

# PUBLIC DISCLOSURE

November 20, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank in Pinckneyville Charter Number 13975

210 South Main Street Pinckneyville, IL 62274

Office of the Comptroller of the Currency 500 North Broadway, Suite 1700 St. Louis, MO 63102

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 First National Bank in Pinckneyville's (FNB) performance in the state of Illinois. The major factors that support this rating include:

- FNB's loan-to-deposit ratio (LTD) is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of the bank's loans are inside its assessment area (AA).
- The bank's distribution of loans to individuals of different income levels is reasonable throughout its AA.

#### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

FNB's quarterly LTD ratio averaged 47.1 percent over the 12-quarter period ending December 31, 2021. Over the same period, the LTD ratio ranged from a low of 39.8 percent to a high of 56.2 percent. This is comparable to the LTD ratios of two other financial institutions of similar asset size and geographic location, whose quarterly averages ranged from 34.4 percent to 65.1 percent over the same evaluation period.

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

A majority of the bank's loans are inside its AA. In a sample of 100 loans, the bank originated 86 percent of its total loans inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

		Lending	g Inside a	nd Outsi	de of the A	ssessment	Area			
	1	Number	of Loans			Dollar A	Amount o	of Loans \$	(000s)	
Loan Category	Insi	de	Outs	ide	Total	Insid	le	Outs	Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	43	86.0	7	14.0	50	3,626	84.4	671	15.6	4,297
Consumer	43	86.0	7	14.0	50	407	83.2	82	16.8	489
Total	86	86.0	14	14.0	100	4,033	84.3	753	15.7	4,786

Source: Evaluation Period 1/1/2019 – 12/31/2021 Bank Data

Due to rounding, totals may not equal 100.0%

## **Description of Institution**

FNB is an intrastate financial institute headquartered in Pinckneyville, Illinois. FNB is wholly owned by First Perry Bancorp, Inc., a one-bank holding company also located in Pinckneyville. In addition to FNB, First Perry Bancorp, Inc. owns a FNB affiliate, First National Insurance Services, Inc., also located in Pinckneyville. FNB has two automated teller machines (ATM), one located at the main office drive-thru that was replaced with a full-service ATM from a cash withdrawal-only ATM in December 2021. The other is located in the insurance office.

There were no affiliate or subsidiary activities considered in this evaluation. Since the last evaluation the bank has not opened or closed any branches and there have been no major changes in the bank's corporate structure, including merger or acquisition activities.

As of December 31, 2021, the bank had total assets of \$148.5 million, total deposits of \$119.3 million, and tier 1 capital of \$14.8 million or 24.6 percent of total risk-weighted assets. The bank's total loans were \$48.8 million or 32.9 percent of total assets.

Loan portfolio composition as of December 31, 2021, includes the following:

Loan Type	Amount Outstanding \$(000s)	Percentage of Loan Portfolio
Commercial Loans	\$8,905	18.2%
Residential Loans	\$34,470	70.6%
Agricultural Loans	\$1,381	2.8%
Consumer Loans	\$3,931	8.1%
Other Loans	\$157	0.3%
Total Loans	\$48,844	100.0%
Source: 12/31/2021 FFIEC Call Report		

The bank offers a variety of banking products to consumers and businesses. The bank's primary business strategy is to concentrate on lending products representative of community needs, which is primarily home mortgage and consumer loans. Deposit products consist of checking, savings, money market, certificates of deposit, health savings accounts, and individual retirement accounts. Lending products include home mortgage, commercial, consumer, and agriculture loans. The bank's services also include debit cards, online and mobile banking with bill pay, and mobile deposits.

For CRA purposes, the bank identified one non-MSA AA in the state of Illinois. The AA consists of four middle-income census tracts (CT) in western Perry County (CTs 301, 302, 303, 304). The CTs were considered distressed due to unemployment during the evaluation period. There are no low- or moderate-income (LMI) CTs in the AA. Although FNB's AA represents only a portion of Perry County, it is reasonable due to the bank's size and only office being located in the small, rural town of Pinckneyville, Illinois.

