



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Schaumburg Bank & Trust Company, National Association
Charter Number: 24150

1180 East Higgins Road
Schaumburg, IL 60173-0000

Office of the Comptroller of the Currency

ADC-CHICAGO (8309) Field Office
1700 East Golf Road Suite 800
Schaumburg, IL. 60173

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of Schaumburg Bank & Trust Company, National Association with respect to the Lending, Investment, and Service Tests:

| Performance Levels | Schaumburg Bank & Trust Co. N.A. Performance Tests | | |
|---------------------------|---|-----------------|--------------|
| | Lending Test* | Investment Test | Service Test |
| Outstanding | | | |
| High Satisfactory | | X | X |
| Low Satisfactory | X | | |
| 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:

- Lending levels reflect an adequate responsiveness to the bank's assessment area (AA).
- Distribution of loans to small businesses and individuals of various income levels is good.
- Geographic distribution throughout the AA is adequate.
- Retail banking services are sufficient to reach all segments of the bank's AA population.
- Community Development loans, investments and services help meet identified credit needs within the AA.

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.

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.

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

Schaumburg Bank and Trust Company N.A. (SBT), formerly known as Advantage National Bank Group, is a full service intrastate bank headquartered in Schaumburg, IL, which is located approximately 22 miles northwest of the city of Chicago.

SBT is a wholly owned subsidiary of Wintrust Financial Corporation (Wintrust), which is headquartered in Lake Forest, IL. In addition to SBT, Wintrust owns and operates fourteen other banks, an insurance finance company, a trust company, and an investment firm. A full service mortgage company, Wintrust Mortgage, was an operating subsidiary of one of Wintrust's financial institutions at the time of this performance evaluation, subsequently this mortgage company was merged into that affiliate bank. At the bank's request, the HMDA-reportable loans originated by the mortgage company in SBT's designated AA were considered as part of the bank's CRA performance. We also took into consideration, at the request of SBT, the bank's other consumer lending performance.

As of June 30, 2011, SBT reported total assets of \$595 million and \$417 million in loans and leases. Tier 1 Capital was approximately \$54 million. Currently, the bank operates five office locations in Elk Grove Village, Roselle, Bloomingdale, Wood Dale, and Schaumburg, IL. Bank locations added since the prior CRA examination include the Wood Dale location that opened on March 25, 2011 and the Schaumburg location, which opened on August 22, 2011. All five locations are full service and are equipped with Automated Teller Machines (ATMs). The strategic focus of SBT is to make itself the bank of choice for both small businesses and consumers throughout its AA. The bank is primarily a commercial lender, but also originates consumer loans and facilitates mortgages with referrals to the affiliated mortgage company.

SBT's lending portfolio as of June 30, 2011 consisted of:

| Loan Type | \$ Amount (in millions) | Percentage of Portfolio |
|---------------------|----------------------------|-------------------------|
| Commercial | \$275 | 68% |
| 1-4 Family Mortgage | \$61 | 15% |
| Consumer | \$38 | 9% |
| Multi Family | \$21 | 5% |
| Other | \$9 | 3% |
| Total | \$404 | 100% |

There are no legal or financial factors impeding the bank's ability to help meet the credit needs of its AA. The bank received a Satisfactory rating at the prior CRA examination, dated November 17, 2007, which was also conducted using the large bank CRA examination procedures.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test is January 1, 2008 through June 30, 2011. Products reviewed in the lending test included small business loans reported on the CRA LAR and residential mortgages reported on the bank's HMDA LAR. Home mortgage loans reported by the bank's affiliate, Wintrust Mortgage Company, which were originated in SBT's AA were also considered. In addition, we analyzed the bank's consumer loans originated during the evaluation period per SBT's request.

The evaluation period for community development activities was December 17, 2007 to September 30, 2011. The bank's community development activities included community development lending, investments, and services provided within the AA as well as a broader regional area that included the bank's AA.

Deposit information reported to the Federal Deposit Insurance Corporation as of June 30, 2011 was used to determine the bank's deposit market share and market presence within its AA.

