PUBLIC DISCLOSURE

December 13, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Evergreen Bank Group
Certificate Number: 35230

1515 West 22nd Street, Suite 100W
Oak Brook, Illinois 60523

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Chicago Regional Office

300 South Riverside Plaza, Suite 1700
Chicago, Illinois 60606

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, nor should it 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.

TABLE OF CONTENTS

INSTITUTION RATING

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

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

The following summarizes Evergreen Bank Group's (Evergreen) performance for the years of 2018, 2019, and 2020 under the 2017 FDIC approved Strategic Plan (Plan) that covers the timeframe within the current evaluation period. The Plan established measurable goals intended to help meet the needs within the bank's assessment area through lending activities, community development investments and grants, and community development services.

- Lending, investment, and service activities meet the Plan goals for "Satisfactory" performance for the plan year 2018.
- Lending, investment, and service activities meet the Plan goals for "Satisfactory" performance for the plan year 2019.
- Lending, investment, and service activities meet the Plan goals for "Satisfactory" performance for the plan year 2020.

DESCRIPTION OF INSTITUTION

Evergreen is a commercial bank headquartered in Oak Brook, Illinois, and is a wholly-owned subsidiary of Bancorp Financial, Inc., a one bank holding company. The bank continues to operate three full-service offices. The main office is in Oak Brook, Illinois in an upper-income census tract. Branch offices are located in Hinsdale, Illinois in an upper-income census tract and Evergreen Park, Illinois in a middle-income census tract. The bank did not open or close any offices since the previous CRA evaluation.

Evergreen operates reasonable banking hours at all offices (including Saturdays) and offers drive-up services at the Evergreen Park and Hinsdale branches, and automated teller machines at all offices. The bank offers traditional consumer and commercial deposit and credit products.

The bank continues to operate a Loan Production Office (LPO) in Reno, Nevada. The LPO operates Evergreen's indirect motorsport lending divisions, FreedomRoad Financial and Performance Finance. Motorsport lending represents Evergreen's primary lending focus, particularly outside its assessment area, and represents the largest segment of its loan portfolio. This lending division has relationships with over 2,342 motorsport dealerships across the nation. No deposits of any type are offered or taken at the LPO.

Within its designated assessment area, the bank is primarily focused on commercial and real estate lending. Additional key lines of business are home equity lines of credit (HELOCs) and second mortgage loans. The bank does not offer agriculture loans.

According to the bank's September 30, 2021 Consolidated Reports of Condition and Income (Call Report), the institution reported total assets of $1.2 billion, total loans of $978 million, and total deposits of 1.0 billion, yielding a loan-to-asset ratio of 80.4 percent and loan-to-deposit ratio of 95.8 percent. The institution's loan portfolio distribution is detailed in the following table.

Loan Portfolio Distribution as of 9/30/2021		
Loan Category	**$(000s)**	**%**
Construction, Land Development, and Other Land Loans	13,843	1.4
Secured by 1-4 Family Residential Properties	86,375	8.8
Secured by Multifamily (5 or more) Residential Properties	28,754	2.9
Secured by Nonfarm Nonresidential Properties	154,519	15.9
Total Real Estate Loans	***283,491***	***29.0***
Commercial and Industrial Loans	26,937	2.8
Consumer Loans	664,907	68.0
Other Loans	1,634	.2
Municipal Loans	692	.1
Total Loans	***977,661***	***100.0***
Source: Reports of Condition and Income		

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

Evergreen was assigned a CRA rating of "Satisfactory" as a result of the previous CRA evaluation dated September 17, 2018. The prior evaluation assessed the bank's performance for the period that includes the last two years of the prior Plan (July 1, 2015 to June 30, 2017), and the first six months of the current Plan (July 1, 2017 to December 31, 2017). Please refer to the Public Evaluation dated September 17, 2018 for details.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance is evaluated. Evergreen's assessment area continues to comprise the entire Illinois counties of Cook and DuPage, which are located within the Chicago-Naperville-Joliet IL Metropolitan Division. The bank's assessment area is consistent with the requirements of the regulation. The assessment area does not include the bank's LPO in Reno, Nevada.

Economic and Demographic Data

The following table provides detailed demographic information for the bank's assessment area based on 2015 American Community Survey (ACS) data.

