



PUBLIC DISCLOSURE

October 22, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Atlanta National Bank
Charter Number 3711

105 Southwest Church Street
Atlanta, Illinois 61723

Office of the Comptroller of the Currency

211 Fulton Street
Suite 604
Peoria, Illinois 61602

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

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Overall CRA Rating is Outstanding

The Lending Test is rated: Outstanding

- The borrower distribution of loans reflects excellent penetration.
- A substantial majority of loans originated or purchased by the bank are to customers within its assessment areas (AAs).
- Lending activity is reasonable, given the performance context and the identified need for small dollar lending.

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 (MD): 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 (MSA): 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

The Atlanta National Bank (ANB or bank) is an intrastate financial institution headquartered in Atlanta, Illinois, along Interstate 55 and Historic US Route 66, southwest of Bloomington, Illinois, and northeast of Springfield, Illinois. The bank reported \$57.5 million in total assets, at June 30, 2018.

The bank is wholly owned by ANB Bancorp, Inc., a \$57.5 million one-bank holding company headquartered in Atlanta, Illinois. ANB Bancorp, Inc. does not negatively impact the bank's ability to meet the credit needs of the community.

ANB's mission is to provide the best customer service possible by employing a dedicated and experienced staff. ANB serves its customers with a range of traditional lending products including agriculture, business, consumer, and residential lending.

Residential real estate represented the largest loan portfolio at \$6.3 million, followed by agricultural at \$5.0 million, commercial at \$3.0 million, and consumer at \$2.4 million at December 31, 2017. The bank originated or purchased 1,111 loans totaling \$31.5 million between January 1, 2015 and December 31, 2017, per bank data.

ANB held a net loans and leases to total assets of 29.1 percent and a tier 1 leverage capital ratio of 13.5 percent, at June 30, 2018.

The bank primarily serves rural areas in the northern portion of Logan County, the southwestern portion of McLean County, and the western portion of DeWitt County, Illinois. The bank has two branches, one in Atlanta, Illinois, serving Logan County (Atlanta AA), and one in McLean, Illinois, serving McLean and DeWitt Counties (McLean AA), which encompasses the Bloomington, Illinois, MSA (Bloomington MSA). The bank's sole ATM is located at the Atlanta, Illinois, branch drive-thru facility.

ANB competes with banks in larger markets in Bloomington, Normal, Springfield, Lincoln, and Peoria, Illinois. Competition includes national banks, state banks, credit unions, farm credit institutions, as well as non-bank lenders for consumer and automobile loans. ANB held a 7.9 percent market share in Logan County, Illinois, ranking fourth among twelve FDIC insured institutions, at June 30, 2017. In the Bloomington MSA, ANB held a less than one percent deposit market share ranking 28th among 32 FDIC insured institutions.

The previous CRA rating, which the OCC determined using the Small Bank criterion, was Satisfactory, as detailed in the PE dated April 8, 2013.

There are no legal or financial circumstances that impede the bank's ability to meet the credit needs of its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is from the date of the previous CRA PE of April 08, 2013, through October 22, 2018. We assessed the bank under the Small Bank criterion, which includes a lending test. The lending test evaluated the lending activity for the calendar years of 2015 and 2016 on a combined basis and compared to 2010 U.S. Census data. Due to changes in census data effective January 1, 2017, the 2017 calendar year lending activity was evaluated separately and compared to the 2015 American Community Survey (ACS) Census data.

The primary loan products for the AAs were determined to be agricultural and consumer loans, based on the number and dollar amount of loans originated and purchased between January 1, 2015, and December 31, 2017. Agriculture loans accounted for 38.7 percent by dollar and 12.5 percent by number. Consumer lending accounted for 20.6 percent by dollar and 71.2 percent by number.

Data Integrity

ANB is not required to maintain CRA loan application register data on agriculture lending outside of the individual credit files. Therefore, we utilized random sampling to obtain data for agriculture loans, as well as consumer loans. We obtained the gross revenues of agriculture borrowers and gross income of consumer borrowers. We also geocoded each loan sampled.

Selection of Areas for Full-Scope Review

The Atlanta AA, along with McLean AA, both received full scope reviews.

Ratings

The overall rating is based primarily on those areas that received full-scope reviews. The Atlanta AA received a greater weighting in our analysis as a majority of deposits and loans were derived from this AA. The combined lending performance in 2015 and 2016 received a greater weighting than the 2017 performance. We gave more weight to consumer lending than agriculture lending due to the greater volume of loan originations.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] 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

ANB exceeds the standard for satisfactory performance.

