

PUBLIC DISCLOSURE

June 21, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

CIBM Bank
Certificate Number: 11729

2913 West Kirby Avenue
Champaign, Illinois 61821

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Chicago Regional Office

300 South Riverside Plaza, Suite 1700
Chicago, Illinois 60606

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, nor should it 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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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs.
- The bank made a majority of its home mortgage and small business loans in the assessment areas.
- The geographic distribution of home mortgage and small business loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of loans to borrowers reflects, given the demographics of the assessment areas, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the prior evaluation; therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

- The institution demonstrated adequate responsiveness to the community development needs of its assessment areas through community development loans, qualified investments, and community development services, as appropriate. Examiners considered the institution's capacity and the need and availability of such opportunities for community development in the assessment areas.

Discriminatory or Other Illegal Credit Practices

No violations of the substantive provisions of the anti-discriminatory laws and regulations or other illegal credit practices were identified during the evaluation.

DESCRIPTION OF INSTITUTION

Background

CIBM Bank is chartered in Champaign, Illinois, and is a wholly owned subsidiary of CIB Marine Bancshares, Inc., of Brookfield, Wisconsin, a one-bank holding company. CIBM Bank operates in east-central Illinois, northern Illinois, central Indiana, and southeastern Wisconsin. Other than the holding company, there are no affiliates. The bank received an overall Satisfactory rating on its prior FDIC Performance Evaluation dated May 20, 2019. The prior exam used Interagency Intermediate Small Institution Examination Procedures.

Operations

CIBM Bank operates 10 full-service branches in its assessment areas with seven in Illinois, one in Indiana, and two in Wisconsin. CIBM closed two branches, one located at 4125 N. Sheridan Road, Peoria, IL (middle-income tract) and one located at 302 W. Springfield Avenue, Champaign, IL (NA tract). In addition, one branch was opened at 7815 N. Knoxville Avenue, Peoria, IL (middle-income tract). No merger or acquisition activities have occurred since the prior examination.

The bank has two loan production offices (LPOs) with home mortgage loans being the primary loan product. One LPO is an upper-income census tract in the Chicago assessment area in Naperville, IL, and one LPO in Sheboygan, WI.

CIBM Bank offers loan products including commercial, agricultural, home mortgage, and consumer loans, primarily focusing on home mortgage and commercial lending. The bank provides a variety of deposit services including checking, savings, money market deposit accounts, and certificates of deposit. The bank provides alternative delivery channels to serve its customers, including bank-owned automated teller machines (ATMs) at the branches, online banking, online bill payment, mobile banking, and telephone banking. The bank's website is www.cibmbank.com. Business services include remote deposit capture, lockbox, merchant services, online money management, disbursement services, and automatic sweep services. The bank participates in a couple of surcharge-free ATM networks where customers can use those ATMs owned by other participating banks without incurring any fees for usage of the ATMs.

Ability and Capacity

Assets totaled \$756.7 million as of March 31, 2022, and included total loans of \$538.6 million, total securities of \$107.2 million, total deposits of \$646.2 million, and total equity capital of \$77.9 million. Commercial and residential loans represent the largest concentrations of the bank's lending activity. The following table shows that loans secured by nonfarm nonresidential properties and commercial and industrial loans make up 57.8 percent of total loans, and 1-4 family residential mortgage loans make up 37.9 percent of total loans. CIBM originates a significant number of home mortgage loans that are sold through the secondary market

Loan Portfolio Distribution as of 3/31/22		
Loan Category	\$(000s)	%
Construction and Land Development	18,817	3.5
Secured by Farmland	657	0.1
Secured by 1-4 Family Residential Properties	164,685	30.6
Secured by Multifamily (5 or more) Residential Properties	39,114	7.3
Secured by Nonfarm Nonresidential Properties	261,557	48.6
Total Real Estate Loans	484,830	90.0
Commercial and Industrial Loans	49,477	9.2
Agricultural Loans	0	0.0
Consumer Loans	213	<0.1
Other Loans	4,107	0.8
Less: Unearned Income	0	0.0
Total Loans	538,627	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank’s ability to meet assessment area credit needs.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. CIBM Bank has designated seven separate assessment areas, which remain unchanged since the prior evaluation. These assessment areas do not arbitrarily exclude any low- or moderate-income census tracts, do not reflect illegal discrimination, and otherwise meet the requirements of the CRA regulations. A more detailed discussion of each assessment area, including economic and demographic data, competition, and community contacts, can be found in the separate assessment area sections of this evaluation.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated May 20, 2019, to the current evaluation dated June 21, 2022. Examiners used the Interagency Intermediate Small Institution Examination Procedures to evaluate CIBM Bank’s CRA performance. These procedures include two tests: the Small Bank Lending Test and the Community Development Test.

CIBM Bank is considered an interstate bank because it operates seven offices in the State of Illinois, one office in the State of Indiana, and two offices in the State of Wisconsin. It is subject to the Interstate Banking and Branching Efficiency Act of 1994 (IBBEA). Examination procedures performed during the current evaluation reflected that CIBM Bank is complying with all applicable requirements of IBBEA.

This evaluation includes an overall rating, a State of Illinois rating, a State of Indiana rating, and a State of Wisconsin rating, in accordance with IBBEA guidelines. In accordance with Interagency CRA procedures, examiners must conduct a full-scope review on at least one assessment area in each state. Other factors are considered when determining whether examiners should conduct full-scope or limited-scope reviews, including prior weak performance in any assessment area. At the prior evaluation dated May 20, 2019, all three rated areas received a satisfactory rating in both the lending and community development tests as well as an overall rating of satisfactory. Given the significant volume of lending in the Chicago assessment area as well as significant concentrations of LMI individuals and geographies, the Chicago assessment area was reviewed using full scope procedures. Given the lesser volume of lending in the other Illinois assessment areas, the remaining four areas were reviewed using limited scope procedures. As both Indiana and Wisconsin contain only one assessment area in each, both assessment areas were reviewed under full-scope procedures.

The bank’s loan and deposit production in the State of Illinois significantly exceeded the production in Indiana and Wisconsin. The following table details the distribution of branches, home mortgage loans, small business loans, and deposits by assessment area. The bank’s performance in Illinois contributes more weight to the bank’s overall CRA rating. The rating for the State of Illinois is heavily influenced by the bank’s performance in the Chicago and Champaign assessment areas due to greater volume of home mortgage loans, deposits, and branches.

State and Assessment Area Weighting								
Assessment Area	Branches		Home Mortgage Loans		Small Business Loans		Deposits as of 6/30/20	
	#	%	#	%	#	%	\$	%
Chicago	1	10.0	2,157	64.9	166	19.0	15,477	2.7
Champaign	3	30.0	83	2.5	106	12.1	267,941	47.1
Bloomington	1	10.0	70	2.1	28	3.2	60,712	10.7
Danville	1	10.0	38	1.1	34	3.9	30,930	5.4
Peoria	1	10.0	19	0.6	74	8.5	51,698	9.1
Subtotal Illinois	7	70.0	2,367	71.2	408	46.7	426,758	75.0
Indiana	1	10.0	632	19.0	130	14.9	32,703	5.8
Wisconsin	2	20.0	324	9.8	336	38.4	109,302	19.2
Total	10	100.0	3,323	100.0	874	100.0	568,763	100.0

Source: 2019-2021 HMDA and CRA data, 6/30/20 Summary of Deposits

Examiners relied upon records provided by the bank, U.S. Census data, D&B demographic data, and community contacts. CIBM Bank’s CRA performance was analyzed in relation to the bank’s performance context, which includes (but is not limited to) bank size and structure, financial condition, loan mix, resources, limitations, assessment area demographics, economic factors, competition, loan demand, and available opportunities.

Activities Reviewed

The CRA evaluation is based upon a review of home mortgage and small business loans. These two loan types are the primary business focuses of the bank. Small farm, consumer, or any other loan types do not account for a significant portion of loans, thus they were not reviewed.

Home mortgage loans consist of home purchase, home improvement, refinance, and multifamily loans reported pursuant to the Home Mortgage Disclosure Act (HMDA) requirements for 2019-2021. In 2019, CIBM originated 1,317 home mortgage loans totaling \$275.1 million; in 2020, 2,479 loans totaling \$580.6 million; and in 2021, 1,886 loans totaling \$413.9 million.

The bank optionally collects and reports data pursuant to the data collection requirements of CRA, and that data was used to evaluate the bank's small business lending. Small business loans reported under CRA from 2019-2021 were reviewed. In 2019, CIBM originated 161 small business loans totaling \$38.7 million; in 2020, 511 loans totaling \$66.1 million; and in 2021, 382 loans totaling \$64.9 million.

When analyzing home mortgage and small business lending performance, this evaluation presents aggregate loan information for 2019 and 2020 for comparison purposes regarding home mortgage and small business lending. The aggregate data for 2021 is not available at the time of this evaluation. Demographic data from the U.S. Census 2015 ACS and D&B data is used as additional measures of comparison for the bank's home mortgage and small business loans, respectively.

The bank's record of originating home mortgage loans contributed more weight to overall conclusions due to the larger loan volume when compared to small business lending during the evaluation period. While weighted more heavily overall, in the Peoria assessment area, based on volume, small business loans carried more weight. In the Wisconsin and Danville, IL assessment areas the products were weighted evenly.

For the Lending Test, examiners reviewed the number and dollar volume of home mortgage and small business loans. Examiners emphasized performance by number of loans, because the number of loans is a better indicator of the number of individuals and businesses served. Performance by dollar did not lead to different conclusions.

When determining the Lending Test rating, more weight was given to the geographic distribution of loans and borrower profile than loan-to-deposit ratio and assessment area concentration. These two factors are more important because they most directly identify how well the bank serves the traditionally underserved segments of the population.

For the Community Development Test, bank management provided data on community development loans, qualified investments, and community development services since the prior CRA evaluation dated May 20, 2019. Prior period investments that remain on the bank's books as of June 21, 2022 are included.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

An overall “Satisfactory” rating is assigned under the Lending Test. This rating is consistent with the most heavily weighted rated area, the State of Illinois. In addition, the State of Wisconsin was also rated “Satisfactory” under this test while the State of Indiana was rated “Outstanding.” The overall conclusion is supported by a more than reasonable loan-to-deposit ratio, a majority of loans in the assessment area, and reasonable performance under both the borrower distribution and geographic distribution criterion.

When analyzing performance for home mortgage and small business lending under the Geographic and Borrower Distribution criterion, examiners applied more weight on comparisons to aggregate data. Aggregate data provides a better indication of actual opportunities in an area as it represents the performance of all lenders. The demographics (percent of owner-occupied dwellings, percent of businesses, the percent of families, and the percentage of businesses with revenues under \$1 million) represents all possible borrowers, not just those actually interested in or that can qualify for a loan.

