



PUBLIC DISCLOSURE

June 3, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

CenTrust Bank, National Association
Charter Number 24617

385 Waukegan Road
Northbrook, IL 60062

Office of the Comptroller of the Currency

Downers Grove Office
2001 Butterfield Road, Suite 400
Downers Grove, IL 60515

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The Lending Test rating is based on CenTrust Bank, National Association's (CenTrust or the bank) lending performance in the state of Illinois. The major factors that support this rating includes:

- CenTrust's distribution of loans to businesses of different sizes within its assessment area (AA) is reasonable.
- CenTrust's distribution of loans among geographies of different income levels within its AA is reasonable.
- CenTrust's average loan-to-deposit ratio (LTD) is reasonable.
- CenTrust originated or purchased a majority of its loans from inside its AA.
- CenTrust did not receive any complaints regarding its Community Reinvestment Act (CRA) performance during the evaluation period.

Loan-to-Deposit Ratio

Considering CenTrust's size and financial condition, and the credit needs of its AA, the bank's LTD ratio during the evaluation period was reasonable. The bank's LTD ratio averaged 79.7 percent over the past 16 quarters from the first quarter-end after the start of the bank's last CRA evaluation through December 31, 2023. During this period, the bank's quarterly LTD ratio ranged from a low of 64.3 percent to a high of 97.5 percent.

We compared CenTrust's average quarterly LTD ratio to the ratios of 22 similarly situated federal- and state-chartered banks in the AA, based on a combination of size, location, and lending opportunities. The asset size of each similarly situated bank was less than \$316 million and the group had a combined average quarterly LTD ratio of 75.6 percent during the same period. CenTrust's loan-to-deposit ratio was ranked 10th in this group.

Lending in Assessment Area

CenTrust originated or purchased a majority of its loans inside its AA during the evaluation period. The bank originated and purchased 61.6 percent of its loans inside its AA. This analysis was performed at the bank rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	37	61.7	23	38.3	60	15,426	60.7	9,993	39.3	25,419
Source: OCC sample of 60 business loans originated between 1/1/2021 and 12/31/2023. Note: Due to rounding, totals may not equal 100.0%.										

Description of Institution

CenTrust is a \$154.9 million intrastate financial institution headquartered in Northbrook, Illinois, a northwest suburb of Chicago. The bank is a wholly-owned subsidiary of United Community Bancshares, Inc., a one bank holding company. CenTrust is a full-service banking institution, and it operates one branch office located in Cook County. It also owns and operates one deposit-taking automated teller machine (ATM) in Illinois, which is located at the branch and is available 24 hours a day and seven days a week. There were no mergers or acquisitions affecting the scope of the bank's operations during the evaluation period, and no branches were opened or closed.

CenTrust's AA in Illinois during 2021 and 2022 included portions of Cook and Lake Counties. In February 2023 the bank expanded the AA to include a larger portion of Cook County to the south, and it added a portion of DuPage County to better reflect its market area. This increased the number of census tracts (CTs) in the AA from 286 to 1,054, and substantially increased the number of low- and moderate-income geographies in the AA. We used the bank's expanded AA for this analysis.

CenTrust offers conventional deposit and loan products (primarily commercial loans). In addition, the bank offers online and mobile banking. Mobile banking is currently offered for business customers, and the bank is in the process of implementing consumer mobile deposit access.

As of December 31, 2023, CenTrust's tier one capital totaled \$18.0 million and its loan portfolio totaled \$105.9 million, or 68.3 percent of the bank's total assets. The bank's primary loan products are business loans (including commercial real estate loans), with an emphasis on Small Business Administration guaranteed loans. The bank's loan mix is 80.7 percent business loans and 19.3 percent residential real estate loans.

In response to the COVID-19 pandemic, the bank offered Paycheck Protection Plan (PPP) loans to commercial borrowers to provide relief from hardships caused by the pandemic. During the evaluation period, the bank originated 47 PPP loans totaling \$4.5 million. These PPP loans were small loans to businesses and are included in the primary product review for this evaluation period.

CenTrust's business strategy is to help small- to mid-sized businesses grow safely, profitably, and with sufficient capital. There are no known impediments limiting the bank's ability to help meet the credit needs of its local community, including low- and moderate-income families and neighborhoods. CenTrust received a "Satisfactory" rating as a result of its last CRA Performance Evaluation, dated March 16, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated CenTrust's CRA Performance using Small Bank evaluation procedures, which assess the bank's record of meeting the credit needs of its AA through lending activities. The evaluation period for the review was from January 1, 2021, to December 31, 2023.

