# INTERMEDIATE SMALL BANK

# **PUBLIC DISCLOSURE**

February 16, 2021

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Federal Saving Bank Charter Number 716195 4000 W. Diversey Avenue Chicago, Illinois 60639

Office of the Comptroller of the Currency

Chicago Field Office 2001 Butterfield Rd., 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: Outstanding
The community development test is rated: Satisfactory

The major factors that support this rating include:

- The Federal Savings Bank's (TFSB or bank) geographic distribution of loans is excellent, based on performance in the bank's assessment area (AA).
- The bank's distribution of loans to individuals of different income levels is excellent.
- The bank's loan-to-deposit (LTD) ratio is more than reasonable.
- The bank's Community Development (CD) activities reflect adequate responsiveness to community development needs.
- While a majority of the bank's loans are originated or purchased outside of its AA, this is reasonable given the bank's nationwide lending strategy.
- The bank has not received any CRA related complaints.

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

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

TFSB's quarterly average LTD ratio on a bank-wide basis for the period from March 31, 2017, to September 30, 2020, was 123 percent. The most recent LTD ratio, as of September 30, 2020, was 94 percent. We reviewed the LTD ratios of four banks with similar mortgage banking business strategies located in TFSB's AA, and determined that TFSB had the highest average LTD ratio. The other banks' LTD ratios ranged from 82 percent to 93 percent.

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

A substantial majority of TFSB's loans are originated or purchased outside of its AA.

TFSB originated or purchased 10.1 percent of its loans inside its AA during the evaluation period.

TFSB's poor percentage of lending within its AA is reflective of its business strategy. The bank's business strategy is to be a monoline mortgage lender with a nationwide presence. To accomplish this strategy, the bank has 40 loan production offices (LPOs) in 20 states, including three in Illinois. The bank originates and sells mortgage loans, along with servicing rights, to various investors. Almost all of its \$1.2 billion loan portfolio is held for sale, with another \$111 million in loans held for investment. A

strategy of selling loans immediately after origination allows the bank to quickly originate more mortgages. During the evaluation period, the bank sold approximately 76,000 loans totaling \$18 billion.

Lending Inside and Outside of the Assessment Area													
	1	Number	of Loans		Total #	Dollar A	)0s)	T 1					
Loan Category	Insi	de	Outs	ide		Insi	de	Outside	Total				
	#	%	#	%		\$	%	\$	%	\$(000s)			
Home Mortgage	7,967	10.1	71,183	89.9	79,150	2,034,628	8.4	22,120,193	91.6	24,154,822			

Source: Bank Data

Due to rounding, totals may not equal 100%

# **Description of Institution**

TFSB is a \$1.4 billion intrastate financial institution headquartered in Chicago, Illinois. \$1.2 billion, or 90 percent, of the bank's assets are real estate loans. As of December 31, 2020, the bank's tier one capital totaled \$160 million. The bank is a wholly owned subsidiary of National Bancorp Holdings, Inc, a one-bank holding company located in Chicago, Illinois with no other assets.

TFSB's primary loan products are be 1-4 family residential real estate loans, with an emphasis on Federal Housing Authority (FHA) and Veteran's Administration (VA) guaranteed loans. Retail residential real estate loans comprise 99 percent of the bank's loan portfolio, which includes purchase and refinance loans. There is a negligible number and dollar volume of commercial and personal loans.

As of December 31, 2020, TFSB had two full-service retail branches and four Automated Teller Machines (ATMs). The main branch in Chicago, Illinois, and this location has two ATMs that only dispense cash and are only accessible during bank hours. The other branch is in Lake Forest, Illinois, and this location has one ATM that only dispenses cash but is accessible 24 hours per day. The bank recently added another ATM in Oak Brook, Illinois that only dispenses cash and is only accessible during office hours. In addition, the bank has 40 LPOs nationwide, an increase of 17 offices since our last CRA Public Evaluation. Since the last Public Evaluation, the bank added three LPOs in its AA, although one of those has since closed. Other LPOs are located in Arizona, California, Colorado, Delaware, Florida, Indiana, Kansas, Maryland, Massachusetts, Michigan, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, Tennessee, Texas, and Virginia.

