



PUBLIC DISCLOSURE

June 30, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Crystal Lake Bank & Trust Company, N. A.
Charter Number 23574

70 North Williams Street
Crystal Lake, IL 60014

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Chicago Field Office
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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

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including the low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Crystal Lake Bank and Trust Company, N.A. (CBLT) issued by the OCC, the institution's supervisory agency, for the evaluation period ending 5/31/2014. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

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

The following table indicates the performance level of **Crystal Lake Bank & Trust Company, N. A.** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Crystal Lake Bank and Trust Company Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The bank's lending levels reflected excellent responsiveness to the assessment area (AA) residential and small business credit needs.
- The distribution of lending to borrowers reflects excellent penetration among retail customers of different income levels and businesses of different sizes.
- The bank's community development (CD) lending activity had a positive impact on the Lending Test rating
- The bank has made a significant level of CD investments and has exhibited excellent responsiveness to credit and community economic development needs.
- CBLT's delivery systems are accessible to individuals of different income levels within the bank's AA, and CLBT provided an excellent level of CD services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Census Tract (CT) – 2010: Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau’s Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or

- b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 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.

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 MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Median Family Income (MFI) – 2010: The median income derived from the United States Census Bureau’s American Community Survey data every 5 years and used to determine the income level category geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated Area: A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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 One 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.

Description of Institution

CLBT is a full-service intrastate bank headquartered in Crystal Lake, IL, which is at the northwest corner of the Chicago-Naperville-Joliet Metropolitan Division. As of December 31, 2013, total assets were \$808 million and Tier One Capital was \$80 million. The bank is wholly owned by Wintrust Financial Corporation (Wintrust).

Wintrust is a financial services holding company based in Rosemont, IL, with assets over \$18 billion. Wintrust, through its financial subsidiaries, provides community-oriented, personal and commercial bank services, wealth management services, commercial insurance premium financing, mortgage origination, short-term accounts receivable financing, and administrative services, such as data processing of payrolls, billing and treasury management services. Wintrust's market area includes the greater Chicago, IL and southern Wisconsin metropolitan areas through its 15 wholly owned banking subsidiaries. Wintrust also provides a range of wealth management services through three separate subsidiaries, operating under one name, Wintrust Wealth Management. Since, 1931, Chicago-based Wayne Hummer Investments has been providing a full-range of investment products and services tailored to meet the specific needs of individual investors throughout the country. Great Lakes Advisors, a registered investment adviser, provides portfolio management for individuals, as well as institutional investors. The Chicago Trust Company, N.A. provides trust and investment products and services to individuals and businesses in Wintrust community bank markets. Wintrust offers specialty lending through indirect non-bank subsidiaries and divisions of its banks. First Insurance Funding Corp. (FIRST), and its subsidiary Broadway Premium Funding Corp. (Broadway), is in the business of originating financing for the payment of commercial insurance premiums on a national basis. Tricom, Inc. provides short-term accounts receivable financing, value-added out-sourced administrative services to clients in the temporary staffing industry throughout the United States and payroll services to small businesses.

CLBT is an interstate bank, currently with six full-service banking centers and two limited-service drive up locations. One full-service branch, located on Northwest Highway in Crystal Lake, was added since the last CRA performance evaluation. The bank also operates eight deposit-taking ATMs, one at each facility. CLBT's business strategy is to remain a true community bank, serving the deposit and lending needs of its local community with products designed for their needs.

CLBT offers a variety of consumer, home equity, and commercial loan products to the individuals and families in its AA. As of December 31, 2013, the loan portfolio totaled \$587 million, and represented 73 percent of the bank's total assets. The composition of the loan portfolio was as follows:

Loan type	Dollar Amount (000's)	Percent of Total Loans
Construction, Land Development, and other Land Loans	24,839	4.24
Secured by Farmland	1,125	0.19
1-4 Family Residential	54,022	9.21
Multifamily Residential	14,715	2.51
Nonfarm, Nonresidential Real Estate	167,092	28.49
Commercial and Industrial	228,994	39.04
Consumer	94,804	16.16
Other	932	0.16
Total Loans	586,523	100.00

Residential mortgage lending is primarily provided to bank customers through Wintrust Mortgage Company (Wintrust Mortgage), a subsidiary of bank affiliate Barrington Bank and Trust Co. (Barrington). The bank has requested that lending activity of Wintrust Mortgage Company inside the bank's AA be included in the analysis of lending performance during this performance evaluation. When the affiliate loans are added in, small business loans continue to be the loan type with the largest volume of loan originations and purchases during the review period, followed by residential mortgage loans and consumer loans in that order.