Based on our review of the number and dollar volume of loans originated or purchased during the evaluation period, CenTrust's primary lending product was business loans. We reviewed a random sample of 60 business loans originated during the evaluation period for our analysis of lending inside versus outside the bank's AA, and we expanded the sample of small business loan to include 60 business loans originated within the AA during the review period for the geographic and income distribution tests.

Due to changes between the 2015 American Community Survey (ACS) U.S. Census and the 2020 U.S. Census, we performed separate analysis for the periods of 2021 vs. 2022 and 2023 to evaluate geographic distribution and borrower income criteria. Performance in Tables Q and R in Appendix D reflect data from both analysis periods.

For analysis purposes, we compared CenTrust's lending performance to demographic data from the 2020 United States (U.S.) Census, the 2015 American Community Survey (ACS) U.S. Census, 2021 and 2023 Dun and Bradstreet (D&B) Data, and Federal Deposit Insurance Corporation (FDIC) deposit market share data as of June 30, 2023. No affiliate activity was included in this analysis. Refer to the table in Appendix A for more information on the scope of this review.

Selection of Areas for Full-Scope Review

CenTrust has one AA in the state of Illinois, and we completed a full-scope review of that AA. A community profile for the AA is provided in the "Scope" section of the State of Illinois rating.

Ratings

The bank's overall rating is based on the State of Illinois rating.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Illinois

CRA rating for the State of Illinois: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- CenTrust's distribution of loans to businesses of different sizes within its AA is reasonable.
- CenTrust's distribution of loans among geographies of different income levels within its AA is reasonable.

Description of Institution's Operations in Illinois

CenTrust has one AA in the state of Illinois. The AA consists of 1,054 CTs within portions of Cook, DuPage, and Lake Counties. Cook and DuPage Counties are located in the Chicago-Naperville-Schaumburg, IL Metropolitan Division (MD), and Lake County is located in the Lake County, IL MD. Because both of these MDs are located in the Chicago-Naperville-Elgin, IL-IN MSA, our evaluation was based on of the MSA¹. As of December 31, 2023, the AA included 84 low-income CTs, 176 moderate-income CTs, 319 middle-income CTs, 465 upper-income CTs and 10 CTs that have not been assigned an income classification. The AA meets the requirements of CRA and does not arbitrarily exclude any low- or moderate-income geographies.

Competition

Competition for deposits in the AA is strong. According to the June 30, 2023 FDIC Deposit Market Share Report, CenTrust's deposits in the AA totaled \$121.3 million, for 0.2 percent of the AA's total market share, and CenTrust ranked 89 out of 114 deposit-taking institutions. The three largest institutions for deposit market share were JP Morgan Chase Bank National Association (N.A.), BMO Harris Bank N.A., and Bank of America N.A., which accounted for a combined 50.2 percent of total deposits in the AA.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), the unemployment rate in the AA generally improved during the evaluation period. As of December 31, 2023, unemployment rates for Cook (4.4 percent) and DuPage (3.4 percent) Counties were lower than the state unemployment rate (4.5 percent), while the rate for Lake County (5.0 percent) was higher. The unemployment rates for Cook and Lake Counties were higher than the national unemployment rate (3.7 percent) during that same time period.

¹ Due to the 2020 U.S. Census changes, on July 21, 2023, the Chicago-Naperville-Elgin IL-IN-WI MSA changed to the Chicago-Naperville IL-IN-WI Combined Statistical Area (CSA). The Chicago-Naperville-Elgin, IL MD changed to the Chicago-Naperville,-Elgin, IL-IN MSA. The Chicago-Naperville-Evanston, IL MD changed to the Chicago-Naperville-Schaumburg, IL MD, and the Elgin, IL MD. The Lake County-Kenosha County, IL-WI MD split into the Lake County, IL MD and the Kenosha, WI MSA. In addition, between the 2015 ACS US Census data and the 2020 US Census data, there were additional CTs created in the AA effective in 2022.

During the evaluation period, the economy in Lake County was advancing at a slow but steady pace, while the economies in Cook and DuPage Counties were in a recovery cycle. Industries driving the local economies include manufacturing, health care and social services, educational services, retail trade, and professional, scientific, and technical services. The top three employers in Lake County were AbbVie Inc, Naval Station Great lakes, and Baxter Healthcare Corp. The top three employers in Cook and DuPage Counties were Amazon.com Inc., Advocate Healthcare System, and Northwestern Memorial Healthcare.