Demographic Information of the Assessment Area						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	1,535	16.5	25.5	25.9	31.3	0.8
Population by Geography	6,166,805	12.3	26.1	28.7	32.6	0.3
Housing Units by Geography	2,533,565	12.4	24.6	28.2	34.4	0.4
Owner-Occupied Units by Geography	1,355,993	5.6	20.4	32.4	41.4	0.2
Occupied Rental Units by Geography	925,049	18.8	29.7	23.9	26.9	0.8
Vacant Units by Geography	252,523	25.4	28.6	21.2	24.2	0.6
Businesses by Geography	476,177	5.6	17.0	26.7	50.0	0.6
Farms by Geography	5,138	4.7	17.5	31.8	45.8	0.1
Family Distribution by Income Level	1,424,403	25.6	16.5	17.9	40.0	0.0
Household Distribution by Income Level	2,281,042	27.3	15.5	16.7	40.5	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		$75,024	Median Housing Value			$252,409
			Median Gross Rent			$1,048
			Families Below Poverty Level			11.9%

Source: 2015 ACS and 2020 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.

Based on the 2015 ACS, the assessment area consisted of 253 low-income geographies; 391 moderate-income; 397 middle-income; 481 upper-income, and 13 census tracts that have nominal population that do not have an income categorization (designated as "NA"). As noted in the table above, 25.6 percent and 16.5 percent of families in the assessment area have low- and moderate-incomes, respectively. The table also shows that 11.9 percent of families in the assessment area have incomes below the poverty level. These segments of the population may face difficulty qualifying for and/or servicing debts, particularly in amounts necessary to finance homes in the assessment area.

Based on 2021 D&B data, the largest industry sector in the assessment area is services (comprising 37.0 percent of businesses) followed by finance, insurance and real estate at 11.0 percent, and retail trade at 10.0 percent. The majority of businesses (58.0 percent) employ fewer than five employees, and 84.0 percent of businesses reported revenues less than $500,000. Approximately 7.0 percent of businesses in the assessment area represent headquarters of multi-location businesses, while 91.0 percent of businesses operate from a single location. Seven percent of the total non-farm businesses in the assessment area are located in low-income census tracts and 18.0 percent are located in moderate-income census tracts. The lower percentages of businesses in low- and moderate-income census tracts reflect challenges in making business loans in these areas.

Competition

The bank operates in a highly competitive environment. According to the FDIC Summary of Deposits data (as of June 30, 2021), there were 1,511 branch office facilities of 114 different institutions within the bank's assessment area. Evergreen had a deposit market share of 0.2 percent.

Community Contacts

To gain additional understanding of the needs in the assessment area, examiners used information obtained from recent contacts with community and economic development entities in Cook and DuPage Counties. One community contact stated that the housing stock is woefully inadequate compared to the demand for affordable housing. In addition, more affordable multi-family housing units are needed in the bank's assessment area. A second community contact noted that there is a need for business growth capital that would open more businesses and foster more community ownership of property throughout the bank's assessment area.

SCOPE OF EVALUATION

General Information

Examiners evaluated Evergreen's CRA performance using the Examination Procedures for Institutions with Strategic Plans. Evergreen developed a three-year Plan, which was approved by the FDIC and became effective on May 25, 2017. This evaluation covers Evergreen's CRA performance for the period in the Plan from January 1, 2018 through December 31, 2020.

Activities Reviewed

The Plan outlines measurable, annual performance goals for the following activities within the bank's assessment area:

- Loans in low- and moderate-income census tracts;
- Loans to low- and moderate-income borrowers and small businesses;
- Qualified community development loans;
- Qualified community development investments and grants,
- Maintaining cumulative qualified community development investments; and
- Qualified community development services.

Examiners used bank records, publicly available information, and demographic data to evaluate the bank's performance according to the goals in the Plan. For the bank's lending goals in low- and moderate-income census tracts and to low- and moderate-income borrowers and small businesses, examiners reviewed applicable small business and consumer purpose loans from 2018 through 2020. For purposes of this Plan, consumer purpose loans include home mortgage loans subject to the Home Mortgage Disclosure Act (HMDA), HELOCs, and other consumer loans. Within the Plan, the institution refers to HMDA loans as first and second mortgage lending, and other consumer loans include motorsports, car, and unsecured personal loans. Examiners reviewed the universe of applicable loans for each of the following years covered by this evaluation, which included the following total number and dollar volume of loans: 706 small business and consumer purpose loans totaling $56.5 million in 2018, 659 loans totaling $56.4 million in 2019, and 865 loans totaling $66.8 million in 2020.

