



## PUBLIC DISCLOSURE

January 28, 2019

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Bankers Trust Company, National Association  
Charter Number 14564

1201 Broadway, Quincy  
Illinois 62301

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 Satisfactory**

**The Lending Test is rated: Satisfactory**

**The Community Development Test is rated: Satisfactory**

- The borrower distribution of loans reflects reasonable penetration in the assessment areas (AAs).
- The geographic distribution of loans reflects reasonable dispersion in the AAs.
- A majority of loans are to customers within the AAs.
- The average loan-to-deposit (LTD) ratio is reasonable.
- The community development performance demonstrates adequate responsiveness in the Quincy AA.

## 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 (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; 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

First Bankers Trust Corporation (FBTC or bank) is an intrastate financial institution headquartered in Quincy, Illinois, near Interstate 172 and the Mississippi River, with assets of \$917.5 million, at December 31, 2018.

The bank is wholly owned by First Bankers Trustshares, Inc. (FBTI), a holding company headquartered in Quincy, Illinois with assets of \$930.0 million, at December 31, 2018. FBTI also owns First Bankers Trust Services Inc., a state chartered trust company. FBTI or affiliates do not negatively affect FBTC's ability to meet the credit needs of the community.

FBTC's stated CRA mission is to continue to find ways to meet the needs of the community through its banking products and services and evolving those services to continue to meet the needs of the community into the future.

FBTC serves its customers in two AAs in west-central and central Illinois. The bank sources a substantial majority of its deposits, 96.2 percent, from the Quincy AA, which covers the west-central portions of rural Illinois and includes all CTs in Adams, Hancock, McDonough, Schuyler Counties, and a portion of northwestern Pike County. The bank sources a substantial minority of deposits, 3.8 percent, from the Springfield AA, which includes all CTs in Sangamon County.

FBTC serves the Quincy AA with nine branches and 21 ATMs, and the Springfield AA with one branch and one ATM.

Commercial lending represented the largest loan portfolio at \$256.0 million, followed by agriculture at \$85.5 million, consumer at \$70.3 million, and residential at \$69.0 million at December 31, 2018. The bank originated or purchased 9,137 loans totaling \$551.1 million between January 1, 2016 and December 31, 2018, per bank data.

The bank originates fixed-rate residential mortgages from its AAs for sale into the secondary market. The bank purchases consumer automobile loans from automobile dealers in the Quincy AA.

The bank experienced turnover of key lending officers in the Springfield AA, during the evaluation period, which may have reduced its lending opportunities.

FBTC held a net loans and leases to total assets of 51.0 percent and a tier one leverage capital ratio of 9.1 percent, at December 31, 2018.

Competition is high in the AAs. FBTC competes with national banks, state banks, credit unions, farm credit unions, and non-bank lenders for consumer and residential loans. The bank held a first position in deposit market share of 19.7 percent among 34 FDIC insured financial institutions in the Quincy AA, at June 30, 2018. The bank held a less

than one percent deposit market share among 24 FDIC institutions in the Springfield AA, at June 30, 2018.

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

The previous CRA rating, which the OCC determined using the Intermediate-Small Bank criterion, was Satisfactory, as detailed in the PE dated January 4, 2016.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The evaluation period is from the date of the previous CRA PE of January 4, 2016, through December 31, 2018. We assessed the bank under the Intermediate-Small Bank criterion, which includes a lending test and a community development test. The lending test evaluated the lending activity for the calendar year of 2016 and compared to 2010 U.S. Census data. Due to changes in census data, effective January 1, 2017, the lending activity for 2017 and 2018 calendar years were evaluated separately and compared to the 2015 American Community Survey (ACS) Census data.

The primary loan products for the AAs were determined to be commercial, residential, and consumer loans, based on the number and dollar amount of loans originated and purchased between January 1, 2016, and December 31, 2018, per bank data. Commercial loans accounted for 42.7 percent by dollar and 8.9 percent by number. Residential loans accounted for 28.4 percent by dollar, and 17.1 percent by number. Consumer loans accounted for 13.7 percent by dollar, and 68.0 percent by number.