Data Integrity

We conducted an independent test of the accuracy of all CRA LAR and HMDA LAR data used in our performance evaluation. Lending Information on small business loans, consumer loans, and residential mortgages was assessed and found to be accurate and reliable. A data integrity examination of the HMDA data reported by Wintrust Mortgage Company was performed during a separate OCC examination conducted in 2011 and that data was also found to be reliable.

We also conducted a data integrity review of the bank's community development loans, investments, and services during this examination. All community development activity included in this performance evaluation was validated as meeting community development criteria.

Selection of Areas for Full-Scope Review

The bank has one AA, which consists of 88 census tracts within Cook and Dupage Counties, both of which are located in the Chicago/Naperville/Joliet Metropolitan Division (MD 16974). All of the bank's five branches are located within the AA. There were no low- or moderate-income (LMI) census tracts arbitrarily excluded. The bank's AA meets all regulatory requirements and received a full scope review for this evaluation.

Ratings

The analysis of lending activity was weighted more heavily for small business loans and consumer lending over residential mortgages loans based on the volume of loans reported during the evaluation period and the bank's primary business strategy. Borrower distribution was weighted more heavily than geographic distribution as the bank's AA does not have any low-income census tracts and only three moderate-income census tracts. Demographic data for the three moderate-income census tracts reflects only 3% of the AA population resides in those census tracts and only 5% of AA business are located in those census tracts. In the bank's AA, there are 167 financial institutions, so competition is especially high due to several branch offices of large and regional banks being located throughout the bank's AA. We took all of these factors into consideration in our assessment of SBT's CRA performance.

Other

To ascertain AA credit needs for this evaluation, we reviewed four community contacts recently conducted with organizations located in or close to the bank's market area and we conducted one new community contact. We also took into consideration information available from a variety of public forums held in the Chicagoland area during 2011. In addition, we reviewed current reports on affordable housing, economic development and consumer financial services needs for Chicago and its suburban areas. We determined that community development opportunities, although limited, do exist in the northwest suburban areas of Chicago. In addition, economic development and job creation through financial assistance to small businesses are important community credit needs.

Fair Lending or Other Illegal Credit Practices Review

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 performance under the lending test is rated “Low Satisfactory”. Based on our full scope review, the bank’s overall lending activity in the AA is adequate.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other Products in appendix C for the facts and data used to evaluate the bank’s lending activity.

The bank’s business strategy for direct lending is primarily commercial lending, and under corporate guidance the bank has elected since 2005 to refer the vast majority of its mortgage loan applications to its affiliate, Wintrust Mortgage Company. During this examination, we considered those mortgages originated by Wintrust Mortgage Company that are within the bank’s AA in addition to those originated directly by the bank. As only one home improvement loan was originated during the evaluation period, that category of residential mortgage lending was not analyzed or considered in our lending test evaluation.

The bank’s deposit market share within its AA is reasonable. As of June 30, 2011, SBT ranks 51st out of 167 financial institutions located in its designated AA with a market share of 0.21%. During the evaluation period, the bank’s average quarterly loan to deposit ratio equaled 84.79%. The bank’s June 30, 2011 quarterly loan to deposit ratio equaled 82.75%. These ratios reflect a good lending performance factor for SBT.

Lending in Assessment Area

This analysis includes only those loans originated or purchased by the bank and does not include affiliate lending. See the following breakdown by loan type, number, and amount of loans.

| Lending in Assessment Area | | | | | | | | | | |
|-----------------------------------|-----------------|-------|---------|-------|-------|-------------------------|-------|---------|-------|---------|
| Loan Type | Number of Loans | | | | | Dollars of Loans (000s) | | | | |
| | Inside | | Outside | | Total | Inside | | Outside | | Total |
| | # | % | # | % | | \$ | % | \$ | % | |
| HMDA | 8 | 28.57 | 20 | 71.43 | 28 | 2,485 | 15.81 | 13,230 | 84.19 | 15,715 |
| Small Bus | 356 | 65.20 | 190 | 34.80 | 546 | 54,391 | 51.09 | 52,062 | 48.91 | 106,453 |
| Consumer | 171 | 67.86 | 81 | 32.14 | 252 | 20,756 | 65.16 | 11,098 | 34.84 | 31,854 |
| Total | 535 | 64.77 | 291 | 35.23 | 826 | 77,632 | 50.40 | 76,390 | 49.60 | 154,022 |

