



## **PUBLIC DISCLOSURE**

July 30, 2018

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Hometown National Bank  
Charter Number 2503

260 Bucklin Street  
LaSalle IL, 61301

Office of the Comptroller of the Currency

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

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

## Table of Contents

<b>OVERALL CRA RATING .....</b>	<b>2</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>3</b>
<b>DESCRIPTION OF INSTITUTION .....</b>	<b>7</b>
<b>SCOPE OF THE EVALUATION.....</b>	<b>7</b>
<b>DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>9</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....</b>	<b>10</b>
<b>LENDING TEST .....</b>	<b>10</b>
<b>APPENDIX A: SCOPE OF EXAMINATION.....</b>	<b>A-1</b>
<b>APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....</b>	<b>B-1</b>

## Overall CRA Rating

**The Lending Test is rated: Satisfactory.**

The primary factors supporting Hometown National Bank's rating include:

- The Loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank's lending occurs within the assessment areas (AAs).
- Lending to borrowers of different income levels reflects reasonable penetration.
- The bank's distribution of loans in its AAs among low- and moderate-income geographies reflects reasonable dispersion.

## 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 Metropolitan Area/AA.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. CT boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. CTs generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. CTs are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's AA(s) or outside the AA(s) provided the bank has adequately addressed the community development needs of its AA(s).

**Community Reinvestment Act (CRA):** The statute that requires the Office of the Comptroller of the Currency (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 CT 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, 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 refinancing, 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 Metropolitan Area/AA.

**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. 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 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 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 (MSA):** 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 MSA 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.

**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) 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

Hometown National Bank (HNB or bank) is a wholly owned subsidiary of LaSalle Bancorp, Inc., a one-bank holding company formed in 1984. Since the last CRA examination, there have been no significant changes to the corporate structure. The bank's business strategy continues to focus on commercial real estate (CRE) lending, specifically small loans to businesses.

HNB has three office locations. The main office is located in LaSalle, IL and two other branches are located in Peru and Joliet, IL, respectively. All bank offices provide full banking services and include deposit-taking Automated Teller Machines and drive-up capabilities.

As of June 30, 2018, HNB had total assets of \$222 million and approximately \$131 million in gross loans and leases. The bank's primary loan types are commercial and residential real estate loans, as reflected in the chart below. The bank reported tier 1 capital of \$26 million as of June 30, 2018.

<b>Loan Products</b>	<b>Outstanding Dollars (\$000s)</b>	<b>% of Total Loans</b>
Commercial Loans (including CRE and construction loans)	\$105,927	80.64%
Residential Real Estate Loans	\$16,578	12.62%
Individual Loans	\$866	0.66%
Agricultural Loans	\$7,991	6.08%
<b>Total Loans</b>	<b>\$131,362</b>	<b>100%</b>

Source: Call Report data as of June 30, 2018

This examination did not identify any legal, financial, or other factors that would impede the bank's ability to help meet the credit needs in its AAs. HNB received a "Satisfactory" rating at the last CRA examination dated June 10, 2013.

HNB has two AAs; one (MSA AA) that contains portions of Will County in the Chicago-Naperville-Arlington Heights, IL MD #16974, which is part of the Chicago-Naperville-Elgin, IL-IN-WI MSA, and the other located in a Non-MSA (Non-MSA AA). The MSA AA consists of 62 CTs located in Will County, IL. The Non-MSA AA is comprised of eight CTs located in LaSalle County, IL.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated the CRA performance of HNB using the small bank CRA examination procedures. The evaluation period for this assessment is June 10, 2013 through July 30, 2018. Under small bank CRA examination procedures, the primary performance evaluation is conducted under the lending test. The lending test assesses the bank's record of meeting the credit needs of its AAs through lending activities.

The evaluation under the lending test analyzed the bank's primary loan products, consisting of commercial loans and residential loans, and considered performance from January 1, 2015



through December 31, 2017 (lending evaluation period). No affiliate or subsidiary activity was considered in this review.

We evaluated data using two separate analysis periods due to changes in census data pursuant to the American Community Survey (ACS), which occurred in 2015. We analyzed small loans to businesses and residential mortgage loans originated in 2015 and 2016 combined (2015/2016) based on 2010 census data. We analyzed small loans to businesses and residential mortgage loans originated in 2017 based on the 2015 ACS data. We analyzed small loans to businesses data for 2017 comparing bank performance to 2016 small business peer lending aggregate data, as that was the most recent available for our analysis.

To evaluate performance for residential real estate lending, we reviewed home purchase, home improvement, and home refinance loans reported under the (HMDA in aggregate from January 1, 2015 through December 31, 2017. Additionally, to evaluate small business lending performance, we selected a random sample of 109 small loans to businesses in order to have a minimum of 20 small loans to businesses in each AA originated during the review period. We used HMDA data and sampled small business loan files to analyze the bank's record of lending in its AAs and perform the Borrower and Geographic Distribution analysis. We also reviewed interviews conducted with individuals representing community organizations in both the bank's AAs during the evaluation period.

To evaluate the bank's loan volume, we calculated an average quarterly LTD ratio since the previous evaluation (from June 10, 2013 to June 30, 2018).

We used Federal Deposit Insurance Corporation (FDIC) annual deposit information to determine the bank's deposit market share and deposit market ranking within its AAs. The most recent deposit market share information is as of June 30, 2017.

