



## PUBLIC DISCLOSURE

August 4, 2025

### ILLINOIS COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Peoples Bank & Trust  
Illinois Institution Identification Number: 22194

200 South Locust Street  
Pana, Illinois 62557

Illinois Department of Professional Regulation  
555 West Monroe Street, 5<sup>th</sup> Floor Chicago, IL 60661

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#### THIS ILLINOIS COMMUNITY REINVESTMENT ACT (ILCRA) EVALUATION IS AVAILABLE FOR PUBLIC REVIEW AND COMMENT.

This evaluation reflects the Secretary's assessment pursuant to Section 35-10(b) of the Illinois Community Reinvestment Act [205 ILCS 735/35-10(b)] of the performance of this bank in helping to meet the financial services needs of its local communities, including low- and moderate-income neighborhoods, consistent with the safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned herein does not represent an analysis, conclusion, or opinion of the Illinois Department of Financial and Professional Regulation, Division of Banking, concerning the safety and soundness of this financial institution.

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## INSTITUTION RATING

**INSTITUTION'S ILCRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has an adequate record of helping to meet the credit needs of its assessment area (AA), including low- and moderate-income (LMI) neighborhoods, in a manner consistent with its resources and capabilities.

**The Lending Test is rated Satisfactory.**

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and AA credit needs.
- The bank made a majority of its small business and small farm loans in the AAs.
- The distribution of loans reflects reasonable penetration among businesses and farms of different sizes.
- The geographic distribution of loans reflects reasonable dispersion throughout the AAs.
- The institution did not receive any ILCRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

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

The institution demonstrated adequate responsiveness to the community development needs of its AA through community development loans (CDLs), qualified investments, and community development services, as appropriate. Examiners considered the institution's capacity and the need and availability of such opportunities for community development in the AA.

### Discriminatory or Other Illegal Credit Practices

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's ILCRA rating.

### Assessment Factors

ILCRA examiners reviewed the bank's activities in its AA to the performance standards outlined in 38 Ill. Admin. Code 345.200 and did not find evidence that the bank is not meeting the financial services needs of its local communities. Therefore, the bank's ILCRA rating was not affected.

## DESCRIPTION OF INSTITUTION

### Background

Peoples Bank & Trust (PBT) is a \$592.2 million Illinois state-chartered financial institution, headquartered in Pana, Illinois. The bank is a wholly owned subsidiary of People First Bancshares, Inc., a one-bank holding company, also located in Pana. PBT has an affiliation with Peoples Investment LLC and Peoples Assistance Company (PAC). PAC assists very low-income homeowners in rural areas applying for loans and grants through the United States Department of Agriculture Section 504 Home Repair Program. Loans under this program are designed to help these homeowners repair, improve, or modernize their homes. Grants are awarded to elderly, very low-income homeowners to remove health and safety hazards.

The Federal Deposit Insurance Corporation (FDIC) assigned a rating of “Satisfactory” at the prior Community Reinvestment Act (CRA) evaluation dated August 11, 2022, based on Federal Financial Institutions Examination Council (FFIEC) Interagency Intermediate Small Institution Examination Procedures. PBT acquired Arcola First Bank in Arcola, IL, effective May 17, 2024. There has been no other merger or acquisition activities since the prior evaluation.

### Operations

PBT operates 14 offices including its main office throughout its AA. The thirteen branches consist of nine full-service and four limited-service facilities. Since the prior evaluation and the May 2024 merger, the bank added three branches located in the rural Illinois cities of Arcola, Arthur and Tuscola. There are no material differences in the cost of services at its branches. The following table illustrates the distribution of branches.

Distribution of Branches within All Assessment Area							
County	N/A	Low	Moderate	Middle	Upper	Total	LMI
	#	#	#	#	#	#	%
Christian	0	0	1	3	0	4	25.0
Douglas	0	0	0	1	1	2	0.0
Greene	0	0	1	0	0	1	100.0
Coles	0	0	0	0	1	1	0.0
Effingham	0	0	0	1	0	1	0.0
Fayette	0	0	0	0	0	0	0.0
Montgomery	0	0	0	0	0	0	0.0
Morgan	0	0	0	1	0	1	0.0
Moultrie	0	0	0	0	1	1	0.0
Shelby	0	0	0	1	0	1	0.0
Macoupin	0	0	1	0	0	1	100.0
Sangamon	0	0	0	0	1	1	0.0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>7</b>	<b>4</b>	<b>14</b>	<b>21.4</b>

*Source: <https://www.bankpbt.com/hours-locations-atms>*

The bank offers a range of traditional loan and deposit products to serve consumer, agricultural, and business customers. Commercial credit products include real estate loans, equipment

financing, small business loans, construction, commercial and industrial loans, and revolving lines of credit. PBT offers home mortgage, home equity lines of credit, vehicle loans, and personal loans. Agricultural loans include small farm loans, seasonal operating production loans, machinery and equipment loans, Illinois Finance Authority program loans, and Farm Services Agency loans.

Deposit products consist of checking, money market, and savings accounts along with certificates of deposit, health savings accounts, and individual retirement accounts. Alternative banking services offered by the bank include debit cards for automated teller machines (ATMs), internet banking, mobile banking, Online Bill Pay, and direct deposit. The bank also offers trust and estate planning. Lastly, PBT refers its customers to Wintrust Investments for brokerage and insurance services.

### **Ability and Capacity**

As of the March 31, 2025, Consolidated Reports of Condition and Income (Call Report), PBT reported approximately \$592.2 million in total assets, \$397.9 million in total loans, \$153.8 million in net securities, and \$477.5 million in total deposits. Total assets have increased approximately \$11.5 million or 19.8 percent, and total loans have increased approximately \$51.1 million or 14.7 percent since the prior examination. These increases are due in part to the merger. Commercial and industrial loans continue to be the highest loan category at 35.1 percent. The loan portfolio is illustrated in the following table.

<b>Loan Portfolio Distribution as of 3/31/2025</b>		
<b>Loan Category</b>	<b>\$ (000s)</b>	<b>%</b>
Construction and Land Development	1,242	0.3
Secured by Farmland	76,238	19.2
Secured by 1-4 Family Residential Properties	33,572	8.4
Secured by Multifamily (5 or more) Residential Properties	16,637	4.2
Secured by Nonfarm Nonresidential Properties	66,287	16.7
<b>Total Real Estate Loans</b>	<b>193,976</b>	<b>48.8</b>
Commercial and Industrial Loans	139,476	35.1
Agricultural Production and Other Loans to Farms	52,728	13.2
Consumer Loans	8,213	2.1
Obligations of States and Political subdivisions in the U.S.	3,254	0.8
Other Loans	225	0.1
Lease Financing Receivables (net of unearned income)	0	0.0
Less: Unearned Income	(0)	(0.0)
<b>Total Loans</b>	<b>397,872</b>	<b>100.0</b>

*Source: Report of Condition and Income. Due to rounding, totals may not equal 100.0*

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet AA credit needs.

## DESCRIPTION OF ASSESSMENT AREA

ILCRA requires each financial institution to define one or more AAs within which its ILCRA performance will be evaluated. PBT designated three AAs throughout central Illinois that are detailed in the table below. The first AA is the Illinois Non-Metropolitan Statistical Area Assessment Area (Non-MSA AA). The second AA is in the St. Louis, Missouri-Illinois Metropolitan Statistical Area Assessment Area (STL AA). The third AA is the Springfield, Illinois Metropolitan Statistical Area Assessment Area (Springfield AA). The AAs include contiguous census tracts, conform to ILCRA regulatory requirements, do not extend substantially beyond MSA boundaries, and do not arbitrarily exclude any LMI geography.

