distribution of consumer loan originations and purchases was excellent.

- For 2014, 2015, and 2016 combined, the overall distribution of the bank's consumer loans in both low- and moderate-income geographies was excellent. The proportion of consumer loans in both low- and moderate-income geographies was significantly stronger than the percentage of households in those geographies.
- The bank's consumer lending in 2017 was consistent with the bank's combined lending 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**

A substantial majority of the number of Beverly's home mortgage and consumer loans were originated inside of the AA, 97.06 percent and 96.82 percent respectively. For small business loans, excluding the bulk purchases of FIFCO loans that began in 2016, a majority of loans or 54.23 percent were originated inside of the AA. For core lending (less FIFCO and niche lending) the bank originated over 84 percent of small business loans inside its AA.

## **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 was good.

- High home costs in the bank's AA raised homeownership affordability hurdles, especially for low-income borrowers. The AA's median family housing value for 2016 was \$291 thousand. The maximum income level for low-income borrowers in the AA was \$37 thousand, making the median housing value 7.81 times greater than the maximum low-income level. Please refer to the AA Market Profile Table for further details.
- The proportion of 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 proportion of loans to low-income borrowers was weaker than the proportion of low-income families yet significantly stronger than the aggregate distribution of loans to those borrowers.
- The proportion of loans to moderate-income borrowers was significantly stronger than the proportion of moderate-income families and the aggregate distribution of loans to those borrowers.
- The bank's home mortgage lending in 2017 was consistent with the bank's combined lending in 2014, 2015, and 2016.

### **Small Loans to Businesses**

Based on the data in Table 11 in appendix C and the following performance context considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue was adequate.

- The distribution of the bank's small loans to businesses by revenue was adequate. The proportion of loans was weaker than the proportion of small businesses and stronger than the aggregate distribution of loans to those businesses.
- For 2014, 2015, and 2016, over 17 percent of the bank's reported loans did not have revenue data to analyze. Of these 111 loans, 93 were purchased FIFCO loans. We used

loan size as a proxy to analyze the size distribution of FIFCO loans and determined that only 8 loans or 8.60 percent were greater than \$100 thousand.

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

### **Consumer Loans**

Based on the data in Table 13 in appendix C, the bank's borrower distribution of consumer originations and purchases was excellent.

- For 2014, 2015, and 2016 the bank's distribution of reported consumer loans to both low- and moderate-income borrowers was excellent. The percentages of loans made to both low- and moderate-income borrowers were significantly stronger than the numbers of low- and moderate-income households in the bank's AA.
- The bank's consumer lending in 2017 was consistent with the bank's combined lending in 2014, 2015, and 2016.

### **Community Development Lending**

Based on the data in Table 1 Lending Volume in appendix C and the following performance context considerations, we concluded the community development (CD) lending was excellent and had a significantly positive impact on the lending test rating in the Chicago MSA.

- The level of CD lending in the AA was excellent. Beverly made 99 CD loans in its AA for a total of \$86.95 million, which represented 68.17 percent of Tier One Capital. Fifty-three percent of the dollar amount of CD lending originated during the evaluation period, totaling \$25.36 million, had a primary purpose of affordable housing. Affordable housing was noted as the predominant need in the AA. The bank originated 26 loans totaling \$17.76 million to local non-profits that provided important services to low- and moderate-income individuals in the AA and 14 loans totaling \$33.33 million that had the primary purpose of economic development.

Examples of CD loans in the AA include:

- The bank funded a \$7.50 million capital call line of credit for a Small Business Investment Company (SBIC) to help bridge calls for future investments. The SBIC was licensed by the Small Business Administration (SBA) in 2012 and has deployed over \$244 million in capital through eighteen investments in small businesses as defined by the SBA.
- Beverly provided a working capital line of credit in collaboration with the city of Chicago to an organization that provides small business micro-lending. The organization focused on low- and moderate-income neighborhoods throughout Chicago with income levels below 60 percent of the area median family income and poverty levels above 20 percent. To date, the organization has financed 40 small businesses with microloans.

- The bank provided a working capital line of credit to a local Chicago non-profit whose mission is to provide services for at-risk children and families. The organization provided accredited education, mental health, and social services to 800 homeless families and 1,700 children.

## **Product Innovation and Flexibility**

Innovative and flexible loan products offered were effective in helping the bank address community credit needs. The bank originated a significant number of loans under these programs.