Loan-to-Deposit Ratio

The quarterly average LTD ratio is poor; however, when considering the volume of loans originated, the lending activity is reasonable. ANB's quarterly average LTD ratio was 32.8 percent for the period from June 30, 2013, to June 30, 2018, with a low of 27.2 percent and a high of 37.7 percent. ANB ranked ninth of nine similarly sized FDIC insured financial institutions that compete with the bank for deposits in the AAs. The comparable institutions ranged in size from \$15.1 million to \$116.4 million, and reported quarterly average LTD ratios from 51.6 percent to 88.4 percent during the same time period. Note that the LTD ratio is calculated on a bank-wide basis.

The bank originated 1,111 loans between January 1, 2015, and December 31, 2017. The LTD ratio was negatively impacted by the high level of competition for agriculture, business, and residential lending and the generally small dollar size of the consumer loans originated, which represented the majority of the bank's lending activity by number of loans. Small dollar lending was identified as a credit need by a community contact. ANB originated 792 consumer purpose loans, of which 58.3 percent were for \$5,000 or less and 12.9 percent were \$1,000 or less.

Lending in Assessment Area

A substantial majority of loans are to customers inside the AAs during the evaluation period. Note that the proportion of lending inside versus outside the bank's assessment areas is calculated on a bank-wide basis.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$ (000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$ (000s)	%	\$ (000s)	%	
Agriculture	37	92.5	3	7.5	40	3,993	94.1	251	5.9	4,244
Consumer	37	92.5	3	7.5	40	273	90.6	28	9.4	301
Totals	74	92.5	6	7.5	80	4,266	93.9	279	6.1	4,545

Source: Random In/Out sample of agriculture and consumer loans originated or purchased between January 1, 2015, and December 31, 2017.

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

The borrower distribution of loans reflects excellent penetration throughout the AAs. The borrower distribution in both the Atlanta AA and Mclean AA reflects excellent performance.

Agriculture Lending:

The distribution of agriculture loans reflects excellent penetration to farms of different sizes in the AAs.

See Tables 2a and 2b in Appendix C for Assessment Area Distribution of Loans to Small Farms by Gross Annual Revenues for 2015-2016 and 2017.

Atlanta AA:

The distribution of agriculture loans reflects excellent penetration to farms of different sizes in the Atlanta AA.

For 2015 and 2016, the distribution of agriculture loans reflected excellent penetration. The proportion of lending to small farms was near to the percentage of small farms in the AA, and the lending performance was significantly stronger than the aggregate distribution of loans to small farms in the AA.

For 2017, the distribution of agriculture loans reflected excellent penetration. The proportion of lending to small farms exceeded the percentage of small farms, and the lending performance was significantly stronger than the aggregate distribution of loans to small farms in the AA.

McLean AA:

The borrower distribution reflects reasonable penetration among farms of different sizes in the McLean AA.

For 2015 and 2016, the distribution of agriculture loans reflected reasonable penetration. The proportion of lending to small farms was near to the percentage of small farms in the AA. The lending performance was significantly stronger than the aggregate distribution of loans to small farms in the AA.

For 2017, the distribution of agriculture loans reflected reasonable penetration. The proportion of lending to small farms was near to the percentage of small farms in the AA. The lending performance was significantly stronger than the aggregate distribution of loans to small farms in the AA.

Consumer Lending:

The borrower distribution reflects excellent penetration among households and individuals of different incomes in the AAs.

See Tables 3a and 3b in Appendix C for Assessment Area Distribution of Consumer Loans by Income Category of the Borrower for 2015-2016 and 2017.

Atlanta AA:

The borrower distribution reflects excellent penetration among households and individuals of different incomes in the Atlanta AA.

For 2015 and 2016, the distribution of consumer loans reflected excellent penetration. The proportion of lending to low-income households was near to the percentage of low-income households in the AA. The proportion of lending to moderate-income households significantly exceeded the percentage of moderate-income households in the AA.

For 2017, the distribution of consumer loans reflected excellent penetration. The proportion of lending to both low- and moderate-income households significantly exceeded the percentage of low- and moderate-income households in the AA.

McLean AA:

The borrower distribution reflects excellent penetration among households and individuals of different incomes in the McLean AA.

For 2015 and 2016, the distribution of consumer loans reflected excellent penetration. The proportion of lending to both low- and moderate-income households significantly exceeded the percentage of both low- and moderate-income households in the AA.