For CRA purposes, TFSB has one AA. The AA is in the state of Illinois and includes all of Cook, DuPage, and Lake Counties, which contain 1,689 census tracts (CTs). Of these CTs, 16 percent are low-income, 25 percent are moderate-income, 26 percent are middle-income, 32 percent are upper-income, and 1 percent have no income level designation.

Competition in TFSB's AA remains high. As of June 30, 2020, there were 122 financial institutions with 1,764 offices in the AA. The top ten are large financial intuitions, which hold approximately 80 percent of the deposit market share. TFSB only has 0.21 percent of the deposit market share.

TFSB has the resources and financial strength to meet the credit needs of its communities. There are no legal or financial factors impeding the bank's ability to help meet the credit needs in its AA. TFSB received a "Satisfactory" rating for its prior CRA Public Evaluation, which was dated March 13, 2017.

# **Scope of the Evaluation**

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

TFSB was evaluated using Intermediate Small Bank CRA Evaluation procedures, which entails evaluating the bank's record in meeting the credit needs of its delineated AA. We evaluated the bank's record of lending and CD activities during the evaluation period.

The evaluation period for the lending test is January 1, 2017, through December 31, 2020. Our conclusions regarding TFSB's lending performance during the evaluation period are based on a single identified primary product type, specifically residential mortgage loans as reported on the bank's Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR). This product type accounted for 99 percent of lending activity during the evaluation period.

For the lending test, TFSB's performance during the evaluation period was compared to 2015 American Community Survey (ACS) U.S. Census and 2020 HMDA Aggregate data, which serves as our primary comparator to the bank's lending performance.

The evaluation period for the CD Test, including CD loans, investments/donations, and services was January 1, 2019, through December 31, 2020. This is due to TFSB's asset size increasing to a level that triggered the CD test requirement beginning January 1, 2019.

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

In each state where the bank has a branch, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank-delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank-delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

#### **Ratings**

TFSB's overall rating is based of the state of Illinois rating.

The lending test review considered only the retail home mortgage portfolio, as that portfolio represents 99 percent of all of TFSB's loans. The bank's low ratio of loans inside its AA, compared to outside of its AA, was mitigated by its nationwide mortgage banking business strategy.

The MMSA rating and state ratings are based on performance in all of TFSB's AA. Refer to the "Scope" section under each state and MMSA Rating section for detail regarding how the areas were weighted in arriving at the respective ratings.

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

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, 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 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.

Charter Number:716195

# **State Rating**

#### State of Illinois

CRA rating for the State of Illinois<sup>1</sup>: Satisfactory
The Lending Test is rated: Outstanding
The Community Development Test is rated. Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

• The bank's geographic distribution of loans is excellent.

- The bank's distribution of loans to individuals of different income levels is excellent.
- The bank's Community Development (CD) activities reflect adequate responsiveness to community development needs.
- The bank has not received any CRA related complaints.

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

As of December 31, 2020, both of TFSBs retail branches and all four of its ATMs were located in Illinois. The bank's main branch in Chicago, Illinois, and the other branch is in Lake Forest, Illinois. Three of the four ATMs are located at these branches, and the other is at one of the bank's LPOs in Oak Brook, Illinois.

As part of the evaluation process, we reviewed one recent community contact that primarily works with individuals in TFSB's AA. We also contacted two other community contacts serving individuals in the bank's AA. These contacts detailed opportunities for banks to participate in providing loans and services to low- and moderate-income individuals and households, particularly in the area of affordable housing and down-payment assistance.

<sup>&</sup>lt;sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

#### Chicago MSA AA

Table A – De	mographic I	nformation	of the Assessn	nent Area		
Asses	ssment Area:	: TFSB Stat	te of Illinois A	A		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,689	15.7	24.9	26.2	32.2	0.9
Population by Geography	6,869,703	11.7	25.5	29.3	33.2	0.3
Housing Units by Geography	2,794,794	11.8	24.1	28.9	34.8	0.4
Owner-Occupied Units by Geography	1,535,778	5.3	19.7	32.9	41.9	0.2
Occupied Rental Units by Geography	987,690	18.5	29.7	24.7	26.5	0.7
Vacant Units by Geography	271,326	24.5	28.5	22.1	24.3	0.5
Businesses by Geography	489,233	5.2	16.3	27.6	50.3	0.6
Farms by Geography	6,097	4.3	17.9	32.9	44.7	0.1
Family Distribution by Income Level	1,603,724	25.0	16.4	17.9	40.6	0.0
Household Distribution by Income Level	2,523,468	26.8	15.5	16.7	41.0	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Hous	Median Housing Value		
Median Family Income MSA - 29404		\$87,137	Median Gross	\$1,053		
Lake County-Kenosha County, IL-WI			Families Belo	evel	11.4%	