Description of Assessment Areas			
Assessment Area	Counties in Assessment Area	# of Census Tracts	# of Branches
Non-MSA AA	Christian, Douglas, Greene, Coles, Effingham, Fayette, Montgomery, Morgan, Moultrie, Shelby	76	12
STL AA	Macoupin	13	1
Springfield AA	Partial County: Sangamon	8	1

*Source: Bank Records*

## SCOPE OF EVALUATION

### General Information

The evaluation encompasses the period from the previous FDIC performance evaluation dated August 11, 2022, to the current ILCRA evaluation conducted by the Illinois Department of Financial and Professional Regulation (IDFPR), Division of Banking, dated August 4, 2025. Examiners completed a full scope review of the bank's Non-MSA AA and Springfield AA and a limited-scope review of the STL AA. The bank's performance in the Non-MSA AA carried the most weight in the overall ratings, as this is where a majority of the bank's lending and deposit activities take place. The Springfield AA and STL AA carried little weight due to drastically lower deposit levels and lending volume during the review period. Examiners used the FFIEC Interagency Intermediate Small Institution Examination Procedures to evaluate PBT's ILCRA performance. These procedures include the Lending Test and the Community Development Test. The criteria for these tests are detailed in the Appendices.

IDFPR also provides comments regarding the institution's fair lending policies and procedures pursuant to 205 ILCS 735/35-15. Examiners conducted the fair lending review in accordance with the FFIEC Interagency Fair Lending Examination Procedures. In addition, under Section 345.200 of the implementing rules of ILCRA, assessment factors as described below on Page 42 were considered in the evaluation of PBT's record of ILCRA performance.

Financial institutions must achieve a satisfactory rating under the Lending Test and Community Development Test to obtain an overall satisfactory rating. Evidence of discrimination and/or a negative evaluation of assessment factors can lower the overall rating.

## **Activities Reviewed**

After a review of PBT's business strategy, loan portfolio composition, and the number and dollar volume of loan originations during the review period, examiners determined the bank's major loan products to be Small Business and Small Farm loans. Consumer and Home Mortgage loans do not represent a significant portion of the loan portfolio. Therefore, these loan products were not reviewed and have no material impact on the conclusions. As the bank is not required to report CRA or ILCRA small business loan data, bank records served as the source for small business and small farm loan performance. Based on the number and dollar volume of lending, small business received slightly more weight than small farm loans.

Examiners analyzed the institution's originated and purchased small business and small farm loans from January 1, 2023, through December 31, 2024, to evaluate performance under the Lending Test. Examiners reviewed 77 small business loans, totaling \$10.6 million in 2023, and 168 small business loans, totaling \$28.9 million in 2024. Examiners reviewed 67 small farm loans, totaling in \$10.2 million in 2023, and 113 small farm loans, totaling \$12.3 million 2024.

CDLs, qualified investments, and community development services since the prior CRA evaluation were considered under the Community Development Test.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

PBT demonstrated reasonable performance under the Lending Test. The performance under the Loan-to-Deposit Ratio, Assessment Area Concentration, Borrower Profile, and Geographic Distribution supports the conclusion.

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

PBT's net LTD ratio is reasonable given the institution's size, capacity, and AA credit needs. PBT maintained an average net LTD ratio of 77.6 percent from September 30, 2022, to March 31, 2025, over 11 quarters. The net LTD ratio steadily increased throughout the evaluation period ranging from a low of 59.1 percent as of September 30, 2022, to a high of 84.8 percent as of December 31, 2024. PBT's average net LTD ratio is slightly greater than the 74.3 percent average of six ratios of similarly-situated institutions (SSIs), as shown in the table below. Examiners identified SSIs based on asset size, areas served, and lending emphasis.

Loan-to-Deposit Ratio Comparison		
Institution	Total Assets as of 3/31/2025 (\$000s)	Average Net LTD Ratio (%)
<b>Peoples Bank &amp; Trust</b>	<b>592,161</b>	<b>77.6</b>
Similarly-Situated Institution #1	602,303	74.5
Similarly-Situated Institution #2	580,614	65.6
Similarly-Situated Institution #3	350,149	74.6
Similarly-Situated Institution #4	476,625	84.9
Similarly-Situated Institution #5	701,746	76.3
Similarly-Situated Institution #6	1,382,607	70.0

*Source: Reports of Condition and Income 9/30/2022 through 3/31/2025*

### Assessment Area Concentration

The bank made a majority of loans and engaged in a majority of other lending-related activities in its AA. This conclusion is reflected, by number and dollar volume, in its small business and small farm loans. The following table summarizes loan concentrations inside and outside of the AA.

Lending Inside and Outside of the Assessment Area												
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$ (000s)		
	Inside		Outside			Inside		Outside				
	#	%	#	%		\$ (000s)	%	\$ (000s)	%			
Small Business												
2023	61	79.2	16	20.8	77	6,812	64.1	3,811	35.9	10,623		
2024	130	77.4	38	22.6	168	15,603	54.0	13,303	46.0	28,906		
<b>Subtotal</b>	<b>191</b>	<b>78.0</b>	<b>54</b>	<b>22.0</b>	<b>245</b>	<b>22,415</b>	<b>56.7</b>	<b>17,114</b>	<b>43.3</b>	<b>39,529</b>		
Small Farm												
2023	64	95.5	3	4.5	67	9,282	91.4	868	8.6	10,150		
2024	99	87.6	14	12.4	113	9,988	81.3	2,304	18.7	12,292		
<b>Subtotal</b>	<b>163</b>	<b>90.6</b>	<b>17</b>	<b>9.4</b>	<b>180</b>	<b>19,270</b>	<b>85.9</b>	<b>3,172</b>	<b>14.1</b>	<b>22,442</b>		
<b>Total</b>	<b>354</b>	<b>83.3</b>	<b>71</b>	<b>16.7</b>	<b>425</b>	<b>41,685</b>	<b>67.3</b>	<b>20,286</b>	<b>32.7</b>	<b>61,971</b>		

*Source: Bank Data, as reported  
Due to rounding, totals may not equal 100.0%.*

### Borrower Profile

The distribution of loans reflects, given the demographics of the AAs, reasonable penetration among businesses and farms of different sizes. This conclusion is primarily determined from the borrower distribution of small business and small farm loans in the Non-MSA AA as this is the where the vast majority of loan activity is. Both the Springfield AA and STL AA have a very limited amount of activity due to limited operations there. Examiners focused on the percentage of small business and small farm loans to operations with gross annual revenues

(GARs) of \$1 million or less. To determine borrower profile, examiners sampled and reviewed 90 small business loans and 166 small farms loans in 2023 and 2024 out of the universe detailed below. Please refer to the separate AA sections of this evaluation for further discussion of the bank's performance under this criterion.

Loan Products Reviewed				
Loan Category	Universe		Reviewed	
	#	\$(000s)	#	\$(000s)
Small Business				
2023	61	6,812	41	3,307
2024	130	15,603	49	5,281
Sub-total	<b>191</b>	<b>22,415</b>	<b>90</b>	<b>8,588</b>
Small Farm				
2023	64	9,282	37	6,719
2024	99	9,988	41	4,416
Sub-total	<b>163</b>	<b>19,270</b>	<b>79</b>	<b>11,135</b>
Totals	<b>354</b>	<b>41,685</b>	<b>166</b>	<b>19,723</b>

*Source: Bank Data*

### Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AAs. Examiners primarily derived this conclusion based on the bank's distribution of loans in the Non-MSA AA in moderate-income census tracts. There were no designated low-income geographies in the Non-MSA AA. There are no LMI tracts in the Springfield AA and a minimal presence in the STL AA, meaning these areas carried no material weight within the analysis and conclusions for this test. Please refer to the separate AA sections of this evaluation for further discussion of the bank's performance under this criterion.

### Response to Complaints

The bank did not receive any ILCRA-related complaints since the previous FDIC evaluation; therefore, this criterion did not affect the Lending Test rating.

## COMMUNITY DEVELOPMENT TEST

PBT demonstrated adequate responsiveness to the community development needs of its AAs through CDLs, qualified investments, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities. The bank's performance in the Non-MSA AA primarily supports this conclusion, as this AA holds the most weight in the overall conclusions. In addition, the bank has limited operations in the other two AAs.

## **Community Development Loans**

During the 36-month evaluation period, PBT originated 38 CDLs, totaling \$19.8 million. The majority of the CDLs by number, were economic development, the top need identified by community contacts. These loans are responsive to the needs of the community, and the broader regional & statewide area.

The bank's level of CDLs to average net loans and average total assets were 5.4 percent of average net loans and 3.4 percent of average total assets or 0.15 percent and 0.10 percent per month, respectively. In the bank's previous examination, there were 68 loans totaling \$58.5 million over 38 months. This was 11.8 percent of average assets or 0.31 percent per month and 18.2 percent of average net loans or 0.48 percent per month. PBT's CDL volume is significantly lower than the prior examination's performance. The reason for the decrease in volume is that many of PBT's customers participated in the now defunct Paycheck Protection Program, which were counted as CDLs in the previous exam.