There are no known legal or financial factors impeding the bank's ability to meet the credit needs of its community. CLBT has the resources needed to help meet the legitimate credit needs of its AA. CLBT was rated Outstanding at the prior CRA evaluation dated March 14, 2011.

Scope of the Evaluation

Evaluation Period/Products Evaluated

For this performance evaluation, the bank's performance was assessed under the Lending, Investment, and Service tests. In evaluating the bank's lending performance, we reviewed residential mortgage loans filed under the Home Mortgage Disclosure Act (HMDA). We also considered small business loans collected and reported under the Community Reinvestment Act. The evaluation period for the Lending Test was January 1, 2011 through December 31, 2013, except for community development loans, which were evaluated from March 1, 2011 through May 31, 2014. In this evaluation, at the bank's request, we also considered HMDA loans reported by CLBT's affiliate, Barrington that were located within CLBT's assessment area (AA).

The evaluation of data was completed using two separate analysis periods due to changes in the census data available. HMDA data, as well as loans reported on the CRA Loan Application Register that were originated and purchased in 2011 were evaluated using 2000 census data and compared to 2011 peer data. HMDA and CRA loans originated and purchased in 2012 through 2013 were analyzed using 2010 census data. HMDA and small business loan data was compared to 2012 peer data, which was the most recent peer data available. There was no peer data available for comparison to the bank's consumer loan data. Market share data was not considered meaningful and therefore was not analyzed in those instances where the market share was less than one percent.

Refer to Table 1 Lending Volume in Appendix D for the facts and data used to evaluate the bank's lending activity.

The Investment Test included a review of investments, grants and donations made by CLBT that met CD criteria. The evaluation period for the Investment Test was March 1, 2011 through May 31, 2014. We considered the volume of grants, investments and donations made during the evaluation period. Additional consideration was given to the responsiveness of those activities to identified CD needs. We also considered investments made during prior evaluation periods that remain outstanding.

The Service Test evaluation period was also March 1, 2011 through May 31, 2014. Service Test performance was based on branch distribution, hours of operation, branch openings and closing,

alternative delivery systems, retail products and services, and CD services provided by CLBT employees.

Data Integrity

As part of this CRA performance evaluation, we tested a sample of CLBT's HMDA and CRA lending data. We determined that the data was reliable and the data was used for this evaluation.

We also reviewed bank-identified loans, investments, and services that management presented with a primary purpose of CD. We used only those loans, investments and services in this evaluation that had such a primary purpose.

Selection of Areas for Full-Scope Review

CLBT has only one AA and it received a full-scope review. The AA includes a portion of McHenry County, Illinois, which is part of Chicago-Joliet-Naperville IL Metropolitan Division.

Based on the 2010 census data, this AA includes no low- or moderate-income census tracts (CTs). The AA consists of 36 percent middle-income CTs and 64 percent upper-income CTs. The AA, based on 2000 census information also did not include any low- or moderate-income CTs but included 41 percent middle-income CTs and 59 percent upper-income CTs. The June 30, 2013, FDIC deposit market share report showed that CLBT ranked second out of 30 financial institutions taking deposits in McHenry County with a market share of 10 percent.

Refer to the Market Profile in Appendix C for detailed demographics and other performance context information for the AA.

Ratings

The bank's overall rating is based on performing a full-scope review. For analysis purposes, greater weight was placed on loan data from 2012 through 2013 to reach our conclusions. Seventy-five percent of the lending occurred within that timeframe and it is considered most reflective of the bank's overall performance. In addition, this timeframe most closely reflects the bank's current performance context.

Small loans to businesses were the largest portion of lending activity during the 2012 through 2013 evaluation period, representing 61.2 percent of the overall lending volume. As the most predominant loan product, small loans to businesses received the most weight during our analysis. Home mortgage loan originations and purchases represented 19.7 percent of the lending activity, and consumer loans during the same timeframe accounted for 19.1 percent of the lending volume. Home improvement, multi-family, and small farm lending origination and purchase activity was minimal and would not have had a material impact in the evaluation of CLBT's overall performance so analysis of those loans were not performed.