### **Data Integrity**

We conducted a data integrity review of the 2016, 2017, and 2018 HMDA loan application registers (LARs). We utilized random sampling and verified reported data against source documents. We found the data in the HMDA LARs to be reliable for use in this evaluation.

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

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

The Quincy AA, along with the Springfield AA, both received full-scope reviews.

## **Ratings**

The overall rating is based primarily on those areas that received full-scope reviews. The Quincy AA received a greater weighting in our analysis. The combined lending performance in 2017 and 2018 received a greater weighting than the 2016 performance.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 12 CFR 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**

FBTC meets the standard for satisfactory performance.

#### **Loan-to-Deposit Ratio**

The quarterly average LTD ratio is reasonable. The quarterly average LTD ratio was 67.0 percent for the 12-quarter period between March 31, 2016, and December 31, 2018, with a low of 61.0 percent and a high of 74.4 percent. FBTC ranked 15<sup>th</sup> of 15 similarly situated FDIC insured financial institutions that compete with the bank for deposits in the AAs. The comparable institutions ranged in size from \$104.8 million to \$2.1 billion and reported quarterly average LTD ratios from 73.5 percent to 106.9 percent. The LTD ratio is calculated on a bank-wide basis.

#### **Lending in Assessment Area**

A majority of loans are to customers inside the AAs. The proportion of lending inside versus outside the bank's assessment areas is calculated on a bank-wide basis.

See Table 1 in Appendix C for Lending Inside and Outside of the Assessment Area.

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

The borrower distribution of loans reflects reasonable penetration in both the Quincy and Springfield AAs.

#### Home Mortgage Lending:

The distribution of home mortgage loans reflects reasonable penetration among families of different income levels in the AAs, given the performance context.

See Tables 2a and 2b in Appendix C for Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower.

#### Quincy AA:

The distribution of home mortgage loans reflects reasonable penetration in the Quincy AA.

For 2016, the distribution of home mortgage loans reflected reasonable penetration. The proportion of lending to low-income families was significantly less than the percentage of low-income families in the AA, but stronger than the aggregate distribution. The proportion of lending to moderate-income families exceeded the

percentage of moderate-income families in the AA, and was stronger than the aggregate distribution.

For 2017 and 2018, the distribution of home mortgage loans reflected reasonable penetration. The proportion of lending to low-income families was less than the percentage of low-income families in the AA, but comparable to the aggregate distribution. The proportion of lending to moderate-income families significantly exceeded the percentage of moderate-income families in the AA, and was stronger than the aggregate distribution.

Springfield AA:

The distribution of home mortgage loans reflects reasonable penetration in the Springfield AA.

For 2016, the distribution of home mortgage loans reflected reasonable penetration. The proportion of lending to low-income families was near to the percentage of low-income families in the AA, and significantly stronger than the aggregate distribution. The proportion of lending to moderate-income families exceeded the percentage of moderate-income families in the AA, and was comparable to the aggregate distribution.

For 2017 and 2018, the distribution of home mortgage loans reflected reasonable penetration. The proportion of lending to low-income families was significantly less than the percentage of low-income families in the AA, and significantly weaker than the aggregate distribution. The proportion of lending to moderate-income families significantly exceeded the percentage of moderate-income families in the AA, and was stronger than the aggregate distribution.

Small Business Lending:

The distribution of business loans reflects excellent penetration among businesses of different sizes in the AAs, given the performance context.

See Tables 3a and 3b in Appendix C for Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues.

Quincy AA:

The distribution of business loans reflects excellent penetration in the Quincy AA.

For 2016, the distribution of business loans reflected reasonable penetration to businesses of different sizes. The proportion of lending to small businesses was near to the percentage of small businesses in the AA, but significantly stronger than the aggregate distribution.

For 2017 and 2018, the distribution of business loans reflected excellent penetration to businesses of different sizes. The proportion of lending to small businesses exceeded the percentage of small businesses in the AA, and was significantly stronger than the aggregate distribution.