## **Data Integrity**

Prior to this evaluation, we validated the accuracy of the bank's HMDA data from a sample of 29 HMDA loans in 2017. Our data integrity review did not identify any material errors. As such, we used all HMDA-reportable data from 2015 through 2017 for analysis of home loan products (purchase, improvement, and refinance). Additionally, we selected a random sample of 109 small loans to businesses from 2015 through 2017 to capture a minimum of 20 small loans to businesses inside each of the bank's AAs for 2015/2016, and for 2017 in order to evaluate small business lending performance. We used 81 small loans to businesses located inside of the bank's AAs in our evaluation.

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

We performed a full scope review of both the MSA AA and the Non-MSA AA.

## **Ratings**

The bank's overall rating is based on those areas that received full-scope reviews.

## **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 [or any affiliate whose loans have been considered as part of the institution's lending performance] 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.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

**HNB's performance in both the MSA AA and the Non-MSA AA is satisfactory. The LTD ratio is reasonable. A majority of the bank's loans are originated inside its AAs. HNB's borrower distribution reflects reasonable penetration. The geographic distribution reflects reasonable dispersion.**

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

HNB's quarterly average LTD ratio is reasonable given the credit needs of the AAs, market conditions, and the bank's size and financial condition. The LTD ratio is calculated on a bank-wide basis. The bank's quarterly average LTD ratio from June 30, 2013 to June 30, 2018 was 66.8 percent. The bank's peer group consisted of 13 institutions, with assets ranging from \$100 million to \$300 million and located within HNB's market area. The quarterly average LTD ratio for the peer group ranged from 36.2 percent to 109.0 percent. HNB's LTD ratio is ranked eighth out of fourteen banks in its combined AAs. The bank's LTD ratio is reasonable when considering the strong competition in the combined AA, which limits lending opportunities. HNB competes with large national and regional banks that have a larger market presence and capacity to lend, such as BMO Harris Bank, JP Morgan Chase, First Midwest Bank, and Old Plank Trail Community Bank. These four national lenders operate 74 banking offices inside the market area and hold a combined 47.7 percent of local deposits, while HNB operates three local offices and holds 1.3 percent of local deposits.

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

HNB's record of lending in the AAs is satisfactory.

During the evaluation period, HNB originated a majority (57.0 percent by volume) of its loans inside the AAs. The proportion of lending inside versus outside the AA(s) is calculated on a bank-wide basis. HNB is primarily a commercial lender. During the evaluation period, HNB originated 74.3 percent by volume and 65.6 percent by dollar amount of its commercial loans inside it's the AAs. The bank originated 51.2 percent by volume and 40.9 percent by dollar amount of its home mortgage loans inside the AAs during the evaluation period.

Table D below summarizes the results from the AA lending analysis.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%	\$	%	\$	%		
Home Mortgage										
2015 -2016	119	52.9	106	47.1	225	12,479	41.8	17,352	58.2	29,831
2017	47	47.5	52	52.5	99	4,930	38.8	7,770	61.2	12,700
<b>Subtotal</b>	<b>166</b>	<b>51.2</b>	<b>158</b>	<b>48.8</b>	<b>324</b>	<b>17,409</b>	<b>40.9</b>	<b>25,122</b>	<b>59.1</b>	<b>42,531</b>
Small Business										
2015 -2016	41	75.9	13	24.1	54	5,019	69.5	2,207	30.5	7,226
2017	40	72.7	15	27.3	55	4,578	61.9	2,823	38.1	7,401
<b>Subtotal</b>	<b>81</b>	<b>74.3</b>	<b>28</b>	<b>25.7</b>	<b>109</b>	<b>9,597</b>	<b>65.6</b>	<b>5,030</b>	<b>34.4</b>	<b>14,627</b>
<b>Total</b>	<b>247</b>	<b>57.04</b>	<b>186</b>	<b>43.0</b>	<b>433</b>	<b>27,006</b>	<b>47.2</b>	<b>30,152</b>	<b>52.8</b>	<b>57,158</b>
<i>Source: Evaluation Period: 1/1/2015 - 12/31/2017 HMDA LAR and Bank Data  Due to rounding, totals may not equal 100.0</i>										

## Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

HNB's lending to borrowers of different incomes reflects reasonable penetration. The distribution of residential real estate lending is reasonable and the distribution of small loans to businesses is excellent.

### 2015/2016

HNB's lending to borrowers of different incomes per 2015/2016 combined data reflects reasonable distribution. The distribution of residential real estate lending is reasonable and the distribution of small loans to businesses is excellent.

Our analysis of residential lending considered the percentage of families and households in the AAs living below the poverty level. The percentage of families below the poverty level was 8.1 percent for the MSA AA and 9.1 percent for the Non-MSA AA during the 2015/2016 evaluation period. Additionally, the median housing value in the MSA AA for the period is five times the median annual income of low-income families in the AA, while the median housing value in the Non-MSA AA for the period is four times the median annual income of low-income families in the AA. The aforementioned factors demonstrate a homeownership affordability issue for many low-income families, limiting mortgage demand among these families. Residents of limited income may face difficulty meeting credit-underwriting standards. Generally, home ownership is not a viable option for these families and affordable home purchase opportunities are limited.

*Please refer to the demographic tables in Appendix B for further information.*

## **MSA AA**

Lending to borrowers of different incomes in the MSA AA reflects reasonable penetration. The distribution of residential real estate lending is reasonable and the distribution of small loans to businesses is excellent.

### **Residential Lending**

The overall distribution of home mortgage loans to borrowers of low- and moderate-income levels within the MSA AA is reasonable. Our conclusion takes into account the impact of home ownership affordability issues for low-income borrowers in the MSA AA.