Other

As part of this performance evaluation, we relied on two contacts made with organizations within the bank's AA in order to gain a better understanding of community credit needs and opportunities. The following economic concerns were mentioned during these interviews:

- Foreclosures continue to be a problem in McHenry County and the falling property values are also a major concern.
- Affordable housing is one need that continues to be prevalent.
- Unemployment also remains high as are poverty levels.
- Also of concern is the fact that approximately 50 percent of the county's population works outside of the county. Creation of higher paying jobs and new businesses will help to reverse this trend.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any AA by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the bank's AA is rated Outstanding. Based on a full-scope review, the bank's overall performance in the AA is excellent.

Lending Activity

Refer to Table 1 Lending Volume in Appendix D for the facts and data used to evaluate the bank's lending activity.

Throughout the evaluation period, the bank's lending activity within the AA was excellent. Lending levels reflected excellent responsiveness to AA residential and small business credit needs. Performance during 2012 through 2013 was excellent. During this two-year period, CLBT originated or purchased 1,028 loans totaling \$144 million in the AA. The bank's lending market shares are lower than its deposit market share of 10 percent; however, there are only 29 competitors for deposit market share as compared to the number of lenders competing within the bank's market area. Peer data for 2012 (most recent available) showed that for home purchase loans, CLBT ranked tenth among 185 financial institutions reporting HMDA data with a 1.74 percent market share. For home refinance loans, CLBT ranked 28th among 345 lenders with a market share of .63 percent. For small loans to businesses, CLBT ranked ninth among 72 lenders with a 3.26 percent market share.

During 2011, bank performance was excellent and was not inconsistent with the 2012 and 2013 lending performance.

Distribution of Loans by Income Level of the Geography

A geographic distribution analysis was not meaningful as CLBT's AA contained no low- or moderate-income geographies for either analysis period.

Lending Gap Analysis

CLBT exhibits an adequate record of serving the home mortgage and small business credit needs of the AA. No gaps were noted in the bank's mortgage, small business, or consumer lending.

Inside/Outside Ratio

CLBT made a majority (62 percent) of its loans inside the AA during the review period. For this analysis, we determined the percentage of bank lending inside the AA for year 2011 using the AA that was in place under the 2000 census. We next determined the percentage of lending for years 2012 through 2013 inside the bank's AA using 2010 census data. Thirty-four percent of residential mortgage lending was within the AA, 59 percent of small business lending was within the AA, and 77 percent of consumer lending was inside the AA. The percentage of mortgage lending inside the AA was diluted

due to the fact that a majority of residential mortgage purchase and refinance applications are referred to Wintrust Mortgage. This analysis included bank originations and purchases only.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8 and 10 in Appendix D for the facts and data used to evaluate the borrower income distribution of the bank's home mortgage loan originations and purchases.

Overall, the borrower income distribution of CLBT's home mortgage lending was excellent. The borrower distribution of home mortgage lending in 2012 through 2013 was excellent. The distribution of borrowers reflects excellent penetration among retail customers of different income levels and business customers of different sizes.

Our analysis focused on the bank's lending to low- and moderate-income borrowers as compared to the level of low- and moderate-income families within the AA. According to the 2010 census, 11.77 percent of the families were low-income, and 13.85 percent were moderate-income. Another factor considered in the evaluation of the borrower distribution of home mortgage loans was that four percent of families in the AA live below the poverty level. Additionally, according to the US Bureau of Labor Statistics, the unemployment rate in 2013 for McHenry County was 8.3 percent, higher than the national unemployment rate of 6.7 percent, and just under the Illinois unemployment rate of 8.9 percent. During the review period, 57 percent of the home mortgage loans originated or purchased within the AA were for refinance purposes and 43 percent were for home purchases, so home refinance performance carried slightly more weight than home purchase activity.

Home Purchase Loans

The borrower income distribution of CLBT's home purchase loans reflected excellent distribution to borrowers of different income levels.

The borrower income distribution of home purchase loans in 2012 and 2013 was excellent. The bank's purchase lending to low-income borrowers was excellent. The percentage of home purchase loans originated or purchased by the bank to low-income borrowers was near to the percentage of low-income families in the AA. Considering those families living below the poverty level and the high unemployment rate, the bank's performance was excellent. The bank's purchase lending to moderate-income borrowers was excellent. The percentage of home purchase loans originated or purchased by the bank to moderate-income borrowers exceeded the percentage of moderate-income families. Market share analysis showed that the bank's market of lending to moderate-income borrowers was adequate.

The bank's borrower income distribution of home purchase loans in 2011 was not inconsistent with the excellent borrower income distribution of home purchase loans in 2012 through 2013

Refinance Loans

The borrower income distribution of CLBT's refinance loans was excellent.