The Plan contains a point system for the performance in each of the aforementioned goal criteria. The points for each goal are then tallied for each year of the Plan to determine the bank's annual CRA performance ratings. The following table shows the range of possible points the bank can earn and the points necessary to achieve Outstanding, Satisfactory, Needs to Improve, and Substantial Noncompliance scores. This table applies to all CRA goals set forth in the Plan.

Annual Performance Measurements		
Scale	**Minimum Points**	**Maximum points**
Outstanding	64	84
Satisfactory	43	63
Needs to Improve	22	42
Substantial Noncompliance	0	21
Source: 2017 CRA Strategic Plan		

Examiners assessed the bank's performance according to the goals and point system outlined in the Plan. The following sections summarize examiners' conclusions.

CONCLUSIONS ON PERFORMANCE CRITERIA

The Plan established the following measurable goals for evaluating Evergreen's lending in the assessment area in the applicable years:

Retail Lending

1. Lending in low-income census tracts within the bank's assessment area in (i) HMDA; (ii) HELOC; and (iii) other consumer lending;
2. Lending in moderate-income census tracts within the bank's assessment area in (i) HMDA; (ii) HELOC; and (iii) other consumer lending;
3. Lending to low-income borrowers within the bank's assessment area in (i) HMDA, (ii) HELOC, and (iii) other consumer lending;
4. Lending to moderate-income borrowers within the bank's assessment area in (i) HMDA, (ii) HELOC, and (iii) other consumer lending:
5. Small business lending in low-income census tracts within the bank's assessment area;
6. Small business lending in moderate-income census tracts within the bank's assessment area;
7. Small business lending to businesses with gross annual revenues less than $1 million within the bank's assessment area.

Community Development

8. Community development lending within the bank's assessment area;
9. Annual community development investments and grants within the bank's assessment area;
10. Year-end community development investments within the bank's assessment area; and

11. Community development services within the bank's assessment area.

Under the scoring system, specific accomplishments translate into a numeric score for each activity. For each year during the Plan, the bank receives points equivalent to its accomplishments in each of the 11 areas. The total number of points earned for all 11 activity areas are then aggregated to assign a combined total score for each year.

Under this system, half of all points the bank may earn are in the area of lending and half of all points the bank may earn are in the areas of community development investments, grants and community development services. In order to receive at least a Satisfactory rating for CRA, the bank must earn at least an aggregate of 43 out of a possible 84 points in each year during the term of the Plan.

Geographic Distribution Lending Performance

The Plan contains measurable goals for lending in low- and moderate-income areas. For this criterion, the Plan has separate targets for small business loans and all other loans, which the Plan defines as HMDA, HELOCs, and other consumer loans. The targets are tied to the percentage of the bank's average total assets for each Plan year. Points are awarded for reaching certain levels of lending (see following table). The points earned under this lending criterion are totaled and contribute to determining the bank's annual performance.

Geographic Distribution Lending Performance				
Annual Plan Goals				
Loans in Low-Income Census Tracts*	0.20%	0.35%	0.50%	0.65%
Loans in Moderate-Income Census Tracts*	0.40%	0.75%	1.10%	1.45%
Small Businesses Lending in Low-Income Census Tracts*	0.15%	0.20%	0.25%	0.30%
Small Businesses Lending in Moderate -Income Census Tracts*	0.15%	0.30%	0.45%	0.60%
Points	1	2	3	4
*As a percent of Plan year assets				

In 2018, the bank originated a total of 25 loans (HMDA, HELOC, and consumer) in low-income census tracts and 85 such loans in moderate-income census tracts. Also in 2018, the bank originated 4 and 12 small business loans in low- and moderate-income census tracts, respectively. The following table provides details on Evergreen's geographic lending performance relative to the goals for Plan year 2018:

Geographic Lending Bank Performance			
Plan Year	1/1/2018 – 12/31/2018		
Plan Year Assets*	$943,216,000		
	$	**% of Plan Year Assets**	**Points Awarded**
Loans in Low-Income Census Tracts	$5,153,746	0.55%	3
Loans in Moderate-Income Census Tracts	$4,167,960	0.44%	1
Small Businesses Lending in Low-Income Census Tracts	$2,271,221	0.24%	2
Small Businesses Lending in Moderate -Income Census Tracts	$3,906,795	0.41%	2
*Average total assets from Call Report data during Plan year.			