HNB's origination of home mortgage loans to low-income borrowers reflects poor penetration. The percentage of home mortgage loans to low-income borrowers at 7 percent is significantly lower than the percentage of low-income families at 20.6 percent. Aggregate peer lending data also reflects poor penetration with the percentage of aggregate peer loans originated to low-income borrowers at 8.5 percent, which is significantly lower than the percentage of low-income families, underscoring home affordability issues for low-income borrowers in the MSA AA. The percentage of HNB home mortgage loans to low-income borrowers is reasonably less than the percentage of aggregate peer lending at 8.5 percent.

HNB's origination of home mortgage loans to moderate-income borrowers reflects reasonable penetration. The percentage of home mortgage loans to moderate-income borrowers at 16.1 percent is near the percentage of moderate-income families at 18.1 percent. Additionally, the percentage of home mortgage loans to moderate-income borrowers is reasonably less than the percentage of aggregate peer lending at 19.7 percent.

### **Small Business Lending**

The distribution of loans to businesses with gross annual revenues of \$1 million or less within the MSA AA reflects excellent penetration.

The percentage of loans originated to businesses with gross annual revenues of \$1 million or less at 95.0 percent exceeds the percentage of businesses in the MSA AA with gross annual revenues of \$1 million or less at 78.1 percent. Additionally, the percentage of loans to businesses with gross annual revenues of \$1 million or less significantly exceeds the percentage of aggregate peer lending at 39.6 percent.

## **Non-MSA AA**

Lending to borrowers of different incomes in the Non-MSA AA reflects reasonable penetration. The distribution of residential real estate lending is reasonable and the distribution of small loans to businesses is excellent.

### **Residential Lending**

The overall distribution of home mortgage loans to borrowers of low- and moderate-income levels within the Non-MSA AA reflects reasonable penetration in 2015/2016. Our conclusion

considers the impact of home ownership affordability issues for low-income borrowers in the Non-MSA AA.

HNB's origination of home mortgage loans to low-income borrowers reflects poor penetration. The percentage of home mortgage loans to low-income borrowers at 7.9 percent is significantly lower than the percentage of low-income families at 14.9 percent. Moreover, aggregate peer lending data also reflects poor penetration with the percentage of aggregate peer loans originated to low-income borrowers at 5.1 percent being significantly lower than the percentage of low-income families. Despite home affordability issues in the Non-MSA AA, the percentage of home mortgage loans to low-income borrowers exceeds and is reasonably above the percentage of aggregate peer lending of 5.1 percent.

HNB's origination of home mortgage loans to moderate-income borrowers reflects excellent penetration. The percentage of home mortgage loans to moderate-income borrowers at 15.8 percent exceeds the percentage of moderate-income families at 15.1 percent. The percentage of home mortgage loans to moderate-income borrowers is reasonably less than the percentage of aggregate peer lending at 15.4 percent.

### Small Business Lending

The distribution of loans to businesses with gross annual revenues of \$1 million or less within the Non-MSA AA reflects excellent penetration.

The percentage of loans originated to businesses with gross annual revenues of \$1 million or less at 90.0 percent exceeds the percentage of businesses in the Non-MSA AA with gross annual revenues of \$1 million or less at 69.4 percent. Additionally, the percentage of small loans to businesses with gross annual revenues of \$1 million or less significantly exceeds the percentage of aggregate peer lending at 41.9 percent.

*Please refer to the lending tables in Appendix B for further information.*

### **2017**

HNB's lending to borrowers of different incomes per 2017 data reflects reasonable penetration. The distribution of residential real estate lending is reasonable while the distribution of small loans to businesses is excellent.

Our analysis of residential lending took into consideration the percentage of families and households in the AAs living below the poverty level. The percentage of families below the poverty level is 9.3 percent for the MSA AA during the 2017 evaluation period. The percentage of families below the poverty level totals 8.7 percent for the Non-MSA AA during the 2017 evaluation period. Additionally, the median housing value in both the MSA and the Non-MSA AAs for the period is four times the median annual income of low-income families in the AAs. The aforementioned factors demonstrate a homeownership affordability issue for many low-income families, limiting mortgage demand among these families. Residents of limited income may face difficulty meeting credit-underwriting standards. Generally, home ownership is not a viable option for these families and affordable home purchase opportunities are limited.

*Please refer to the demographic tables in Appendix B for further information.*

## **MSA AA**

Lending to borrowers of different incomes in the MSA AA reflects reasonable penetration. The distribution of residential real estate lending is reasonable and the distribution of small loans to businesses is excellent.

### **Residential Lending**

The overall distribution of home mortgage loans to borrowers of low- and moderate-income levels within the MSA AA reflects reasonable penetration. Our conclusion considers the impact of home ownership affordability issues for low-income borrowers in the MSA AA.

HNB's origination of home mortgage loans to low-income borrowers reflects poor penetration. The percentage of home mortgage loans to low-income borrowers at 5.6 percent is significantly lower than the percentage of low-income families at 21.8 percent. Aggregate peer lending data also reflects poor penetration with the percentage of aggregate peer loans originated to low-income borrowers being significantly lower than the percentage of low-income families at 8.9 percent. The bank's percentage of home mortgage loans to low-income borrowers is reasonably less than the percentage of aggregate peer lending.

HNB's origination of home mortgage loans to moderate-income borrowers reflects reasonable penetration. The percentage of home mortgage loans to moderate-income borrowers at 16.7 percent is near the percentage of moderate-income families at 17.6 percent. Additionally, the percentage of home mortgage loans to moderate-income borrowers is reasonably less than the percentage of aggregate peer lending at 23.8 percent.

### **Small Business Lending**

The distribution of loans to businesses with gross annual revenues of \$1 million or less within the MSA AA reflects excellent penetration.