The borrower income distribution of refinance loans in 2012 through 2013 was excellent. The percentage of refinance loans originated or purchased by the bank to low-income borrowers was near to the percentage of low-income families in the AA, and considering those families living below the poverty level and the high unemployment rate, the bank's performance was excellent. The percentage of refinance loans to moderate-income borrowers that were originated or purchased by the bank during the review period was excellent as it exceeded the percentage of moderate-income families in the AA. Market share analysis was not performed for lending to low- or moderate-income borrowers as the bank's market share was less than one percent.

The borrower income distribution of the bank's refinance lending in 2011 was adequate and weaker than the bank's home refinance lending in 2012 through 2013. Home refinance lending to low-income borrowers was poor as it was well below the percentage of low-income families in the AA. Refinance lending to moderate-income borrowers was adequate as it was below the percentage of moderate-income families. Market share analysis for refinance lending to low- and moderate-income borrowers was not performed as it was less than one percent.

Small Loans to Businesses

Refer to Table 11 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

CLBT's distribution of small loans to businesses with revenues of \$1 million or less was excellent in 2012 through 2013.

The origination of small loans to businesses with less than \$1 million in gross annual revenues approximated the percentage of small businesses within the AA. The bank's market share of loans to small businesses exceeded its overall market share of loans to businesses. Additionally, 83 percent of the bank's small loans to businesses were in amounts of \$250 thousand or less, demonstrating the bank's willingness to finance small loan requests from its business community.

Bank performance in 2011 was not inconsistent with performance in 2012 through 2013. Bank lending exceeded the percentage of small businesses in its AA and 80 percent of the loans were in amounts of \$250 thousand or less.

Consumer Loans

Refer to Table 13 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of consumer loans to low- or moderate-income borrowers. For this analysis, the bank's lending performance was compared to the percentage of low- and moderate-income households in their AA.

CLBT's distribution of consumer loans to low- and moderate-income borrowers within its AA was excellent. For 2012 and 2013, the percentage of bank lending to both low- and moderate borrowers exceeded the percentage of low- and moderate-income households. No market share data was available for analysis.

Bank performance in 2011 was not inconsistent with 2012 through 2013 performance.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

The bank's CD lending activity had a positive impact on the Lending Test rating. CLBT was a leader in making community development loans. CLBT originated and renewed loans totaling \$8.6 million in the AA during the evaluation period, representing 9.46 percent of Tier One Capital as of March 31, 2014. These CD loans included seven new originations totaling \$7.3 million and 14 renewals totaling \$1.3 million. The loans were used primarily to provide working capital to various organizations that provide community services to LMI individuals and families within the bank's AA, but funds were also used for purchases of affordable housing and for economic development. The bank also originated 13 affordable housing multifamily loans in the broader Chicagoland area totaling \$3.4 million for which they received positive consideration.

Specific examples of the CD loans originated within the AA during this evaluation period follow:

- The bank provided \$5 million in funding to a company that owns a 98-unit apartment complex in Cary, Illinois that primarily provides affordable housing to LMI individuals.
- The bank provided \$2.1 million to a developer who is constructing a 60-unit apartment community in Crystal Lake that will rent to households whose incomes are at or below 60 percent of the area median income. Twenty-five percent of the units will be allocated for households earning 30 percent of the area median income.
- Five loans totaling \$755 thousand were made to Home of the Sparrow, an organization that provides transitional housing and services for homeless single females and their children. Funds were used for working capital and to purchase or refinance properties that are used to house their clients.

Product Innovation and Flexibility

CLBT uses a variety of flexible lending products in order to help serve the needs of individuals, families, and small businesses within its AA. The bank's lending performance reflects a good record of serving the credit needs in the AA, including assisting low- and moderate-income individuals, and very small businesses, consistent with safe and sound banking practices. The bank has demonstrated a positive responsiveness to the AA's identified credit needs.

The bank participates in the 504 and 7A lending programs offered through the Small Business Administration. Twenty-one loans totaling \$6 million were originated during the review period under the 504 program and seven loans totaling \$2 million were originated under the 7A program. The bank also participates in the Patriot Express Pilot Loan program offered by the SBA for veterans and members of the military community wanting to establish or expand a small business. Fourteen loans totaling \$4 million were originated under this program. In 2013, the bank participated in the Advantage Illinois Program, originating two loans totaling \$615 thousand. Three standard small business lending solution products offered by the bank include Business Overdraft Protection, a revolving line of credit, and a term loan, all with streamlined application processes for small business owners.