Performance was compared to recently evaluated SSIs where the bank performed better. The five SSIs operating in the AA averaged 4.5 percent of average net loans or 0.13 percent per month and ranged from 0.6 percent to 7.4 percent or 0.01 to 0.20 percent per month. In addition, the five SSIs averaged 2.9 percent of average total assets or 0.08 percent per month that ranged from 0.3 percent to 5.4 percent or 0.01 percent per month to 0.14 percent per month

PBT's community development lending also includes loans that the bank originated to entities that serve a broader statewide or regional area that includes the bank's AAs. While none of these loans directly benefits any of the bank's AAs, they are still considered under the Community Development Test because the bank demonstrated reasonable responsiveness to community development needs within its AAs. The bank originated 4 community development loans, totaling approximately \$2.6 million that benefited the regional or statewide area.

The following two tables summarize the bank's community development lending activity since the previous evaluation. The first table contains the bank's community development lending activity by year and purpose, while the second illustrates the bank's activity by assessment area and purpose.

Community Development Lending Overall										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
8/11/2022 – 12/31/2022	2	81	0	0	6	208	1	200	9	489
2023	0	0	0	0	7	1,121	4	14,143	11	15,264
2024	0	0	1	116	14	1,123	0	0	15	1,239
Year-to-Date (YTD) 2025	0	0	0	0	3	2,774	0	0	3	2,774
<b>Total</b>	<b>2</b>	<b>81</b>	<b>1</b>	<b>116</b>	<b>30</b>	<b>5,226</b>	<b>5</b>	<b>14,343</b>	<b>38</b>	<b>19,766</b>

Source: Bank Records

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Non-MSAAA	2	81	1	116	22	3,785	5	14,343	30	18,326
STL AA	0	0	0	0	8	1,441	0	0	8	1,441
Springfield AA	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>81</b>	<b>1</b>	<b>116</b>	<b>30</b>	<b>5,226</b>	<b>5</b>	<b>14,343</b>	<b>38</b>	<b>19,766</b>

Source: Bank Records

Further discussion of the bank's CDLs is included in the separate AA sections of this evaluation.

## Qualified Investments

PBT made 164 donations and 21 investments, totaling \$6.3 million over 36 months. The bank's level of qualified investments to average total assets and average net securities were 1.1 percent of average total assets or 0.03 percent per month and 3.9 percent of average net securities or 0.1 percent per month. In the bank's prior examination, there were 157 qualified investments and donations, totaling \$8.5 million over 38 months. This translates to 1.7 percent of average total assets or 0.045 percent per month and 6.4 percent of average net securities or 0.2 percent per month. PBT's current investment dollar volume is below its prior performance.

Performance was also compared to the SSIs. The five SSIs averaged 3.1 percent of average net securities or 0.09 percent per month and ranged from 0.8 percent to 6.7 percent or 0.02 percent per month to 0.18 percent per month. The five SSIs averaged 0.7 percent of average total assets or 0.021 percent per month and ranged from 0.2 percent to 1.3 percent or 0.005 percent per month to 0.038 percent per month. PBT's investments are notable as a majority of them are

economic development, which is responsive to the community development needs. The bank also had an approximately \$784,000 prior period investment in the statewide/regional area. The following tables summarize the bank's CD investment activity, by year and purpose or by AA, since the previous evaluation.

Community Development Investments Overall										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	6	757	0	0	0	0	6	757
8/11/2022 – 12/31/2022	0	0	2	2,463	0	0	0	0	2	2,463
2023	0	0	11	1,970	0	0	0	0	11	1,970
2024	0	0	2	970	0	0	0	0	2	970
Year-to-Date (YTD) 2025	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>21</b>	<b>6,160</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>21</b>	<b>6,160</b>
Qualified Grants and Donations	7	2	120	86	29	61	8	15	164	164
<b>Total</b>	<b>7</b>	<b>2</b>	<b>141</b>	<b>6,246</b>	<b>29</b>	<b>61</b>	<b>8</b>	<b>15</b>	<b>185</b>	<b>6,324</b>

Source: Bank Records

Community Development Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Non-MSA AA	0	0	21	6,160	0	0	0	0	21	6,160
STL AA	0	0	0	0	0	0	0	0	0	0
Springfield AA	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>21</b>	<b>6,160</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>21</b>	<b>6,160</b>
Qualified Grants and Donations	7	2	120	86	29	61	8	15	164	164
<b>Total</b>	<b>7</b>	<b>2</b>	<b>141</b>	<b>6,246</b>	<b>29</b>	<b>61</b>	<b>8</b>	<b>15</b>	<b>185</b>	<b>6,324</b>

Source: Bank Records

Further discussion of the bank's qualified investments and grants is included in the separate AA sections of this evaluation.

## **Community Development Services**

During the 36-month evaluation period, the bank completed 91 services or 2.5 services per month. The level of community development services is similar to its prior performance. In the previous exam, PBT completed 87 services or 2.3 services per month. Performance was compared to the SSIs. The five SSIs averaged 97 services or 2.9 services per month and ranged from 10 to 232 services or 0.2 to 6.8 services per month. The following tables illustrate the bank's community development services by year, purpose, and AA.

<b>Community Development Services Overall</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	#	#	#	#	#
8/11/2022 – 12/31/2022	0	7	14	0	21
2023	0	9	13	0	22
2024	0	10	15	0	25
Year-to-Date (YTD) 2025	0	9	14	0	23
<b>Total</b>	<b>0</b>	<b>35</b>	<b>56</b>	<b>0</b>	<b>91</b>

*Source: Bank Records*

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	#	#	#	#	#
Non-MSAAA	0	31	56	0	87
Springfield AA	0	4	0	0	4
STL AA	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>35</b>	<b>56</b>	<b>0</b>	<b>91</b>

*Source: Bank Data*

Further discussion of the bank's community development services is included in the separate AA sections of this evaluation.

## **ILLINOIS NON-MSA ASSESSMENT AREA– Full-Scope Review**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ILLINOIS NON-MSA ASSESSMENT AREA**

PBT's Non-MSA AA is comprised of ten contiguous counties. Specifically, the bank designated the AA to include Christian, Douglas, Greene, Coles, Effingham, Fayette, Montgomery, Morgan,

Moultrie, and Shelby Counties. All of these counties are in non-metropolitan portions of the state.

The institution operates twelve locations in this AA, including its main office. There are nine full-service locations and three limited-service facilities. According to the 2024 Wolters Kluwer Peer Deposit and Branch report, this AA accounted for 97.3 percent of the bank's total deposits, the largest deposit market share among its AAs. This AA included a substantial majority of the bank's small business and small farm loans. Thus, the bank's performance in this AA is the most heavily weighted in the overall rating.

### **Economic and Demographic Data**

Examiners used demographic data from the 2020 American Community Survey (ACS) and 2024 Dun & Bradstreet (D&B) data to analyze the bank's ILCRA performance. According to 2020 ACS data, this AA consists of 76 census tracts and has a total population of 265,495. The following table illustrates the distribution of geographies by income level, population by income level, and the bank's branch and ATM locations based on the census tract income designations for the area.

Branch and ATM Distribution by Geography Income Level in the Non-MSA AA												
Tract Income Level	Census Tracts		Population		Branches		ATMs		Opened Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	13	17.1	43,322	16.3	2	16.7	2	18.2	0	0.0	0	0.0
Middle	48	63.2	164,370	61.9	7	58.3	6	54.5	1	33.3	0	0.0
Upper	15	19.7	57,803	21.8	3	25.0	3	27.3	2	66.7	0	0.0
Not Available	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total</b>	<b>76</b>	<b>100.0</b>	<b>265,495</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>

Source: 2020 ACS, Bank Data, <https://www.bankpbt.com/about-us/community-reinvestment-act/>  
Due to rounding, totals may not equal 100.0%

The following table provides a summary of the demographic information within the Non-MSA AA.