During the 2021 evaluation period there were 460,916 businesses in the AA, of which 18,128 (3.9 percent) were located in low-income CTs, 60,342 (13.1 percent) were located in moderate-income CTs, 109,009 (23.7 percent) were located in middle-income CTs, 270,747 (58.7 percent) were located in upper-income CTs, and 2,690 (0.6 percent) were located in CTs with no income designation. During the 2022-2023 evaluation period there were 662,286 businesses in the AA, of which 24,348 (3.7 percent) were located in low-income CTs, 74,883 (11.7 percent) were located in moderate-income CTs, 187,897 (28.3 percent) were located in middle-income CTs, 371,464 (55.8 percent) were located in upper-income CTs, and 3,694 (0.5 percent) were located in CTs with no income designation. Small businesses with gross annual revenue of \$1 million or less totaled 395,851 (95.9 percent) during the 2021 evaluation period and 594,892 (89.8 percent) during the 2022-2023 evaluation period.

The total population of the AA was 4.3 million in 2021 and increased to 4.4 million by 2023. The percentage of families in the AA living below the poverty level was 9.4 percent in 2021 and 6.8 percent in 2023.

Table A – Demographic Information of the Assessment Area						
Assessment Area: MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Owner-Occupied Units by Geography	980,777	3.1	13.6	29.8	53.3	0.2
Occupied Rental Units by Geography	659,005	11.4	25.9	25.4	36.6	0.7
Vacant Units by Geography	153,276	13.9	23.1	24.4	37.9	0.6
Businesses by Geography	460,916	3.9	13.1	23.7	58.7	0.6
Farms by Geography	4,830	2.8	12.7	27.5	56.9	0.1
Family Distribution by Income Level	1,012,493	21.5	15.1	17.4	46.1	0.0
Household Distribution by Income Level	1,639,782	23.6	14.6	16.3	45.5	0.0
Geographies (Census Tracts)	1,043	10.1	19.1	25.9	44.2	0.8
Population by Geography	4,336,652	7.9	20.2	28.1	43.4	0.3
Housing Units by Geography	1,793,058	7.1	18.9	27.7	45.9	0.4
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$302,739
Median Family Income MSA - 29404 Lake County- Kenosha County, IL-WI		\$87,137	Median Gross Rent			\$1,119
			Families Below Poverty Level			9.4%
Source: 2015 ACS and 2021 D&B data. Note: Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: MSA 2022 -2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,054	8.0	16.7	30.3	44.1	0.9
Population by Geography	4,421,838	6.6	17.3	32.0	43.6	0.5
Housing Units by Geography	1,818,533	6.1	16.0	31.8	45.6	0.4
Owner-Occupied Units by Geography	1,010,390	3.3	12.0	33.2	51.4	0.2
Occupied Rental Units by Geography	670,883	9.6	21.6	30.8	37.3	0.7
Vacant Units by Geography	137,260	10.4	18.2	27.1	43.8	0.6
Businesses by Geography	662,286	3.7	11.3	28.4	56.1	0.6
Farms by Geography	6,451	2.9	11.7	30.8	54.3	0.3
Family Distribution by Income Level	1,024,232	20.5	14.9	17.9	46.7	0.0
Household Distribution by Income Level	1,681,273	22.8	14.3	16.2	46.7	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$92,622	Median Housing Value			\$352,146
Median Family Income MSA - 29404 Lake County- Kenosha County, IL-WI		\$105,876	Median Gross Rent			\$1,360
			Families Below Poverty Level			6.8%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Community Contact

During our analysis, we considered information from three community contacts working for organizations that provide affordable housing, social services, and economic development in Cook, Lake, and DuPage counties. These contacts identified credit needs within their communities that included affordable housing (including downpayment assistance programs for purchases and rental assistance), economic development (including building new homes, acquiring and rehabbing older properties, and repairing homes for low- and moderate-income persons including senior citizens), and access to capital for small entrepreneurs.

Scope of Evaluation in Illinois

This analysis reflects a full-scope review of the AA in this State.

LENDING TEST

CenTrust's performance under the Lending Test in the State of Illinois is rated Satisfactory.

Conclusions for a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the State of Illinois is reasonable.

Distribution of Loans by Income Level of the Geography

CenTrust exhibits reasonable geographic distribution of loans in the State of Illinois. We did not identify any unexplained conspicuous lending gaps in the AA.