- Beverly uses 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 this evaluation period.
- Beverly offers financing through the SBA. Wintrust established a specialty SBA lending department within one its financial subsidiaries. These specialized lending officers are shared with Beverly and other lending affiliates. The SBA products offered include: 7A Program; 504 Program; Express Program; and SBA CAP Lines. Beverly also offers in-house Small Business Micro Loans and Small Business Overdraft Protection Lines. These specific products are tailored to effectively meet the credit needs of small business with annual revenues of less than \$1 million.
- A full array of mortgage products, including Federal Housing Administration and Veterans Affairs loans, are available through the mortgage origination operations of the bank's financial affiliate. In 2017, an innovative program to provide down payment or closing cost or escrow assistance to low- or moderate-income borrowers was implemented (Wintrust Community Bank Down Payment Program). For the 2017 program year the maximum grant was \$2,000 per household. Funds were made available through multiple Department of Housing and Urban Development-approved non-profit agencies across the Wintrust footprint. The assistance provided was in the form of a grant paid on behalf of the borrower at the time the borrower closes on a first mortgage for a home purchase and was fully forgiven at closing. The innovative segment of this grant program was that Wintrust does not mandate the borrower use a Wintrust mortgage loan product to qualify for the grant.
- Wintrust also developed two flexible small dollar fixed rate consumer loan programs in amounts up to \$2,500 with rates lower than most credit cards and other fast cash loans. The Everyday Loan programs were designed specifically for low- and moderate-income individuals in the bank's AA. 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 Outstanding. Based on a full-scope review, Beverly's overall investment test performance in the Chicago MSA was excellent.

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 excellent.

- Over the CD evaluation period of 43 months the bank's dollar amount of investments in the Chicago MSA represented 8.92 percent of the bank's Tier One Capital. Beverly had an additional three unfunded commitments to invest that represented 0.59 percent of Tier One Capital.
- Beverly exhibited excellent responsiveness to credit and community development needs of the AA. The bank had 354 current- and prior-period investments totaling \$11.38 million. Economic development was supported through investments in four Community Development Financial Institutions (CDFIs) and three SBICs. Community services targeted towards low- and moderate-income individuals were supported through 233 separate donations and investments to 82 different organizations throughout Chicago. These organizations provided a wide range of community services targeted towards low- and moderate-income individuals including financial education, health services, local area hospitals, food banks, and social services. The bank also invested in several bonds that supported local area schools where the majority of students were low-income and received free or reduced lunches. Affordable housing was supported through contributions to local affordable housing corporations for various loan pools for use by low- and moderate-income borrowers.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

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

### Retail Banking Services

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

- The bank's branches were reasonably accessible to essentially all parts of the bank's community. The bank had an adequate number of branches and ATMs, reflected in Table 15, in low- and moderate-income areas compared to the population distribution.

- The opening and closing of branches, reflected in Table 15, have not adversely affected the accessibility of the delivery of service across the community. Beverly acquired two branches in July 2015 through the acquisition of Suburban Bank & Trust by affiliate, Hinsdale Bank & Trust. Both branches were closed in November 2015 due to their proximity to existing Beverly branches on Western Avenue and in Oak Lawn. The closed branches were located in upper- and middle-income geographies.
- The bank's hours and services did not vary in a way that inconvenienced certain portions of the AA, particularly low- and moderate-income individuals or low- and moderate-income geographies. Beverly maintained standard business hours and offered traditional banking products, mortgage, consumer, small business lending, and services at all branch locations in the AA.
- Beverly offers accessible alternative delivery systems through debit cards, ATMs, telephone and online banking, electronic bill pay, and mobile banking options. The bank has 11 deposit taking ATMs in the AA.

### **Community Development Services**

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development services was excellent.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities.
- Of the 100 different organizations that bank employees, senior management, and members of the board of directors participated with, bank representatives provided leadership roles for 98 of those different organizations. Fifty two different bank representatives reported 6,194 hours dedicated to CD services during this evaluation period, representing over 144 hours per month. The bank worked with four affordable housing advocacy groups, 13 organizations that promoted economic development, and 81 CD service organizations that brought financial education, health care, and affordable housing options to low- and moderate-income individuals throughout the AA.

Notable examples included:

- Money Smart is a comprehensive financial education curriculum designed to help low- and moderate-income individuals outside the financial mainstream enhance their financial skills and create positive banking relationships. Money Smart has reached over 3 million consumers since 2001. Financial education fosters financial stability for individuals, families, and entire communities. The bank provided the Money Smart curriculum to consumers free of charge in several versions. Additionally, Wintrust is a FDIC Money Smart Alliance member and works closely to receive the most recent training and materials to the Money Smart curriculum as well as provide feedback. Beverly Bank has 15 employees that teach the Money Smart Curriculum and taught over 600 hours of financial education to 56 organizations over the evaluation period.