To further help meet the needs of LMI individuals and families within the AA, the bank offers the Money Smart Everyday Small Dollar Loan, designed to provide an alternative to high interest payday loans, and the Money Smart Certificate of Deposit loan, where the loan proceeds are used to purchase the certificate of deposit. The purpose of this loan is to help the borrower to establish or improve their credit history. The bank has originated 30 Money Smart Everyday Loans totaling \$57 thousand, and 17 Money Smart Certificate of Deposit loans totaling \$30 thousand during the review period.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the AA is rated Outstanding.

Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments. The table includes all qualified investments CLBT made during the evaluation period and those from the prior period that remained on the banks books.

Based on a full scope review, the bank's performance in the AA was excellent. The bank has made a significant level of community development investments and has exhibited excellent responsiveness to credit and community economic development needs. Total bank investments and grants made in the AA totaled \$6.4 million, which is 7.82 percent of Tier 1 capital on March 30, 2014. CLBT supported 40 different community organizations with 133 contributions totaling \$161 thousand. Total investments included six funded investments during the review period totaling \$4.6 million, and 13 prior investments with a current balance of \$1.6 million. Fifty-eight percent of the bank's qualified investments were to organizations that focus on affordable housing, 21 percent was for community revitalization purposes, 16 percent was to organizations that support economic development within the AA, and 5 percent was to organizations that provide community services to LMI individuals and families.

The bank also has a \$580 thousand legally binding commitment to invest in an organization within the AA that meets CD criteria, which demonstrates the bank's future commitment to the CD needs in the AA.

The level of qualified investments and grants made by the bank reflects the bank's willingness to work with a variety of organizations within the AA to help meet various CD needs. Some of the more significant qualifying investments and grants made during this evaluation period are as follows:

- A commitment for \$1 million was made to Victory Park Capital, a Small Business Investment Company (SBIC). \$420 thousand of the commitment was funded during the review period, leaving an unfunded commitment of \$580 thousand.
- The bank purchased a \$500 thousand Illinois State Housing Development Authority (IHDA) Bond.
- The bank invested \$2 million in a school bond issued by Community School District #300, which is located in their AA and has a 92 percent school population that is LMI. Funds are to be used to renovate and repair school buildings and to purchase updated technology equipment.
- An investment of \$1.2 million was made in the CRA Qualified Investment Fund. The fund invests in fixed income securities that support community development activities.
- A \$23 thousand donation was made to Habitat for Humanity for the purpose of building affordable housing in the bank's AA.
- Multiple donations totaling over \$21 thousand were made to the McHenry County Economic Development Corporation, to support its effort to attract new commerce and industry to McHenry County.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated Outstanding. Based on full-scope reviews, the bank's performance in the AA is excellent.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

CBLT's delivery systems are accessible to individuals of different income levels within the bank's AA. There are no low- or moderate-income geographies in CLBT's AA. However there are low- and moderate-income individuals and families that reside within the middle- and upper-income geographies within the AA.

CLBT operates five full-service branches in addition to its main location in Crystal Lake, Illinois. In addition, there are two limited service drive up locations. One branch location was opened by the bank since the last performance evaluation, on Northwest Highway in Crystal Lake, in 2011. No office locations have been closed since the prior review period. Lobby hours and products and services offered by the bank provide good accessibility for all bank customers. Hours and services are standard among all locations.

There are eight Automated Teller Machines (ATMs); one at each branch and at each of the two drive-up facilities. In addition, Wintrust has formed an alliance with MoneyPass, SUM and Allpoint ATM networks allowing the bank to offer 65,000 surcharge-free ATM locations within the U.S. that bank customers can access. Other delivery systems offered by the bank include 24/7 telephone and internet banking, including bill payment.

Community Development Services

CLBT provided an excellent level of CD services, which had a positive impact on the Service Test Rating. CLBT is a leader in providing CD services that are highly responsive to community needs. Bank representatives are involved in a large number of CD activities within the AA, often in a leadership capacity. During the review period, 28 employees provided over 1,700 hours in CD services to the communities that CLBT serves. CLBT provided qualified CD services to four organizations that provide affordable housing, twenty-two organizations that provide community services to low- and moderate-income individuals and four organizations that provide economic development services. The types of services provided included serving as board members, acting as organization treasurers, and participating as committee members, advisors, and mentors for these CD organizations.