Small Loans to Businesses

Refer to Table Q in appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

CenTrust's distribution of small loans to businesses in geographies of different income levels within the AA is reasonable. We gave more weight to the bank's lending in moderate-income CTs, given the significantly higher number of moderate-income CTs compared to low-income CTs in the AA during the evaluation periods.

During the 2021 evaluation period, CenTrust's distribution of small loans to businesses in geographies of different income levels within the AA was reasonable. No small loans to businesses in our sample were originated in the low-income CTs, and the bank's percentage of small loans to businesses in the moderate-income CTs was below both the percentage of the AA's businesses located in the moderate-income CTs and the percentage of aggregate business lending that occurred in the moderate-income CTs.

During the 2022-2023 evaluation period, CenTrust's distribution of small loans to businesses in geographies of different income levels within the AA was reasonable. The bank's percentage of small loans to businesses in the low-income CTs was below both the percentage of the AA's businesses located in the low-income CTs and the percentage of aggregate business lending that occurred in the low-income CTs. However, the bank's percentage of small loans to businesses in the moderate-income CTs significantly exceeded both the percentage of the AA's businesses located in the moderate-income CTs and the percentage of aggregate business lending that occurred in the moderate-income CTs.

Distribution of Loans by Income Level of the Borrower

CenTrust exhibits reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Refer to Table R in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

CenTrust's distribution of loans to businesses of different sizes in the AA during both the 2021 and 2022-2023 evaluation periods was reasonable. While the percentage of loans that the bank originated to businesses with \$1 million or less in annual gross revenue was significantly below the percentage of AA businesses with \$1 million or less in annual gross revenue, it exceeded the percentage of aggregate lending that occurred to businesses with \$1 million or less in annual gross revenue in both evaluation periods. We also noted that the percentage of bank loans without annual gross revenue information available in 2022-2023 was higher than the percentage of AA businesses that did not report annual gross revenue information. Some of these businesses would likely be small businesses with annual gross revenue of \$1 million or less.

Responses to Complaints

CenTrust did not receive any complaints regarding its CRA performance during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	(1/1/2021 to 12/31/2023)	
Bank Products Reviewed:	Small Business Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Chicago-Naperville-Elgin, IL-IN MSA	Full Scope	<i>CenTrust Bank, N.A. has one AA consisting of 1054 census tracts located in portions of Cook, DuPage, and Lake Counties.</i>

Appendix B: Rating Summary

RATINGS	
Overall Bank:	Lending Test Rating
CenTrust Bank, N.A.	Satisfactory
State:	
Illinois	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including low- and moderate (LMI) areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the U.S. Census Bureau in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low-Income Geography: A census tract with a median family income that is less than 50 percent of the area median family income.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	# of Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending
MSA	20	7,818	100.0	177,355	3.9	0	4.8	13.1	10.0	15.5	23.7	40.0	27.0	58.7	50.0	52.3	0.6	0	0.4

Source: 2021 D&B data, 01/01/2021 - 12/31/2021 bank data, 2021 CRA aggregate data.
Note: Due to rounding, totals may not equal 100.0%.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	# of Bank Loans	\$(000s) Bank Loans	% of Bank Total	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of Aggregate Lending
MSA	40	19,612	100.0	154,709	3.7	2.5	3.4	11.3	20.0	11.7	28.4	35.0	32.3	56.1	42.5	52.1	0.6	0	0.4

Source: 2023 D&B data, 01/01/2022 - 12/31/2023 bank data, 2022 CRA aggregate data.
Note: Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	# of Bank Loans	\$(000s) of Bank Loans	% of Total Bank Loans	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of AA Businesses	% of Bank Loans
MSA	20	7,818	100.0	177,355	85.9	55.0	44.3	5.7	47.6	8.4	0

Source: 2021 D&B data, 01/01/2021 - 12/31/2021 bank data, 2021 CRA aggregate data.

Note: Due to rounding, totals may not equal 100.0%.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-2023**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	# of Bank Loans	\$(000s) of Bank Loans	% of Total Bank Loans	Overall Market (#)	% of AA Businesses	% of Bank Loans	% of Aggregate Lending	% of AA Businesses	% of Bank Loans	% of AA Businesses	% of Bank Loans
MSA	40	19,612	100.0	154,709	89.8	57.5	52.7	4.0	35.0	6.2	7.5

Source: 2023 D&B data, 01/01/2022 - 12/31/2023 bank data, 2022 CRA aggregate data.

Note: Due to rounding, totals may not equal 100.0%.