Loan-to-Deposit Ratio

The bank’s loan-to-deposit ratio is more than reasonable given the institution’s size, financial condition, and assessment area credit needs. The bank’s loan-to-deposit ratio, calculated from Call Report data, averaged 94.2 percent over the past eight calendar quarters from May 20, 2019 to June 20, 2022. CIBM’s ratio went from a high of 107.4 percent at June 30, 2020 to a low of 82.1 at March 31, 2022.

Examiners compared the bank’s loan-to-deposit ratio to seven similarly-situated banks (SSBs) based on asset size, geographic location, lending focus, and information from bank management. The SSBs averaged a ratio 79.9 percent ranging from a low of 57.5 to a high of 93.0 percent. CIBM’s ratio exceeded all of the SSBs. Of the seven SSBs, the three with the highest ratios had their LTD ratio considered more than reasonable at their most recent CRA examinations.

Assessment Area Concentration

The bank originated a majority of its loans by both number and dollar volume within its assessment areas. The following table reflects the bank’s HMDA home mortgage and small business loans inside and outside the assessment areas for 2019-2021.

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										
2019	821	62.3	496	37.7	1,317	184,684	67.1	90,421	32.9	275,105
2020	1,408	56.8	1,071	43.2	2,479	366,019	63.0	214,601	37.0	580,620
2021	1,094	58.0	792	42.0	1,886	252,645	61.0	161,230	39.0	413,875
Subtotal	3,323	58.5	2,359	41.5	5,682	803,348	63.3	466,252	36.7	1,269,600
Small Business										
2019	140	87.0	21	13.0	161	31,739	81.9	6,992	18.1	38,731
2020	413	80.8	98	19.2	511	55,341	83.8	10,731	16.2	66,072
2021	321	84.0	61	16.0	382	55,117	84.9	9,811	15.1	64,928
	874	82.9	180	17.1	1,054	142,197	83.8	27,534	16.2	169,731
Total	4,197	62.3	2,539	37.7	6,736	945,544	65.7	493,786	34.3	1,439,331
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. This conclusion is supported by satisfactory performance in the Illinois and Wisconsin rated areas and outstanding performance in the Indiana rated area.

Borrower Profile

The distribution of loans to borrowers reflects reasonable penetration among retail customers of different income levels and businesses of different sizes. This conclusion is supported by satisfactory performance in the Illinois and Wisconsin rated areas and outstanding performance in the Indiana rated area.

Flexible Lending Programs

CIBM has developed, internally, two loan programs that are targeted to low- and moderate-income (LMI) borrowers and/or geographies or small businesses. These programs are available in all of the bank's seven assessment areas and enhance CIBM's ability to serve area credit needs. Details on the programs:

Affordable Loan Program (ALP) – This internally created loan program is restricted to LMI borrowers or properties located in LMI geographies. Properties may be either owner-occupied or investment 1-4 family homes. Homeownership education is required for all owner-occupied properties. The required credit score has been adjusted downward and currently must be at least 660. For applicants with minimal credit history, their payment history on rent, utilities, and other

payments is considered. The bank provides grants to cover origination charges of up to \$1,125. Additional grants up to \$3,000 are eligible for closing cost and down payment assistance for low-income borrowers and for properties in low-income census tracts.

In addition, some borrowers may qualify for grants provided by non-profit or government entities to further assist with down payments. CIBM has partnered with the Illinois Down Payment Assistance Program, Federal Home Loan Bank (FHLB) Down Payment Plus Program, Illinois Assist Program, and the City of Chicago's Public Safety Officer or First Responder Home Buyer Assistance Program to provide these grants. The bank also refers eligible borrowers to the City of Chicago's Micro Market Recovery Program. In 2019-2021, CIBM originated 371 ALP loans totaling \$53.9 million.

Fast Track Business Loan Program – This internally created program was launched in October 2017. The bank began offering term loans and lines of credit of \$15,000 to \$100,000 for various business purposes. This program includes a streamlined underwriting process with credit decisions made within two business days. In 2019-2021, CIBM originated 146 loans totaling \$10.1 million.

In addition, CIBM offers various home mortgage lending products through the FHA, VA, and USDA, as well as small business loans through the SBA.

Response to Complaints

CIBM Bank did not receive any CRA-related complaints since the prior evaluation. Therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

An overall "Satisfactory" rating is assigned under the Community Development (CD) Test. CIBM's community development performance demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas. The conclusion is supported by adequate responsiveness in all three rated areas.

Community Development Loans

CIBM originated 30 community development loans totaling \$35.1 million. This represents 6.3 percent of average total loans over the 12 quarters since the last examination. This represents an increase from the prior examination when the bank reported 12 loans totaling \$19.8 million.

Examiners compared CIBM's performance to five SSBs. The SSBs were chosen due to their asset size, business focus, recency of the last CRA evaluation, and markets served. The five SSB's had an average CD loan to average total loans ratio of 9.1 percent. The SSBs ranged from a low of 1.9 percent to a high of 15.4 percent. While CIBM's ratio was the second lowest of the group, all the

SSBs received satisfactory ratings for Community Development on their most recent examination. The following tables provide details on CIBM’s CD lending by year and assessment area.

All Community Development Lending by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
5/20/19-12/31/19	1	274	0	0	4	695	6	11,996	11	12,965
2020	0	0	1	1,420	7	3,373	0	0	8	4,793
2021	1	1,105	0	0	5	3,773	2	4,210	8	9,088
2022 YTD*	0	0	0	0	3	8,234	0	0	3	8,234
Total	2	1,379	1	1,420	19	16,075	8	16,206	30	35,080

*Source: Bank Records; * 01/01/22 to 06/21/22.*

All Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize Or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Bloomington	0	0	0	0	0	0	1	5,100	1	5,100
Champaign	0	0	0	0	2	7,398	0	0	2	7,398
Chicago	1	1,105	0	0	4	2,699	1	1,500	6	5,304
Danville	0	0	0	0	0	0	0	0	0	0
Peoria	0	0	0	0	0	0	5	8,749	5	8,749
Illinois Total	1	1,105	0	0	6	10,097	7	15,349	14	26,551
Indianapolis	1	274	0	0	2	1,672	1	857	4	2,803
Milwaukee	0	0	1	1,420	11	4,306	0	0	12	5,726
Totals	2	1,379	1	1,420	19	16,075	8	16,206	30	35,080

Source: Bank records

Qualified Investments

CIBM originated 195 qualified investments and donations totaling \$15.7 million. This represents 2.1 percent of average assets over the 12 quarters since the last examination. This level is consistent with the level at the prior evaluation where CIBM reported 159 qualified investments and donations totaling \$15.5 million

Examiners compared CIBM’s performance to five SSBs. The five SSB’s had an average investments to average assets ratio of .7 percent. The SSBs ranged from a low of .4 percent to a high of 1.3 percent. CIBM’s ratio exceeded all of the SSBs. The following tables provide details on CIBM’s qualified investments and donations by year and assessment area.

Community Development Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	81	7,313	0	0	0	0	0	0	81	7,313
5/20/2019-2/31/2019	1	1,060	0	0	0	0	0	0	1	1,060
2020	0	0	2	6	0	0	0	0	2	6
2021	13	7,122	0	0	0	0	0	0	13	7,122
YTD 2022*	0	0	0	0	0	0	0	0	0	0
Subtotal	95	15,495	2	6	0	0	0	0	97	15,501
Qualified Grants & Donations	0	0	98	160	0	0	0	0	98	160
Total	95	15,495	100	166	0	0	0	0	195	15,661

*Source: Bank Data; * 01/01/22 to 06/21/22.*

All Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize Or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Bloomington	8	896	9	11	0	0	0	0	17	907
Champaign	8	724	18	25	0	0	0	0	26	749
Chicago	12	5,229	11	28	0	0	0	0	23	5,257
Danville	2	1	15	7	0	0	0	0	17	8
Peoria	20	1,229	7	17	0	0	0	0	27	1,246
Illinois Total	50	8,079	60	88	0	0	0	0	110	8,167
Indianapolis	29	3,888	12	35	0	0	0	0	41	3,923
Milwaukee	16	3,528	28	43	0	0	0	0	44	3,571
Totals	95	15,495	100	166	0	0	0	0	195	15,661

Source: Bank records

Community Development Services

Bank employees provided 115 instances of financial expertise or technical assistance to community development-related organizations during the evaluation period in the 12 quarters since the prior evaluation. This level is similar to the 80 instances at the 9 quarters at prior evaluation.

Examiners compared CIBM's performance to five SSBs. The five SSBs had an average of 65 CD services. The SSBs ranged from a low of 21 to a high of 124 services. CIBM's ratio exceeded all but one of the SSBs. The following tables provide details on CIBM's CD services by year and assessment area.

In addition to community development services, one banking office in the Champaign assessment area is located in a low-income census tract. This location increases the availability of banking services to low- and moderate-income individuals in that assessment area.

All Community Development Services by Year					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize Or Stabilize	Totals
5/20/2019-12/31/19	0	16	4	0	20
2020	0	39	1	0	40
2021	0	40	2	0	42
2022 YTD*	0	11	2	0	13
Totals	0	106	9	0	115
<i>Source: Bank record; * 01/01/22 to 06/21/22.</i>					

All Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Bloomington	0	5	0	0	5
Champaign	0	19	4	0	23
Chicago	0	13	0	0	13
Danville	0	6	0	0	6
Peoria	0	7	0	0	7
Illinois Total	0	50	4	0	54
Indianapolis	0	13	1	0	14
Milwaukee	0	43	4	0	47
Total	0	106	9	0	115
<i>Source: Bank Data</i>					

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No violations of the substantive provisions of the anti-discriminatory laws and regulations or other illegal credit practices were identified during the evaluation.

STATE OF ILLINOIS

CRA RATING FOR STATE OF ILLINOIS SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN STATE OF ILLINOIS

The majority of loans (66.1 percent of home mortgage and small business loans within all assessment areas) and deposits (75.0 as of June 30, 2020) are in Illinois. The majority of branches (7 of 10 or 70.0 percent) are in Illinois, as well as the majority of qualified investments and community development services.

The Chicago assessment area maintains only 3.6 percent of deposits while the Champaign assessment area maintains the majority of deposits (62.8 percent) and branches (42.9 percent) in the State of Illinois. However, the Chicago assessment area has 83.7 percent of home mortgage and small business loans originated in the State of Illinois during the review period. The Champaign, Bloomington, Danville, and Peoria assessment areas contain 6.8, 3.5, 2.6, and 3.4 percent of loans, respectively. Given its significantly larger population and numbers of businesses, the Chicago assessment area contains the most lending opportunities of all the Illinois assessment areas. . Given these factors, the Chicago assessment area received significantly more weight when drawing conclusions.