In 2019, the bank originated a total of 23 loans (HMDA, HELOC, and consumer) in low-income census tracts and 95 such loans in moderate-income census tracts. Also in 2019, the bank originated 4 and 12 small business loans in low- and moderate-income census tracts, respectively. The following table provides details on Evergreen's geographic lending performance relative to the Plan for the year 2019.

Geographic Lending Bank Performance			
Plan Year	1/1/2019 – 12/31/2019		
Plan Year Assets*	$1,058,656,500		
	$	**% of Plan Year Assets**	**Points Awarded**
Loans in Low-Income Census Tracts	$1,198,000	0.11%	0
Loans in Moderate-Income Census Tracts	$5,352,000	0.51%	1
Small Businesses Lending in Low-Income Census Tracts	$1,359,000	0.13%	0
Small Businesses Lending in Moderate -Income Census Tracts	$3,735,000	0.35%	2
*Average total assets from Call Report data during Plan year.			

The following table provides details on Evergreen's geographic lending performance relative to the Plan for the year 2020.

Geographic Lending Bank Performance			
Plan Year	1/1/2020 – 12/31/2020		
Plan Year Assets*	$1,241,876,500		
	$	**% of Plan Year Assets**	**Points Awarded**
Loans in Low-Income Census Tracts	$399,000	0.03%	0
Loans in Moderate-Income Census Tracts	$2,404,000	0.19%	0
Small Businesses Lending in Low-Income Census Tracts	$2,369,000	0.19%	1
Small Businesses Lending in Moderate-Income Census Tracts	$4,322,000	0.35%	2
* Average total assets from Call Report data during Plan year.			

Borrower Profile Lending Performance

The Plan contains measurable goals for lending to low- and moderate-income borrowers, and small businesses. For this criterion, the Plan has separate targets for small business loans and all other loans, which the Plan defines as HMDA, HELOCs, and other consumer loans. The targets are tied to the percentage of the bank's average total assets for each Plan year. Points are awarded for reaching certain levels of lending (see following table). The points earned under this lending criterion are totaled and contribute to the bank's annual performance.

Borrower Profile Lending Performance				
Annual Plan Goals				
Loans to Low-Income Borrowers*	0.05%	0.10%	0.15%	0.20%
Loans to Moderate-Income Borrowers*	0.10%	0.15%	0.20%	0.25%
Loans to Small Businesses*	0.90%	1.25%	1.60%	1.95%
Points	1	2	3	4
* As a percent of Plan year assets				

In 2018, the bank originated 41 loans (HELOC and consumer) to low-income borrowers and 91 such loans to moderate-income borrowers. In 2018, the bank originated 23 small business loans to businesses with revenues less than $1 million. The following table provides details on Evergreen's borrower profile lending performance relative to the Plan for the year 2018.

Borrower Profile Bank Performance			
Plan Year	1/1/2018 – 12/31/2018		
Plan Year Assets*	$943,216,000		
	$	**% of Plan Year Assets**	**Points Awarded**
Loans to Low-Income Borrowers	$570,192	0.06%	1
Loans to Moderate-Income Borrowers	$1,337,493	0.14%	1
Loans to Small Businesses	$7,158,797	0.76%	0
*Average total assets from Call Report data during Plan year.			

In 2019, the bank originated 36 loans (HMDA, HELOC, and consumer) to low-income borrowers and 82 such loans to moderate-income borrowers. In 2019, the bank originated 28 small business loans to businesses with revenues less than $1 million. The following table provides details on Evergreen's borrower profile lending performance under this criterion for the year 2019.

Borrower Profile Lending Performance			
Plan Year	1/1/2019 – 12/31/2019		
Plan Year Assets*	$1,058,656,500		
	$	**% of Plan Year Assets**	**Points Awarded**
Loans to Low-Income Borrowers	$1,090,000	0.10%	2
Loans to Moderate-Income Borrowers	$2,105,000	0.20%	3
Loans to Small Businesses	$8,949,000	0.85%	0
*Average total assets from Call Report data during Plan year.			