The bank's level of lending in its AA is adequate. Overall, a high percentage of the bank's loans, 65% by number, are within the bank's AA. This is mirrored by small business lending, also showing 65% of originations inside the AA. A majority (68%) of consumer lending is also originated within the AA. Although only 29% of the bank's mortgage lending is shown as being within the AA, this does not reflect the mortgage lending originated by the bank's affiliated mortgage company. Over 700 mortgage loans, in addition to those HMDA loans originated by the bank directly, which are noted above, were originated by Wintrust Mortgage Company within SBT's AA during this evaluation period.

Distribution of Loans by Income Level of the Borrower

The bank's lending activity based on borrower distribution is good.

Home Mortgage Loans

Refer to Tables 8 and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage purchase and refinancing loan originations and purchases. This analysis includes loans originated by both the bank and its affiliate Wintrust Mortgage Company.

Overall borrower distribution of home mortgage loans to borrowers of different income levels is good. As there are more moderate-income families than low-income families in the bank's AA, the bank's home mortgage lending performance with moderate-income borrowers was given slightly more weight than its performance with low-income borrowers.

The distribution of home purchase loans to low-income borrowers is adequate. The bank's level of lending to low-income borrowers (6.62%) was somewhat lower than the percentage of low-income families (11.12%). However, the bank's performance is reasonable considering that three percent of the families in the AA are living below the poverty level and are unlikely to be able to readily afford homeownership. Additionally, the bank's market share for lending to low-income borrowers (0.9%) is near to its overall market share (1.4%). Moderate-income borrower distribution was excellent with bank lending (38.24%) exceeding the percentage of moderate-income families (15.57%). Correspondingly, the bank's market share for home purchase lending to moderate-income borrowers at 2.3% exceeded its overall market share (1.4%).

The bank's origination of home mortgage refinance loans to low-income borrowers (3.84%) is poor in relation to the percentage of low-income borrowers (11.12%). However, overall the bank's performance is adequate as the bank's market share of home refinance loan lending to low-income borrowers is excellent at 1.2% and meets its overall home mortgage refinance loan market share. Distribution of home mortgage refinance loans to moderate-income borrowers (12.53%) is adequate as the ratio is near to the percentage of moderate-income families (15.57%) in the AA. The bank's market share of home refinance loan lending to moderate-income borrowers is also adequate as the ratio (0.9%) is near to the bank's overall home refinance lending market share ratio (1.2).

Small Loans to Businesses

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall distribution of small business loans originated by SBT in its AA is good.

During the review period, 63% of SBT's business loans were to small businesses (those with revenues of \$1 million or less), which is near to the demographics that show that 71% of the businesses within the AA are small businesses. Further supporting the bank's performance is the fact that 78% of the small business loans reported on the CRA LAR were in amounts of \$250,000 or less and 68% were in amounts of \$100,000 or less.

A market share report of those financial institutions that originated small business loans within the bank's AA reflects excellent market share performance for SBT. The bank has an overall small business market share of 0.06% based on number of loans and a market share of 0.14% for small business lending to businesses with revenues of \$1 million or less.

Consumer Loans

Refer to Table 13 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Overall the bank's borrower distribution of consumer loans is good. As there are more moderate-income households than low-income households in the bank's AA, the bank's consumer lending performance with moderate-income borrowers was given slightly more weight than its performance with low-income borrowers.