Source: 2015 ACS and 2019 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**

TFSB identified two AAs, both of which are located within the state of Illinois. One AA includes all of Cook and DuPage counties, which are part of the Chicago-Naperville-Evanston, IL Metropolitan Division. The other includes all of Lake County, which is part of the Lake County-Kenosha County, IL-WI Metropolitan Division. Both AAs are part of the Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area. As a result, we combined the two AAs when evaluating the bank's performance, and we performed a full-scope review of this AA. In addition, due to the bank's strategic plan, the examiners put more weight on lending performance within the bank's AA than on the percentage of the bank's lending that occurred inside its AA compared to outside its AA. Refer to Appendix A for more information.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

#### **LENDING TEST**

TFSB's performance under the Lending Test in the state of Illinois is rated Outstanding.

#### **Conclusions for Illinois Receiving a Full-Scope Review**

Based on a full-scope review, TFSB's lending performance in the state of Illinois is excellent.

#### Distribution of Loans by Income Level of the Geography

TFSB's geographic distribution of loans in the state of Illinois is excellent.

#### Home Mortgage Loans

Refer to Table O in the State of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of home mortgage loan that TFSB originated and purchased.

TFSB's geographic distribution of home mortgage loans is excellent. The percentage of the bank's home mortgage loans that were originated or purchased in low-income CTs was above the percentage of the AA's owner-occupied housing units located in low-income CTs, and the percentage of aggregate lending that occurred in low-income CTs. The percentage of the bank's home mortgage loans that were originated or purchased in moderate-income CTs significantly exceeded both the percentage of the AA's owner-occupied housing units located in moderate-income CTs, and the percentage of aggregate lending that occurred in moderate-income CTs.

#### Distribution of Loans by Income Level of the Borrower

TFSB's distribution of loans to individuals of different income levels in the state of Illinois is excellent, given the product lines offered by the bank.

#### Home Mortgage Loans

Refer to Table P in the State of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of home mortgage loan that TFSB originated and purchased.

TFSB's distribution of home loans to individuals of different income levels is excellent. While the percentage of the bank's home mortgage loans to low-income borrowers was well below the percentage of the AA's families that are low-income, it exceeded the percentage of aggregate lending to low-income borrowers. The percentage of the bank's home mortgage loans to moderate-income borrowers significantly exceeded both the percentage of the AA's families that are moderate-income, and the percentage of aggregate lending to moderate-income borrowers.

Based on information in Table A, low-income families in the AA earn no more than \$43,600 annually, depending on where they live in the AA, and moderate-income families earn between \$37,500 and \$69,700 annually, depending on where they live in the AA. 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 results in a maximum monthly mortgage payment of \$1,090 for low-income borrowers, and \$1,743 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MMSA median housing value would be \$1,368. Low-income borrowers would be challenged to afford a mortgage loan in this AA.

#### **Responses to Complaints**

There were no complaints related to TFSB's CRA performance during this evaluation period.

#### COMMUNITY DEVELOPMENT TEST

TFSB's performance under the Community Development Test in the state of Illinois is rated Satisfactory.

# Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review of community development activities in 2019 and 2020, TFSB exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of opportunities for community development in the bank's AA.. CD loans and investments made during the evaluation period totaled \$5.3 million, or 3.3 percent of tier one capital.

#### **Number and Amount of Community Development Loans**

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate TFSB's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans												
A sa casamont A was	Total											
Assessment Area	#	% of Total #	\$(000s)	% of Total \$								
Illinois	30	100	150	100								

The level of qualified CD loans in the AA exhibits adequate responsiveness to the needs of the community. During the evaluation period, TFSB originated 30 qualified CD loans in the AA. The loans totaled \$150,000, or 0.09 percent of tier 1 capital. All 30 loans were down payment assistance loans made under the TFSB Community Second Program. Each borrower received \$5,000 towards down payment and closing cost assistance, which carries no interest and is forgivable after five years of primary owner occupancy. All loans under this program were made to low- or moderate-income borrowers.