The percentage of loans originated to businesses with gross annual revenues of \$1 million or less at 90.0 percent exceeds the percentage of businesses in the MSA AA with gross annual revenues of \$1 million or less at 79.3 percent. Additionally, the percentage of loans HNB originated to businesses with gross annual revenues of \$1 million or less significantly exceeds the percentage of aggregate peer lending of 39.6 percent.

*Please refer to the lending tables in Appendix B for further information.*

## **Non-MSA AA**

Lending to borrowers of different incomes in the Non-MSA AA reflects reasonable penetration. The distribution of residential real estate lending is reasonable and the distribution of small loans to businesses is excellent.

### Residential Lending

The overall distribution of home mortgage loans to borrowers of low-and moderate-income levels within the Non-MSA AA reflects reasonable penetration. Our conclusion considers the impact of home ownership affordability issues for low-income borrowers in the Non-MSA AA.

HNB's origination of home mortgage loans to low-income borrowers reflects very poor penetration. The bank did not originate any home mortgage loans to low-income borrowers in 2017; however, in addition to borrower home affordability issues impacting low-income borrowers in the Non-MSA AA, the bank did not receive any home mortgage applications from low-income borrowers in the AA during the 2017 evaluation period. Aggregate peer lending data also reflects poor penetration, with the percentage of aggregate peer loans originated to low-income borrowers at 6.4 percent being significantly lower than the 17.2 percent of low-income families in the Non-MSA AA.

HNB's origination of home mortgage loans to moderate-income borrowers reflects excellent penetration. The percentage of home mortgage loans to moderate-income borrowers at 24.1 percent exceeds the percentage of moderate-income families at 17.4 percent. Additionally, the percentage of home mortgage loans to moderate-income borrowers is reasonably above the percentage of aggregate peer lending at 15.9 percent.

### Small Business Lending

The distribution of loans to businesses with gross annual revenues of \$1 million or less within the Non-MSA AA reflects excellent penetration.

The percentage of loans originated to businesses with gross annual revenues of \$1 million or less at 75.0 percent exceeds the percentage of businesses in the Non-MSA AA with gross annual revenues of \$1 million or less at 70.5 percent. Additionally, the percentage of loans HNB originated to businesses with gross annual revenues of \$1 million or less is reasonably above the percentage of aggregate peer lending of 41.9 percent.

*Please refer to the lending tables in Appendix B for further information.*

### **Geographic Distribution of Loans**

HNB's lending among low and moderate-income geographies reflects reasonable dispersion. The distribution of residential real estate lending is reasonable and the distribution of small loans to businesses is excellent.

### **2015/2016**

HNB's distribution of loans in its AAs among low- and moderate-income geographies per 2015/2016 data reflects reasonable dispersion. Home mortgage lending in the MSA AA demonstrates reasonable dispersion among low- and moderate-income geographies. The bank's record of small loans to businesses reflects reasonable dispersion among low and moderate-income CTs.



HNB did not have any low or moderate-income CTs in the Non-MSA AA during the 2015/2016 evaluation period. Our analysis reflects lending in a majority of the CTs, with no conspicuous lending gaps.

## **MSA AA**

### **Residential Lending**

The overall distribution of home mortgage loans in low- and moderate-income geographies within the MSA AA reflects reasonable dispersion.

The bank's geographic distribution in low-income CTs is excellent. The percentage of home mortgage loans originated in low-income CTs at 7 percent exceeds the percentage of owner-occupied housing units (OOHUs) of 3.3 percent. Additionally, the percentage of home mortgage loans originated in low-income CTs significantly exceeds the percentage of aggregate peer lending of 1.7 percent.

HNB's geographic distribution in moderate-income CTs is reasonable. The percentage of home mortgage loans originated in moderate-income CTs at 18.6 percent is near the percentage of OOHUs of 21.2 percent in these CTs. Additionally, the percentage of home mortgage loans originated in moderate-income CTs is reasonably above the percentage of aggregate peer lending of 10.9 percent.

### **Small Business Lending**

The distribution of small loans to businesses in low- and moderate-income geographies within the bank's MSA AA reflects reasonable dispersion.

The percentage of small loans to businesses originated in low-income CTs is reasonable as the percentage of bank loans at 5 percent is near the percentage of businesses located in low – income CTs at 7.1 percent. Additionally, the percentage of small loans to businesses HNB originated in low-income CTs is reasonably above the percentage of aggregate peer lending of 4.7 percent.

The percentage of small loans to businesses originated in moderate-income CTs is excellent as the percentage of bank loans at 35.0 percent exceeds the percentage of businesses located in moderate–income CTs at 24.2 percent. Additionally, the percentage of small loans to businesses originated in moderate-income CTs is reasonably above the percentage of aggregate peer lending of 20.9 percent.

## **2017**

HNB's distribution of loans in its AAs among low- and moderate-income geographies per 2017 data reflects excellent dispersion. Home mortgage lending demonstrates excellent dispersion among low- and moderate-income geographies. The bank's record of small loans to businesses reflects excellent dispersion among low- and moderate-income CTs.

HNB did not have any low-income CTs in the Non-MSA AA during the 2017 evaluation period. Our analysis reflects lending in a majority of the CTs, with no conspicuous lending gaps.

## **MSA AA**

HNB's distribution of loans in the MSA AA among low- and moderate-income geographies reflects excellent dispersion. Home mortgage lending demonstrates excellent dispersion among low- and moderate-income geographies. The bank's record of small loans to businesses reflects reasonable dispersion among low- and moderate-income CTs.

### **Residential Lending**

The overall distribution of home mortgage loans to low- and moderate-income geographies within the MSA AA reflects excellent dispersion.

