

**STATE OF ILLINOIS**  
**DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION**  
**DIVISION OF BANKING**



**APPLICATION FOR DESIGNATION AS A WHOLESALE OR LIMITED PURPOSE BANK  
UNDER THE ILLINOIS COMMUNITY REINVESTMENT ACT**

**NOTICE TO APPLICANT**

Under the provisions of the Illinois Freedom of Information Act, 5 ILCS 140/1et. seq., this application is considered a public document and available to the public upon request.

If the applicant is of the opinion that disclosure of commercial or financial information would likely result in substantial harm to the competitive position of the applicant or that disclosure of information of a personal nature would result in a clearly unwarranted invasion of personal privacy, a request for confidential treatment must be submitted in writing concurrently with the submission of the application and must discuss in detail the justification for confidential treatment. Such justification must be provided for each response or exhibit for which confidential treatment is requested.

The applicant's reasons for requesting confidentiality should demonstrate specifically the harm that would result from public release of the information. A statement simply indicating that the information would result in competitive harm or that it is personal in nature is not sufficient. A claim that disclosure would violate the law or policy of another state is not, in and of itself, sufficient to exempt information from disclosure. It must be demonstrated that disclosure would either cause "competitive harm" or present an unwarranted invasion of personal privacy.

Information for which confidential treatment is requested should be: (1) specifically referenced in the public portion of the application by reference to the confidential section; (2) separately bound; and (3) labeled "Confidential."

The applicant should follow this same confidentiality procedure when filing any supplemental information to the application. Under (205 ILCS 735/) Illinois Community Reinvestment Act (CRA) and Illinois Administrative Code Title 38§345.250, a bank may file a request, in writing, with the Department, at least three (3) months prior to the effective date of the designation. If the Department approves the designation, it remains in effect until the bank requests revocation of the designation or until one year after the Department notifies the bank that the Department has revoked the designation on its own initiative.

The Department of Financial and Professional Regulation ("Department") will determine whether information submitted as confidential will be so regarded and will advise the applicant of any decision to make available to the public information labeled "Confidential." However, the Department, without prior notice to the applicant, may disclose or comment on any of the contents of the application in the approval issued by the Department in connection with the Agency's decision on the application.

This state agency is requesting disclosure of information that is necessary to accomplish the statutory purpose outlined under Chapter 205, Act 5, Section 13(a) of the Illinois Compiled Statutes. Disclosure of this information is REQUIRED. Failure to provide any information will result in this form not being processed. This form has been approved by the Agency Forms Coordinator.

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**Instructions**

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1. Applications should be submitted in an electronic version or by e-mail. A paper version may be submitted as an alternative, but an electronic version in either a Word or Excel format is preferred. The application and non-refundable filing fee, made payable to the "Department of Financial and Professional Regulation", must be submitted to the Springfield office.

**Department of Financial and Professional Regulation  
Division of Banking  
Corporate Activities Section  
320 West Washington Street  
Springfield, IL 62786**

**Applications may also be submitted electronically to:**  
[IDFPR.BanksandTrustApps@illinois.gov](mailto:IDFPR.BanksandTrustApps@illinois.gov)

**The schedule of filing fees is available at:**  
<http://www.ilga.gov/commission/jcar/admincode/038/038003700000300R.html>  
*Currently there are no filing fees associated with the filing of this application*

2. This application must be complete and accompanied by all of the required information before it will be accepted for processing.
3. Additional pages may be attached to this application as inserts wherever the space provided in the application is insufficient. Label additional pages with the preceding page number followed by a letter (i.e., 2a, 2b...).
4. Separate and identify each section and exhibit.
5. The Department may require additional information as needed.
6. Questions pertaining to this application should be directed to the Corporate Activities Section at (217) 785-2900.

# Application for Designation as a Wholesale or Limited Purpose Bank Under the Illinois Community Reinvestment Act

## Required Information Attach the Following Information as Exhibits

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1. A request for designation as a wholesale or limited-purpose bank should state how the bank satisfies one of the following definitions:
  - Wholesale bank - a bank that is not in the business of extending home mortgage, small business, small-farm or consumer loans to retail customers. A bank will not be considered in the business of extending loans to retail customers if it does not hold itself out to the retail public as providing such loans and the bank's revenues from extending such loans are insignificant when compared to its overall lending operations. Wholesale banks may engage in very limited retail lending if this activity is incidental and is done on an accommodation basis.
  - Limited purpose bank – a bank that offers only a narrow product line (such as credit cards or automobile loans) to a regional or broader market. A limited purpose bank continues to meet the narrow product line requirement if it provides other types of loans on an infrequent basis.

A so-called “niche bank,” (a bank that is in the business of lending to the public, but that specializes in certain types of retail loans or extending credit to a group of borrowers with, for example, certain financial or professional characteristics) would not generally qualify as a wholesale or limited purpose bank. A savings association or savings bank would generally not qualify as a limited purpose bank absent additional limitations on its activities.

The statement should contain facts and the data sufficient to describe the nature of the bank's current and prospective business, credit products offered, and the market area served. For a de novo bank, the written request must include a business plan that contains a description of the bank's proposed nature of business, credit and other product(s) to be offered, and the market area to be served.

2. If the bank engages in retail or other lending activities that may not be viewed as consistent with its request for designation as a wholesale or limited-purpose bank, it should provide sufficient information about those activities to the Department to determine whether they are infrequent, incidental or performed on an accommodation basis. This information should address the following elements, as appropriate:
  - a. Describe each type of activity and the conditions or circumstances under which the bank offers the product or service.

For example, if the bank engages in mortgage lending, explain whether such loans are offered to the general public or, for example, offered only to corporate customers or employees of the bank.
  - b. State the percentage of the bank's assets and income that each activity represents.
  - c. Explain how the incidental lending activity relates to the bank's assessment area(s).
  - d. State whether the volume of incidental lending activity would be sufficient to allow

for a reasonable evaluation of the bank's performance under the lending test.

3. Describe any legal constraints or limitations that affect the type of credit services that the bank may offer.
4. Describe the bank's assessment area(s) and the location of its branches and offices. The bank's assessment area(s) must generally consist of one or more MSAs or one or more contiguous political subdivisions in which the bank has its main office, branches and deposit taking ATMs.
5. Explain how the bank's network of branches is consistent with the designation as a wholesale or limited purpose bank.
6. State the proposed effective date for the designation, which should be at least 90 days after the request is submitted to the Department.

**Application for Designation as a Wholesale or Limited Purpose Bank Under the Illinois  
Community Reinvestment Act**

**Application Certification**

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The applicant certifies that the statements and information contained in this application are true and complete to the best of his/her knowledge and belief.

If the Department finds, at any time after receipt of this document, that any of the information contained herein is not true and complete, the Department may take such action as authorized by applicable law, rule or regulation.

**Signature(s) of authorized  
representative of applicant:**

**Date:**

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