- Beverly has five employees that serve in leadership positions for a nonprofit organization that supports revitalization and stabilization within the bank's AA as well as across the state of Illinois. The organization is the largest nonprofit lender in Illinois for new homebuyers and homeowners. Leadership positions held include serving on the Board of Trustees, the Advisory Council, Board of Directors, and the Neighborhood Strategy Committee.
- An Executive Vice President of Beverly is a Board Member of a nonprofit organization that promotes economic development in the Calumet area of Chicago, which is primarily low- and moderate-income. The organization has a variety of workforce development programs to address the industry's need for manufacturing talent and training as well as employee retention. Incentive programs relating to Tax Incremental Financing (TIF) Districts, Small Business Improvement Fund and Enterprise Zone Programs are also offered. The Illinois Enterprise Zone Program is designed to stimulate economic growth and neighborhood revitalization in economically depressed areas.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	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	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Beverly Bank & Trust Company, NA Chicago, IL		HMDA Small Business Consumer
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Chicago MSA	Full Scope	

## Appendix B: Community Profiles for Full-Scope Areas

### Chicago MSA

Demographic Information for Full-Scope Area: Chicago MSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,319	19.33	28.81	24.18	26.69	0.99
Population by Geography	5,236,393	14.63	29.80	27.16	28.02	0.39
Owner-Occupied Housing by Geography	1,107,485	7.00	24.12	32.26	36.40	0.23
Businesses by Geography	282,658	6.97	20.38	26.61	45.25	0.79
Farms by Geography	3,054	5.80	21.84	31.93	40.37	0.07
Family Distribution by Income Level	1,184,857	28.01	17.03	17.72	37.23	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	533,684	23.40	38.56	24.60	13.13	0.31
Median Family Income	= \$75,350					
FFIEC Adjusted Median Family Income for 2017	= \$77,500					
Households Below the Poverty Level	= 16%					
				Median Housing Value	= \$245,250	
				Unemployment Rate	= 5.66%	

\* 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.

Beverly's AA, which meets regulatory requirements, consists of all 1,319 census tracts in Cook County, IL. Cook County contains the city of Chicago and all or parts of more than 130 suburban cities, towns, and villages. It has a population of 5.2 million people, which makes it the most populous county in Illinois, and it contains 945 square miles of land, making it the sixth largest county in the state by land area. Beverly's seven branches are clustered on the south side of the city of Chicago in three of the 77 Community Areas the City officially has identified for planning purposes and in two adjacent inner-ring southwest suburbs. Of the 1,319 census tracts in Cook County, 48 percent are primarily low- or moderate-income. A significant number of those low- and moderate-income tracts are in the southern half of the County where Beverly's branches are located.

As of June 30, 2017, Beverly had a deposit market share in Cook County of 0.36 percent, which ranked 26th out of 116 financial institutions gathering deposits in the county. JP Morgan Chase Bank, Bank of America, and BMO Harris Bank held the top three market shares, which together constituted approximately 50 percent of the deposit market in the county. Of the 25 banks with larger deposit market shares than Beverly, ten are large banks with operations in many states. In addition, five of Beverly's competitors are regional banks roughly comparable in size to the combined banks owned by Wintrust Financial Corporation. Eighty-three percent of the deposits that Beverly holds are from four branches in the Beverly and Hyde Park neighborhoods of Chicago, one of which is the bank's headquarters office.

The portion of Cook County in which Beverly's branches are located contains a great diversity of incomes, housing types, and economic clusters. Within a short distance of Beverly's branches are some of the lowest-income and highest-income neighborhoods in the city of

Chicago. Similarly, within close proximity to Beverly's branches, the density of residential and commercial development varies greatly – from very dense, high-rise rental neighborhoods to low-density, single-family suburban communities. Some portions of Beverly's AA have long suffered for a lack of investment in commercial activities and residential buildings, while other immediately adjacent areas consistently have seen the physical assets of the community renewed with building renovations, new businesses, and new construction. Strong economic drivers have been absent for decades from some communities, while other neighborhoods have had powerful, world-renowned economic drivers. Economic characteristics are changing. Large projects with regional economic development and tourism implications recently have been initiated in communities that formerly received little new investment. Housing markets where recovery from the 2008-09 financial crisis was almost imperceptible for nearly a decade, recently have been reported as now being among the most active and most-improved residential real estate markets in the region. The uptick in these real estate markets has given rise to concerns in some communities that redevelopment is moving too quickly, displacing existing residents, and eliminating affordable housing.

AA economic and housing market conditions give rise to the need for interventions in the housing market that concentrate investments in targeted areas to address troubled properties, preserve existing affordable housing, and increase the number of available affordable units. Discussion has included less-common methods such as community land trusts and accessory dwelling units. Other responses to the housing market conditions in Beverly's AA include, financing for home renovations and improvements, often in conjunction with public sector support for such lending and often targeted to aging homeowners; financing for the acquisition and renovation of small multi-family rental buildings; foreclosure and homebuyer counseling; support for visible investments in commercial districts, such as façade improvement programs for commercial buildings. Other responses to conditions in the AA include donations of money and expertise for workforce development initiatives and to organizations that provide business planning and development services as well as financing for smaller businesses. Initiatives that increase the liquidity of small business micro loan organizations and enable them to produce more small business loans also would be responsive.