The bank's geographic distribution in both low- and moderate-income CTs is excellent. The percentage of home mortgage loans originated in low-income CTs at 38.9 percent exceeds the percentage of OOHUs of 5.1 percent in these CTs. Additionally, the percentage of home mortgage loans originated in low-income CTs significantly exceeds the percentage of aggregate peer lending of 3.2 percent.

The percentage of home mortgage loans originated in moderate-income CTs at 22.2 percent exceeds the percentage of OOHUs of 13.6 percent in these CTs. Additionally, the percentage of home mortgage loans originated in moderate-income CTs significantly exceeds the percentage of aggregate peer lending of 10.9 percent.

### **Small Business Lending**

The distribution of small loans to businesses in low- and moderate-income geographies within the bank's MSA AA reflects reasonable overall dispersion.

The percentage of small loans to businesses originated in low-income CTs is excellent as the percentage of bank loans at 20.0 percent exceeds the percentage of businesses located in low-income CTs at 13.3 percent. Additionally, the percentage of small loans to businesses HNB originated in low-income CTs is reasonably above the percentage of aggregate peer lending of 10.8 percent.

The percentage of small loans to businesses originated in moderate-income CTs is reasonable as the percentage of bank loans at 15.0 percent is near the percentage of businesses located in moderate-income CTs at 15.7 percent. Additionally, the percentage of small loans to businesses HNB originated in moderate-income CTs is reasonably below the percentage of aggregate peer lending of 16.6 percent.

## **Non-MSA AA**

HNB's distribution of loans in the Non-MSA AA among low- and moderate-income geographies reflects reasonable dispersion. Home mortgage lending demonstrates reasonable dispersion among low- and moderate-income geographies. The bank's record of small loans to businesses reflects excellent dispersion among moderate-income CTs.

The Non-MSA AA contained no low-income CTs during the evaluation period.

### Residential Lending

The bank's geographic distribution in moderate-income CTs is reasonable. The percentage of home mortgage loans originated in moderate-income CTs at 3.4 percent is near the percentage of OOHUs of 4.6 percent in these CT and is reasonably above the percentage of aggregate peer lending of 2.7 percent.

### Small Business Lending

The percentage of small loans to businesses originated in moderate-income CTs is excellent as the percentage of bank loans at 15.0 percent exceeds the percentage of businesses located in moderate-income CTs at 12.8 percent. Additionally, the percentage of small loans to businesses HNB originated in moderate-income CTs is reasonably above the percentage of aggregate peer lending of 12.4 percent.

### **Responses to Complaints**

HNB has not received any written comments or complaints regarding its performance in its efforts to help meet the credit needs of its AAs during the evaluation period. The OCC has not received any written complaints, comments, or inquiries concerning HNB and its efforts to comply with the spirit and intent of the CRA.

## 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”).

<b>Time Period Reviewed</b>	Lending Test : (01/01/2015 to 12/31/2017)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
(Hometown National Bank (HNB) LaSalle, IL)	Commercial and Residential Real Estate	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
MSA - Chicago-Naperville-Elgin, IL-IN-WI MSA, (CTs from MD 16974 Chicago-Naperville-Arlington Heights, IL within the MSA) (MSA AA)	Full Scope	
LaSalle County, IL Non-MSA (Non-MSA AA)	Full Scope	

## Appendix B: Community Profiles for Full-Scope Areas

The bank has two AAs; one which is part of the Chicago-Naperville-Elgin, IL-IN-WI MSA (MSA AA), and the other located in a Non-MSA (Non-MSA AA). The MSA AA consists of 62 CTs in Will County IL. The Non-MSA AA consists of eight CTs in LaSalle County IL.

### (Non-MSA AA)

Demographic Information for Full-Scope Area: (Non-MSA 2017)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs/BNAs)	8	0.0	12.5	75.0	12.5	0.0
Population by Geography	30,396	0.0	8.5	75.7	15.8	0.0
Owner-Occupied Housing by Geography	9,210	0.0	4.6	78.0	17.4	0.0
Businesses by Geography	1,981	0.0	12.8	68.6	18.7	0.0
Farms by Geography	112	0.0	1.8	57.1	41.1	0.0
Family Distribution by Income Level	7,796	17.2	17.4	21.1	44.3	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	2,702	0.00	12.58	72.80	14.62	0.00
Median Family Income	= \$59,121	Median Housing Value		=\$114,939		
Families Below the Poverty Level	= 8.7%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: F2015 ACS Census and 2017 HUD updated MFI.

Demographic Information for Full-Scope Area:(Non-MSA 2016)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs/BNAs)	8	0.0	0.0	75.0	25.0	0.0
Population by Geography	31,221	0.0	0.0	73.3	26.7	0.0
Owner-Occupied Housing by Geography	9,757	0.0	0.0	71.8	28.2	0.0
Businesses by Geography	1,970	0.0	0.0	71.1	28.9	0.0
Farms by Geography	103	0.0	0.0	53.4	46.6	0.0
Family Distribution by Income Level	8,445	14.9	15.1	23.6	46.4	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	2,530	0.00	0.00	77.08	22.92	0.00
Median Family Income Families Below the Poverty Level	= \$ 54,499 = 9.1%	Median Housing Value = \$121,440				

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 Census Data, and 2016 HUD updated MFI.

## **Non-MSA AA**

This Non-MSA AA contains eight CTs in LaSalle County, IL. The bank has two offices in this Non-MSA AA, one located in a middle-income CT and one in a moderate-income CT per 2015 ACS data, which was a middle-income CT per 2010 census data. According to 2010 Census data, the Non-MSA AA consisted of no low- or moderate-income CTs, six middle-income CTs, and two upper-income CTs. Per 2015 ACS data, the Non-MSA AA consists of no low-income CTs, one moderate-income CT, six middle-income CTs, and one upper-income CT. The CTs in this Non-MSA AA are contiguous, meet the requirements of the CRA, and do not arbitrarily exclude any low- or moderate-income geographies.