Demographic Information of the Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	76	0.0	17.1	63.2	19.7	0.0
Population by Geography	265,495	0.0	16.3	61.9	21.8	0.0
Housing Units by Geography	123,939	0.0	17.1	61.5	21.4	0.0
Owner-Occupied Units by Geography	79,871	0.0	13.0	63.6	23.4	0.0
Occupied Rental Units by Geography	29,816	0.0	27.3	54.8	17.9	0.0
Vacant Units by Geography	14,252	0.0	18.7	63.7	17.6	0.0
Businesses by Geography	20,882	0.0	15.9	60.6	23.5	0.0
Farms by Geography	2,120	0.0	6.6	70.5	22.9	0.0
Family Distribution by Income Level	68,796	19.2	18.0	21.9	40.9	0.0
Household Distribution by Income Level	109,687	24.5	15.8	18.0	41.6	0.0
Median Family Income Non-MSAs - IL	\$67,835	Median Housing Value			\$109,558	
		Median Gross Rent			\$669	
		Families Below Poverty Level			9.4%	

Source: 2020 ACS, 2024 D&B Data, and FFIEC Estimated Median Family Income;  
(\*) The NA category consists of geographies that have not been assigned an income classification.

Economic and demographic data from the 2020 ACS and 2024 D&B report provide relevant comparable factors on which examiners base conclusions. The analysis under the Geographic Distribution criterion compares the distribution of small business and small farm loans by a geography's income to the percentage of businesses and farms located in each geography. Based on the table above, only 15.9 percent of businesses and only 6.6 percent of farms are in moderate-income census tracts.

Examiners used the 2022, 2023 and 2024 FFIEC Median Family Income (MFI) Report, which sets forth the criteria by which geographies and families are determined to be low, moderate, middle, and upper income.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
<b>IL NA Median Family Income (99999)</b>				
2022 (\$76,100)	<\$38,050	\$38,050 to <\$60,880	\$60,880 to <\$91,320	≥\$91,320
2023 (\$82,300)	<\$41,150	\$41,150 to <\$65,840	\$65,840 to <\$98,760	≥\$98,760
2024 (\$82,800)	<\$41,400	\$41,400 to <\$66,240	\$66,240 to <\$99,360	≥\$99,360

Source: FFIEC

According to 2024 D&B data, there were 2,120 farms in the AA. The GARs of farms operating in the AA in 2024 are as follows:

- 98.5 percent report \$1.0 million or less,
- 0.7 percent report greater than \$1 million, and
- 0.8 percent did not report revenues to D&B

While D&B data is useful, it is a voluntary survey. Instead, the 2022 U.S. Census of Agriculture (AgCensus), a legally mandated survey, provides better context in which to consider PBT's small farm lending. According to the 2022 AgCensus, 8,441 farms were operating in the AA. Of the 8,441 farms, 3,296, or 39.0 percent, had interest expenses. Stated differently, 5,145 farms, or 61.0 percent, did not utilize debt to support operations. This fact suggests a reduced reliance on lending by farmers in the AA.

According to 2024 D&B data, there are 20,882 businesses in the AA. The GARs of businesses operating in the AA are as follows:

- 81.0 percent report \$1.0 million or less,
- 4.3 percent report greater than \$1 million, and
- 14.7 percent did not report revenues to D&B

Service industries represent the largest portion of businesses (31.0 percent); followed by non-classifiable establishments (17.1 percent); retail trade (12.5 percent); and agriculture, forestry, and fishing (9.2 percent). In addition, 62.9 percent of businesses have four or fewer employees, and 87.1 percent operate from a single location.

According to Data Axle's September 1, 2024, reporting, nine of the largest employers and the range of employees in the multi-county AA are listed below:

- Sarah Bush Lincoln Health Center (1,000-4,999)
- International Paper Co. (1,000-4,999)
- Jacksonville Memorial Hospital (500-999)
- Hertzberg-New Method Inc. (500-999)
- Reynolds Consumer Products (500-999)
- Consolidated Communications (500-999)
- Masterbrand Cabinets, Inc. (500-999)
- HSHS St Anthony's Memorial Hospital (500-999)
- Quad/Graphics Inc. (500-999)

According to the article, *"Amid National Increase, Unemployment Rates in Central Illinois Decrease"* by Hannah Flayhan, published on August 1, 2025<sup>1</sup>, WAND News, unemployment rates in this community are inconsistent with national trends. Local workforce development

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<sup>1</sup> Flayhan, Hannah (2025, Aug. 1). Amid National Increase, Unemployment Rates in Central Illinois Decrease. WAND News. [https://www.wandtv.com/news/amid-national-increase-unemployment-rates-in-central-illinois-decrease/article\\_d6914ac8-ff3d-4d44-afc8-b45c7aef47cb.html](https://www.wandtv.com/news/amid-national-increase-unemployment-rates-in-central-illinois-decrease/article_d6914ac8-ff3d-4d44-afc8-b45c7aef47cb.html)

agencies have seen greater participation in their programs. The following table illustrates the unemployment rates by county, state, and nation.

Unemployment Rates				
Area	2022	2023	2024	May 2025
Christian County, Illinois	4.2	4.5	4.3	3.4
Douglas County, Illinois	3.5	3.7	3.6	2.9
Greene County, Illinois	4.2	4.3	4.1	3.1
Coles County, Illinois	4.1	4.0	4.0	3.3
Effingham County, Illinois	3.3	3.5	3.8	2.8
Fayette County, Illinois	4.6	5.1	5.0	3.8
Montgomery County, Illinois	4.4	4.8	4.6	3.7
Morgan County, Illinois	4.3	4.3	4.3	3.3
Moultrie County, Illinois	3.5	3.8	3.7	3.2
Shelby County, Illinois	3.9	4.1	4.2	3.1
State of Illinois	4.6	4.5	5.1	4.8
National Average	3.6	3.6	4.0	4.2

*Source: Bureau of Labor Statistics (State and National are seasonally adjusted, and Counties are not seasonally adjusted.)*

## **Competition**

This AA has a high demand for financial services. According to the June 30, 2024, FDIC Deposit Market Share Report, there were 58 institutions operating 158 offices throughout the entire AA. Of these institutions, PBT ranked 5<sup>th</sup> with a 4.6 percent deposit market share.

While PBT is not a CRA or ILCRA reporter, the 2023 Wolters Kluwers Peer Small Business Report was used as a measure of demand for small business and small farm loans. In 2023, a total of 89 lenders reported 6,521 small business loans originated or purchased at \$281.1 million. The top five institutions controlled 62.1 percent of the small business loans market share by number of loans. In 2023, a total of 30 lenders reported 1,371 small farm loans originated or purchased at \$150.7 million. The top five lenders controlled 66.8 percent of the small farm loans market share.

## **Community Contacts**

As part of the examination, community contact interviews were conducted, and community contact files were reviewed to help examiners identify and understand the AA's credit and CD needs. The information provided during the interviews helps examiners determine area needs and whether local financial institutions are responsive to these needs.

Examiners interviewed a community contact that operated within the bank's AA with a knowledge of agricultural credit needs. This contact emphasized the need for small farm loans in the form of operating loans and lines of credit. Examiners also interviewed a community contact, specializing in affordable housing in the AA.

This individual emphasized financial literacy, lines of credit for rehab of housing to create affordable housing units, and community services for LMI households. Examiners also interviewed a community contact, with a focus on economic development in the AA. This contact focused on the need for development of small businesses in the downtowns of the communities in the AA. Another interview with an economic development advocate for Coles County emphasized the need for affordable housing to house LMI residents working in the area. A realtor interviewed who operated in Greene County echoed the need for affordable housing.

### **Credit and Community Development Needs and Opportunities**

Considering information from the community contacts, bank management, and demographic and economic data, examiners determined that affordable housing and the economic development through small businesses and small farms represent the primary credit needs in the AA.

The AA provides multiple opportunities for financial institutions to meet their community development responsibilities. Designated by federal and state government to encourage economic development, revitalization, and stabilization, enterprise zones are readily available to channel dollars in Christian, Coles, Douglas, and Montgomery Counties<sup>2</sup>. Given the dependence on agriculture in this AA, small farm lending including operating and equipment loans are a key opportunity throughout this AA. Per a community contact, financial institutions can work with the Small Business Administration to provide Section 504 and 7A loans in this AA. Additionally, financial institutions can work with several non-profit agencies in the area to encourage the creation of affordable housing and provide housing counseling services to LMI individuals.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ILLINOIS NON-MSA ASSESSMENT AREA**

### **LENDING TEST**

PBT demonstrated reasonable performance under the Lending Test in the Non-MSA AA. The performance under Borrower Profile and Geographic Distribution supports the conclusion.