Springfield AA:

The distribution of business loans reflects reasonable penetration in the Springfield AA.

For 2016, the distribution of business loans reflected excellent penetration to business of different sizes. The proportion of lending to small businesses exceeded the percentage of small businesses in the AA, and was significantly stronger than the aggregate distribution.

For 2017 and 2018, the distribution of business loans reflected reasonable penetration to business of different sizes. The proportion of lending to small businesses was near to the percentage of small businesses in the AA, and was significantly stronger than the aggregate distribution.

Consumer Lending:

The distribution of consumer loans reflects reasonable penetration among households of different incomes in the AAs, given the performance context.

See Tables 4a and 4b in Appendix C for Assessment Area Distribution of Consumer Loans by Income Category of the Borrower.

Quincy AA:

The distribution of consumer loans reflects reasonable penetration in the Quincy AA.

For 2016, the distribution of consumer loans reflected reasonable penetration to households of different incomes. The proportion of lending to low-income households was significantly less than the percentage of low-income households in the AA. The proportion of lending to moderate-income households exceeded the percentage of moderate-income households in the AA.

For 2017 and 2018, the distribution of consume loans reflected reasonable penetration to households of different incomes. The proportion of lending to low-income families was less than 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.

Springfield AA:

The distribution of consumer loans reflects excellent penetration in the Springfield AA.

For 2016, the distribution of consumer loans reflected excellent penetration to households of different incomes. The proportion of lending to low-income households met 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 and 2018, the distribution of consumer loans reflected excellent penetration to households of different incomes. 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.

### **Geographic Distribution of Loans**

The geographic distribution reflects reasonable dispersion in CTs of different incomes in both the Quincy and Springfield AAs.

#### Home Mortgage Lending:

The geographic distribution of home mortgage loans reflects reasonable dispersion in the AAs, given the performance context.

See Tables 5a and 5b in Appendix C for Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower.

#### Quincy AA:

The geographic distribution of home mortgage loans reflects reasonable dispersion in the Quincy AA.

For 2016, the distribution of home mortgage loans reflected reasonable dispersion. The proportion of lending in low-income CTs was near to the percentage of owner-occupied housing units in low-income CTs in the AA, but weaker than the aggregate distribution. The proportion of lending in moderate-income CTs significantly exceeded the percentage of owner-occupied housing units in moderate income CTs in the AA, and was significantly stronger than the aggregate distribution.

For 2017 and 2018, the distribution of home mortgage loans reflected reasonable dispersion. There was one low-income CT in the AA, which contained zero owner-occupied housing units. The proportion of lending in moderate-income CTs was near to the percentage of owner-occupied housing units in the AA, and weaker than the aggregate distribution.

#### Springfield AA:

The geographic distribution of home mortgage loans reflects reasonable dispersion in the Springfield AA.

For 2016, the distribution of home mortgage loans reflected reasonable dispersion. The proportion of lending in low-income CTs was less than the percentage of owner-occupied housing units in low-income CTs in the AA, and weaker than the aggregate distribution. The proportion of lending in moderate-income CTs was near to the percentage of owner-occupied housing units in moderate-income CTs in the AA, and was stronger than the aggregate distribution.

For 2017 and 2018, the distribution of home mortgage loans reflected reasonable dispersion. The proportion of lending in low-income CTs significantly exceeded the percentage of owner-occupied housing units in low-income CTs in the AA, and was significantly stronger than the aggregate distribution. The proportion of lending in moderate-income CTs was less than the percentage of owner-occupied housing units in moderate-income CTs in the AA, and was weaker than the aggregate distribution.

#### Small Business Lending:

The geographic distribution of business loans reflects reasonable dispersion in the AAs, given the performance context.

See Tables 6a and 6b in Appendix C for Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography.

#### Quincy AA:

The geographic distribution of business loans reflects reasonable dispersion in the Quincy AA.