Financial institution competition in the MSA AA exists in the form of local and regional banks, including community banks and savings and loan institutions. HNB ranks seventh of all (23) banks in the Non-MSA AA, holding 6 percent of the deposit market share per the most recent (June 30, 2017) FDIC Deposit Market Share Report.

The local economy in the Non-MSA AA is improving. Unemployment rates continue on an improving trend, declining from 7.5 percent to 5.3 percent from December 31, 2015 to December 31, 2017 per U.S. Bureau of Labor Statistics (BLS) data. Despite improvement, the Non-MSA AA unemployment rates remain higher than state unemployment rates. State unemployment during the same time frame improved from 6 to 4.7 percent.

Companies providing the majority of employment across the Non-MSA AA are Carus Chemical (chemical), J.C. Whitney (retail), and LaSalle Veteran's Home (healthcare), per IL Valley Chamber of Commerce and Economic Development data.

The percentage of families living below the poverty level totaled 9.1 percent during the 2015/2016 period and 8.7 percent during the 2017 evaluation period. Additionally, the median housing value in the Non-MSA AA for the 2015/2016 period was four times the median annual income of low-income families in the Non-MSA AA, and during the 2017 review period is 3.83 times. The aforementioned factors demonstrate a homeownership affordability issue for many low-income families, limiting mortgage demand among these families. Residents of limited income may face difficulty meeting credit-underwriting standards. Generally, home ownership is not a viable option for these families and affordable home purchase opportunities are limited. Additionally, the bank did not receive any home mortgage applications from low-income borrowers in the Non-MSA AA during the 2017 evaluation period per 2017 HMDA data, further underscoring the limited lending opportunities in the Non-MSA AA.

We reviewed a community contact (from an agency providing community services to LaSalle County) within the Non-MSA AA during the review period. The contact stated that affordable rental housing, especially units appropriate for families, is a key need for the community. This type of housing is an important part of economic development; without available affordable housing for employees of businesses, the area cannot attract companies relocating from elsewhere. An additional identified key need is economic development through fostering new businesses, which will result in new jobs. Redevelopment of access to healthcare services is also needed as the hospital in southern LaSalle County closed in early 2016. The contact also identified homebuyer counseling for first time and low-income buyers, job training to provide local residents the ability to earn a living wage, and financial education as additional needs.

Opportunities for financial institution involvement noted by the contact include:

- Involvement in redevelopment of the former St. Mary's Hospital in Streator, IL in southern LaSalle County – OSF Hospitals, which owns the building, has discussed using the building for healthcare and other community services.
- Homebuyer counseling.
- Affordable housing development.
- Job training through the local Workforce Investment Board to help connect local employers, community colleges, and local residents.
- Banks can provide funding, personnel and space for workshops that will be part of the training program being developed by a local community service agency in the county. This is a program that will provide job training and internships to the parents of children in the agency's Head Start program. Per the contact, the program is designed to help families as a whole, rather than working with children in isolation from their overall living circumstances.

## Demographic Information:

2016: According to 2010 census data, the Non-MSA AA population is 31,221. The Non-MSA AA contained approximately 8,445 families, of which 1,258 (14.9 percent) were low-income, and 1,275 (15.1 percent) were moderate-income. Approximately 9.1 percent of families lived below the poverty level. The 2016 family income for the Non-MSA AA is \$54,499. The median income for low-income families was \$29,000.

Of the 14,183 housing units in the Non-MSA AA, 9,757 or 68.8 percent were owner occupied. The Non-MSA AA had no low- or moderate-income CTs in 2016. Of total housing units in the Non-MSA AA, 3,195 or 22.5 percent were occupied rental units and 1,231 or 8.7 percent were vacant. The median housing value in the Non-MSA AA was \$121,440.

2017: According to 2015 ACS data, the Non-MSA AA population is 30,396. The Non-MSA AA contains approximately 7,796 families, of which 1,340 (17.2 percent) are low-income, and 1,356 (17.4 percent) are moderate-income. Approximately 8.7 percent of families live below the poverty level. The 2017 median family income for the Non-MSA AA is \$59,121. The median income for low-income families was \$30,200.

Of the 14,459 housing units in the Non-MSA AA, 9,210 or 63.7 percent are owner occupied. Of these owner-occupied units, 424 or 4.6 percent are located in moderate-income CTs. The Non-MSA AA had no low-income CTs in 2017. Of total housing units in the Non-MSA AA, 3,536 or 24.5 percent are occupied rental units and 1,713 or 11.8 percent are vacant. The median housing value in the Non-MSA AA is \$114,939.



**(MSA AA)**

Demographic Information for Full-Scope Area: (MSA AA 2017)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs/BNAs)	62	12.9	24.2	40.3	21.0	1.6
Population by Geography	238,310	11.0	20.4	42.0	26.6	0.0
Owner-Occupied Housing by Geography	58,107	5.1	13.6	50.0	31.3	0.0
Businesses by Geography	9,892	13.3	15.7	45.0	25.9	0.1
Farms by Geography	292	8.2	19.9	48.6	22.9	0.3
Family Distribution by Income Level	56,681	21.8	17.6	23.0	37.6	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	22,325	18.33	28.81	38.62	14.24	0.00
Median Family Income Families Below the Poverty Level	= \$75,350 = 9.3%	Median Housing Value = \$159,119				

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2015 ACS Census, and 2017 HUD updated MFI.