FNB's last CRA performance evaluation was on July 16, 2019. Utilizing Small Bank CRA examination procedures, the OCC concluded that FNB's performance was rated "Satisfactory." There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AA.

## **Scope of the Evaluation**

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

The scope of this evaluation includes an assessment of FNB under the small bank performance criteria, which consists of the lending test. This test evaluates the bank's record of meeting the credit needs of its AA through lending activities. The evaluation period for the lending test is January 1, 2019 through December 31, 2021.

Based on our review of all loans originated during the evaluation period, we determined the bank's primary loan products to be home mortgage loans and consumer loans. To evaluate lending performance, we selected a random sample of 50 mortgage loans and 50 consumer loans originated between January 1, 2019 and December 31, 2021. We compared these loans to the 2015 American Community Survey (ACS) Census, 2021 Dun & Bradstreet (D&B) data, and the 2021 aggregate Home Mortgage Disclosure Act (HMDA) data.

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

For purpose of this evaluation, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. Perry County, IL AA was selected for a full-scope review. Refer to the "Scope" section under the State Rating for details regarding how the full-scope AA was selected. Refer to Appendix A, Scope of Examination, for more information.

# **Ratings**

FNB's overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from the bank's observed performance under the CRA small bank lending test, as well as related performance context information from the bank's AA. Refer to the "Scope" section under each State Rating section for details regarding how the area was weighted in arriving at the respective rating.

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

Pursuant to 12 CFR 25.28(c) in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 Consumer Financial Protection Bureau, 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:

- FNB's LTD ratio is reasonable given the bank's size, financial condition, and level of local competition.
- A majority of the bank's loans are inside its AA.
- The bank's distribution of loans to individuals of different income levels is reasonable throughout its AA.

#### **Description of Institution's Operations in Illinois**

FNB has one AA that consists of four CTs in western Perry County, Illinois. All four CTs in the AA are designated middle-income. The CTs were considered distressed due to unemployment during the evaluation period. There are no LMI CTs in the AA.

#### Competition

Competition for deposits is moderate due to the number and size of the financial institutions within the AA. According to the June 30, 2021, FDIC Deposit Market Share Report, the bank's deposits in the AA totaled \$114.8 million, representing 100 percent of the bank's total deposits. The AA has a total of five deposit-taking institutions operating seven branches. The bank ranked first in the AA with a deposit market share of 24.8 percent.

#### Geographic Distribution of the Population

According to the 2015 ACS Census data, the population in the bank's AA was 15,313. The entire AA is comprised of middle-income CTs. The CTs were considered distressed due to unemployment during the evaluation period.

#### Family Distribution by Income Level

According to the same data, there were 3,377 families in the AA. The distribution of families by income level was 621 (18.4 percent) low income, 581 (17.2 percent) moderate income, 900 (26.7 percent) middle income, and 1,275 (37.8 percent) upper income.

#### Employment and Economic Factors

According to the Bureau of Labor Statistics report, the unemployment rates for Perry County ranged from a low of 4.9 percent in 2019 to a high of 9.5 percent in 2020. The unemployment rate increased

significantly in 2020 due to COVID-19 pandemic-related factors but is starting to stabilize. However, employment has not returned to pre-pandemic levels. The state of Illinois and national averages noted similar trends.

Area	2019	2020	2021						
Perry County	4.9%	9.5%	6.1%						
State of Illinois	4.0%	9.4%	6.1%						
National	3.7%	8.1%	5.4%						
Source: US Department of Labor; Bureau of Labor Statistic. Rates are not seasonally adjusted.									

In 2021, the percentage of families in the AA living below the poverty level was 11.3 percent. Low-income households totaled 28.3 percent and moderate-income households totaled 14.9 percent.

The top employment sectors in the AA are Education and Health Services, Professional and Business Services, Government, Retail Trade, and Manufacturing. Some of the major employers in the area include Pinckneyville Correctional Center, Pinckneyville Community Hospital, and Pinckneyville School District.