For 2017, the distribution of consumer loans reflected excellent penetration. The proportion of lending to both low- and moderate-income households significantly exceeded the percentage of both low- and moderate-income households in the AA.

Geographic Distribution of Loans

There are no low- or moderate-income geographies in the Atlanta AA or McLean AA.

Responses to Complaints

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

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test: (January, 1 2015 to December 31, 2017)	
Financial Institution	Products Reviewed	
The Atlanta National Bank Atlanta, Illinois	Agriculture Loans Consumer Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
State of Illinois (Nonmetropolitan Area) Atlanta AA (Bloomington, Illinois MSA - 14010) McLean AA	Full Scope Full Scope	Logan County (#107) – CTs: 9529, 9530, 9531, 9532, 9533, and 9534 McLean County (#113) – CT: 60 DeWitt County (#39) – CT: 9716

Appendix B: Community Profiles for Full-Scope Areas

Demographic Information of the Assessment Area						
Assessment Area: Atlanta AA 2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	0.0	83.3	16.7	0.0
Population by Geography	21,402	0.0	0.0	87.9	12.1	0.0
Housing Units by Geography	9,479	0.0	0.0	88.8	11.2	0.0
Owner-Occupied Units by Geography	6,229	0.0	0.0	88.0	12.0	0.0
Occupied Rental Units by Geography	2,362	0.0	0.0	90.3	9.7	0.0
Vacant Units by Geography	888	0.0	0.0	90.3	9.7	0.0
Businesses by Geography	1,022	0.0	0.0	90.6	9.4	0.0
Farms by Geography	128	0.0	0.0	58.6	41.4	0.0
Family Distribution by Income Level	5,451	16.1	17.9	19.7	46.3	0.0
Household Distribution by Income Level	8,591	22.5	15.2	17.2	45.1	0.0
Median Family Income Non-MSAs - IL		\$54,499	Median Housing Value			\$93,918
			Median Gross Rent			\$555
			Families Below Poverty Level			8.2%
			Households Below Poverty Level			11.1%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Information of the Assessment Area						
Assessment Area: Atlanta AA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	0.0	100.0	0.0	0.0
Population by Geography	19,929	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	9,524	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	5,690	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	3,118	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	716	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,028	0.0	0.0	100.0	0.0	0.0

Farms by Geography	136	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	5,684	21.0	14.9	20.4	43.7	0.0
Household Distribution by Income Level	8,808	26.2	14.1	16.0	43.7	0.0
Median Family Income Non-MSAs - IL	\$59,121	Median Housing Value			\$98,348	
		Median Gross Rent			\$633	
		Families Below Poverty Level			13.8%	
		Households Below Poverty Level			18.0%	
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Demographic Information of the Assessment Area						
Assessment Area: McLean AA 2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	7,598	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	3,085	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	2,480	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	388	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	217	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	292	0.0	0.0	100.0	0.0	0.0
Farms by Geography	80	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,192	21.7	16.4	24.8	37.2	0.0
Household Distribution by Income Level	2,868	20.4	14.1	16.8	48.7	0.0
Median Family Income MSA - 14010 Bloomington, IL MSA	\$74,930	Median Housing Value			\$135,948	
		Median Gross Rent			\$838	
		Families Below Poverty Level			5.7%	
		Households Below Poverty Level			7.0%	
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table 7 – Demographic Information of the Assessment Area						
Assessment Area: McLean AA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	7,491	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	3,216	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	2,496	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	365	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	355	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	295	0.0	0.0	100.0	0.0	0.0
Farms by Geography	86	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,199	14.5	17.7	27.9	39.9	0.0
Household Distribution by Income Level	2,861	15.8	13.4	20.4	50.4	0.0
Median Family Income MSA - 14010 Bloomington, IL MSA		\$81,357	Median Housing Value			\$132,267
			Median Gross Rent			\$617
			Families Below Poverty Level			6.6%
			Households Below Poverty Level			8.0%
<i>Source: 2015 ACS Census and 2017 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The local economy of the two AAs is stable. Unemployment rates were 3.6 percent and 4.2 percent in Logan County and Bloomington MSA, respectively, and compare favorably to the State of Illinois unemployment rate of 4.9 percent, at December 31, 2017. Stable economic conditions and low unemployment rates may provide opportunities for lending in the assessment areas.

Major employment sectors in both AAs include agriculture, retail, schools and local government.