Demographic Information for Full-Scope Area: (MSA AA 2016)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs/BNAs)	62	9.7	29.0	40.3	19.4	1.6
Population by Geography	236,581	8.1	24.7	45.3	21.9	0.0
Owner-Occupied Housing by Geography	61,246	3.3	21.2	50.9	24.7	0.0
Businesses by Geography	9,768	7.4	24.3	46.3	22.0	0.0
Farms by Geography	281	5.0	17.1	47.3	30.2	0.4
Family Distribution by Income Level	57,825	20.6	18.1	23.5	37.8	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	22,358	14.11	36.01	39.15	10.73	0.00
Median Family Income Families Below the Poverty Level	= \$72,196 = 8.1%	Median Housing Value = \$190,445				

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 Census, and 2016 HUD updated MFI.

## **MSA AA**

The MSA AA contains 62 CTs in Will County, IL. The bank has one office in this MSA AA located in a middle-income CT, per both 2010 census data and 2015 ACS data. According to 2010 Census data, the MSA AA consisted of six low-income CTs, 18 moderate-income CTs, 25 middle-income CTs, 12 upper-income CTs, and one CT with no income classification. Per 2015 ACS data, the MSA AA consists of eight low-income CTs, 15 moderate-income CTs, 25 middle-income CTs, 13 upper-income CTs, and one CT with no income classification. The CTs in this MSA AA are contiguous, meet the requirements of the CRA, and do not arbitrarily exclude any low- or moderate-income geographies.

Financial institution competition in the MSA AA is strong due to the presence of large regional and national banks, as well as many local community banks and savings and loan institutions. HNB ranks 33 out of 44 banks in the MSA AA, holding 0.29 percent of the deposit market share per the June 30, 2017 FDIC Deposit Market Share Report. BMO Harris Bank, JP Morgan Chase, First Midwest Bank, Old Plank Trail Community Bank, and First Community Financial Bank make up the top five banks in the MSA AA, with 76 offices inside the market area and holding a combined 63.1 percent of deposits.

The local economy in the MSA AA is steadily improving. Unemployment rates continue on an improving trend, moving from 6.0 percent to 5.1 percent from December 31, 2015 to December 31, 2017 per U.S. BLS data. MSA AA unemployment rates are in line with state unemployment rates, though state unemployment as of December 31, 2017, reflect slightly more improvement than the local unemployment rate. State unemployment during the same time frame improved from 6.0 percent to 4.7 percent.

Companies providing the majority of employment across the MSA AA are Amazon (distribution/logistics), Plainfield School District (education), and Presence St. Joseph Medical Center (healthcare), per the Will County Center for Economic Development data.

The percentage of families living below the poverty level totaled 8.1 percent during the 2015/2016 evaluation period and 9.3 percent during the 2017 evaluation period. Additionally, the median housing value in the MSA AA for the 2015/2016 period was five times the median annual income of low-income families in the MSA AA, and during the 2017 review period was four times. The aforementioned factors demonstrate a homeownership affordability issue for many low-income families, limiting mortgage demand among these families. Residents of limited income may face difficulty meeting credit underwriting standards. Generally, home ownership is not a viable option for these families and affordable home purchase opportunities are limited.

We reviewed a community contact from within the MSA AA during the review period from an agency providing community services to Will County, IL. The contact stated that commercial lending to entrepreneurial startup and existing small business are key needs for the community. Opportunities for financial institution involvement noted by the contact are commercial lending and working capital loans.

## Demographic Information:

2016: According to 2010 census data, the MSA AA population is 236,581. The MSA AA contained approximately 57,825 families, of which 11,912 (20.6 percent) were low-income, and 10,466 (18.1 percent) were moderate-income. Approximately 8.1 percent of families lived below the poverty level. The 2016 median family income for the MSA AA is \$72,196. The median income for low-income families was \$37,350.

Of the 85,451 housing units in the MSA AA, 61,246 or 71.8 percent were owner occupied. Of these owner-occupied units, 2,021 or 3.3 percent are located in low-income CTs and 12,984 or 21.2 percent are located in moderate-income CTs. Of total housing units in the MSA AA, 18,270 or 21.4 percent were occupied rental units and 5,935 or 6.9 percent were vacant. The median housing value in the MSA AA was \$190,445.

2017: According to 2015 ACS data, the MSA AA population is 238,310. The MSA AA contains approximately 56,681 families, of which 12,356 (21.8 percent) are low-income, and 9,976 (17.6 percent) are moderate-income. Approximately 9.3 percent of families live below the poverty level. The 2017 median family income for the MSA AA is \$75,350. The median income for low-income families was \$38,750.

Of the 85,733 housing units in the MSA AA, 58,107 or 67.8 percent are owner occupied. Of these owner-occupied units, 2,963 or 5.1 percent are located in low-income CTs and 7,903 or 13.6 percent are located in moderate-income CTs. Of total housing units in the MSA AA, 21,169 or 24.7 percent are occupied rental units and 6,457 or 7.6 percent are vacant. The median housing value in the MSA AA is \$159,119.