For 2016, the distribution of business loans reflected reasonable dispersion. The proportion of lending in low-income CTs was near to the percentage of businesses in low-income CTs in the AA, and weaker than the aggregate distribution. The proportion of lending in moderate-income CTs was less than the percentage of businesses in moderate-income CTs in the AA, and was significantly weaker than the aggregate distribution.

For 2017 and 2018, the distribution of business loans reflected reasonable dispersion. There was one low-income CT in the AA and it contained too few businesses for a meaningful analysis. The proportion of lending in moderate-income CTs was near to the percentage of businesses in moderate-income CTs in the AA, and was comparable to the aggregate distribution.

Springfield AA:

The geographic distribution of business loans reflects reasonable dispersion in the Springfield AA.

For 2016, the distribution of business loans reflected reasonable dispersion. The proportion of lending in low-income CTs was less to the percentage of businesses in low-income CTs in the AA, and weaker than the aggregate distribution. The proportion of lending in moderate-income CTs significantly exceeded the percentage of businesses in moderate-income CTs in the AA, and was significantly stronger than the aggregate distribution.

For 2017 and 2018, the distribution of business loans reflected reasonable dispersion. The proportion of lending in low-income CTs met the percentage of businesses in low-income CTs in the AA, and was stronger than the aggregate distribution. The proportion of lending in moderate-income CTs was near to the percentage of businesses in moderate-income CTs, and was comparable to the aggregate distribution.

#### Consumer Lending:

The geographic distribution of consumer loans reflects reasonable dispersion in the AAs, given the performance context.

See Tables 7a and 7b in Appendix C for Assessment Area Distribution of Consumer Loans by Income Category of the Geography .

Quincy AA:

The geographic distribution of consumer loans reflects reasonable dispersion in the Quincy AA.

For 2016, the distribution of consumer loans reflected reasonable dispersion. The proportion of lending in low-income CTs was less than the percentage of households in low-income CTs. The proportion of lending in moderate-income CTs significantly exceeded the proportion of households in moderate-income CTs.

For 2017 and 2018, the distribution of consumer loans reflected reasonable dispersion. There was one low-income CT in the AA and it contained too few households for a meaningful analysis. The proportion of lending in moderate-income CTs was near to the percentage of households in moderate-income CTs.

Springfield AA:

The geographic distribution of consumer loans reflects reasonable dispersion in the Springfield AA.

For 2016, the distribution of consumer loans reflected excellent dispersion. The proportion of lending in low-income CTs exceeded the percentage of households in low-income CTs. The proportion lending in moderate-income CTs met the percentage of households in moderate-income CTs.

For 2017 and 2018, the distribution of consumer loans reflected poor dispersion. The proportion of lending in low-income CTs was less than the percentage of households in low-income CTs. The proportion of lending in moderate-income CTs was significantly less than the percentage of households in moderate-income CTs.

### **Responses to Complaints**

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

### **COMMUNITY DEVELOPMENT TEST**

FBTC's performance under the community development test is rated Satisfactory. FBTC's performance displayed adequate responsiveness in the Quincy AA and poor responsiveness in the Springfield AA. In making this determination, we gave more weight to the performance in the Quincy AA and considered the bank's level of expertise in community development activities, availability of opportunities in the rural area of the Quincy AA, and limited presence of the Springfield AA.

### **Number and Amount of Community Development Loans**

FBTC's CD lending performance is excellent in the Quincy AA but very poor in the Springfield AA.

In the Quincy AA, FBTC originated nine loans and lines of credits totaling \$8.1 million to community service organizations that provide health and human services and housing support to low- and moderate-income individuals.

Notable community development lending activity includes:

- A \$1.9 million in operating lines of credit to a community service organization that provides mental health, rehabilitation, and educational services to low- and moderate-income individuals.
- A \$500 thousand operating line of credit to a community service organization that provides low- and moderate income individuals and families with alcohol and drug abuse treatment and support, family services, day care services, rehabilitation and residential support, and vocational and employment services.
- A \$125 thousand operating line of credit to an organization that provides daycare and early development services to children of low- and moderate-income parents.