Refer to the individual sections for the details on the Illinois assessment areas.

SCOPE OF EVALUATION – STATE OF ILLINOIS

The rating for the State of Illinois is based upon the full-scope evaluation of the bank's performance in the Chicago, and limited scope reviews of performance in the Champaign, Bloomington, Danville, and Peoria assessment areas. The Chicago assessment area received the most weight when drawing conclusions on performance in the State of Illinois.

The bank's lending performance was evaluated based upon a review of HMDA home mortgage loans and small business loans originated in 2019-2021. The bank's community development loans, qualified investments, and community development services since the prior evaluation dated May 20, 2019, were reviewed, as well as prior period qualified investments.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ILLINOIS

LENDING TEST

An overall "Satisfactory" rating is assigned under the Lending Test. This rating is consistent with performance in the most heavily weighted rated Chicago assessment area. This conclusion is supported by a reasonable performance under both the borrower distribution and geographic distribution criterion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the State of Illinois. This conclusion is supported by reasonable performance in the full-scope area and consistent performance in the limited scope areas.

Borrower Profile

The distribution of loans to borrowers reflects reasonable penetration among retail customers of different income levels and businesses of different sizes. This conclusion is supported by reasonable performance in the full-scope area and consistent performance in the limited scope areas.

COMMUNITY DEVELOPMENT TEST

CIBM demonstrated adequate responsiveness to the community development needs of the Illinois assessment areas through qualified community development loans, investments, and services. Examiners considered the institution's capacity and the need and availability of such opportunities. CIBM maintains seven branch offices (70 percent of total branches), 75.0 percent of total deposits, 66.1 percent of home mortgage loans and small business loans in the State of Illinois.

Community Development Loans

CIBM originated 14 CD loans totaling \$26.6 million in the State of Illinois assessment areas. This level accounts for 46.7 percent by number and 75.7 percent by dollar of total CD lending. CD lending substantially increased from the previous exam when CIBM originated four loans totaling \$5.9 million. The current level is consistent with the bank's presence in the area. The table below provides details:

Community Development Lending – Illinois Assessment Area										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
5/20/19-12/31/19	0	0	0	0	0	0	5	11,139	5	11,139
2020	0	0	0	0	2	425	0	0	2	425
2021	1	1,105	0	0	2	2,274	2	4,210	5	7,589
2022 YTD*	0	0	0	0	2	7,398	0	0	2	7,398
Total	1	1,105	0	0	6	10,097	7	15,349	14	26,551

*Source: Bank Records; * 01/01/22 to 06/21/22.*

Qualified Investments

The bank has 110 qualified investments totaling \$8.2 million for the current evaluation in the State of Illinois. This level of activity represents 56.4 percent by number and 52.1 percent by dollar. This level is slightly less by dollar than the 89 qualified investments and donations totaling \$9.0 million at the prior exam and is slightly less than the bank's presence in the State of Illinois. The investments in the Affordable Housing category relate to mortgage-backed securities that are secured by home mortgage loans to low- and moderate-income individuals.

Community Development Investments – Illinois Assessment Area										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	44	4,163	0	0	0	0	0	0	44	4,163
5/20/2019-12/31/2019	1	1,060	0	0	0	0	0	0	1	1,060
2020	0	0	0	0	0	0	0	0	0	0
2021	5	2,856	0	0	0	0	0	0	5	2,856
2022 YTD*	0	0	0	0	0	0	0	0	0	0
Subtotal	50	8,079	0	0	0	0	0	0	50	8,079
Donations & Grants	0	0	60	88	0	0	0	0	60	88
Total	50	8,079	60	88	0	0	0	0	110	8,167

*Source: Bank Data; ; * 01/01/22 to 06/21/22.*

Community Development Services

Bank representatives provided 54 instances of financial expertise or technical assistance to community development-related organizations in the Illinois assessment areas during the evaluation period. This represents 47.0 percent of total CD Services, which is slightly less than CIBM’s presence in the area. At the prior evaluation, bank representatives provided 46 community development services in this assessment area. CIBM also operates one branch in a low-income tract in the Champaign assessment area. The following table provides details:

Community Development Services – Illinois Assessment Area					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
5/20/19-12/31/19	0	6	2	0	8
2020	0	22	1	0	23
2021	0	18	1	0	19
2022 YTD*	0	4	0	0	4
Total	0	50	4	0	54

*Source: Bank Records; * 01/01/22 to 06/21/22.*

CHICAGO ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN CHICAGO

This assessment area is referred to as the Chicago assessment area and consists of Cook and DuPage counties in the Chicago-Naperville-Arlington Heights MD plus Kane County in the Elgin MD. The tristate Chicago-Naperville-Elgin, IL-IN-WI MSA is subdivided into four separate MDs (Chicago-Naperville-Arlington Heights, IL; Elgin, IL; Lake County-Kenosha, IL-WI; and Gary, IN). This assessment area is located in northeastern Illinois. CIBM maintains one branch and a mortgage loan production office in the assessment area. The assessment area accounts for 10.0 percent of branches, 55.4 percent of home mortgage and small business lending, and 2.7 percent of total deposits.

Economic and Demographic Data

This assessment area includes all 1,617 census tracts in Cook, DuPage, and Kane counties. These census tracts reflect the following income designations according to the 2015 ACS:

- 259 low-income census tracts,
- 420 moderate-income census tracts,
- 424 middle-income census tracts,
- 501 upper-income census tracts, and
- 13 census tracts with no income designation.

The vast majority of the low- and moderate-income census tracts are located in Cook County. The bank has one branch office in the Chicago assessment area, located in DuPage County. This assessment area includes 88.9 percent of the total population of the Illinois assessment areas. Additional demographic information is shown in the following table.

Demographic Information of the Assessment Area						
Assessment Area: CIBM Chicago IL AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,617	15.9	26.0	26.2	31.1	0.8
Population by Geography	6,691,691	11.6	26.6	28.9	32.6	0.3
Housing Units by Geography	2,716,949	11.7	25.0	28.6	34.3	0.4
Owner-Occupied Units by Geography	1,482,896	5.3	20.6	32.7	41.3	0.2
Occupied Rental Units by Geography	970,625	18.1	30.5	24.2	26.4	0.8
Vacant Units by Geography	263,428	24.5	29.3	21.6	24.0	0.5
Businesses by Geography	609,277	6.9	18.6	26.7	47.2	0.6
Farms by Geography	7,093	4.9	19.2	33.1	42.7	0.1
Family Distribution by Income Level	1,553,329	25.2	16.5	18.1	40.2	0.0
Household Distribution by Income Level	2,453,521	26.9	15.5	16.8	40.8	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$249,860
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,048
			Families Below Poverty Level			11.6%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to 2021 D&B data, 609,277 non-farm businesses are located in the assessment area. Gross annual revenues for these businesses are as follows:

- 86.8 percent of businesses have revenues of \$1 million and less.
- 5.1 percent of businesses have more than \$1 million in revenues.
- 8.2 percent of businesses did not report their revenues.

The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by the level of gross annual revenues. Service industries represent the largest portion of businesses at 37.0 percent; followed by finance, insurance, and real estate (10.6 percent); retail trade (10.5 percent); construction (5.3 percent); and transportation (5.1 percent). In addition, 63.0 percent of businesses have four or fewer employees, and 58.0 percent operate from a single location.

The FFIEC-updated median family income is used to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle-, and upper-income categories are presented in the following table. The categories are based on the 2019-2021 FFIEC-updated median family income for the Chicago-Naperville-Arlington Heights MD and Elgin MD.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Chicago-Naperville-Evanston, IL Median Family Income (16984)				
2019 (\$82,000)	<\$41,000	\$41,000 to <\$65,600	\$65,600 to <\$98,400	≥\$98,400
2020 (\$84,800)	<\$42,400	\$42,400 to <\$67,840	\$67,840 to <\$101,760	≥\$101,760
2021 (\$87,100)	<\$43,550	\$43,550 to <\$69,680	\$69,680 to <\$104,520	≥\$104,520
Elgin, IL Median Family Income (20994)				
2019 (\$92,700)	<\$46,350	\$46,350 to <\$74,160	\$74,160 to <\$111,240	≥\$111,240
2020 (\$92,900)	<\$46,450	\$46,450 to <\$74,320	\$74,320 to <\$111,480	≥\$111,480
2021 (\$94,600)	<\$47,300	\$47,300 to <\$75,680	\$75,680 to <\$113,520	≥\$113,520
<i>Source: FFIEC</i>				

Competition

The Chicago assessment area is a highly competitive market. According to the FDIC’s Summary of Deposits report as of June 30, 2020, there are 128 FDIC-insured financial institutions located within the assessment area. Collectively, these institutions operate 1,717 offices and hold \$440.5 billion in FDIC-insured deposits. The top five FDIC-insured banks collectively capture 63.1 percent deposit market share. CIBM Bank ranked 117th with less than 0.1 percent deposit market share.

The assessment area contains numerous bank and non-bank lenders providing home mortgage and small business loans in the assessment area. According to 2020 HMDA aggregate data 845 lenders originated or purchased 323,432 home mortgage loans totaling \$95.9 billion. CIBM ranked 57th with a .3 percent market share.

According to 2020 aggregate CRA Small Business loan data 325 lenders originated 207,720 small business loans totaling \$12.8 billion. CIBM ranked 85th with a .03 percent market share.

Community Contacts

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available. Examiners reviewed four recent contacts with community-based organizations within the assessment area. The contacts included a municipal housing agency, an economic development organization focusing on small business, and two non-profit entities focusing on affordable housing needs in the assessment area.

The contacts identified needs for both consumer and business financial education, start-up capital, business expansion, micro-loans for small businesses, and both subsidized and unsubsidized affordable housing. Affordable housing needs include the need for financing for both 1-4 family and multi-family (5+ units). Two of the entities operate investments funds in which financial institutions can participate through investments in the funds, which then directly provide funds for small business loans and multi-family affordable housing projects. The contacts indicated that area financial institutions are generally responsive to area needs, though increased commitments would be useful.

Credit and Community Development Needs and Opportunities

Considering the information from the community contacts, demographic data, and discussions with bank management, examiners determined that community development needs in the assessment area include affordable housing, small business lending, and financial literacy for small businesses and consumers. The high level of low- and moderate-income families (37.2 percent) along with the percentage of businesses with revenues of \$1 million or less (86.9 percent) supports these needs.