Borrower distribution for consumer lending to low-income borrowers is adequate as the bank's percentage of loans (9.94%) is somewhat lower than the percentage of low-income households (13.09%). As the vast majority of the bank's consumer lending analyzed for this evaluation consisted of home equity lending, once again the ability of low-income borrowers (3% of households living below the poverty level) to be able to readily afford homeownership was taken into consideration.

Borrower distribution for consumer lending to moderate-income borrowers is good as the bank's percentage of loans (12.87%) is near to the percentage of moderate-income households (14.93%).

Distribution of Loans by Income Level of the Geography

The bank's lending activity based on geographic distribution is poor. As there are no low – income geographies in the bank's AA, only a geographic analysis of activity in moderate – income census tracts was performed.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans is adequate.

Refer to Tables 2 and 4, in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage purchase and refinancing loan originations and purchases.

The geographic distribution for home purchase loans in moderate – income census tracts (0.79%) is poor as compared to the percentage of the AA's owner occupied housing units (2.09%). However, the bank's market share for home purchase loans in moderate – income census tracts (1.7%) is excellent as it exceeds its overall market share of 1.4%.

The geographic distribution for home refinance in moderate - income census tracts (0.61%) is poor as compared to the percentage of the AA's owner occupied housing units (2.09%). However, the bank's market share for home refinance loans in moderate-income census tracts (1.6%) is excellent as it exceeds its overall market share of 1.2%.

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses within the moderate census tracts is poor. The percentage of bank lending in moderate – income census tracts (1.13%) is lower than the percentage of small businesses in the moderate – income geographies within the AA (5.39%). In addition, the bank's market share for lending in moderate – income geographies(.01%) is lower than its overall small business lending market share(.06%).

Consumer Loans

Refer to Table 13 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans within the moderate - income census tracts is poor when compared to the percentage of households in moderate – income geographies (3.12%). The percentage of consumer loans made in the moderate-income census tracts (1.17%) is lower than the percentage of households in the moderate-income census tracts (3.12%).

Lending Gap Analysis

During this review, we did not identify any lending gaps.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending.

Community development lending activity had a positive impact on the bank's performance.

The bank made seven loans within the AA for community development needs totaling \$3.6 million dollars. One of these loans was to a not-for-profit corporation whose primary purpose is to work with LMI youth to help prevent juvenile delinquency. The loan was originally for \$130 thousand and was increased by \$20 thousand the following year. This loan has been renewed three times during the evaluation period. The bank also extended a loan to a non-profit family care center that primarily provides health care services to local LMI families. This loan has also been renewed twice since its origination and totals \$1 million dollars.

Product Innovation and Flexibility

The bank developed products geared towards assisting with the credit needs of LMI individuals and small businesses. The bank offers a product to small business called Easy Access Line of Credit along with the Small Business Overdraft Protection Line. The Small Business Overdraft Protection Lines total 104 lines of credit established for a total of \$156 thousand dollars. In addition, the bank has an All Purpose Loan Program, which was created as an alternative to payday lending. The bank has originated 21 All Purpose Loans for a total of \$113 thousand dollars. While neither of these products is innovative, they do demonstrate the bank's willingness and flexibility to help meet community credit needs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "High Satisfactory". The bank's performance under the investment test is good as the bank provides a significant level of qualified investments in its AA and in the wider regional areas that include its AA.

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments. This table includes all qualified investments that SBT made during the evaluation period, those that remained on the bank's books from prior periods, and unfunded commitments made during the evaluation period.

During the evaluation period, the bank made seven new qualified investments totaling \$2.9 million. In addition, the bank carried on its books eight investments made in prior periods with a value of \$734 thousand. Altogether, 15 investments totaling \$2.2 million as well as \$900 thousand in unfunded commitments were considered.