#### **Number and Amount of Qualified Investments**

The Community Development Investment Table shown below sets for the information and data used to evaluate TFSB's level of CD investments.

	Qualified Investments													
Assessment Area		Prior Period*		Current Period			Unfunded Commitments**							
	#	\$(000s)	#	\$(000s)	#	% of Total #	\$(000s)	% of Total \$	#	\$(000s)				
Illinois	0	0	1	5,143	1	100	5,143	100	0	0				

<sup>\*</sup> Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The level of qualified CD investments reflects adequate responsiveness to the needs of the community. During the evaluation period, TFSB made one investment in its AA totaling \$5.1 million. The security was purchased from Fannie Mae and consists of mortgages to low- and moderate-income individuals. The investment equals 3.2 percent of tier 1 capital

TFSB bank made a \$3,000 donation to Realty of Chicago, which provides services to low- and moderate-income individuals. These services include home buying assistance in low- and moderate-income neighborhoods as well as community service events where agents provide resources for low- and moderate-income families.

### **Extent to Which the Bank Provides Community Development Services**

TFSB provides a reasonable level of community development services. Bank personnel volunteer in leadership roles (i.e. treasurer, board member) for organizations that focus on promoting community service, literacy, and economic development to low- and moderate-income individuals and families. Bank personnel provided 230 hours of qualified CD services during 2019 and 2020.

# **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 MSA(s) and non-MSA(s) 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:	01/01/2017-12/31/2020 for th	e Lending test. 01/01/2019-12/31/2020 for the CD									
	test.										
Bank Products Reviewed:		unity development loans, qualified investments,									
	community development services										
Affiliate(s)	Affiliate Relationship	Products Reviewed									
None											
List of Assessment Areas and Type of	of Examination										
Rating and Assessment Areas	Type of Exam	Other Information									
MMSA(s)											
Chicago-Naperville-Elgin, IL-IN-WI MSA.	Full-Scope	The bank's AA consists of all of Cook, DuPage, and Lake counties.									
Name of State											
Illinois	Full-Scope										

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

	RATINGS - The F	ederal Saving Bank	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank
The Federal Saving Bank	Outstanding	Satisfactory	Satisfactory

<sup>(\*)</sup> The Lending Test and Community Development Test carry equal weight in the overall rating.

# **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 moderage-income 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.

#### **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.
- Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography The percentage distribution of the number of small 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 arrogate 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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography
   The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size)

throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- **Table T.** Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm 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: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2017-20

	Tota	l Home Mo	ortgage	Loans	Low-I	ncome '	Tracts	Moderat	Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$		Overall Market			% of Aggregate Lending	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		% of Aggregate Lending	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			
TFSB State of Illinois AA	7,967	2,034,628	100.0	219,151	5.3	6.9	4.2	19.7	23.4	16.0	32.9	34.7	30.8	41.9	34.8	48.9	0.2	0.1	0.2	
Total	7,967	2,034,628	100.0	219,151	5.3	6.9	4.2	19.7	23.4	16.0	32.9	34.7	30.8	41.9	34.8	48.9	0.2	0.1	0.2	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available. Note: Due to rounding, totals may not equal 100.0%.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2017-20

	Total Home Mortgage Loans				Low-In	come Bo	orrowers		Moderate-Income Borrowers			Middle-Income Borrowers			ncome E	Borrowers	Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% of Aggregate Lending	% Families	% Bank Loans	% of Aggregate Lending	% Families	% Bank Loans	% of Aggregate Lending	% Families	% Bank Loans	% of Aggregate Lending	% Families	% Bank Loans	% of Aggregate Lending
TFSB State of Illinois AA	7,967	2,034,628	100.0	219,151	25.0	7.8	5.2	16.4	25.4	15.4	17.9	27.8	20.2	40.6	33.3	44.0	0.0	5.7	15.1
Total	7,967	2,034,628	100.0	219,151	25.0	7.8	5.2	16.4	25.4	15.4	17.9	27.8	20.2	40.6	33.3	44.0	0.0	5.7	15.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.

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