The assessment area provides numerous opportunities for involvement in community development activities. The Chicago metropolitan area contains empowerment zones and tax increment financing districts designated by local or state government entities for revitalization, stabilization or economic development. These areas are established to stimulate economic activities that include job preservation, job creation, business development, and residential development. Additionally, the State of Illinois and local community organizations sponsor various programs to support affordable housing and economic development.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CHICAGO

LENDING TEST

The bank's lending performance reflects reasonable responsiveness to the credit needs in the Chicago assessment area. This conclusion is supported by reasonable geographic and borrower distributions.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the Chicago assessment area. The conclusion is supported by reasonable performance in both home mortgage and small business lending.

Home Mortgage Lending

The geographic distribution of loans reflects reasonable dispersion throughout the Chicago assessment area. The bank's reasonable performance in both low- and moderate-income tracts supports this conclusion. Examiners compared CIBM's performance to 2019 and 2020 HMDA aggregate performance, as well as the percentage of housing units in all years. HMDA aggregate data for 2021 is not currently available. When drawing conclusions, examiners placed substantially more weight on the comparison to aggregate, as it is a better measure of lending opportunities in the assessment area as it represents the performance of all lenders. The following table provides details.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: CIBM Chicago IL AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	5.3	4.1	8	1.6	1,144	0.9
2020	5.3	3.3	7	0.7	1,222	0.5
2021	5.3	--	17	2.6	3,899	2.4
Moderate						
2019	20.6	16.6	50	9.7	9,866	7.9
2020	20.6	14.4	66	6.7	12,915	5.0
2021	20.6	--	90	13.7	20,186	12.3
Middle						
2019	32.7	31.0	146	28.5	30,735	24.5
2020	32.7	30.0	330	33.5	80,090	31.1
2021	32.7	--	216	32.8	46,029	28.0
Upper						
2019	41.3	48.1	308	60.0	83,234	66.5
2020	41.3	52.1	581	59.0	162,860	63.3
2021	41.3	--	335	50.8	94,101	57.2
Not Available						
2019	0.2	0.2	1	0.2	227	0.2
2020	0.2	0.2	1	0.1	229	0.1
2021	0.2	--	1	0.2	280	0.2
Totals						
2019	100.0	100.0	513	100.0	125,205	100.0
2020	100.0	100.0	985	100.0	257,316	100.0
2021	100.0	--	659	100.0	164,495	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

CIBM's performance trails aggregate performance in both low- and moderate-income tracts in both 2019 and 2020. The assessment area consists of three counties, Cook, DuPage, and Kane. While the counties are contiguous, the volume of low- and moderate-income tracts within each county is not consistent. Cook County contains the highest number (253 low or 19.2 percent and 381 moderate or 28.9 percent) and concentration of LMI tracts, while DuPage County contains no low- and only 10 (4.6 percent) moderate-income tracts. Kane County contains 4 low- (4.9 percent) and 29 moderate-income tracts (35.4 percent). CIBM's lending volume within each of the three counties is somewhat even with 755 loans in Cook, 793 in DuPage, and 609 in Kane County. As previously noted, CIBM maintains only one branch and one mortgage loan production office in the assessment area.

As approximately 37 percent of CIBM’s home mortgage lending in the assessment area occurs within DuPage County with nominal LMI tracts, it is helpful to review CIBM’s performance on a county by county basis. This analysis reveals performance more consistent with aggregate results. The following tables provide details on CIBM’s performance in each county.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Cook County						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	6.9	5.6	7	4.2	1,083	2.6
2020	6.9	4.6	6	1.8	1,070	1.2
2021	6.9	--	16	6.1	3,706	5.5
Moderate						
2019	24.2	19.8	28	16.8	5,947	14.4
2020	24.2	17.8	42	12.8	9,244	10.6
2021	24.2	--	63	24.1	14,998	22.2
Middle						
2019	32.0	29.7	53	31.7	10,919	26.4
2020	32.0	29.2	115	35.2	27,954	32.0
2021	32.0	--	86	33.0	18,952	28.0
Upper						
2019	36.7	44.7	78	46.7	23,137	56.0
2020	36.7	48.2	163	49.8	48,947	56.0
2021	36.7	--	95	36.4	29,663	43.9
Not Available						
2019	0.2	0.2	1	0.6	227	0.5
2020	0.2	0.2	1	0.3	229	0.3
2021	0.2	--	1	0.4	280	0.4
Totals						
2019	100.0	100.0	167	100.0	41,312	100.0
2020	100.0	100.0	327	100.0	87,444	100.0
2021	100.0	--	261	100.0	67,598	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Geographic Distribution of Home Mortgage Loans						
Assessment Area: DuPage County						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	--	0	0.0	0	0.0
Moderate						
2019	3.4	3.0	4	1.9	406	0.8
2020	3.4	2.5	6	1.6	980	1.0
2021	3.4	--	4	1.9	906	1.7
Middle						
2019	34.5	32.4	61	28.4	12,898	24.0
2020	34.5	29.9	123	33.8	31,992	32.6
2021	34.5	--	75	35.0	15,310	29.2
Upper						
2019	62.1	64.6	150	69.8	40,438	75.2
2020	62.1	67.6	235	64.6	65,264	66.4
2021	62.1	--	135	63.1	36,171	69.0
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	215	100.0	53,741	100.0
2020	100.0	100.0	364	100.0	98,236	100.0
2021	100.0	--	214	100.0	52,387	100.0
Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Home Mortgage Loans						
Assessment Area: Kane County						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	1.5	0.8	1	0.8	60	0.2
2020	1.5	0.5	1	0.3	152	0.2
2021	1.5	--	1	0.5	193	0.4
Moderate						
2019	23.4	17.1	18	13.7	3,514	11.7
2020	23.4	13.7	18	6.1	2,691	3.8
2021	23.4	--	23	12.5	4,282	9.6
Middle						
2019	35.1	38.2	32	24.4	6,918	22.9
2020	35.1	36.3	92	31.3	20,144	28.1
2021	35.1	--	55	29.9	11,768	26.4
Upper						
2019	40.0	43.9	80	61.1	19,659	65.2
2020	40.0	49.5	183	62.2	48,649	67.9
2021	40.0	--	105	57.1	28,267	63.5
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	131	100.0	30,152	100.0
2020	100.0	100.0	294	100.0	71,636	100.0
2021	100.0	--	184	100.0	44,510	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

At the county level, CIBM’s performance in low-tracts in 2019 slightly trails aggregate in Cook County and is consistent with aggregate in Kane County. In 2020, performance in low-income tracts declines, and trails aggregate in Cook County though continues with consistent performance in Kane County. In 2021, Cook County performance improves substantially. DuPage County contains no low-income tracts. Considering performance in all three years, overall performance in low-income tracts is reasonable.

Performance in moderate tracts is similar to that in low-income tracts. In 2019, performance in all three counties somewhat trails aggregate, though not unreasonably. In 2020, performance declines, significantly trailing aggregate in both Cook and Kane counties. In 2021, performance improves, particularly in Cook County. Considering performance in all three years, overall performance in moderate-income tracts is reasonable.

In addition, as noted in the overall conclusions section, CIBM has developed and implemented the ALP, which targets low- and moderate-income borrowers and geographies. The program allows for more lenient underwriting than conventional mortgage financing. In addition, the program allows for access to grant money to offset loan costs and down payments. LMI borrowers frequently struggle in obtaining enough funds for down payments. This program addresses a critical credit need in the assessment area. From 2019 to 2021, the bank originated nine loans in low-income tracts and 54 in moderate-income tracts under the ALP.

Small Business Lending

The geographic distribution of small business loans reflects reasonable dispersion throughout the Chicago assessment area. The bank's poor performance in moderate-income tracts was offset by reasonable performance in low-income tracts. Examiners compared CIBM's performance to 2019 and 2020 to CRA Small Business aggregate performance, as well as the percentage of business in all years. 2021 CRA Small Business aggregate data is not currently available. When drawing conclusions, examiners placed substantially more weight on the comparison to aggregate, as it is a better measure of lending opportunities in the assessment area as it represents the performance of all lenders. The following table provides details.

Geographic Distribution of Small Business Loans							
Assessment Area: CIBM Chicago IL AA							
Tract Income Level		% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low							
	2019	5.4	4.4	3	17.6	1,237	26.0
	2020	5.5	5.7	3	5.1	623	6.5
	2021	6.9	--	3	3.3	413	2.3
Moderate							
	2019	17.0	17.9	1	5.9	400	8.4
	2020	17.1	17.8	7	11.9	1,005	10.4
	2021	18.6	--	5	5.6	2,062	11.4
Middle							
	2019	27.7	30.5	2	11.8	228	4.8
	2020	27.2	29.1	13	22.0	3,997	41.6
	2021	26.7	--	22	24.4	5,751	31.7
Upper							
	2019	49.3	46.9	11	64.7	2,885	60.7
	2020	49.6	47.0	36	61.0	3,994	41.5
	2021	47.2	--	60	66.7	9,940	54.7
Not Available							
	2019	0.6	0.3	0	0.0	0	0.0
	2020	0.6	0.4	0	0.0	0	0.0
	2021	0.6	--	0	0.0	0	0.0
Totals							
	2019	100.0	100.0	17	100.0	4,750	100.0
	2020	100.0	100.0	59	100.0	9,619	100.0
	2021	100.0	--	90	100.0	18,166	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>							

As noted above, in low-tracts in 2019, CIBM’s performance substantially exceeds aggregate and the demographic. In 2020, performance declines, though is generally consistent with both measures. While performance further declines in 2021, aggregate data is not available for comparison. Overall, performance in low-tracts is reasonable.

Performance in moderate-income tracts appears poor. As noted above, performance in all three years trails aggregate and the demographic substantially. However, as noted in the Home Mortgage section above, DuPage County contains no low-income tracts and only 10 moderate-income tracts. When

reviewing performance on a county by county basis, performance in moderate-tracts remains poor in 2019 in Cook and Kane counties, However, in 2020, performance in Cook County trails less substantially (5.7 percentage points lower than aggregate) and exceeds in Kane County (11.5 percentage points higher than aggregate).

Considering the reasonable performance in low-income tracts, despite weaker performance, though generally adequate performance, in moderate-income tracts, overall, the geographic distribution of small business loans is reasonable.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area(s), reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes. This conclusion is supported by reasonable home mortgage performance and excellent small business performance.