The bank purchased two mortgage backed securities during this current evaluation period totaling \$1 million of original commitments and outstanding balances as of the examination date of \$461 thousand. These Fannie Mae and Freddie Mac mortgage backed securities were for affordable housing serving the LMI homeowners in the bank's AA. The bank also purchased three certificates of deposit which total \$675 thousand at a Community Development Financial Institution (CDFI) that serves the urban communities around Chicago. The bank also holds a pool of loans from a regional CDFI totaling \$250 thousand at origination and with an outstanding balance of \$178 thousand. In addition, the bank made a \$1 million binding commitment to invest in an SBA-licensed Small Business Investment Companies (SBIC), of which \$900 thousand dollars remains unfunded. The focus of the SBIC is to aid in the development of small businesses in the Chicagoland area and the surrounding region. Previous examination period outstanding balances totaled \$734 thousand.

The bank's investments provide good responsiveness to identified credit needs within the AA by supporting entities that facilitate funding for affordable housing and for new business activity that will lead to new jobs and economic development.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Chicago-Naperville-Joliet MD is good as the bank's delivery systems are accessible to essentially all portions of the AA.

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.

During the evaluation period, the bank opened two branches, increasing its total branches to five. A bank facility was purchased in Schaumburg, Illinois in addition to the acquisition of a location in Wood Dale, Illinois. All branches are located in middle-income geographies. The bank has not closed any branches.

Lobby and drive up hours at all locations provide convenient access to banking products and services to customers. Other delivery services including ATMs and internet and telephone banking services are also available to customers. In addition, all Wintrust ATMs are available to customers as part of the STAR system, which provides ATM services to banks in the Star Network at no additional fees to customers. The Bloomingdale branch has collaborated with Bloomingdale Horizon, an independent senior living community providing housing for LMI individuals, to provide services to the residents on a weekly basis.

Community Development Services

SBT's community development service activity had positive impact on the bank's performance. The level of community development services demonstrates a relatively high level of participation in response to community development needs of the AA.

Twenty-four bank officers or employees are involved with seven different organizations and provide their financial expertise by serving as financial advisors or consultants. The organizations primarily serve LMI persons or small businesses and typically involve community education or medical services, in addition to acting as a resource for small businesses. There are several employees who volunteer at other community organizations and serve as chairpersons or as board members.

The bank also participates in the Money Smart program, offered through the FDIC. The bank partners up with local non-profits to offer instructor led financial literacy training. The Money Smart program is a comprehensive financial education curriculum designed to help individuals outside the financial mainstream enhance their financial skills and create positive banking relationships. Nine Money Smart sessions were held in 2011.

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): 1/1/2008 to 6/30/2011 Investment and Service Tests and CD Loans: 12/17/2007 to 9/30/2011 | |
| Financial Institution | | Products Reviewed |
| Schaumburg Bank & Trust Company N.A. 1180 E. Higgins Road Schaumburg, Illinois 60173 | | Home mortgage, small business, home refinance, consumer loans, community development loans, qualified investments, and community development services. |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| Wintrust Mortgage Company | Subsidiary of Barrington Bank and Trust Company | Home Mortgages |
| List of Assessment Areas and Type of Examination | | |
| Assessment Area | Type of Exam | Other Information |
| Chicago-Naperville-Joliet, IL MD #16974 | Full Scope | |

Appendix B: Market Profiles for Full-Scope Areas

[Chicago- Naperville-Joliet, IL MSA #16974

| Demographic Information for Full-Scope Area: Schaumburg Assessment Area (AA) | | | | | | |
|--|---------|---------------|--------------------|------------------|--|---------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs) | 88 | 0.00 | 3.41 | 55.68 | 40.91 | 0.00 |
| Population by Geography | 576,915 | 0.00 | 17,159 | 325,698 | 234,058 | 0.00 |
| Owner-Occupied Housing by Geography | 156,309 | 0.00 | 2.09 | 53.08 | 44.83 | 0.00 |
| Businesses by Geography | 49,200 | 0.00 | 5.39 | 59.36 | 35.25 | 0.00 |
| Farms by Geography | 563 | 0.00 | 2.49 | 52.22 | 45.29 | 0.00 |
| Family Distribution by Income Level | 149,322 | 11.12 | 15.57 | 25.57 | 47.74 | 0.00 |
| Distribution of Low- and Moderate-Income Families throughout AA Geographies | 39,854 | 0.00 | 5.53 | 6.91 | 28.56 | 0.00 |
| Median Family Income = \$70,484 HUD Adjusted Median Family Income for 2009 = \$74,600 Households Below the Poverty Level = 3.07% | | | | | Median Housing Value = \$174,282 Unemployment Rate = 3.6% | |
| | | | | | | |

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2009 HUD updated MFI.