FBTC did not originate any qualifying loans in the Springfield AA during the evaluation period.

### **Number and Amount of Qualified Investments**

FBTC's CD investment performance is poor in both the Quincy and Springfield AAs. The bank did not make qualified investments, other than qualifying contributions and donations. The rural nature of the Quincy AA limited opportunities in eligible community development investments.

FBTC had 194 qualifying current period contributions and donations totaling \$275 thousand and two prior period investments totaling \$24 thousand. The Quincy AA accounted for the bulk of activity with \$253 thousand in current period contributions and donations and \$24 thousand in prior period investments. The Springfield AA accounted for \$22 thousand in current period contributions and donations.

### **Extent to Which the Bank Provides Community Development Services**

FBTC's CD service performance is adequate in both the Quincy and Springfield AA.

Delivery systems are reasonably accessible to individuals of different incomes level and businesses of different sizes. FBTC operates 10 full-service branch and 22 ATMs in the AAs. In 2016, one branch and eight ATMs were located in low-income CTs, and one branch and one ATM were located in an underserved or distressed middle-income CT. In 2017 and 2018, four ATMs were located in low-income CTs, one ATM located in a moderate-income CT, and one branch and ATM were located in an underserved or distressed middle-income CT. Banking services are also available through online, telephone, and mobile platforms.

Extended hours are available at all drive-up locations. Weekend services are also offered; five branches and 10 drive-up locations offer Saturday service while one branch and one drive-up location offer Sunday service.

Notable services include:

- FBTC participates in the USDA Rural Housing Program. This federal government program is designed to encourage people to purchase homes in rural areas. The USDA sets maximum income guidelines for people to qualify for the program. FBTC originated 74 loans, totaling \$6.6 million. This service is available in all AAs.
- The bank participates in the FHLB's Downpayment Plus Program. The program provides down payment and closing costs assistance for low- and moderate-income homebuyers. FBTC originated 40 loans, totaling \$2.7 million. This service is available in all AAs.

#### Quincy AA:

- A loan program with a local school district in the Quincy AA provides small dollar, short-term financing to help low- and moderate-income parents pay for laptop, book and school fees. Loans were provided at a 4.99 percent interest for 10 months. FBTC originated five loans totaling \$2,840.
- The bank participates in a loan program with a local economic development group that offers a matched savings program to low- and moderate-income individuals to save for specific goals, such as a down payment for a home. The program triples the participant's savings by matching it 2:1.
- FBTC bank officers and employees contributed 1,962 volunteer hours, of which 447 hours were in leadership capacities. The hours benefited organizations that provide economic development support to small businesses, promote financial literacy, and community services to low- and moderate-income persons.

#### Springfield AA:

- FBTC bank officers contributed 480 volunteer hours, of which, 300 hours were in leadership capacities. The hours benefited organization that provide community services to low- and moderate-income persons.

### **Responsiveness to Community Development Needs**

FBTC displays adequate responsiveness to the community development needs of the Quincy AA.

FBTC displays poor responsiveness to the community development needs of the Springfield AA.

# 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): January 1, 2016 to December 31, 2018 CD Test: January 5, 2016 to December 31, 2018	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First Bankers Trust Company (FBTC) Quincy, Illinois	Commercial Loans Residential Loans Consumer Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
State of Illinois (Nonmetropolitan Area) Quincy AA	Full Scope	All CTs in: Adams, Hancock, McDonough, and Schuyler Counties. Pike County – CT 9525
(Springfield MSA - 44100) Springfield AA AA	Full Scope	All CTs in Sangamon County