Home Mortgage

The distribution of loans to borrowers reflects reasonable penetration among retail customers of different income levels. This conclusion is supported by reasonable performance with both low- and moderate-income borrowers. The following table provides details:

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: CIBM Chicago IL AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	25.2	5.0	13	2.5	1,476	1.2
2020	25.2	4.2	28	2.8	3,534	1.4
2021	25.2	--	36	5.5	5,665	3.4
Moderate						
2019	16.5	15.7	92	17.9	17,324	13.8
2020	16.5	13.9	159	16.1	28,176	11.0
2021	16.5	--	159	24.1	29,998	18.2
Middle						
2019	18.1	20.4	153	29.8	35,099	28.0
2020	18.1	20.0	254	25.8	56,746	22.1
2021	18.1	--	186	28.2	43,525	26.5
Upper						
2019	40.2	43.6	250	48.7	69,209	55.3
2020	40.2	46.6	527	53.5	157,157	61.1
2021	40.2	--	268	40.7	82,221	50.0
Not Available						
2019	0.0	15.3	5	1.0	2,098	1.7
2020	0.0	15.2	17	1.7	11,702	4.5
2021	0.0	--	10	1.5	3,085	1.9
Totals						
2019	100.0	100.0	513	100.0	125,205	100.0
2020	100.0	100.0	985	100.0	257,316	100.0
2021	100.0	--	659	100.0	164,495	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

In 2019 and 2020, CIBM’s performance slightly trails aggregate performance with low-income borrowers. While 2021 aggregate data is not available, CIBM’s performance improves, exceeding the prior years by both number and percentage. While CIBM’s performance substantially trails the demographic, nearly half of low-income borrowers live below the poverty level. Aggregate performance also significantly trails the demographic, which demonstrates the challenges all lenders

face in providing home mortgage loans to this income segment. Given the increasing trend, overall, performance with low-income borrowers is reasonable.

CIBM’s performance with moderate-income borrowers exceeds aggregate performance by 2.2 percentage points in both 2019 and 2020, though is generally consistent with aggregate. In 2021, by both number and percentage, performance improves, substantially exceeding the prior years as well as the demographic.

Through CIBM’s targeted loan program, ALP, CIBM originated two loans to low-income borrowers and 45 loans to moderate-income borrowers that likely would not have qualified for conventional mortgage loans. Given the bank’s 2019 and 2020 performance, overall performance with moderate-income borrowers is reasonable

Small Business

The distribution of loans to borrowers of different sizes reflects excellent penetration among businesses of different sizes. Examiners focused on the bank’s lending to businesses less than \$1 million in revenues. The following table provides details:

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: CIBM Chicago IL AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2019	83.6	48.2	9	52.9	2,150	45.3
2020	84.9	37.2	31	52.5	4,516	46.9
2021	86.8	--	58	64.4	9,198	50.6
>\$1,000,000						
2019	6.8	--	7	41.2	2,050	43.2
2020	6.1	--	23	39.0	4,885	50.8
2021	5.1	--	23	25.6	6,595	36.3
Revenue Not Available						
2019	9.6	--	1	5.9	550	11.6
2020	9.0	--	5	8.5	218	2.3
2021	8.2	--	9	10.0	2,373	13.1
Totals						
2019	100.0	100.0	17	100.0	4,750	100.0
2020	100.0	100.0	59	100.0	9,619	100.0
2021	100.0	--	90	100.0	18,166	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

CIBM exceeded aggregate performance in 2019 and significantly exceeded aggregate in 2020. The improvement in 2020 comes despite a sizable drop in aggregate performance. In 2021, performance improves further as near two-thirds or all small business loans were originated to small businesses. In addition, CIBM’s Fast Track Business Loan program, which provides for a streamlined approval process and two- day approval times provided 17 loans totaling \$1.5 million, all to small businesses. Considering the reasonable performance in 2019 and strong performance in 2020 and 2021, overall, the distribution of small business loans is excellent.

COMMUNITY DEVELOPMENT TEST

CIBM demonstrated adequate responsiveness to the community development needs of the Chicago assessment area through qualified community development loans, investments, and services. Examiners considered the institution’s capacity and the need and availability of such opportunities. As previously discussed, the bank maintains one branch office, 2.7 percent of total deposits, 55.6 percent of home mortgage loans and small business loans, and 10 percent of branches in the Chicago assessment area.

Community Development Loans

CIBM originated six CD loans totaling \$5.3 million in the assessment area. This level accounts for 20.0 percent by number and 15.1 percent by dollar of total CD lending. CD lending substantially increased from the previous exam when CIBM originated one loan totaling \$527,000. The current level exceeds the bank’s branch and deposit presence in the area and is consistent with the level of small business lending in the area. The table below provides details:

Community Development Lending- Chicago Assessment Area										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
5/20/19-12/31/19	0	0	0	0	0	0	1	1,500	1	1,500
2020	0	0	0	0	2	425	0	0	2	425
2021	1	1,105	0	0	2	2,274	0	0	3	3,379
2022 YTD*	0	0	0	0	0	0	0	0	0	0
Total	1	1,105	0	0	4	2,699	1	1,500	6	5,304

*Source: Bank Records; *01/01/22 to 06/21/22.*

CIBM’s CD lending has been responsive to area credit and community development needs. The majority of CD lending supports economic development efforts. As noted previously, loans to support business expansion and affordable housing are primary credit needs in the area. The four economic development loans consist of SBA 504 loans, which specifically assist small businesses with adding or retaining jobs, including jobs for LMI individuals. Additional examples include:

- A \$1.5 million line of credit to acquire and rehab 1-4 family properties in target LMI tracts in Cook County. The loan supports efforts to revitalize and stabilize LMI areas.
- A \$1.1 million line of credit to acquire and rehab a 19-unit apartment building. The property is in a low-income tract and the units will lease at rates affordable to LMI families.

Qualified Investments

CIBM originated four qualified investments totaling approximately \$3.4 million, maintained eight prior period investments totaling approximately \$1.9 million, and made 11 donations totaling \$28,000 in the assessment area. This level accounts for 11.8 percent by number and 33.6 percent by dollar of total qualified investments. Qualified investments increased from the previous exam when CIBM originated 17 qualifying investments totaling \$4.4 million. The current level exceeds the bank’s branch and deposit presence in the area. The table below provides details:

Community Development Investments –Chicago Assessment Area										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	8	1,868	0	0	0	0	0	0	8	1,868
5/20/2019-12/31/2019	1	1,060	0	0	0	0	0	0	1	1,060
2020	0	0	0	0	0	0	0	0	0	0
2021	3	2,301	0	0	0	0	0	0	3	2,301
2022 YTD*	0	0	0	0	0	0	0	0	0	0
Subtotal	12	5,229	0	0	0	0	0	0	12	5,229
Donations & Grants	0	0	11	28	0	0	0	0	11	28
Total	12	5,229	11	28	0	0	0	0	23	5,257

*Source: Bank Data; *01/01/22 to 06/21/22.*

CIBM demonstrated adequate responsiveness to areas credit and community development needs. All of the bank’s qualified investments consist of mortgage-backed securities made up of mortgage loans to LMI borrowers in the assessment area. As previously noted, affordable housing is a primary credit need in the assessment area.

Community Development Services

Bank representatives provided 13 instances of financial expertise or technical assistance to community development-related organizations in the Chicago assessment area during the evaluation period. At the prior evaluation, bank representatives provided 15 community development services in this assessment area.

Bank employees volunteer as board members of some of the organizations. This includes a non-profit that provides support to LMI families struggling with abuse and an organization that supports the best interests of abused, neglected, dependent and vulnerable children in the DuPage County court system. The following table provides details on CIBM’s community service activities:

Community Development Services – Chicago Assessment Area					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize Or Stabilize	Totals
5/20/2019-12/31/19	0	1	0	0	1
2020	0	8	0	0	8
2021	0	2	0	0	2
2022 YTD*	0	2	0	0	2
Totals	0	13	0	0	13

*Source: Bank records; *01/01/22 to 06/21/22.*

OTHER ILLINOIS ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE REVIEW ASSESSMENT AREAS

The following table summarizes the conclusions for the four Illinois assessment areas reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution’s CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. Performance in each limited-scope assessment area was generally consistent with bank performance in the full-scope Chicago, IL assessment area. The bank’s community development performance in the Danville assessment area was considered less than consistent, as there were nominal CD loan and investments in the Danville assessment area. The Danville CD performance did not alter the bank’s overall performance rating.

Assessment Area	Lending Test	Community Development Test
Champaign, IL MSA	Consistent	Consistent
Peoria, IL MSA	Consistent	Consistent
Bloomington, IL MSA	Consistent	Consistent
Danville, IL MSA	Consistent	Below

Facts and data that support conclusions for the limited-scope assessment areas are included in this section, beginning with a summary of CIBM’s operations and activities in each area. Additional demographic data and information on the geographic and borrower distributions on home mortgage and small business loans for each of these assessment areas is located in the appendix.

Champaign, IL Assessment Area

The Champaign, IL MSA assessment area includes all of Champaign and Piatt counties in Illinois. CIBM operates three branches in this assessment area. This assessment area contains 30 percent of all branches, 4.5 percent of all home mortgage and small business loan originations, and 47.1

percent of deposits. The table below summarizes the bank’s lending and community development activities in this assessment area during the evaluation period.

Activity	#	\$
Home Mortgage Loans (2019 - 2021)	83	\$9.6 million
Small Business Loans (2019 - 2021)	106	\$8.9 million
Community Development Loans	2	\$7.4 million
Qualified Investments	26	\$749,000
Community Development Services	23	-
<i>Source: Bank Data</i>		

Peoria, IL Assessment Area

The Peoria, IL MSA assessment area includes all of Peoria, Tazewell, and Woodford counties in Illinois. CIBM operates one branch in this assessment area. This assessment area contains 10.0 percent of all branches, 2.2 percent of all home mortgage and small business loan originations, and 9.1 percent of deposits. The table below summarizes the bank’s lending and community development activities in this assessment area during the evaluation period.

Activity	#	\$
Home Mortgage Loans (2019 - 2021)	19	\$2.6 million
Small Business Loans (2019 - 2021)	74	\$10.4 million
Community Development Loans	5	\$8.7 million
Qualified Investments	27	\$1.2 million
Community Development Services	7	-
<i>Source: Bank Data</i>		

Bloomington, IL Assessment Area

The Bloomington, IL MSA assessment area includes all of McLean County in Illinois. CIBM operates one branch in this assessment area. This assessment area contains 10 percent of all branches, 2.3 percent of all home mortgage and small business loan originations, and 10.7 percent of deposits. The table below summarizes the bank’s lending and community development activities in this assessment area during the evaluation period.