### **Borrower Profile**

The distribution of loans reflects reasonable penetration among businesses and farms of different sizes. Only lending in the AA was considered in the borrower profile analysis. Examiners focused on performance by number of loans because the number of loans is a

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<sup>2</sup> <https://dceo.illinois.gov/expandrelocate/incentives/taxassistance/ez-maps.html>

better indicator of the number of borrowers served. Reasonable small business and small farm lending primarily supports this conclusion.

### *Small Business Loans*

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. Performance was measured against the percentage of businesses with GARs of \$1 million or less. The bank's lending to businesses with GARs at or below \$1 million trails the percentage of small businesses reporting such revenue to D&B in 2023 and exceeds the demographic in 2024. However, D&B data represents all businesses, not just those seeking credit. Moreover, D&B data does not necessarily represent the demand in the market. Many small businesses seek credit through other mechanisms, such as credit cards, home equity loans, or financing through non-bank sources to fund their businesses. While PBT is not required to collect and submit small business loan data, CRA small business aggregate data can provide insights into the demand and opportunities to lend. In 2023, CRA small business aggregate data indicated that 56.3 percent of loans were made to small businesses. This gauge of market demand suggests challenges in lending. Overall, the distribution of small business loans to businesses with GARs at or below \$1 million is reasonable. The following table demonstrates the bank's performance.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$ (000s)	%
<= \$1,000,000					
2023	82.1	27	75.0	2,098	72.4
2024	82.3	39	88.6	2,652	64.7
> \$1,000,000					
2023	4.2	9	25.0	800	27.6
2024	4.1	5	11.4	1,447	35.3
Revenue Not Available					
2023	13.7	0	0.0	0	0.0
2024	13.5	0	0.0	0	0.0
<b>Total</b>					
<b>2023</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>2,898</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>44</b>	<b>100.0</b>	<b>4,099</b>	<b>100.0</b>

Source: 2023, 2024 D&B Data; Bank Data  
Due to rounding, totals may not equal 100.0%.

### *Small Farm Loans*

The distribution of small farm loans reflects reasonable penetration among farms of different sizes. Performance was measured against the percentage of farms with GARs of \$1 million or

less. The bank's lending to farms with GARs at or below \$1 million trails the percentage of small farms reporting such revenue to D&B in 2023 and exceeds the demographic in 2024. In addition, much like small businesses, D&B data represents all farms and does not necessarily indicate if small farms are seeking traditional bank financing. As a result, aggregate data may provide more insight. While PBT is not required to collect and submit small farm data, CRA Small Farms aggregate data cannot directly be compared to the bank's performance but can gauge demand. 2023 CRA Small Business aggregate data indicated that 60.2 percent of loans were originated to small farms. This level of demand illustrates challenges in lending. As discussed above, the AgCensus data supports this conclusion. Therefore, the bank's performance is reasonable. The following table illustrates the bank's performance.

<b>Distribution of Small Farm Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Farms</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<b>&lt;= \$1,000,000</b>					
2023	98.3	29	78.4	4,910	73.1
2024	98.3	41	100.0	4,416	100.0
<b>&gt; \$1,000,000</b>					
2023	0.9	8	21.6	1,809	26.9
2024	0.8	0	0.0	0	0.0
<b>Revenue Not Available</b>					
2023	0.9	0	0.0	0	0.0
2024	0.8	0	0.0	0	0.0
<b>Total</b>					
<b>2023</b>	<b>100.0</b>	<b>37</b>	<b>100.0</b>	<b>6,719</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>4,416</b>	<b>100.0</b>

*Source: 2023, 2024 D&B Data; Bank Data  
Due to rounding, totals may not equal 100.0%.*

## Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. Examiners only focused on the percentage by number of loans in the moderate-income census tracts, as there are no low-income tracts in this AA. Only loans originated inside the AA are included in the analysis. The bank's reasonable performance in small business and small farm lending supports this conclusion.

### *Small Business Loans*

The geographic distribution of small business loans reflects reasonable dispersion in the AA. As shown in the following table, the bank's performance in the moderate-income tracts is below the percentage of businesses in these geographies in 2023 and 2024. However, the

number of businesses located in these tracts is not representative of the demand for lending or the percentage of small businesses seeking or qualifying for financing. As a measure of demand but not for comparison, aggregate data can be used. In moderate-income tracts, aggregate data in 2023 was 13.5 percent, suggesting challenges in lending. In addition, PBT's performance is higher than one of four recently evaluated SSIs operating in the AA that demonstrated reasonable performance. While PBT's performance is below the other three SSIs, PBT's performance is comparable to these SSIs. Given the level of demand and the bank's capacity, PBT's performance is reasonable.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$ (000s)	%
Moderate					
2023	16.8	5	8.9	491	7.7
2024	15.9	9	7.2	540	3.7
Middle					
2023	62.3	45	80.4	4,796	74.9
2024	60.6	95	76.0	11,303	78.4
Upper					
2023	20.9	6	10.7	1,116	17.4
2024	23.5	21	16.8	2,578	17.9
<b>Total</b>					
<b>2023</b>	<b>100.0</b>	<b>56</b>	<b>100.0</b>	<b>6,403</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>125</b>	<b>100.0</b>	<b>14,421</b>	<b>100.0</b>

Source: 2023, 2024 D&B Data; Bank Data  
Due to rounding, totals may not equal 100.0%.

### *Small Farm Loans*

The geographic distribution of small farm loans reflects reasonable dispersion in the AA. Performance is measured against the percentage of farms in moderate-income tracts. As shown in the following table, the bank's performance in the moderate-income tracts is slightly less than the demographic in 2023 and less in 2024. However, the demographic represents all farms in the AA, not those seeking bank financing. Aggregate data can be used as a measure of demand but not for direct comparison. Aggregate data for 2023 was 2.6 percent, suggesting challenges in lending. Therefore, PBT's performance is reasonable.

<b>Geographic Distribution of Small Farm Loans</b>					
<b>Tract Income Level</b>	<b>% of Farms</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<b>Moderate</b>					
2023	6.7	4	6.3	634	6.8
2024	6.6	1	1.0	110	1.1
<b>Middle</b>					
2023	73.8	53	82.8	7,939	85.5
2024	70.5	82	82.8	7,989	80.0
<b>Upper</b>					
2023	19.5	7	10.9	709	7.6
2024	22.9	16	16.2	1,889	18.9
<b>Total</b>					
<b>2023</b>	<b>100.0</b>	<b>64</b>	<b>100.0</b>	<b>9,282</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>99</b>	<b>100.0</b>	<b>9,988</b>	<b>100.0</b>

*Source: 2023, 2024 D&B Data; Bank Data  
Due to rounding, totals may not equal 100.0%.*

## **COMMUNITY DEVELOPMENT TEST**

PBT demonstrated adequate responsiveness to the community development needs of its AA, primarily through CDLs, qualified investments, and community development services. Examiners considered the institution's capacity to participate in such activities, as well as the availability of community development opportunities and the performance of the bank compared to its prior evaluation and SSIs.

### **Community Development Loans**

PBT originated 30 CDLs, totaling approximately \$18.3 million during the evaluation period in the Non-MSA AA. The loans originated in this AA represent 78.9 percent of all the bank's CDLs by number and 92.7 percent by dollar volume. The level of CDLs decreased by number and dollar volume since the previous evaluation, which included 49 loans totaling \$40.6 million in the AA. The following table shows the community development lending activities by year and purpose.