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2015/2016</b>	
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Hometown Non-MSA	76	6,895	63.9	468	14.9	7.9	5.1	15.1	15.8	15.4	23.6	18.4	21.2	46.4	50.0	42.7	0.0	7.9	15.6	
Hometown MSA	43	5,584	43.1	8,315	20.6	7.0	8.5	18.1	16.1	19.7	23.5	14.0	23.3	37.8	39.5	26.7	0.0	27.90	21.8	
<b>Total</b>	<b>119</b>	<b>12,479</b>	<b>100.0</b>	<b>119</b>	<b>19.8</b>	<b>7.6</b>	<b>8.3</b>	<b>17.7</b>	<b>14.3</b>	<b>19.5</b>	<b>23.5</b>	<b>16.8</b>	<b>23.1</b>	<b>38.9</b>	<b>46.2</b>	<b>27.6</b>	<b>0.0</b>	<b>15.1</b>	<b>21.5</b>	

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017</b>	
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Hometown Non-MSA	29	2,853	61.7	484	17.2	0.0	6.4	17.4	24.1	15.9	21.1	13.8	21.7	44.3	58.6	39.9	0.0	3.4	16.1	
Hometown MSA	18	2,077	38.3	7,955	21.8	5.6	8.9	17.6	16.7	23.8	23.0	5.6	23.8	37.6	22.2	23.9	0.0	50.0	19.6	
<b>Total</b>	<b>47</b>	<b>4,930</b>	<b>100.0</b>	<b>8,439</b>	<b>21.2</b>	<b>2.1</b>	<b>8.7</b>	<b>17.6</b>	<b>21.3</b>	<b>23.3</b>	<b>22.8</b>	<b>10.6</b>	<b>23.7</b>	<b>38.4</b>	<b>44.7</b>	<b>24.8</b>	<b>0.0</b>	<b>21.3</b>	<b>19.4</b>	

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Hometown Non MSA	76	6,895	63.9	468	0.0	0.0	0.0	0.0	0.0	0.0	71.8	80.3	62.8	28.2	19.7	37.2	0.0	0.0	0.0
Hometown MSA	43	5,584	36.1	8,315	3.3	7.0	1.7	21.2	18.6	13.5	50.9	55.8	52.7	24.7	18.6	32.1	0.0	0.0	0.0
<b>Total</b>	<b>119</b>	<b>12,479</b>	<b>100.0</b>	<b>8,783</b>	<b>2.8</b>	<b>2.5</b>	<b>1.7</b>	<b>18.3</b>	<b>6.7</b>	<b>12.8</b>	<b>53.7</b>	<b>71.4</b>	<b>53.2</b>	<b>25.2</b>	<b>19.3</b>	<b>32.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2015/2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Hometown Non MSA	29	2,853	61.7	484	0.0	0.0	0.0	4.6	3.4	2.7	78.0	82.8	72.9	17.4	13.8	24.4	0.0	0.0	0.0
Hometown MSA	18	2,077	38.3	7,955	5.1	38.9	3.2	13.6	22.2	10.9	50.0	16.7	49.8	31.3	22.2	36.1	0.0	0.0	0.0
<b>Total</b>	<b>47</b>	<b>4,930</b>	<b>100.0</b>	<b>8,439</b>	<b>4.4</b>	<b>14.9</b>	<b>3.0</b>	<b>12.4</b>	<b>10.6</b>	<b>10.4</b>	<b>53.9</b>	<b>57.4</b>	<b>51.2</b>	<b>29.4</b>	<b>17.0</b>	<b>35.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2015/2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Hometown Non-MSA	21	2,422	51.2	427	0.0	0.00	0.0	0.0	0.00	0.0	71.1	90.0	69.8	29.0	10.0	30.2	0.0	0.0	0.0
Hometown MSA	20	2,596	48.7	3,279	7.1	5.0	4.7	24.3	35.0	23.6	46.3	45.0	46.5	22.3	15.0	25.2	0.0	0.0	0.0
<b>Total</b>	<b>41</b>	<b>5,019</b>	<b>100.0</b>	<b>3,706</b>	<b>5.9</b>	<b>2.4</b>	<b>4.1</b>	<b>20.3</b>	<b>17.1</b>	<b>20.9</b>	<b>50.4</b>	<b>68.29</b>	<b>49.2</b>	<b>23.4</b>	<b>12.2</b>	<b>25.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Hometown Non-MSA	20	1,826	50.0	427	0.0	0.0	0.0	12.8	15.0	12.4	68.6	75.0	68.9	18.7	10.0	18.7	0.0	0.0	0.0
Hometown MSA	20	2,753	50.0	3,279	13.3	20.0	10.8	15.7	15.0	16.6	45.0	50.0	43.1	25.9	15.0	29.5	0.1	0.0	0.0
<b>Total</b>	<b>40</b>	<b>4,579</b>	<b>100.0</b>	<b>3,706</b>	<b>11.1</b>	<b>10.0</b>	<b>9.5</b>	<b>15.2</b>	<b>15.0</b>	<b>16.1</b>	<b>48.9</b>	<b>62.5</b>	<b>46.1</b>	<b>24.7</b>	<b>12.5</b>	<b>28.3</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015/2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Hometown Non MSA	21	2,422	51.2	427	69.4	90.0	41.9	7.6	4.8	23.0	4.8
Hometown MSA	20	2,596	48.8	3,279	78.1	95.0	39.6	5.5	5.0	16.4	0.0
<b>Total</b>	<b>41</b>	<b>5,019</b>	<b>100.0</b>	<b>3,706</b>	<b>76.7</b>	<b>92.7</b>	<b>39.9</b>	<b>5.9</b>	<b>9.5</b>	<b>17.5</b>	<b>2.4</b>
<i>Source: 2016 D&amp;B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Hometown Non-MSA	20	1,826	50.0	427	70.5	75.0	41.9	8.7	15.0	20.8	10.0
Hometown MSA	20	2,752	50.0	3,279	79.3	90.0	39.6	6.5	10.0	14.3	0.0
<b>Total</b>	<b>40</b>	<b>4,578</b>	<b>100.0</b>	<b>3,706</b>	<b>77.8</b>	<b>82.5</b>	<b>39.9</b>	<b>6.8</b>	<b>12.5</b>	<b>15.4</b>	<b>5.0</b>
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0</i>											