Activity	#	\$
Home Mortgage Loans (2019 - 2021)	70	\$15.7 million
Small Business Loans (2019 - 2021)	28	\$2.9 million
Community Development Loans	1	\$5.1 million
Qualified Investments	17	\$907,000
Community Development Services	5	-
<i>Source: Bank Data</i>		

Danville, IL Assessment Area

The Danville, IL MSA assessment area includes all of Vermilion County in Illinois. CIBM operates one branch in this assessment area. This assessment area contains 10 percent of all branches, 1.7 percent of all home mortgage and small business loan originations, and 5.4 percent of deposits. The table below summarizes the bank’s lending and community development activities in this assessment area during the evaluation period.

Activity	#	\$
Home Mortgage Loans (2019 - 2021)	38	\$3.2 million
Small Business Loans (2019 - 2021)	34	\$1.4 million
Community Development Loans	0	0
Qualified Investments	17	\$8,000
Community Development Services	6	-
<i>Source: Bank Data</i>		

STATE OF WISCONSIN – Full-Scope Review

CRA RATING FOR STATE OF WISCONSIN: SATISFACTORY

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN WISCONSIN

The Wisconsin assessment area includes Milwaukee and Waukesha counties, which make up two of the four counties in the Milwaukee-Waukesha-West Allis MS. This assessment area is located in southeastern Wisconsin. CIBM operates two branches in this assessment area, one located in Brookfield, WI and the other in Elm Grove, WI. Both branches are located in upper-income census tracts. The Wisconsin assessment area accounts for 15.7 percent of home mortgage and small business loans originated in the review period as well as 20.0 percent of branches and 19.2 percent of deposits.

Economic and Demographic Data

This assessment area includes all 384 census tracts in Milwaukee and Waukesha counties of the Milwaukee-Waukesha-West Allis MSA. These census tracts reflect the following income designations according to the 2015 ACS:

- 99 low-income census tract,
- 68 moderate-income census tracts,
- 111 middle-income census tracts,
- 104 upper-income census tracts, and
- 2 census tracts with no income category.

The vast majority of the low- and moderate-income census tracts are located in the City of Milwaukee in Milwaukee County. The assessment area accounts for 9.8 percent of the bank’s home mortgage loans and 38.4 percent of small business loans originated in the review period. In addition, the assessment area accounts for 19.2 percent of total deposits as of June 30, 2021, 20.0 percent of branches, and includes 22.4 percent of the total population of the assessment areas. Additional demographic information is shown in the following table.

Demographic Information – CIBM Wisconsin AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	384	25.8	17.7	28.9	27.1	0.5
Population by Geography	1,349,812	19.4	17.3	29.7	33.6	0.0
Housing Units by Geography	579,579	18.6	17.5	31.5	32.3	0.0
Owner-Occupied Units by Geography	308,791	8.9	14.5	32.0	44.5	0.0
Occupied Rental Units by Geography	227,915	27.8	21.7	32.7	17.7	0.0
Vacant Units by Geography	42,873	39.6	16.9	21.2	22.3	0.0
Businesses by Geography	79,737	13.7	14.2	31.3	40.8	0.1
Family Distribution by Income Level	325,894	25.7	16.3	19.0	39.0	0.0
Household Distribution by Income Level	536,706	26.9	15.8	17.0	40.3	0.0
Median Family Income MSA - 33340 Milwaukee-Waukesha-West Allis, WI MSA	\$71,764	Median Housing Value		\$179,269		
		Median Gross Rent		\$840		
		Families Below Poverty Level		12.6%		
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The FFIEC-updated median family income is used to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle-, and upper-income categories are presented in the following table. The categories are based on the 2019-2021 FFIEC-updated median family income for the Milwaukee-Waukesha-West Allis MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Milwaukee-Waukesha-West Allis, WI MSA (33340)				
2019 (\$82,300)	<\$41,150	\$41,150 to <\$65,840	\$65,840 to <\$98,760	≥\$98,760
2020 (\$83,800)	<\$41,900	\$41,900 to <\$67,040	\$67,040 to <\$100,560	≥\$100,560
2021 (\$84,400)	<\$42,200	\$42,200 to <\$67,520	\$67,520 to <\$101,280	≥\$101,280
<i>Source: FFIEC</i>				

There are 579,579 housing units, with 53.3 percent owner-occupied, 39.3 percent rental-occupied, and 7.4 percent vacant. In addition, 22.8 percent of housing units are multifamily (five or more units). The Geographic Distribution of Loans criterion compares home mortgage loans to the distribution of owner-occupied housing units.

According to 2021 D&B data, 79,737 non-farm businesses are located in the assessment area. Gross annual revenues for these businesses are as follows:

- 80.6 percent of businesses have revenues of \$1 million and less.
- 7.9 percent of businesses have more than \$1 million in revenues.
- 11.6 percent of businesses did not report their revenues.

The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by the level of gross annual revenues. Service industries represent the largest portion of businesses at 44.0 percent; followed by retail trade (13.8 percent); finance, insurance, and real estate (9.8 percent); construction (5.9 percent); and manufacturing (4.5 percent). In addition, 62.3 percent of businesses have four or fewer employees, and 86.4 percent operate from a single location.

Competition

The Wisconsin assessment area is a highly competitive market. According to the FDIC's Summary of Deposits report as of June 30, 2021, there are 40 FDIC-insured financial institutions located within the assessment area. Collectively, these institutions operate 380 offices and hold \$80.5 billion in FDIC-insured deposits. These top five FDIC-insured banks collectively capture 77.0 percent deposit market share. CIBM Bank ranked 31st with a 0.16 percent deposit market share.

The assessment area contains numerous bank and non-bank lenders providing home mortgage and small business loans in the assessment area. According to 2020 HMDA aggregate data, 548 lenders originated or purchased 76,245 home mortgage loans totaling \$17.5 billion. CIBM ranked 80th with a .18 percent market share.

According to 2020 aggregate CRA Small Business loan data, 173 lenders originated 28,245 small business loans totaling \$2.1 billion. CIBM ranked 28th with a .61 percent market share.

Community Contact(s)

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available. Examiners reviewed two recent contacts with community-based organizations within the assessment area. The contacts included a non-profit housing agency and an economic development organization focusing on both business and housing needs.

The contacts identified needs for both consumer and business financial education, financing for small businesses, and both affordable housing and home rehab loans.

Credit and Community Development Needs and Opportunities

Considering the information from the community contacts, demographic data, and discussions with bank management, examiners determined that community development needs in the assessment area include affordable housing, small business lending, and financial literacy for small businesses and consumers. The high level of low- and moderate-income families (36.7 percent) along with the percentage of businesses with revenues of \$1 million or less (80.8 percent) supports these needs.

The assessment area provides numerous opportunities for involvement in community development activities. The Milwaukee metropolitan area contains empowerment zones and tax increment financing districts designated by local or state government entities for revitalization, stabilization or economic development. These areas are established to stimulate economic activities that include job preservation, job creation, business development, and residential development.

SCOPE OF EVALUATION – STATE OF WISCONSIN

The rating for the State of Wisconsin is based upon the full-scope evaluation of the bank's performance in the Milwaukee assessment area, which is the sole assessment area in Wisconsin. Since the State of Wisconsin is a separately rated area, a full-scope review on the sole assessment area is required. The bank's rating for the State of Wisconsin carries lesser weight in the overall rating. CIBM's home mortgage and small business lending in this assessment area account for 15.7 percent of all home mortgage and small business loans originated in all assessment areas. Given the relatively equal level of home mortgage and small business lending in the Wisconsin assessment area, home mortgage and small business lending were weighted equally when drawing conclusions.

The bank's lending performance was evaluated based upon a review of HMDA mortgage loans and small business loans originated in complete years of 2019 -2021. The bank's qualified community development loans, investments, and services since the prior evaluation dated May 20, 2019 were reviewed, as well as prior period qualified investments.

CONCLUSIONS ON PERFORMANCE CRITERIA IN WISCONSIN

LENDING TEST

The bank's lending performance reflects reasonable responsiveness to the credit needs in the Wisconsin assessment area. This conclusion is supported by reasonable geographic and borrower distributions.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the Wisconsin assessment area. This conclusion is supported by excellent home mortgage and reasonable small business loan performance.

Home Mortgage

The geographic distribution of home mortgage loans reflects excellent dispersion. The bank's excellent performance in both low- and moderate-income tracts supports this conclusion. Examiners compared CIBM's performance to 2019 and 2020 HMDA aggregate performance as well as the percentage of housing units in all years. HMDA aggregate data for 2021 is not currently available. When drawing conclusions, examiners placed substantially more weight on the comparison to

aggregate, as it is a better measure of lending opportunities in the assessment area as it represents the performance of all lenders. The following table provides details.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: CIBM Wisconsin AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	8.9	4.4	8	13.3	605	3.9
2020	8.9	3.4	5	3.7	760	1.9
2021	8.9	--	18	14.1	2,105	7.6
Moderate						
2019	14.5	12.0	11	18.3	4,461	28.7
2020	14.5	10.1	16	11.8	2,086	5.2
2021	14.5	--	21	16.4	2,703	9.7
Middle						
2019	32.0	31.0	8	13.3	1,898	12.2
2020	32.0	29.7	26	19.1	8,655	21.6
2021	32.0	--	37	28.9	7,717	27.8
Upper						
2019	44.5	52.6	33	55.0	8,590	55.2
2020	44.5	56.9	89	65.4	28,637	71.3
2021	44.5	--	52	40.6	15,240	54.9
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	60	100.0	15,554	100.0
2020	100.0	100.0	136	100.0	40,137	100.0
2021	100.0	--	128	100.0	27,765	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

In both low- and moderate-income tracts in 2019, CIBM's performance significantly exceeds the aggregate and demographic. Performance in both low- and moderate-tracts declines in 2020, though still slightly exceeds aggregate. Performance in 2021 improves and is consistent with 2019's strong performance and, while 2021 aggregate data is not available, exceeds the demographic. Given CIBM's strong performance in 2019 and 2021, with reasonable performance in 2020, overall, performance is excellent.

Small Business

The geographic distribution of small business loans reflects reasonable dispersion. The bank's reasonable performance in both low- and moderate-income tracts supports this conclusion. Examiners compared CIBM's performance to 2019 and 2020 CRA Small Business aggregate performance as well as the percentage of businesses in all years. CRA Small Business aggregate data for 2021 is not currently available. When drawing conclusions, examiners placed substantially more weight on the comparison to aggregate, as it is a better measure of lending opportunities in the assessment area as it represents the performance of all lenders. The following table provides details.