Community Development Lending – Non-MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
8/11/2022 – 12/31/2022	2	81	0	0	5	176	1	200	8	457
2023	0	0	0	0	4	314	4	14,143	8	14,457
2024	0	0	1	116	11	1,045	0	0	12	1,161
Year-to-Date (YTD) 2025	0	0	0	0	2	2,250	0	0	2	2,250
<b>Total</b>	<b>2</b>	<b>81</b>	<b>1</b>	<b>116</b>	<b>22</b>	<b>3,785</b>	<b>5</b>	<b>14,343</b>	<b>30</b>	<b>18,326</b>

*Source: Bank Records*

Notable examples of the bank's community development loans include:

- Originated a \$13 million loan providing fiber internet in rural areas.
- Originated multiple loans totaling more than \$3.0 million dollars of economic development loans for operating capital to create and retain jobs for LMI residents.
- Originated affordable housing loans totaling \$80,000 to provide rental housing to LMI residents.

### **Qualified Investments**

As shown in the following table, PBT had 21 community development investments and 160 grants, totaling \$6.3 million in the AA. All of the investments in the AA were municipal bonds serving LMI school districts where a majority of the students qualified for free and reduced lunch, totaling nearly \$6.2 million. Qualified investments and donations in this AA represent 97.8 percent by number and 99.95 percent of the dollar volume of the total extended.

Community Development Investments and Donations – Non-MSAA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	6	757	0	0	0	0	6	757
8/11/2022 – 12/31/2022	0	0	2	2,463	0	0	0	0	2	2463
2023	0	0	11	1,970	0	0	0	0	11	1,970
2024	0	0	2	970	0	0	0	0	2	970
Year-to-Date (YTD) 2025	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>21</b>	<b>6,160</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>21</b>	<b>6,160</b>
Qualified Grants and Donations	6	2	117	83	29	61	8	15	160	161
<b>Total</b>	<b>6</b>	<b>2</b>	<b>138</b>	<b>6,243</b>	<b>29</b>	<b>61</b>	<b>8</b>	<b>15</b>	<b>181</b>	<b>6,321</b>

## **Community Development Services**

During the evaluation period in the Non-MSA AA, PBT employees performed 87 services of financial and technical assistance to organizations. The level of community development services remained the same in this AA at the prior evaluation. Additionally, bank employees performed 95.6 percent of the community development services in this AA. The following table illustrates the bank's performance in this AA.

Community Development Services -- Non-MSA AA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
8/11/2022 – 12/31/2022	0	6	14	0	20
2023	0	8	13	0	21
2024	0	9	15	0	24
Year-to-Date (YTD) 2025	0	8	14	0	22
<b>Total</b>	<b>0</b>	<b>31</b>	<b>56</b>	<b>0</b>	<b>87</b>

Notable examples of the bank's CD services include:

- Loan officer serves as a financial advisor on the loan committee for an organization supporting small business development, expansion and recruitment.
- Senior officer provides budgeting and financial advice to an organization that advocates for farmers in the AA.

- Bank officer serves on the board of a non-profit whose mission is to promote the creation and retention of jobs in the AA.

## SPRINGFIELD, IL MSA ASSESSMENT AREA – Full-Scope Review

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SPRINGFIELD, IL MSA ASSESSMENT AREA

PBT designated eight census tracts within Sangamon County as the Springfield AA. The institution operates one location in this AA. As of June 30, 2024, this AA accounted for 2.4 percent of the bank's total deposits and only 2.7 percent of the bank's loans sampled in the Lending Test. Consequently, the lending performance in this area carried little weight in the overall rating.

#### Economic and Demographic Data

The Springfield AA for PBT consists of eight census tracts in Sangamon County. Five census tracts are upper-income, and three census tracts are middle-income. This AA does not have any LMI census tracts. The following table provides a summary of the demographic information within the AA.

Demographic Information of the Springfield AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	0.0	37.5	62.5	0.0
Population by Geography	43,680	0.0	0.0	36.5	63.5	0.0
Housing Units by Geography	17,002	0.0	0.0	40.6	59.4	0.0
Owner-Occupied Units by Geography	13,740	0.0	0.0	37.9	62.1	0.0
Occupied Rental Units by Geography	2,300	0.0	0.0	47.1	52.9	0.0
Vacant Units by Geography	962	0.0	0.0	64.3	35.7	0.0
Businesses by Geography	3,054	0.0	0.0	31.1	68.9	0.0
Farms by Geography	283	0.0	0.0	54.1	45.9	0.0
Family Distribution by Income Level	11,738	12.3	13.4	22.6	51.7	0.0
Household Distribution by Income Level	16,040	11.6	11.5	15.7	61.1	0.0
Median Family Income MSA - 44100 Springfield, IL MSA	\$83,948	Median Housing Value			\$181,905	
		Median Gross Rent			\$943	
		Families Below Poverty Level			3.9%	

Source: 2020 ACS, 2024 D&B Data, and FFIEC Estimated Median Family Income;  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

The analysis of small business loans under the borrower profile criterion in the Lending Test compares the distribution of loans to the distribution of businesses by GAR level. According to 2024 D&B data, there were 3,054 non-farm businesses in the AA. Of these businesses,

- 90.1 percent reported GARs of \$1 million or less.
- 2.3 percent reported GARs of greater than \$1.0 million.
- 7.6 percent was unavailable.

Service industries represent the largest portion of businesses (31.9 percent); followed by non-classifiable establishments (22.5 percent); finance, insurance, and real estate (9.7 percent); retail trade (9.6 percent); and agriculture, forestry, and fishing (8.5 percent). In addition, 64.1 percent of businesses have four or fewer employees, and 93.1 percent operate from a single location.

The AA is eight census tracts, and the residents of these tracts have many employers outside of the AA in Springfield, IL. Data Axle's September 1, 2024, reported, state government employers, health care organizations, and an insurance company as the source of many of the jobs in the AA.

According to the Bureau of Labor Statistics, the unemployment rate for the State of Illinois was 4.8 percent in May 2025 and the national rate was 4.2 percent. The unemployment rate for Sangamon County was 3.9 percent and was below the national and state rates.

Unemployment Rates				
	2022 Average	2023 Average	2024 Average	May 2025
Area	%	%	%	%
Sangamon County, Illinois	4.3	4.3	4.3	3.9
State of Illinois	4.6	4.5	5.1	4.8
National Average	3.6	3.6	4.0	4.2

*Source: Bureau of Labor Statistics (State and National are seasonally adjusted, and Counties are not seasonally adjusted.)*

## Competition

This AA has a moderate demand for financial services. According to the 2024 Wolters Kluwer Deposit Market Share Report, there were 9 institutions operating 15 offices throughout the entire AA. Of these institutions, PBT ranked 8<sup>th</sup> with a 1.1 percent deposit market share.

While PBT is not a CRA or ILCRA reporter, the 2023 Wolters Kluwers Peer Small Business Report was used as a measure of demand for small business and small farm loans. In 2023 a total of 67 lenders reported 3,159 small business loans originated or purchased at \$128.8 million. The top five institutions controlled 69.0 percent of the small business loan market share by number of loans. In 2023, a total of 15 lenders reported 124 small farm loans originated or purchased at \$16.4 million. The top five lenders controlled only 77.4 percent of the small farm loans market share.

## **Community Contacts**

As part of the examination, community contact interviews were conducted, and community contact files were reviewed to help examiners identify and understand the AA's credit and CD needs. The information provided during the interviews helps examiners determine area needs and whether local financial institutions are responsive to these needs

Examiners reviewed a community contact that operated within the bank's AA with a knowledge of small business needs. While the contact thought that credit needs of the community were mostly met, this contact emphasized the need for the right fit with the small business entrepreneur and the right lender. He also stated that helping those with less than perfect credit to get loans is the main growth area. Financial literacy and credit development are needs.

## **Credit and Community Development Needs and Opportunities**

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that economic development through small businesses and financial literacy to build credit are the most important needs in the AA.

The AA provides limited opportunities for PBT to become involved in community development activities, due to the high competition, low population, and minor presence in the area.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE SPRINGFIELD, IL MSA ASSESSMENT AREA**

### **LENDING TEST**

The bank's lending performance in the Springfield AA is reasonable. Lending in this area is very limited due to the high competition and limited demographics. For the Lending Test, the most weight is placed on the Borrower Profile criterion since there are no low- or moderate-income tracts in this AA for geographic distribution analysis. Since there were no small farms loans originated in this AA, examiners placed more weight on small business performance in this AA. However, minimal meaningful conclusions can be made due to the low number of small business loans.

### **Borrower Profile**

The distribution of loans reflects reasonable penetration among businesses of different sizes. The bank is ready to lend.