Community Development activities include:

- A senior officer of the bank serves as Chairman of the McHenry County Economic Development Corporation (MCEDC). The MCEDC works to promote the economic health of McHenry County through retention, expansion, and attraction of commerce and industry, job creation, and facilitation of an economic development structure.
- A bank officer is the treasurer of the HUD sponsored McHenry County Continuum of Care (MCCOC), as well as serving on several committees. MCCOC assists in the coordination and development of services and housing for homeless and low-income persons with housing needs through planning, education, and advocacy.
- A bank employee serves as a board member and co-treasurer of Home of the Sparrow, a non-profit organization whose mission is to provide transitional housing and support services to homeless women and their children with the goal of getting them back into the work force and creating more stability.
- The bank has conducted at least 17 Money Smart seminars during the review period. Money Smart is a comprehensive financial education program designed to provide attendees with the information needed to enhance their financial management skills and create positive banking relationships.
- Sessions have also included modules on small business organization and management.

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 metropolitan and nonmetropolitan areas 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	Lending Test (excludes CD Loans): 1/1/2011 to 12/31/2013 (Month Day, Year to Month Day, Year) Investment and Service Tests and CD Loans: 3/1/2011 to 5/31/2014	
Financial Institution	Products Reviewed	
Crystal Lake Bank and Trust Company, N.A. (CLBT) Crystal Lake, Illinois	Residential home purchase and refinance loans, Small loans to businesses, and Consumer loans. Community Development Loans, Investments, and Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Barrington Bank and Trust Company, N.A. (BBT)	Also owned by Wintrust Financial Corporation	Residential Purchase and Refinance loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Chicago/Naperville/Joliet MD 16974 CLBT AA	Full Scope	

Appendix B: Market Profiles for Full-Scope Areas

CLBT AA

Demographic Information for Full-Scope Area: Crystal Lake Bank and Trust AA – 2000 Census Data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	0.00	0.00	40.63	59.38	0.00
Population by Geography	181,176	0.00	0.00	34.92	65.08	0.00
Owner-Occupied Housing by Geography	64,171	0.00	0.00	34.52	65.48	0.00
Businesses by Geography	32	0.00	0.00	40.63	59.38	0.00
Farms by Geography	0.00	0.00	0.00	39.36	60.64	0.00
Family Distribution by Income Level	48,965	8.59	13.40	24.72	53.29	
Distribution of Low- and Moderate-Income Families throughout AA Geographies	10,768	0.00	0.00	45.97	54.03	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below the Poverty Level	= \$60,166 = \$76,200 = 2.95%				Median Housing Value = \$172,817 Unemployment Rate = 2.43%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2011 HUD updated MFI.

Demographic Information for Full-Scope Area: Crystal Lake Bank and Trust AA – 2010 Census Data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	36	0.00	0.00	36.11	63.89	0.00
Population by Geography	212,863	0.00	0.00	32.27	67.73	0.00
Owner-Occupied Housing by Geography	62,999	0.00	0.00	47.90	52.10	0.00
Businesses by Geography	15,306	0.00	0.00	32.27	67.63	0.00
Farms by Geography	374	0.00	0.00	28.68	70.32	0.00
Family Distribution by Income Level	55,947	11.77	13.85	21.00	53.38	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	14,332	0.00	0.00	42.78	57.22	0.00
Median Family Income FFEIC Adjusted Median Family Income for 2013 Households Below the Poverty Level	= \$72,747 = \$73,400 = 5.16				Median Housing Value = \$261,419 Unemployment Rate = 5.31	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2013 FFEIC updated MFI.

CLBT is headquartered in Crystal Lake, Illinois. Crystal Lake is within the Chicago/Naperville/Joliet Metropolitan District. The bank's defined AA consists of 36 of the 47 geographies in McHenry County, Illinois. There are no low- or moderate-income geographies in the AA (or the county), 13 middle-income geographies, and 23 upper-income geographies within the AA. CLBT has one AA that meets the requirements of the Community Reinvestment Act, and does not arbitrarily exclude low- or moderate-income areas.

As of June 30, 2013, CLBT's deposits totaled \$628 million and all were within McHenry County. Based on FDIC deposit market share data on June 30, 2013 CLBT ranked second out of 30 financial institutions with deposits in McHenry County, with a market share of 10 percent. Major competitors for deposits within the bank's market area include BMO Harris, JP Morgan Chase bank, and Home State Bank, N.A. There are many more lending competitors, including major regional and national banks such as American Express Bank, Chase Bank, Citibank, Capital One, Bank of America, and Wells Fargo, as well as smaller local banks. CLBT's business strategy is to remain a true community bank, serving the deposit and lending needs of its local community with products designed for their needs.