The bank has only one AA, which contains portions of Cook County and DuPage counties located in the Chicago/Joliet/Naperville MD (16974). The SBT AA consists of 88 whole census tracts, with a total population of 576,915. The AA is contiguous, meets the requirements of the CRA regulation, and does not arbitrarily exclude any LMI geographies.

The AA has three moderate-income census tracts and does not contain any low-income census tracts. The three moderate-income tracts are located in Elk Grove Village, Addison, and Arlington Heights. There are 49 middle-income tracts and 36 upper-income census tracts.

SBT purchased Bank of Commerce in March 2011, which is now its Wood Dale branch, and is located in a middle-income tract. In addition, SBT purchased a bank building, which became its Schaumburg branch location, in August 2011, and is located in a middle-income tract. No locations have been closed since the last CRA examination.

As of June 30, 2011, SBT's total deposits were \$483,522. The bank ranks 51st out of 167 financial institutions located in its designated AA with a market share of 0.21%. The assessment area is relatively competitive as there are a number of institutions of varying sizes (large and community banks). SBT's primary business focus is commercial lending, but it also originates consumer loans and facilitates mortgages through referrals to the affiliated mortgage company, Wintrust Mortgage.

In our review of community contacts, we determined that community development opportunities, although limited, do exist in the northwest suburban areas of Chicago. Management is cognizant of the overall economic downturn. As such, given the overall economics of DuPage County and Northern Cook County, the bank has created a partnership with Wintrust Mortgage to help meet the needs of the LMI individuals within the assessment area. SBT has also identified a community need for small lines of credit for small businesses.

Overall unemployment for the AA is 3.6%. Two of the three moderate-income tracts are heavy industrial areas with two mobile home parks. The third moderate-income tract includes a forest preserve, a golf course and a very small pocket of single-family homes located in Addison, IL.

The updated Housing and Urban Development (HUD) 2009 median family income for the SBT AA is \$74,600. A breakdown of family income levels within the AA shows that 11% are low-income, 16% are moderate-income, 26% are middle-income, and 48% are upper-income. Additionally, 3% of the households within the AA have incomes below the poverty level.

Of the 210,649 housing units in the AA, 156,309 or 74% are owner-occupied, and 49,292 or 23% are occupied rental units. Of total housing units, 157,042 (75%) are 1-4 family housing units and 51,065 (24% are multi-family units. The median housing value based on 2009 census data is \$174,282.

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.

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** - Not included in this PE.
- Table 4. Geographic Distribution of Home Mortgage Refinance 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 5. Geographic Distribution of Multifamily Loans** - Not included in this PE.
- 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** - Not included in this PE.
- 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** - Not included in this PE.
- Table 10. Borrower Distribution of Refinance 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 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** - Not included in this PE.
- Table 13. Geographic and Borrower Distribution of Consumer Loans** - 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 14. Qualified Investments

| QUALIFIED INVESTMENTS | | Geography: SCHAUMBURG AA | | | | Evaluation Period: December 17, 2007, TO September 30, 2011 | | | |
|------------------------|---------------------------|--------------------------|----------------------------|-----------|-------------------|---|------------|------------------------|-----------|
| MA/Assessment Area: | Prior Period Investments* | | Current Period Investments | | Total Investments | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | \$(000's) | % of Total | # | \$(000's) |
| Full Review: | | | | | | | | | |
| Chicago-Joliet-MD | 8 | 734 | 7 | 1,415 | 15 | 2,150 | 100 | 1 | 900 |
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| Limited Review: | | | | | | | | | |
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* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