The Atlanta AA has a significantly higher rate of households living below poverty than the McLean AA, which may limit opportunities for consumer lending in the Atlanta AA.

We obtained community contact interviews for each assessment area. For the Atlanta AA, we contacted a local public official, and for the McLean AA, we obtained interviews from a community action group and a local planning commission to gain additional context.

The contact for the Atlanta AA noted the economy to be agriculture focused with most farming operations being large farms. It should be noted the contact described small farms as farms below 500 acres. In comparison for this CRA evaluation, we defined small farms as farms with gross revenues of \$1 million or less. The contact noted that the bank is supportive of smaller farms and their credit needs. The only negative perception the contact had was related to the bank's loan policy being conservative, though this was considered a very mild perception. Bank management also mentioned their conservative underwriting standards, which may limit some opportunities for lending. The contact for the Atlanta AA had no other negative perceptions of ANB and its ability to meet the credit needs of the community. Overall, the contact noted the bank to have a positive impact on the community.

The community contacts for the McLean AA primarily discussed the opportunities and needs of the Bloomington/Normal communities while ANB primarily serves the rural area directly southwest. Due to the McLean AA proximity to Bloomington/Normal communities and the influence on the McLean AA and Bloomington, Illinois MSA, the context provided was determined to be relevant. The economy of the area is heavily influenced by insurance, education, and healthcare sectors. State Farm Insurance is the largest employer and primary influencer of the local economy. The rural areas outside of the cities Bloomington and Normal, Illinois are predominantly agriculture communities focused on the production of corn and soybean. The contact noted that the manufacturing jobs that have left the Bloomington/Normal communities once provided livable wages for lower skilled persons. The contacts noted that the new jobs being created either provide low wages or require a very high skillset to earn a livable wage.

The McLean AA contact noted multiple opportunities within the Bloomington MSA for community development. Although many opportunities primarily relate to the Bloomington/Normal areas, the rural areas that ANB primarily serves can still benefit. Opportunities include: the need to develop small businesses to diversify the economy, training for a higher skilled workforce, small and micro lending, affordable rental and homeownership, development of new and rehab of poor quality affordable housing, social and human services, financial literacy, and infrastructure and transportation investment.

Appendix C: Tables

Table 2a: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2015-16
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Atlanta AA	20	1,890	35.4	29	98.4	90.0	27.6	0.0	10.0	1.6	0.0
McLean AA	20	3,456	64.6	75	98.8	80.0	62.7	1.3	20.0	0.0	0.0
Total	40	5,347	100.0	104	98.9	85.0	52.9	1.3	15.0	1.6	0.0

Source: 2016 D&B Data; Sample of agriculture loans originated or purchased from January 1, 2015, through December 31, 2016. Due to rounding, totals may not equal 100.0

Table 2b: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Atlanta AA	20	1,206	39.1	33	96.3	100.0	27.3	0.0	0.0	3.7	0.0
McLean AA	12	1,883	60.9	83	98.8	83.3	57.8	1.2	16.7	0.0	0.0
Total	32	3,089	100.0	116	97.3	93.7	49.1	1.2	--	3.7	0.0

Source: 2017 D&B Data; Sample of agriculture loans originated or purchased from January 1, 2017, through December 31, 2017. Due to rounding, totals may not equal 100.0

Table 3a: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2015-16
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Atlanta AA	20	180	62.8	22.5	20.0	15.2	25.0	17.2	35.0	45.1	20.0	0.0	0.0	
McLean AA	21	107	37.2	20.4	66.7	14.1	28.6	16.8	0.0	48.7	0.0	0.0	4.8	
Total	41	287	100.0	22.0	43.9	14.9	26.8	17.1	17.1	46.0	9.8	0.0	2.5	

*Source: 2010 U.S Census; Sample of consumer loans originated or purchased from January 1, 2015, through December 31, 2016.
Due to rounding, totals may not equal 100.0*

Table 3b: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2017
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Atlanta AA	20	73	31.4	26.2	35.0	14.1	35.0	16.0	5.0	43.7	25.0	0.0	0.0	
McLean AA	20	160	68.6	15.8	30.0	13.4	40.0	20.4	5.0	50.4	25.0	0.0	0.0	
Total	40	234	100.0	23.7	32.5	14.0	37.5	17.1	5.0	45.3	25.0	0.0	0.0	

*Source: 2015 ACS Census; Sample of consumer loans originated or purchased from January 1, 2017, through December 31, 2017.
Due to rounding, totals may not equal 100.0*