Opportunities and partners for responding to these needs in Beverly's AA are abundant. They include multiple organizations that focus on small business development and financing; an affiliate of the NeighborWorks network; multiple regional CDFIs that work in conjunction with the city of Chicago, the Cook County Land Bank, and with national affordable housing developers to target redevelopment activities that preserve existing, and increase the overall supply of, affordable housing. The AA also has many active housing counseling and social service organizations; nonprofit, municipal and county-level business development and workforce training initiatives; and active SBA 504 certified development companies.

## Appendix C: Tables of Performance Data

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### 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)	
<b>Full Review:</b>												
Chicago MSA	100.00	119	53,793	635	90,106	0	0	99	86,959	754	143,899	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 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)	
<b>Full Review:</b>														
Chicago MSA	100.00	454	8,000	0	0	0	0	3	53	0	0	91	6,629	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 <sup>*</sup>		Other Optional Loans <sup>*</sup>		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
Chicago MSA	360	1,318	0	0	

<sup>\*</sup> 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
<b>Full Review:</b>														
Chicago MSA	73	100.00	6.03	20.55	22.44	43.84	37.86	13.70	33.67	21.92	4.49	18.70	37.25	39.55

\* 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
<b>Full Review:</b>														
Chicago MSA	7	100.00	6.03	0.00	22.44	14.29	37.86	28.57	33.67	57.14	4.79	19.39	34.08	41.74

\* 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					
<b>Full Review:</b>																			
Chicago MSA	16	100.00	6.03	31.25	22.44	31.25	37.86	25.00	33.67	12.50	3.64	14.35	33.27	48.74					

\* 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 <sup>6</sup>			
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Chicago MSA	23	100.00	13.91	43.48	22.77	21.74	30.61	30.43	32.71	4.35	14.82	31.31	32.35	21.52

<sup>6</sup> Based on 2016 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> 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.

<sup>\*\*\*\*</sup> 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					
<b>Full Review:</b>																			
Chicago MSA	635	100.00	6.42	12.28	18.62	17.32	31.03	24.88	43.74	45.51	5.14	18.50	33.23	43.13					

\* 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 <sup>*</sup>								
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>**</sup>	% BANK Loans	% of Farms <sup>**</sup>	% BANK Loans	% of Farms <sup>**</sup>	% BANK Loans	Low	Mod	Mid	Upp					
<b>Full Review:</b>																			
Chicago MSA	0	0.00	5.08	0.00	18.94	0.00	35.88	0.00	40.10	0.00	4.42	19.47	25.66	50.44					

<sup>\*</sup> Based on 2016 Peer Small Business Data -- US and PR

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> 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 <sup>1</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Chicago MSA	73	100.00	26.83	9.59	17.78	27.40	18.66	13.70	36.73	49.32	7.05	20.28	24.79	47.88

\* 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.

<sup>1</sup> 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 <sup>2</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Chicago MSA	7	100.00	26.83	0.00	17.78	0.00	18.66	0.00	36.73	100.00	6.66	13.33	24.06	55.95

\* 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.

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

**Table 10. 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 <sup>3</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Chicago MSA	16	100.00	26.83	7.14	17.78	14.29	18.66	21.43	36.73	57.14	4.72	10.89	20.57	63.82

\* 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.

<sup>3</sup> 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
<b>Full Review:</b>									
Chicago MSA	635	100.00	80.83	46.77	68.82	12.60	18.58	126,567	50,380

\* 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
<b>Full Review:</b>									
Chicago MSA	0	0.00	93.14	0.00	0.00	0.00	0.00	116	38

\* 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 13. Geographic and Borrower Distribution of Consumer Loans (Institution’s Option)**

Geographic and Borrower Distribution: CONSUMER LOANS																			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2016			
Assessment Area:	Geographic Distribution										Borrower Distribution															
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers									
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans								
<b>Full Review:</b>																										
Chicago MSA	454	100.00	11.81	20.48	26.09	39.65	33.63	27.75	28.48	11.67	28.37	47.14	16.54	24.89	17.65	12.56	37.44	10.35								

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census information.

**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)
<b>Full Review:</b>									
Chicago MSA	8	3,539	346	7,842	354	11,381	100.00	3	758

\* '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
<b>Full Review:</b>																	
Chicago MSA	100.00	7	100.00	0.00	28.57	14.29	57.14	2	2	0	0	0	0	14.63	29.80	27.16	28.02