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

### Quincy AA

Demographic Information of the Assessment Area						
2017-2018 Quincy AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	2.6	17.9	64.1	15.4	0.0
Population by Geography	127,673	2.0	15.0	62.5	20.5	0.0
Housing Units by Geography	58,321	0.3	16.3	63.1	20.3	0.0
Owner-Occupied Units by Geography	36,261	0.0	11.0	70.1	19.0	0.0
Occupied Rental Units by Geography	14,696	0.5	27.6	49.2	22.7	0.0
Vacant Units by Geography	7,364	1.5	19.6	56.9	22.0	0.0
Businesses by Geography	6,633	0.1	20.0	59.9	20.0	0.0
Farms by Geography	890	0.0	2.7	87.5	9.8	0.0
Family Distribution by Income Level	32,081	19.3	18.4	22.1	40.1	0.0
Household Distribution by Income Level	50,957	24.9	16.6	18.1	40.4	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housing Value			\$100,298
			Median Gross Rent			\$598
			Families Below Poverty Level			10.0%
			Households Below Poverty Level			15.6%
<p>Source: 2015 ACS Census and 2018 D&amp;B Data            Due to rounding, totals may not equal 100.0            (*) The NA category consists of geographies that have not been assigned an income classification.</p>						

Demographic Information of the Assessment Area						
2016 Quincy AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	7.7	12.8	64.1	15.4	0.0
Population by Geography	128,946	8.9	11.4	59.4	20.3	0.0
Housing Units by Geography	58,305	7.5	11.3	60.9	20.3	0.0
Owner-Occupied Units by Geography	37,771	1.8	9.7	65.4	23.1	0.0
Occupied Rental Units by Geography	14,389	21.0	14.9	45.8	18.3	0.0
Vacant Units by Geography	6,145	10.4	13.2	68.9	7.5	0.0
Businesses by Geography	6,808	13.6	8.8	56.2	21.4	0.0
Farms by Geography	1,043	0.8	5.2	84.3	9.8	0.0
Family Distribution by Income Level	33,075	19.9	18.2	22.3	39.6	0.0

Household Distribution by Income Level	52,160	25.9	17.3	17.0	39.8	0.0
Median Family Income Non-MSAs - IL		\$54,499	Median Housing Value			\$92,499
			Median Gross Rent		\$574	
			Families Below Poverty Level		9.4%	
			Households Below Poverty Level		15.8%	
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The largest economic center in the AA is Quincy, Adams County, where the annualized unemployment rate was 3.8 percent for the county in 2017, which compared favorably to the State of Illinois of 4.7 percent, at December 31, 2017.

Major employment sectors in the Quincy AA include manufacturing, agriculture, and health care.

High rates of poverty may limit opportunities for lending, particularly to low-income households and families.

We contacted a representative of a local economic development organization in Quincy, Illinois. The contact noted the area to be growing due to manufacturing, agriculture, and trucking sectors expanding their facilities. The local governments and school districts contributed to the economic growth with reconstruction and expansion of multiple public facilities. The economic growth has resulted in a lack of skilled labor to fill the needs of the area. Economic growth may result in opportunities for lending in the AA.

The contact noted opportunities for community development include redevelopment of the downtown and riverfront areas of Quincy, Illinois. Housing costs are affordable; however, the contact noted multiple neighborhoods in Quincy, Illinois, have deteriorating housing stock that is in need of rehabilitation to remain habitable.

The contact had positive perceptions of FBTC, and noted the bank is active in working with businesses and local governments in financing projects, such as a new jail and justice center in Adams County.