Geographic Distribution of Small Business Loans						
Assessment Area: CIBM Wisconsin AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	12.8	9.7	5	9.3	1,776	14.9
2020	12.9	10.9	23	13.4	4,776	18.9
2021	13.7	--	19	17.3	3,569	18.8
Moderate						
2019	14.1	12.3	7	13.0	1,457	12.2
2020	13.9	12.7	17	9.9	3,133	12.4
2021	14.2	--	14	12.7	2,432	12.8
Middle						
2019	31.5	31.1	14	25.9	3,021	25.3
2020	31.4	30.6	49	28.5	7,373	29.2
2021	31.3	--	31	28.2	4,768	25.1
Upper						
2019	41.5	46.8	28	51.9	5,694	47.7
2020	41.8	45.7	83	48.3	9,929	39.4
2021	40.8	--	46	41.8	8,244	43.4
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.1	0.0	0	0.0	0	0.0
2021	0.1	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	54	100.0	11,948	100.0
2020	100.0	100.0	172	100.0	25,211	100.0
2021	100.0	--	110	100.0	19,013	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

In all three years in both low- and moderate-income tracts, CIBM's performance is generally consistent with both aggregate performance and the demographic. Given this consistent performance, overall, the geographic distribution of small business loans is reasonable.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area(s), reasonable penetration among individuals of different income levels (including low- and moderate-income) and

businesses of different sizes. The conclusion is supported by reasonable home mortgage performance and small business performance.

Home Mortgage Lending

The distribution of loans to borrowers reflects reasonable penetration among retail customers of different income levels. This conclusion is supported by reasonable performance with both low- and moderate-income borrowers. The following table provides details:

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: CIBM Wisconsin AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	25.7	7.4	8	13.3	693	4.5
2020	25.7	5.1	3	2.2	224	0.6
2021	25.7	--	11	8.6	1,314	4.7
Moderate						
2019	16.3	18.3	5	8.3	603	3.9
2020	16.3	17.6	23	16.9	3,872	9.6
2021	16.3	--	34	26.6	5,417	19.5
Middle						
2019	19.0	22.3	8	13.3	1,760	11.3
2020	19.0	21.9	29	21.3	6,144	15.3
2021	19.0	--	26	20.3	4,453	16.0
Upper						
2019	39.0	40.3	36	60.0	8,669	55.7
2020	39.0	42.9	74	54.4	22,742	56.7
2021	39.0	--	56	43.8	16,553	59.6
Not Available						
2019	0.0	11.7	3	5.0	3,828	24.6
2020	0.0	12.4	7	5.1	7,155	17.8
2021	0.0	--	1	0.8	28	0.1
Totals						
2019	100.0	100.0	60	100.0	15,554	100.0
2020	100.0	100.0	136	100.0	40,137	100.0
2021	100.0	--	128	100.0	27,765	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

As noted in the table above, CIBM's performance with low-income borrowers substantially exceeds aggregate in 2019. However, performance declines and trails aggregate in 2020. While 2021 aggregate data is not available, performance improves in 2021 and is reasonable.

With moderate-income borrowers, 2019 performance significantly trails aggregate though improves in both 2020 and 2021. Performance in 2020 only slightly trails aggregate. In 2021, performance is excellent as CIBM's results exceed the demographic by 10.3 percentage points. Historically aggregate results have been consistent to slightly above the percentage of families.

Considering these factors performance with both low- and moderate-income borrowers is reasonable and reasonable overall.

Small Business Lending

The distribution of loans to borrowers reflects, given the demographics of the assessment area, reasonable penetration among businesses of different sizes. As noted in the following table, CIBM's performance in both 2019 and 2020 slightly exceeded aggregate performance. CIBM's 2021 performance was consistent with 2020. Given generally consistent performance with aggregate results, performance is reasonable. The following table provides details.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: CIBM Wisconsin AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2019	80.5	47.2	27	50.0	4,728	39.6
2020	80.4	37.5	68	39.5	7,565	30.0
2021	80.6	--	44	40.0	4,754	25.0
>\$1,000,000						
2019	8.3	--	24	44.4	7,025	58.8
2020	8.1	--	62	36.0	14,173	56.2
2021	7.9	--	46	41.8	10,777	56.7
Revenue Not Available						
2019	11.2	--	3	5.6	195	1.6
2020	11.4	--	42	24.4	3,473	13.8
2021	11.6	--	20	18.2	3,482	18.3
Totals						
2019	100.0	100.0	54	100.0	11,948	100.0
2020	100.0	100.0	172	100.0	25,211	100.0
2021	100.0	--	110	100.0	19,013	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

COMMUNITY DEVELOPMENT TEST

CIBM demonstrated adequate responsiveness to the community development needs of the Wisconsin assessment area through qualified community development loans, investments, and services. Examiners considered the institution's capacity and the need and availability of such opportunities. As previously discussed, the bank maintains two branch office, 19.2 percent of total deposits, 18.2 percent of home mortgage and small business loans originations, and 20 percent of branches in the Wisconsin assessment area.

Community Development Loans

CIBM originated 12 CD loans totaling \$5.7 million in the assessment area. This level accounts for 40 percent by number and 16.3 percent by dollar of total CD lending. CD lending declined marginally in dollars, since last evaluation, when CIBM originated four loans totaling \$7.3 million. The current level is generally consistent with CIBM's presence in the assessment area. The following table provides details:

Community Development Lending – Wisconsin Assessment Area										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
5/20/19-12/31/19	0	0	0	0	4	695	0	0	4	695
2020	0	0	1	1,420	5	2,948	0	0	6	4,368
2021	0	0	0	0	2	663	0	0	2	663
2022 YTD*	0	0	0	0	0	0	0	0	0	0
Total	0	0	1	1,420	11	4,306	0	0	12	5,726

*Source: Bank Records; * 01/01/22 to 06/21/22.*

CIBM’s CD lending has been responsive to area credit and community development needs. The majority of CD lending supports economic development efforts. As noted previously, loans to support business expansion and affordable housing are primary credit needs in the area. The eleven economic development loans consist of SBA 504 loans, which specifically assist small businesses with adding or retaining jobs, including jobs for LMI individuals.

Qualified Investments

CIBM originated three qualified investments totaling approximately \$2.1 million, maintained 13 prior period investments totaling approximately \$1.4 million, and made 28 donations totaling \$43,000 in the assessment area. This level accounts for 22.56 percent by number and 22.8 percent by dollar of total qualified investments. Qualified investments declined slightly from the previous exam when CIBM originated 39 qualifying investments totaling \$4.1 million. The current level slightly exceeds the bank’s branch, loan, and deposit presence in the area. The table below provides details:

Community Development Investments – Wisconsin Assessment Area										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	13	1,385	0	0	0	0	0	0	13	1,385
5/20/2019-12/31/2019	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	0	0	0	0
2021	3	2,143	0	0	0	0	0	0	3	2,143
2022 YTD*	0	0	0	0	0	0	0	0	0	0
Subtotal	16	3,528	0	0	0	0	0	0	16	3,528
Donations & Grants	0	0	28	43	0	0	0	0	28	43
Total	16	3,528	28	43	0	0	0	0	44	3,571

*Source: Bank Data; * 01/01/22 to 06/21/22.*

CIBM demonstrated adequate responsiveness to areas credit and community development needs. All of the bank’s qualified investments consist of mortgage-backed securities made up of mortgage loans to LMI borrowers in the assessment area. As previously noted, affordable housing is a primary credit need in the assessment area.

Community Development Services

Bank representatives provided 47 instances of financial expertise or technical assistance to community development-related organizations in the Wisconsin assessment area during the evaluation period. This accounts for 40.9 percent of all CD services, which exceeds CIBM’s presence in the assessment area. It also represents an increase from the prior evaluation, when bank representatives provided 28 community development services. The table below provides details on CIBM’s community service activities:

Community Development Services – Wisconsin Assessment Area					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
5/20/19-12/31/19	0	9	1	0	10
2020	0	13	0	0	13
2021	0	17	1	0	18
2022 YTD*	0	4	2	0	6
Total	0	43	4	0	47
<i>Source: Bank Records; * 01/01/22 to 06/21/22.</i>					

Notable examples of CIBM’s CD services include:

- A bank mortgage loan officer conducted three homebuyer seminars in conjunction with a non-profit HUD approved counseling agency. These seminars support affordable housing in the assessment area.
- A bank employee is a Loan Committee member of the Wisconsin Women’s Business Initiative Corporation (WWBIC). WWBIC is a leading innovative statewide economic development corporation that focuses on women, people of color, and low-income individuals, providing direct lending and access to fair and responsible capital, quality business education, one-on-one technical business assistance, and education to increase financial capability. The bank employee also reviewed student business plans with financial projections as part of the WWBIC educational program for students. This activity supports economic development efforts in the area.
- Bank employees provided tax preparation assistance through La Casa de Esperanza’s Voluntary Income Tax Assistance (VITA) as well as financial education. The VITA program provides free federal and state income tax return preparation and filing for low- and moderate-income individuals. Special emphasis is placed on identifying families who are eligible for the Earned Income Tax Credit and helping families take advantage of this credit, which often results in \$1,000 or more in refunds.
- A bank employee serves on the loan committee for an economic development organization that operates a loan fund providing loans to small businesses in the Waukesha, WI area.

STATE OF INDIANA

CRA RATING FOR INDIANA SATISFACTORY

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN INDIANA

The Indiana assessment area consists of eight of the 11 counties in the Indianapolis-Carmel-Anderson MSA, including Boone, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, and Shelby counties. This assessment area is located in central Indiana. CIBM operates one branch in the assessment area. The Indiana assessment area accounted for 18.2 percent of CIBM's home mortgage and small business loan originations in the review period as well as 10.0 percent of branches and 5.8 percent of deposits.

Economic and Demographic Data

The assessment area includes all 349 census tracts in Boone, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, and Shelby counties. These census tracts reflect the following income designations according to the 2015 ACS:

- 61 low-income census tract,
- 92 moderate-income census tracts,
- 104 middle-income census tracts,
- 91 upper-income census tracts, and
- 1 census tract with no income category.

The vast majority of the low- and moderate-income census tracts are located in downtown Indianapolis in Marion County. The bank has one branch office in this assessment area located in northern Marion County. The assessment area accounts for 19.0 percent of the bank's home mortgage loans and 14.9 percent of small business loans. This assessment area includes 16.6 percent of the total population of the assessment area s. Additional demographic information is shown in the following table.