The updated Federal Financial Institutions Examination Council (FFEIC) 2013 median family income for the AA was \$73,400. A breakdown of family income levels within the AA showed that 11.77 percent were low-income, 13.40 percent were moderate-income, 21.00 percent were middle-income, and 53.38 percent were upper-income. Five percent of the households and four percent of the families within the AA have incomes below the poverty level.

Of the 77,495 housing units within the AA, 71,496 (92.26 percent) are 1-4 family housing units. Eighty-one of the housing units are owner occupied, 7 percent are multifamily units, and one percent are mobile homes. The median housing value within the AA based on 2010 census data is \$261,419.

According to the US Bureau of Labor Statistics, the unemployment rate in 2013 for McHenry County was 8.3 percent, higher than the national unemployment rate of 6.7 percent, and just under the Illinois unemployment rate of 8.9 percent

Per information provided by the McHenry County Economic Development Corporation, major employers within McHenry County include Centregra Health System, School District 158, McHenry County, and Follett Library Resources.

As part of this performance evaluation, we relied on two contacts made with organizations within the bank's AA in order to gain a better understanding of community credit needs and opportunities. One interviewee stated that foreclosures continue to be a problem in McHenry County and the falling property values are also a major concern. Affordable housing is one need that continues to be prevalent. Unemployment is also high as are poverty levels. Also of concern is the fact that approximately 50 percent of the county's population works outside of the county. Creation of higher paying jobs and new businesses will help to reverse this trend.

Appendix C: Tables of Performance Data

Content of Standardized 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - 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 market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

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LENDING VOLUME		Geography: CRYSTAL LAKE B&T AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Crystal Lake 2010	100.00	262	50,478	548	74,221	0	0	21	8,611	831	133,310	100.00
Broader Statewide or Regional Area								13	3,407	13	3,407	

* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2013.

*** Deposit Data as of June 30, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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Table 1. Other Products

LENDING VOLUME		Geography: CRYSTAL LAKE B&T AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013								
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:														
Crystal Lake 2010	100.00	218	18,807	0	0	133	11,865	4	46	0	0	50	6,815	100.00

Table 1. Other Products

LENDING VOLUME		Geography: CRYSTAL LAKE B&T AA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
Assessment Area (2013):	Other Unsecured Consumer Loans*			Other Optional Loans*	
	#	\$ (000's)		#	\$ (000's)
Full Review:					
Crystal Lake 2010	31	81		0	0

* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

*** Deposit Data as of June 30, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CRYSTAL LAKE B&T AA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography [*]				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans						
Full Review:																
Crystal Lake 2010	117	100.00	0.00	0.00	0.00	0.00	33.17	21.37	66.83	78.63	****	****	****	****	****	

^{*} Based on 2012 Peer Mortgage Data (USPR) Includes Bank and Affiliate lending data.

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^{*****} Market share was not available for low-and moderate-income geographies and was not calculated for middle- and upper-income geographies

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: CRYSTAL LAKE B&T AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Crystal Lake 2010	4	100.00	0.00	0.00	0.00	0.00	33.17	0.00	66.83	100.00	****	****	****	****	****

* Based on 2012 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

***** Market share was not calculated as this product was not analyzed.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: CRYSTAL LAKE B&T AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Crystal Lake 2010	137	100.00	0.00	0.00	0.00	0.00	33.17	20.44	66.83	79.56	****	****	****	****	****	

* Based on 2012 Peer Mortgage Data (USPR) Includes Bank and Affiliate lending data.

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

***** Market share was not available for low- and moderate-income geographies and was not calculated for middle- and upper-income geographies

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CRYSTAL LAKE B&T AA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013								
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Crystal Lake 2010	4	100.00	0.00	0.00	0.00	0.00	53.33	75.00	46.67	25.00	****	****	****	****	****

^{*} Based on 2012 Peer Mortgage Data (USPR) Includes Bank and Affiliate lending data.
^{**} Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.
^{***} Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.
^{****} Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.
^{*****} Market share was not calculated as this product was not analyzed.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: CRYSTAL LAKE B&T AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography [*]				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans						
Full Review:																
Crystal Lake 2010	548	100.00	0.00	0.00	0.00	0.00	32.37	31.39	67.63	68.61	****	****	****	****	****	

^{*} Based on 2012 Peer Small Business Data -- US and PR. Includes Bank and Affiliate lending data.