## Springfield AA

Table A – Demographic Information of the Assessment Area						
2017-2018 Springfield AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	53	20.8	18.9	39.6	20.8	0.0
Population by Geography	199,016	15.9	14.6	40.8	28.7	0.0
Housing Units by Geography	90,433	16.3	16.9	40.0	26.8	0.0
Owner-Occupied Units by Geography	57,654	9.9	13.3	42.2	34.6	0.0
Occupied Rental Units by Geography	25,231	28.6	21.7	36.8	12.8	0.0
Vacant Units by Geography	7,548	24.2	28.7	33.9	13.2	0.0
Businesses by Geography	11,326	15.8	18.0	37.4	28.8	0.0
Farms by Geography	523	7.5	8.0	51.6	32.9	0.0
Family Distribution by Income Level	50,928	22.8	16.2	20.4	40.5	0.0
Household Distribution by Income Level	82,885	25.4	15.7	17.2	41.7	0.0
Median Family Income MSA - 44100 Springfield, IL MSA		\$73,402	Median Housing Value			\$126,507
			Median Gross Rent			\$737
			Families Below Poverty Level			10.8%
			Households Below Poverty Level			13.6%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
2016 Springfield AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	53	17.0	20.8	35.8	24.5	1.9
Population by Geography	197,465	11.4	18.6	37.5	31.9	0.5
Housing Units by Geography	89,624	12.0	21.2	37.5	28.5	0.8
Owner-Occupied Units by Geography	57,820	6.4	17.5	40.5	35.6	0.0
Occupied Rental Units by Geography	24,148	20.0	27.8	34.0	15.9	2.3
Vacant Units by Geography	7,656	28.5	28.6	26.8	14.6	1.5
Businesses by Geography	11,419	11.8	21.9	31.7	30.2	4.4
Farms by Geography	549	3.3	10.2	52.1	34.2	0.2
Family Distribution by Income Level	51,150	22.3	15.9	21.8	39.9	0.0

Household Distribution by Income Level	81,968	24.1	16.4	18.0	41.5	0.0
Median Family Income MSA - 44100 Springfield, IL MSA		\$66,823	Median Housing Value			\$116,203
			Median Gross Rent		\$663	
			Families Below Poverty Level		9.9%	
			Households Below Poverty Level		11.9%	
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The annualized unemployment rate of Sangamon County was 4.2 percent in 2017, and compared favorably to the State of Illinois.

Major economic sectors include the state government, health care, and education services.

High rates of poverty may limit opportunities for lending, particularly to low-income households and families.

We contacted a representative of a local economic development group in Springfield, Illinois. The contact noted the economy to be depressed but is slowly improving. The local economy was negatively affected by the lack of a state budget. The contact also noted high poverty rates, high property taxes, population outflow, and loss of retail stores negatively affected the economy. A depressed economy may limit opportunities for lending.

The contact noted public and affordable housing to be needs in the community. Neighborhoods in Springfield's downtown to eastside have deteriorated and are in need of rehabilitation. The contact also noted needs in affordable childcare and technical assistance for small businesses and community groups.

The contact had no negative perceptions concerning FBTC. The contact noted the community is overbanked, with growth of local banks coming from outside the local community. An overbanked community may limit opportunities for lending.

## Appendix C: Tables

### Lending in Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$ (000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$ (000s)	%	\$ (000s)	%	
Home Mortgage	689	89.5	81	10.5	770	84,076	87.5	12,047	12.5	96,123
Business	49	81.7	11	18.3	60	16,264	90.6	1,685	9.4	17,949
Consumer	43	71.7	17	28.3	60	530	69.5	233	30.5	763
<b>Total</b>	<b>781</b>	<b>87.8</b>	<b>109</b>	<b>12.2</b>	<b>890</b>	<b>100,870</b>	<b>87.8</b>	<b>13,965</b>	<b>12.2</b>	<b>114,835</b>

*Source: Sample of business and consumer loans: 1/1/2016 - 12/31/2018; HMDA LAR Data;  
Due to rounding, totals may not equal 100.0*

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

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000s)	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Quincy AA	349	43,360	1,869	19.9	7.5	7.0	18.2	22.4	20.5	22.3	20.1	19.6	39.6	42.4	32.8	0.0	7.6	20.1
Springfield AA	32	3,090	6,995	22.3	18.8	10.5	15.9	18.8	18.6	21.8	15.6	20.1	39.9	43.8	35.8	0.0	3.0	15.0

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

**Table 2b: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2017-18**

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (000s)	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Quincy AA	531	63,105	1,781	19.3	10.2	9.9	18.4	24.9	21.6	22.1	20.9	21.2	40.1	38.8	29.4	0.0	5.2	17.9
Springfield AA	29	5,504	5,795	22.8	3.4	11.0	16.2	24.1	20.3	20.4	10.3	19.9	40.5	44.8	31.4	0.0	17.4	17.5