### *Small Business Loans*

The distribution of loans reflects reasonable penetration among businesses of different sizes. Due to the low lending volume of small business loans in the AA, minimal meaningful conclusions could be drawn. The bank originated two loans in 2023 and five loans in 2024.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<= \$1,000,000					
2023	90.0	1	50.0	60	30.3
2024	90.1	3	60.0	136	11.5
> \$1,000,000					
2023	2.2	1	50.0	138	69.7
2024	2.3	2	40.0	1,046	88.5
Revenue Not Available					
2023	7.8	0	0.0	0	0.0
2024	7.6	0	0.0	0	0.0
<b>Total</b>					
<b>2023</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>198</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>1,182</b>	<b>100.0</b>

*Source: 2023, 2024 D&B Data; Bank Data  
Due to rounding, totals may not equal 100.0%.*

### *Small Farm Loans*

There were no small farm loans in the AA. Therefore, meaningful conclusions could not be made.

### Geographic Distribution

A review of the Geographic Distribution criterion would not result in meaningful conclusions because the Springfield AA does not include any low- or moderate-income geographies. Therefore, this criterion does not have a material impact on the rating.

## **COMMUNITY DEVELOPMENT TEST**

PBT's performance under the Community Development Test in the Springfield AA is adequate but below the Non-MSA AA due to high competition. However, it does not materially impact the overall rating. There are limited opportunities for community development activities in this AA, especially when considering that the AA is comprised of

only eight census tracts outside of Springfield. Additionally, the bank only operates one full-service location in this area in a highly competitive market.

### **Community Development Loans**

The bank did not originate any community development loans in this AA during the evaluation period.

### **Qualified Investments**

The bank made four qualified charitable donations totaling approximately \$2,500 during the review period. Three of these donations went to a community service organization that provides essential services to low- or moderate-income individuals. The other donation is to an affordable housing organization, serving LMI residents.

### **Community Development Services**

During the evaluation period in this AA, PBT performed four community development services. Over the four-year review period, a bank staff member provided his expertise to help empower underserved students by supporting their academic and social-emotional skills with innovative school year and summer programs.

## **ST. LOUIS, MO-IL MSA ASSESSMENT AREA – Limited-Scope Review**

### **SCOPE OF EVALUATION FOR BANK'S PERFORMANCE IN THE ST. LOUIS, MO-IL MSA ASSESSMENT AREA**

Examiners conducted a limited scope review of the bank's STL AA. The bank's performance is consistent with the performance of the Non-MSA AA with the lending products and community development activities discussed in the overall scope of the evaluation given its limited presence. The bank's performance in the AA is discussed separately below. However, comments regarding bank performance in this AA are limited, as this AA represents a small portion of the bank's overall operations.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ST. LOUIS, MO-IL MSA ASSESSMENT AREA**

PBT operates one limited-service drive-up facility in the STL AA. The AA contains all of Macoupin County and consists of a population of 44,967. The AA changed from three contiguous geographies in northern Macoupin County in the previous FDIC evaluation to the entire county for this review period. Tracts in Macoupin County were not distressed or underserved during the review period.

Examiners used demographic data from the 2020 American Community Survey (ACS) and 2024 D&B data to analyze the bank's ILCRA performance. According to 2020 ACS data, the AA's census tracts reflect the following income designations:

- 0 low-income census tracts (0.0 percent)
- 8 moderate-income census tracts (61.5 percent)
- 5 middle-income census tracts (38.5 percent)
- 0 upper-income census tracts (0.0 percent)
- 0 census tracts where income data was not available (NA) (0.0 percent)

The following table provides select demographic characteristics.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	0.0	61.5	38.5	0.0	0.0
Population by Geography	44,967	0.0	61.7	38.3	0.0	0.0
Housing Units by Geography	21,769	0.0	62.9	37.1	0.0	0.0
Owner-Occupied Units by Geography	13,986	0.0	60.9	39.1	0.0	0.0
Occupied Rental Units by Geography	4,591	0.0	70.5	29.5	0.0	0.0
Vacant Units by Geography	3,192	0.0	60.5	39.5	0.0	0.0
Businesses by Geography	3,026	0.0	60.9	39.1	0.0	0.0
Farms by Geography	360	0.0	44.7	55.3	0.0	0.0
Family Distribution by Income Level	12,528	29.0	20.7	21.2	29.1	0.0
Household Distribution by Income Level	18,577	29.8	17.5	18.7	34.1	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA	\$84,758	Median Housing Value			\$109,317	
		Median Gross Rent			\$745	
		Families Below Poverty Level			9.1%	

Source: 2020 ACS, 2024 D&B Data, and FFIEC Estimated Median Family Income;  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

The assessment area has a moderate level of demand for financial services. According to the June 30, 2024, FDIC Deposit Market Share Report, 13 FDIC-insured financial institutions operate 23 offices and share \$1.3 billion in total deposits in the assessment area. Of these institutions, PBT ranks 13th in deposit market share at \$1.4 million with 0.11 percent of the area's deposits and 0.29 percent of the bank's overall deposits.

Since PBT is not subject to ILCRA or CRA data collection and reporting requirements, examiners used the Wolters Kluwer 2023 Peer Small Business Market Share Report (most recent

available data) as a gauge of demand in the AA. According to the 2023 Small Business Market Share Report, aggregate data shows 41 financial institutions reported 572 loans, totaling \$26.5 million in the AA. The top five institutions controlled 59.6 percent of the market share by number of loans. Small farm aggregate loan data indicates that 12 financial institutions operate in the AA. These institutions report 245 loans, totaling \$30.9 million in the AA. The top five institutions controlled 91.8 percent of the market share.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ST. LOUIS, MO-IL MSA ASSESSMENT AREA**

### **LENDING TEST**

The bank's lending performance in the STL AA is consistent with the bank's performance in the Non-MSA AA when considering the limited presence in the AA. The AA has 0.29 percent of the bank's deposits and 1.2 percent of the bank's sampled loans. The one-person drive-up limited facility does not take loan applications. Therefore, it has little impact on the institution's overall conclusion. For the Lending Test, examiners placed more weight on small business lending since there were no small farm loans originated in this AA during the review period. The following tables illustrate PBT's performance

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<= \$1,000,000					
2023	84.4	3	100.0	211	100.0
2024	84.9	0	0.0	0	0.0
> \$1,000,000					
2023	3.9	0	0.0	0	0.0
2024	3.7	0	0.0	0	0.0
Revenue Not Available					
2023	11.7	0	0.0	0	0.0
2024	11.4	0	0.0	0	0.0
<b>Total</b>					
<b>2023</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>211</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>

*Source: 2023, 2024 D&B Data; Bank Data  
Due to rounding, totals may not equal 100.0%.*

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate					
2023	61.1	3	100.0	211	100.0
2024	60.9	0	0.0	0	0.0
Middle					
2023	38.9	0	0.0	0	0.0
2024	39.1	0	0.0	0	0.0
<b>Total</b>					
<b>2023</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>211</b>	<b>100.0</b>
<b>2024</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>

*Source: 2023, 2024 D&B Data; Bank Data  
Due to rounding, totals may not equal 100.0%.*

## COMMUNITY DEVELOPMENT TEST

PBT's performance under the Community Development Test in the STL AA is below the bank's performance in the Non-MSA AA due to the limited operations in the AA. These limited operations mean that there is little impact on the overall rating.

### Community Development Loans

During the evaluation period, the bank made eight community development loans totaling approximately \$1.4 million in this AA over 36 months. All of the loans were economic development, and they increased or retained LMI jobs in the AA.

Community Development Lending – STL AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
8/11/2022 – 12/31/2022	0	0	0	0	1	32	0	0	1	32
2023	0	0	0	0	3	807	0	0	3	807
2024	0	0	0	0	3	78	0	0	3	78
Year-to-Date (YTD) 2025	0	0	0	0	1	524	0	0	1	524
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>1,441</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>1,441</b>

*Source: Bank Records*

Notable examples of the bank's qualified community development loans include:

- Approximately \$1.0 million in loans for operating capital for a small farm to retain jobs.
- \$275,000 letter of credit to provide operating capital for another small farm to retain jobs.
- \$31,700 loan for operating capital to a trucking company, a small business to retain jobs.