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2013).

^{****} Market share was not available for low- and moderate-income geographies and was not calculated for middle- and upper-income geographies

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Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: CRYSTAL LAKE B&T AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography [*]				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans						
Full Review:																
Crystal Lake 2010	0	0.00	0.00	0.00	0.00	0.00	29.68	0.00	70.32	0.00	****	****	****	****	****	

^{*} Based on 2012 Peer Small Business Data -- US and PR Includes Bank and Affiliate lending data

^{**} Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2013).

^{****} Market share was not calculated as this product was not analyzed.

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Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CRYSTAL LAKE B&T AA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share ¹				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ¹	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Crystal Lake 2010	117	100.00	11.77	9.82	13.85	20.54	21.00	22.32	53.38	47.32	1.74%	.84	1.01	*	*	

¹ Based on 2012 Peer Mortgage Data (USPR) Includes Bank and Affiliate lending data.

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2010 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 4.3% of loans originated and purchased by bank.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

^{****} Market share for middle and upper income lending not calculated as this data was not analyzed.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT												Geography: CRYSTAL LAKE B&T AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]									
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Crystal Lake 2010	4	100.00	11.77	50.00	13.85	0.00	21.00	50.00	53.38	0.00	****	****	****	****	****					

^{*} Based on 2012 Peer Mortgage Data (USPR) Includes Bank and Affiliate lending data
^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
^{***} Percentage of Families is based on the 2010 Census information.
^{****} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.
² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)
^{****} Market Share not calculated as this product was not analyzed

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: CRYSTAL LAKE B&T AA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013										
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ¹				
	#	% of Total ²	% Families ³	% BANK Loans ⁴	% Families ³	% BANK Loans ⁴	% Families ³	% BANK Loans ⁴	% Families ³	% BANK Loans ⁴	Overall	Low	Mod	Mid	Upp
Full Review:															
Crystal Lake 2010	137	100.00	11.77	8.87	13.85	16.94	21.00	26.61	53.38	47.58	.63	.96	.63	****	****

¹ Based on 2012 Peer Mortgage Data (USPR) Includes Bank and Affiliate lending data

² Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

³ Percentage of Families is based on the 2010 Census information.

⁴ As a percentage of loans with borrower income information available. No information was available for 9.5% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

⁴ Market share for middle and upper income lending not calculated as this data was not analyzed

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CRYSTAL LAKE B&T AA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Crystal Lake 2010	548	100.00	75.22	74.45	66.42	16.24	17.34	3.31	7.67

* Based on 2012 Peer Small Business Data -- US PR Includes Bank lending activity only

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.36% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: CRYSTAL LAKE B&T AA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Crystal Lake 2010	0	0.00	97.06	0.00	0.00	0.00	0.00	****	****

* Based on 2012 Peer Small Business Data -- US and PR Based on bank lending data only

** Small loans to farms originated and purchased in the MAVAA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

***** Market Share not calculated as this product was not analyzed

Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS																		
Geography: CRYSTAL LAKE B&T AA										Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013								
Assessment Area:	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans
Full Review:																		
Crystal Lake 2010	218	100.00	0.00	0.00	0.00	0.00	35.26	39.91	64.74	60.09	13.43	15.14	12.56	14.68	17.71	17.43	56.30	49.08

* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

** Percentage of households is based on 2010 Census Information.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: CRYSTAL LAKE B&T AA				Evaluation Period: March 1, 2011 TO May 31, 2014					
Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Crystal Lake 2010	10	317	134	2,161	144	2,478	39%		
BROADER STATEWIDE OR REGIONAL AREA	3	1,305	5	2,591	8	3,896	61%	1	580

^{*} 'Prior Period Investments' means investments made in a previous 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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: CRYSTAL LAKE B&T AA				Evaluation Period: March 1, 2011 TO May 31, 2014									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Crystal Lake 2010	100.00	8	100.00	0.00	0.00	25.00	75.00	1	0	0	0	1	0	0.00	0.00	32.27	67.73

Charter Number 23574

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: CRYSTAL LAKE B&T AA				Evaluation Period: March 1, 2011 TO May 31, 2014									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Crystal Lake 2010	100.00	8	100.00	0	0	25	75	8	100.00	0	0	2	6	0.00	0.00	32.27	67.73