In 2020, the bank originated 40 loans (HELOC and consumer) to low-income borrowers and 78 loans (HMDA, HELOC, and consumer) to moderate-income borrowers. In 2020, the bank originated 69 small business loans to businesses with revenues less than $1 million. The following table provides details on Evergreen's performance relative to the Plan under this criterion for the year 2020.

Borrower Profile Bank Performance			
Plan Year	1/1/2020 – 12/31/2020		
Plan Year Assets*	$1,241,876,500		
	$	**% of Plan Year Assets**	**Points Awarded**
Loans to Low-Income Borrowers	$389,000	0.03%	0
Loans to Moderate-Income Borrowers	$1,279,000	0.10%	1
Loans to Small Businesses	$8,344,000	0.67%	0
*Average total assets from Call Report data during Plan year.			

Community Development Lending

The Plan contains targets for new community development lending, tied to the percentage of the bank's average total assets for each Plan year. Under the Plan, points are awarded for reaching certain levels of new community development loans. The points earned under this criterion are totaled and contribute to determine the bank's annual performance.

The following table summarizes the community development lending goals established by the Plan and the bank's performance.

Community Development Lending Performance							
Annual Plan Goals							
Community Development Lending*	0.30%	0.60%	0.90%	1.20%	1.50%	1.80%	2.10%
Points	2	4	6	8	10	12	14
Bank Performance							
Plan Year		1/1/2018 – 12/31/2018		1/1/2019 – 12/31/2019		1/1/2020 – 12/31/2020	
Plan Year Assets**		$943,216,000		$1,058,656,500		$1,241,876,500	
Community Development Lending		$13,480,750		$7,919,000		$7,419,000	
Community Development Lending*		1.43%		0.75%		0.60%	
Points Awarded		8		4		4	
* As a percent of Plan year assets; ** Average total assets from Call Report data during Plan year.							

Evergreen's community development lending activities, either directly or through partnerships with non-profit community development organizations, provided funding for affordable multi-family rental housing, revitalization of targeted neighborhoods, and assistance to low- and moderate-income people (such as health care and human services) within the bank's assessment area.

Annual Community Development Investments

The Plan contains goals for the bank's community development investment and grant activity. The goals have targets for new investments and grants tied to the percentage of the bank's average total assets for each year. Points are awarded for reaching certain levels of new qualified community development investments and grants. The points earned under this criterion are totaled and contribute to determining the bank's annual performance.

The following table summarizes the annual investment and grant goals established by the Plan and the bank's performance under this criterion.

Community Development Investment Performance							
Annual Plan Goals							
Community Development Investments*	0.50%	0.60%	0.70%	0.80%	0.90%	1.00%	1.10%
Points	2	4	6	8	10	12	14
Bank Performance							
Plan Year		1/1/2018 - 12/31/2018		1/1/2019 - 12/31/2019		1/1/2020 - 12/31/2020	
Plan Year Assets**		$943,216,000		$1,058,656,500		$1,241,876,500	
Community Development Investments		$11,231,999		$11,991,144		$15,133,472	
Community Development Investments*		1.19%		1.13%		1.22%	
Points Awarded		14		14		14	
* As a percent of Plan year assets; ** Average total assets from Call Report data during Plan year.							

Evergreen's primary qualified community development investment activities are purchased mortgage-backed securities, consisting of pools of home mortgage loans to low- and moderate-income borrowers in the assessment area. Other qualified community development investments include maintaining deposits at Community Development Financial Institutions (CDFIs). CDFIs are designated based on their goal of expanding economic opportunity in low-income communities by providing access to financial products and services to residents and businesses. The bank's qualified community development activities also included donations and grants to a number of organizations in the assessment area that support a variety of community services, such as affordable housing groups, food pantries, homeless shelters, and small business credit services. Lastly, qualified investments also include needs-based scholarships to local area high school students.

Cumulative Community Development Investments

The Plan contains measurable goals for Evergreen's cumulative community development investment activity that includes investments purchased during prior periods. Targets for cumulative investments are tied to the percentage of the bank's average total assets of each year of the Plan. Points are awarded for reaching certain levels of qualified cumulative community development investments. The points earned under this criterion are totaled and contribute to determining the bank's annual performance.