### **Qualified Investments**

PBT did not make any qualified investments or donations in this AA.

### **Community Development Services**

PBT did not perform any community development services in this AA.

## **FAIR LENDING, DISCRIMINATORY, OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The IDFPR Division of Banking provides comments regarding the institution's fair lending policies and procedures pursuant to 205 ILCS 735/35-15. Examiners conducted the fair lending review in accordance with the FFIEC Interagency Fair Lending Examination Procedures. Based on an application of these procedures, examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, the results did not affect the institution's overall ILCRA rating.

## APPENDICES

### INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

1. The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
2. The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
3. The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes;
4. The geographic distribution of the bank's loans; and
5. The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### **Community Development Test**

The Community Development Test considers the following criteria:

1. The number and amount of community development loans;
2. The number and amount of qualified investments;
3. The extent to which the bank provides community development services; and
4. The bank's responsiveness through such activities to community development lending, investment, and service needs.

**ASSESSMENT FACTORS**  
**(38 Ill. Admin. Code 345.200)**

As used in this Part, "assessment factors" means the assessment of the following factors to determine whether a bank is meeting the financial services needs of local communities:

- a) activities to ascertain the financial services needs of the community, including communication with community members regarding the financial services provided;
- b) extent of marketing to make members of the community aware of the financial services offered;
- c) origination of mortgage loans including, but not limited to, home improvement and rehabilitation loans, and other efforts to assist existing low-income and moderate-income resident to be able to remain in affordable housing in their neighborhoods;
- d) for small business lenders, the origination of loans to businesses with gross annual revenues of \$1,000,000.00 or less, particularly those in low-income and moderate-income neighborhoods;
- e) participation, including investments, in community development and redevelopment programs, small business technical assistance programs, minority-owned depository institutions, community development financial institutions, and mutually owned financial institutions;
- f) efforts working with delinquent customers to facilitate a resolution of the delinquency;
- g) origination of loans that show an under concentration and a systemic pattern of lending resulting in the loss of affordable housing units;
- h) evidence of discriminatory and prohibited practices; and
- i) offering retail banking services to unbanked and underbanked persons.

## GLOSSARY

**Affiliate:** This means any company that controls, is controlled by, or is under common control with another company. The term "control" has the meaning given to that term in 12 U.S.C. 1841(a)(2), and a company is under common control with another company if both companies are directly or indirectly controlled by the same company.

**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 metropolitan area/assessment area.

**Alternative financial products or services:** This means financial products or services offered by persons other than an insured depository institution at a higher cost than comparable services offered by an insured depository institution.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five-year estimates based on population thresholds.

**Area Median Income:** This means the median family income for the Metropolitan Statistical Area (MSA), if a person or geography is located in an MSA, or for the metropolitan division, if a person or geography is located in an MSA that has been subdivided into metropolitan divisions; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** This means a geographic area delineated in accordance with 38 Ill. Admin. Code 345.400.

**Bank:** This means a bank that has a charter issued under the Illinois Banking Act [205 ILCS 5], a savings bank that has a charter issued under the Savings Bank Act [205 ILCS 205], and an FDIC-insured banking office of a foreign banking corporation issued a certificate of authority under the Foreign Banking Office Act [205 ILCS 645].

**Branch:** This means a staffed banking facility defined as a branch under Section 2 of the Illinois Banking Act [205 ILCS 5/2] or Section 1007.20 of the Illinois Savings Bank Act [205 ILCS 205/1007.20], and a branch of a banking office of a foreign banking corporation issued a certificate of authority under the Foreign Banking Office Act [205 ILCS 645], whether shared or unshared, including, for example, a mini-branch in a grocery store or a branch operated in conjunction with any other local business or nonprofit organization.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** This includes: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, distressed or underserved nonmetropolitan middle-income geographies designated by the Board of Governors of the Federal Reserve System, FDIC, and Office of the Comptroller of the Currency based on rates of poverty, unemployment, and population loss or based on population size, density, and dispersion. Activities that revitalize and stabilize geographies are designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals; or unbanked or underbanked geographies; and activities targeted to directly and tangibly increase climate resilience in low-income to moderate-income neighborhoods or mitigate environmental harm in LMI neighborhoods.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited-purpose bank:
  - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan unless the loan is for a multifamily dwelling (as defined in 12 CFR 1003.2(n)); and
  - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under 38 Ill. Admin. Code 345.240(d).

**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 loan, which is a consumer loan extended for the purchase of and secured by a motor vehicle; credit card loan, which is a line of credit for household, family, or other personal expenditures that is accessed by a borrower's use of a "credit card," as this term is defined in 12 CFR 1026.2; other secured consumer loan, which is a secured consumer loan that is not included in one of the other categories of consumer loans; and other unsecured consumer loan, which is an unsecured consumer loan that is not included in one of the other categories of consumer loans.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Department:** This means the Illinois Department of Financial and Professional Regulation.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FDIC:** This means the Federal Deposit Insurance Corporation.

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 do 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 income of applicants, the amount of loan requested, and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loan:** This means a closed-end mortgage loan or an open-end line of credit as these terms are defined under Section 1003.2 and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (10) and (13).

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Income level** includes:

**Low-income:** This means an 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.

**Moderate-income:** This means an 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 and less than 80 percent in the case of a geography.

**Middle-income:** This means an 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 and less than 120 percent in the case of a geography.

**Upper-income:** This means an individual income that is 120 percent or more of the area median income or a median family income that is 120 percent or more in the case of a geography.

**Limited purpose bank:** This means a bank that offers only a narrow product line (such as credit card or motor vehicle loans) to a regional or broader market and for which a designation as a limited purpose bank is in effect, in accordance with 38 Ill. Admin. Code 345.250(b).

**Limited-Scope Review:** A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

**Loan Location:** This means a loan is located as follows:

A consumer loan is located in the geography where the borrower resides;

A home mortgage loan is located in the geography where the property to which the loan relates is located; and

A small business or small farm loan is located in the geography where the main business facility or farm is located or where the loan proceeds otherwise will be applied, as indicated by the borrower.

**Loan production office:** This means a staffed facility of a bank, other than a branch, that is open to the public and that provides lending-related services, such as loan information and applications.

**Low-Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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 metropolitan area/assessment area.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and the other having incomes below the median.

**Metropolitan Division (MD):** This means a metropolitan division as defined by the United States Director of the Office of Management and Budget.

**Metropolitan Statistical Area (MSA):** This means a metropolitan statistical area as defined by the United States Director of the Office of Management and Budget.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area (also known as non-MSA):** This means any area that is not located in an MSA.

**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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Remote Service Facility (RSF):** This means an automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank, such as an automated teller machine, cash dispensing machine, point-of-sale terminal, or other remote electronic facility, at which deposits are received, cash dispersed, or money lent.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Bank:** This means a bank that is a small bank under federal administrative rules established by the bank's primary federal financial supervisory agency pursuant to the federal Community Reinvestment Act and an intermediate small bank means a bank that is an intermediate small bank under federal administrative rules established by the bank's primary federal financial supervisory agency pursuant to the federal Community Reinvestment Act.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms.

**Small business loan:** This means a loan included in "loans to small businesses" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Federal Financial Institution Examination Council (FFIEC) 031 and 041).

**Small farm loan:** This means a loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (FFIEC 031 and 041).

**Special credit program:** This means any credit program offered by a bank to meet special social needs which is in conformity with and explicitly authorized by the Equal Credit Opportunity Act (15 U.S.C. 1691(c)) and Regulation B (12 C.F.R. 1002.8).

**Substantial majority:** This means a portion of the bank's lending activity so significant by number and dollar volume of loans that the lending test evaluation would not meaningfully reflect its lending performance if consumer loans were excluded.

**Unbanked person:** This means an individual that does not have a checking or savings account with an insured depository institution.

**Underbanked person:** This means an individual that has a checking or saving account with an insured depository institution but that used financial products or services from a person other than an insured depository institution in the past 12 months.

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

**Very Small Bank:** This means a bank that is eligible for the Very Small Bank Examination Procedure set forth in 38 Ill. Admin. Code 345.450(b).

**Wholesale bank:** This means a bank that is not in the business of extending home mortgage, small business, small farm, or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with 38 Ill. Admin. Code 345.450(b).