#### Housing Characteristics and Home Affordability

The 2015 ACS Census reported total housing units of 6,421 in the AA. Of the total number of housing units, 4,010 (62.5 percent) were owner occupied, 1,280 (19.9 percent) were renter occupied, and 1,131 (17.6 percent) were vacant. The median age of housing stock is 54 years. Older homes often cost more to maintain, frequently require significant repairs to meet building code requirements, and are typically less energy efficient. These factors add to the overall cost of homeownership and can have a negative impact on home affordability for LMI individuals.

Based on information in the table below, low-income families in the AA earned less than \$32,100 (2019) and up to \$33,350 (2021), and moderate-income families earned from \$32,100 (2019) to \$53,360 (2021).

	Median Family Income Ranges Illinois Non-MSA Median Family Income												
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%									
2019 (\$64,200)	<\$32,100	\$32,100 to <\$51,360	\$51,360 to <\$77,040	≥\$77,040									
2020 (\$65,800)	<\$32,900	\$32,900 to <\$52,640	\$52,640 to <\$78,960	≥\$78,960									
2021 (\$66,700)	<\$33,350	\$33,350 to <\$53,360	\$53,360 to <\$80,040	≥\$80,040									
Source: FFIEC													

According to Realtor.com data, the median housing value in the AA ranged from \$60,500 in 2019 to \$77,400 in 2021, an increase of \$16,900 (27.9 percent). This is far greater than the \$2,500 (3.9 percent) increase in the Federal Financial Institution's Examination Council (FFIEC) median-family income over the same period as reflected in the table above.

One method used to determine housing affordability assumes a maximum monthly principal and interest payment of no more than 30 percent of the applicant's income. This calculates a maximum monthly mortgage payment of \$834 for low-income borrowers and \$1,334 for moderate-income borrowers.

Assuming a 30-year mortgage with a 5 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment based on the Realtor.com median-listing price would be \$415. This illustrates that LMI borrowers could qualify for a mortgage loan, but likely be challenged when accounting for the additional expenses mentioned above.

#### **Community Contacts**

We reviewed a community contact from a representative of an organization in Carbondale Illinois that advocates for small businesses in Pinckneyville and other local counties. The contact identified financial education workshops and flexible loan programs for small businesses as the primary needs in the local communities. In general, financial institutions have a good working relationship with individuals and businesses in the communities they serve.

# **Demographics**

The following table provides a summary of the demographics, including housing and business information for the AA.

#### Perry County, IL

			e Assessment County, IL	t Area			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	4	0.0	0.0	100.0	0.0	0.0	
Population by Geography	15,313	0.0	0.0	100.0	0.0	0.0	
Housing Units by Geography	6,421	0.0	0.0	100.0	0.0	0.0	
Owner-Occupied Units by Geography	4,010	0.0	0.0	100.0	0.0	0.0	
Occupied Rental Units by Geography	1,280	0.0	0.0	100.0	0.0	0.0	
Vacant Units by Geography	1,131	0.0	0.0	100.0	0.0	0.0	
Businesses by Geography	726	0.0	0.0	100.0	0.0	0.0	
Farms by Geography	65	0.0	0.0	100.0	0.0	0.0	
Family Distribution by Income Level	3,377	18.4	17.2	26.7	37.8	0.0	
Household Distribution by Income Level	5,290	28.3	14.9	17.7	39.1	0.0	
Median Family Income Non-MSAs - IL		\$59,323	Median Hous	sing Value		\$78,845	
	Median Gross Rent						
			Families belo	w poverty leve	el	11.3%	

Source: 2015 ACS and 2021 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.

# **Scope of Evaluation in Illinois**

We performed a full-scope review of the bank's only AA. Since the AA doesn't contain LMI CTs, additional weight was given to lending to borrowers of different incomes since it represents a better measure of the bank's lending performance. Refer to table in Appendix A for more information.

#### LENDING TEST

The bank's performance under the Lending Test in Illinois is rated Satisfactory.

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

## Distribution of Loans by Income Level of the Geography

An analysis of the geographic distribution of loans would not be meaningful as there are no LMI CTs in the bank's AA.

#### Home Mortgage Loans

Refer to Table O in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

#### Consumer Loans

Refer to Table U in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

#### Lending Gap Analysis

A lending gap analysis wasn't performed because the analysis would not be meaningful, as there are no LMI CTs in the AA.

# Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

#### Home Mortgage Loans

In evaluating the borrower distribution of home mortgage loans, we considered the percentage of families living at or below the poverty level, the median housing value in relation to LMI levels, the median age of housing stock in the AA, and the strong level of competition faced by the bank. In addition, on the eastern half of the CT, closer to the populated area, are three other financial institutions. All these factors impacted the bank's ability to lend to LMI families.

Refer to Table P in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

The distribution of home mortgage loans among individuals of different income levels was reasonable. The bank's percentage of home mortgage loans to low-income borrowers was in line with the percentage of low-income families and above the aggregate percentage of all reporting lenders. The bank's percentage of home mortgage loans to moderate-income borrowers was above the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

#### Consumer Loans

Refer to Table V in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

The distribution of consumer loans among individuals of different income levels is reasonable. The percentage of consumer loans originated to low-income borrowers was slightly below the percentage of low-income households but exceeded the percentage of moderate-income households.

#### **Responses to Complaints**

The bank did not receive any CRA-related complaints 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:	01/01/2019 to 12/31/2021				
Bank Products Reviewed:	Home Mortgage Loans, Const	umer Loans			
Affiliate(s)	Affiliate Relationship	Products Reviewed			
None	Not Applicable	Not Applicable			
List of Assessment Areas and Type of	of Examination				
Rating and Assessment Areas	Type of Exam	Other Information			
Illinois					
Pinckneyville AA	Full-Scope	Perry County – CTs 301, 302, 303, 304			

# **Appendix B: Summary of State Ratings**

RATINGS: First Nat	tional Bank in Pinckneyville
Overall Bank:	Lending Test Rating
First National Bank in Pinckneyville	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 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 United States Bureau of the Census in the most recent decennial census.

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

**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 30<sup>th</sup> 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 O.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- **Table P.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- **Table U.** Assessment Area Distribution of Consumer Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Asse	Cable O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography   2019-2021																		
	Total Home Mortgage Loans Low-Income Tracts			Tracts	Moderate-Income Tracts Middle-Income Tracts				<b>Upper-Income Tracts</b>			Not Available-Income Tracts							
Assessment Area:	#	\$			( )cciinied		00 0	% of Owner- Occupied Housing Units		00 0	_		Aggregate	% of Owner- Occupied Housing Units		00 0	% of Owner- Occupied Housing Units		Aggregate
Pinckneyville AA	50	4,200	100.0	159	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	50	4,200	100.0	159	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table P: Asse	Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2019-2021													2019-2021					
	Total Home Mortgage Loans Low-Income Borrowers			Moderate-Income Mi Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers						
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Pinckneyville AA	50	4,200	100.0	159	18.4	16.0	6.9	17.2	22.0	20.8	26.7	16.0	21.4	37.8	46.0	35.2	0.0	0.0	15.7
Total	50	4,200	100.0	159	18.4	16.0	6.9	17.2	22.0	20.8	26.7	16.0	21.4	37.8	46.0	35.2	0.0	0.0	15.7

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table U: Ass	essm	ent Area	Distributi	on of Consu	mer Loans	by Income Ca	tegory of	the Geograph	y				2019-2021
	Total Consumer Loans			Low-Incom	ne Tracts	Moderate-Inco	ome Tracts	Middle-Incom	e Tracts	Upper-Incom	e Borrowers	Not Available-Income Tracts	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans						
Pinckneyville AA	50	547	100	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
Total	50	547	100	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
Source: 2015 ACS	G; 01/0.	1/2019 - 12	2/31/2021 Ban	k Data.					•	•			

Table V: Ass	essmo	ent Area	Distributi	ion of Consu	mer Loans	by Income Ca	tegory of	the Borrower					2019-2021
	Total Consumer Loans		ner Loans	s Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Incom	e Borrowers	Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Pinckneyville AA	50	547	100	28.3	22.0	14.9	28.0	17.7	28.0	39.1	22.0	0.0	0.0
Total	50	547	100	28.3	22.0	14.9	28.0	17.7	28.0	39.1	22.0	0.0	0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Due to rounding, totals may not equal 100.0%