The table below summarizes the cumulative investment goals established by the Plan and the bank's performance.

Cumulative Community Development Investment Performance							
Annual Plan Goals							
Cumulative Community Development Investments*	1.35%	1.45%	1.55%	1.65%	1.75%	1.85%	1.95%
Points	2	4	6	8	10	12	14
Bank Performance							
Plan Year		1/1/2018 - 12/31/2018		1/1/2019 - 12/31/2019		1/1/2020 - 12/31/2020	
Plan Year Assets**		$943,216,000		$1,058,656,500		$1,241,876,500	
Cumulative Community Development Investments		$27,474,689		$23,770,059		$29,715,691	
Cumulative Community Development Investments*		2.91%		2.25%		2.39%	
Points Awarded		14		14		14	

The bank's cumulative community development investment activities are primarily qualified mortgage-backed securities, as discussed in the annual investment activity.

Community Development Services

The Plan contains measurable goals for community development service activities. Under this criterion, the Plan assigns points based on the total hours that bank employees provide for community development service activities within the assessment area. Points earned under this criterion are totaled and contribute to Evergreen's annual performance. The following table summarizes the community development service goals and the bank's actual performance under this criterion for the applicable year.

Community Development Service Performance							
Annual Plan Goals							
Service Hours per Number of Employees and Directors	1.4	1.5	1.6	1.7	1.8	1.9	2.0
Points	2	4	6	8	10	12	14

Bank Performance			
Plan Year	1/1/2018 – 12/31/2018	1/1/2019 - 12/31/2019	1/1/2020 - 12/31/2020
Average Number of Employees and Directors	143	154	166
Community Development Service Hours Performed	639	541	668
Service Hours per Number of Employees and Directors	4.47	3.51	4.02
Points Awarded	14	14	14

Fourteen Evergreen employees and Directors participated in numerous qualified community development services during the Plan years. Services were provided through a variety of community development entities, including those that provide affordable housing and those that provide assistance and services to low- and moderate-income residents. Bank employees and Directors served in various roles, including board members, finance committee members, and scholarship committees. Many of the service hours are conducted on an ongoing basis. The bank continues to provide financial literacy through the FDIC's Money Smart Program at local elementary schools in which over 50.0 percent of the families are considered low-income.

Performance Totals

As discussed throughout this evaluation, Evergreen's Plan contains measurable goals that assign points for performance under each goal. The points are aggregated for each year of the Plan to help determine whether the bank substantially met its goals and to assign the overall CRA rating. The rating is based on the total points listed in the Annual Performance Measurements table contained in the Scope of Evaluation section, earlier in this document. The following table summarizes the points assigned for each goal contained in the Plan, for each year. Based on Satisfactory ratings earned in each of the Plan years evaluated, Evergreen's performance rating is deemed to be Satisfactory overall.

Performance Totals			
Criterion	1/1/2018 – 12/31/2018	1/1/2019 - 12/31/2019	1/1/2020 - 12/31/2020
	Points Awarded	Points Awarded	Points Awarded
Loans in Low-Income Census Tracts	3	0	0
Loans in Moderate-Income Census Tracts	1	1	0
Small Businesses Lending in Low-Income Census Tracts	2	0	1
Small Businesses Lending in Moderate -Income Census Tracts	2	2	2
Loans to Low-Income Borrowers	1	2	0
Loans to Moderate-Income Borrowers	1	3	1
Loans to Small Businesses – Revenues under $1 Million	0	0	0
Community Development Lending	8	4	4
Community Development Investments	14	14	14
Community Development Investments-Cumulative	14	14	14
Community Development Services	14	14	14
Total	**60**	**54**	**50**
Rating	**Satisfactory**	**Satisfactory**	**Satisfactory**

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

GLOSSARY

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.

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: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

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: For loans, investments, and services to qualify as community development activities, their primary purpose must:

1. Support affordable housing for low- and moderate-income individuals;
2. Target community services toward low- and moderate-income individuals;
3. Promote economic development by financing small businesses or farms; or
4. Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank 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 it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank'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 § 345.24(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 loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured 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.

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).

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 the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

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.

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).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

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 other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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 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 and less than 80 percent in the case of a geography.

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

Nonmetropolitan Area (also known as **non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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.

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

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

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. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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.

Upper-Income: 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.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.