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table 3a: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2016**

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000s)	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Quincy AA	26	5,769	1,054	76.3	73.1	39.7	6.1	26.9	17.6	0.0
Springfield AA	25	9,901	2,336	75.3	76.0	43.8	7.0	24.0	17.6	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data Sample; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table 3b: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017-18**

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000s)	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Quincy AA	25	10,041	1,147	74.7	80.0	50.1	6.6	20.0	18.7	0.0
Springfield AA	25	8,156	2,303	74.4	68.0	49.2	7.3	32.0	18.3	--

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data Sample; 2017 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

<b>Table 4a - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>												<b>2016</b>	
Assessment Area:	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Quincy AA	25	271	25.9	8.0	17.3	20.0	17.0	36.0	39.8	36.0	0.0	0.0	
Springfield AA	25	232	24.1	24.0	16.4	28.0	18.0	24.0	41.5	24.0	0.0	0.0	

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data Sample.  
Due to rounding, totals may not equal 100.0*

<b>Table 4b - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>												<b>2017-18</b>	
Assessment Area:	Total Consumer Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Quincy AA	26	340	24.9	15.4	16.6	26.9	18.1	26.9	40.4	30.8	0.0	0.0	
Springfield AA	25	404	25.4	24.0	15.7	40.0	17.2	24.0	41.7	12.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data Sample.  
Due to rounding, totals may not equal 100.0*

## Geographic Distribution of Loans

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Quincy AA	349	43,360	1,869	1.8	1.4	2.9	9.7	14.0	9.7	65.4	50.7	62.6	23.1	33.9	24.7	0.0	0.0	0.0
Springfield AA	32	3,090	6,995	6.4	3.1	3.6	17.5	15.6	13.8	40.5	50.0	39.6	35.6	31.3	42.9	0.0	0.0	0.1

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

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Quincy AA	531	63,105	1,781	0.0	0.0	0.0	11.0	9.2	11.3	70.1	67.8	68.5	19.0	23.0	20.2	0.0	0.0	0.0
Springfield AA	29	5,504	5,795	9.9	27.6	6.7	13.3	6.9	13.8	42.2	27.6	44.9	34.6	37.9	34.5	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

**Table 6a: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2016**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Quincy AA	26	5,769	1,054	13.6	11.5	13.6	8.8	3.8	8.5	56.2	53.8	52.6	21.4	30.9	25.3	0.0	0	0.0
Springfield AA	25	9,901	2,336	11.8	8.0	9.2	21.9	48.0	17.7	31.7	24.0	35.1	30.2	20.0	34.9	4.4	0.0	3.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data Sample; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table 6b: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017-18**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Quincy AA	25	10,041	1,147	0.1	0.0	0.1	19.7	16.0	17.6	60.0	80.0	64.2	20.2	4.0	18.1	0.0	0.0	0.0
Springfield AA	25	8,156	2,303	15.9	16.0	13.6	18.1	16.0	16.9	37.6	32.0	37.6	28.4	36.0	32.0	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data Sample; 2017 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

<b>Table 7a: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>												<b>2016</b>	
Assessment Area:	Total Consumer Loans		Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Quincy AA	25	271	7.1	4.0	11.1	16.0	60.0	52.0	21.8	28.0	0.0	0.0	
Springfield AA	25	232	10.4	12.0	20.5	20.0	38.5	28.0	29.8	40.0	0.7	0.0	

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data Sample.  
Due to rounding, totals may not equal 100.0*

<b>Table 7b: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>												<b>2017-18</b>	
Assessment Area:	Total Consumer Loans		Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (000s)	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Quincy AA	26	340	0.1	0.0	15.8	11.5	64.0	65.4	20.1	23.1	0.0	0.0	
Springfield AA	25	404	15.6	8.0	15.9	4.0	40.6	48.0	28.0	40.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data Sample.  
Due to rounding, totals may not equal 100.0*