Demographic Information of the Assessment Area						
Assessment Area: CIBM Indiana AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	349	17.5	26.4	29.8	26.1	0.3
Population by Geography	1,767,733	11.3	21.6	30.8	36.2	0.1
Housing Units by Geography	748,917	12.9	23.6	30.0	33.4	0.2
Owner-Occupied Units by Geography	433,669	6.4	16.0	34.3	43.3	0.1
Occupied Rental Units by Geography	238,130	20.0	34.8	24.9	20.0	0.2
Vacant Units by Geography	77,118	27.4	31.6	21.8	18.8	0.4
Businesses by Geography	217,854	11.0	19.9	29.4	39.5	0.2
Farms by Geography	5,858	6.4	13.4	41.5	38.6	0.1
Family Distribution by Income Level	436,137	21.6	16.9	19.3	42.2	0.0
Household Distribution by Income Level	671,799	23.3	16.2	17.6	43.0	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$148,033
			Median Gross Rent			\$836
			Families Below Poverty Level			10.6%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

There are 748,917 housing units, with 57.9 percent owner-occupied, 31.8 percent rental-occupied, and 10.3 percent vacant. In addition, 17.7 percent of housing units are multifamily (five or more units). The Geographic Distribution of Loans criterion compares home mortgage loans to the distribution of owner-occupied housing units.

The FFIEC-updated median family income is used to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle-, and upper-income categories are presented in the following table. The categories are based on the 2019-2021 FFIEC-updated median family income for the Indianapolis-Carmel-Anderson MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Indianapolis-Carmel-Anderson, IN MSA (26900)				
2019 (\$77,800)	<\$38,900	\$38,900 to <\$62,240	\$62,240 to <\$93,360	≥\$93,360
2020 (\$79,600)	<\$39,800	\$39,800 to <\$63,680	\$63,680 to <\$95,520	≥\$95,520
2021 (\$79,700)	<\$39,850	\$39,850 to <\$63,760	\$63,760 to <\$95,640	≥\$95,640
<i>Source: FFIEC</i>				

According to 2021 D&B data, 217,854 non-farm businesses are located in the assessment area. Gross annual revenues for these businesses are as follows:

- 89.3 percent of businesses have revenues of \$1 million and less.
- 3.4 percent of businesses have more than \$1 million in revenues.
- 7.2 percent of businesses did not report their revenues.

The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by the level of gross annual revenues. Service industries represent the largest portion of businesses at 34.4 percent; followed by finance, insurance, and real estate (10.6 percent); retail trade (9.0 percent); construction (6.2 percent); transportation (4.6 percent); and agriculture (2.6 percent). In addition, 58.6 percent of businesses have four or fewer employees, and 92.8 percent operate from a single location.

Competition

According to the FDIC’s Summary of Deposits report as of June 30, 20121, there are 42 FDIC-insured financial institutions located within the assessment area. Collectively, these institutions operate 466 offices and hold \$74.2 billion in FDIC-insured deposits. The top five FDIC-insured banks collectively capture 60.6 percent deposit market share. CIBM Bank ranks 38th with 0.1 percent deposit market share.

According to 2020 HMDA aggregate data, 696 HMDA-reportable institutions originated 136,020 loans totaling \$29.7 billion in the assessment area. The top five lenders collectively capture 21.9 percent home mortgage loan market share by number of loans. CIBM Bank ranks 96th with 0.2 percent home mortgage loan market share.

According to 2020 CRA Small Business aggregate data, 216 CRA-reportable institutions originated 39,935 loans totaling \$3.0 billion in the assessment area. The top five lenders collectively capture 42.8 percent of the small business market share by number of loans. CIBM Bank ranked 52nd with 0.2 percent small business loan market share.

Community Contact(s)

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community

development opportunities are available. Examiners reviewed a recent contact with the Small Business Development Center. The contact identified needs for both financial education and financing for small businesses, including both start-up and longer-term financing.

Credit and Community Development Needs and Opportunities

Considering the information from the community contact, demographic data, and discussions with bank management, examiners determined that community development needs in the assessment area include affordable housing, small business lending, and financial literacy for small businesses and consumers. The high level of low- and moderate-income families (3.0 percent) along with the percentage of businesses with revenues of \$1 million or less (89.5 percent) supports these needs.

The assessment area provides numerous opportunities for involvement in community development activities. The Indianapolis metropolitan area contains empowerment zones and tax increment financing districts designated by local or state government entities for revitalization, stabilization or economic development. These areas are established to stimulate economic activities that include job preservation, job creation, business development, and residential development.

SCOPE OF EVALUATION – INDIANA

The rating for the State of Indiana is based upon the full-scope evaluation of the bank's sole assessment area in Indiana. Since the State of Indiana is a separately rated area, a full-scope review on the sole assessment area is required. The bank's rating for the State of Indiana carries lesser weight in the overall rating. CIBM's home mortgage and small business lending in this assessment area account for 18.2 percent of all loans in all assessment areas.

The bank's lending performance was evaluated based upon a review of HMDA home mortgage loans and small business loans originated in 2019-2021. The bank's qualified community development loans, investments, and services since the prior evaluation dated May 20, 2019, were reviewed, as well as prior period qualified investments.

CONCLUSIONS ON PERFORMANCE CRITERIA IN INDIANA

LENDING TEST

The bank's lending performance reflects excellent responsiveness to the credit needs in the Indiana assessment area. This conclusion is supported by excellent geographic and borrower distributions.

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the Indiana assessment area. This conclusion is supported by excellent home mortgage and small business loan performance.

Home Mortgage

The geographic distribution of home mortgage loans reflects excellent dispersion. The bank's excellent performance in both low- and moderate-income tracts supports this conclusion. Examiners compared CIBM's performance to 2019 and 2020 HMDA aggregate performance as well as the percentage of housing units in all years. HMDA aggregate data for 2021 is not currently available. When drawing conclusions, examiners placed substantially more weight on the comparison to aggregate, as it is a better measure of lending opportunities in the assessment area as it represents the performance of all lenders. The table below provides details.

Geographic Distribution of Home Mortgage Loans						
Assessment Area: CIBM Indiana AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	6.4	4.1	7	4.4	953	2.7
2020	6.4	3.5	13	5.6	1,525	2.8
2021	6.4	--	18	7.4	2,202	4.2
Moderate						
2019	16.0	12.8	31	19.5	7,031	19.7
2020	16.0	11.4	25	10.8	3,612	6.7
2021	16.0	--	46	19.0	6,340	12.1
Middle						
2019	34.3	32.3	43	27.0	8,707	24.4
2020	34.3	30.6	53	22.9	9,910	18.5
2021	34.3	--	55	22.7	11,704	22.3
Upper						
2019	43.3	50.8	78	49.1	18,963	53.2
2020	43.3	54.5	140	60.6	38,651	72.0
2021	43.3	--	123	50.8	32,202	61.4
Not Available						
2019	0.1	0.0	0	0.0	0	0.0
2020	0.1	0.0	0	0.0	0	0.0
2021	0.1	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	159	100.0	35,654	100.0
2020	100.0	100.0	231	100.0	53,698	100.0
2021	100.0	--	242	100.0	52,447	100.0

Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%.

In low-income tracts, CIBM's performance slightly exceeds aggregate in 2019. Performance improves in both 2020 and 2021, exceeding aggregate in 2020 and exceeding the demographic in 2021. Performance in 2021 is notable as historically aggregate lending trails the demographic. While 2021 aggregate is not yet available, CIBM's performance in 2021 is excellent. Overall, given the increasing trend, performance in low-income tracts is excellent,

In moderate-income tracts, CIBM's performance in 2019 and 2021 exceeds the demographic. Performance in 2019 significantly exceeds aggregate results. While in 2020, performance declines, it is still generally consistent with aggregate. Considering the bank's strong 2019 and 2021 performance and reasonable 2020 performance, overall, performance in moderate-income tracts is excellent.

Given CIBM's excellent performance in both low- and moderate-income tracts, as well as the availability of home mortgage products targeting LMI areas and families, overall, the geographic distribution of home mortgage loans is excellent.

Small Business

The geographic distribution of home mortgage loans reflects excellent dispersion. The bank's excellent performance in both low- and moderate-income tracts supports this conclusion. Examiners compared CIBM's performance to 2019 and 2020 CRA Small Business aggregate performance as well as the percentage of businesses in all years. CRA Small Business aggregate data for 2021 is not currently available. When drawing conclusions, examiners placed substantially more weight on the comparison to aggregate, as it is a better measure of lending opportunities in the assessment area as it represents the performance of all lenders. The following table provides details.

Geographic Distribution of Small Business Loans							
Assessment Area: CIBM Indiana AA							
Tract Income Level		% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low							
	2019	9.4	8.1	8	27.6	2,961	35.6
	2020	10.0	7.8	9	15.5	3,580	31.3
	2021	11.0	--	5	11.6	1,616	15.9
Moderate							
	2019	18.9	16.4	6	20.7	1,886	22.6
	2020	19.3	16.0	12	20.7	2,162	18.9
	2021	19.9	--	12	27.9	1,986	19.5
Middle							
	2019	30.4	30.2	8	27.6	2,666	32.0
	2020	30.0	29.8	10	17.2	2,667	23.3
	2021	29.4	--	10	23.3	3,946	38.7
Upper							
	2019	41.1	45.1	7	24.1	815	9.8
	2020	40.6	46.2	27	46.6	3,045	26.6
	2021	39.5	--	16	37.2	2,641	25.9
Not Available							
	2019	0.1	0.2	0	0.0	0	0.0
	2020	0.1	0.2	0	0.0	0	0.0
	2021	0.2	--	0	0.0	0	0.0
Totals							
	2019	100.0	100.0	29	100.0	8,328	100.0
	2020	100.0	100.0	58	100.0	11,454	100.0
	2021	100.0	--	43	100.0	10,189	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>							

CIBM's performance in low-income tracts significantly exceeds aggregate in 2019 and 2020 and exceeds the demographic in all three years. Given the strong performance in all three years, overall, performance in low-income tracts is excellent.

In moderate-income tracts, CIBM's performance exceeds aggregate in both 2019 and 2020. It is also consistent with the demographic. In 2021, performance improves, significantly exceeding the demographic and prior year's results. As a result, performance in moderate-income tracts is excellent.

Considering excellent performance in both low- and moderate-income tracts, overall, the dispersion of small business loans is excellent.

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, excellent penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes. The conclusion is supported by excellent home mortgage performance and excellent small business performance.

Home Mortgage

The distribution of loans to borrowers reflects excellent penetration among retail customers of different income levels. This conclusion is supported by reasonable excellent with both low- and moderate-income borrowers. The following table provides details:

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: CIBM Indiana AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	21.6	8.5	16	10.1	1,830	5.1
2020	21.6	7.0	15	6.5	1,694	3.2
2021	21.6	--	19	7.9	2,320	4.4
Moderate						
2019	16.9	19.3	37	23.3	5,329	14.9
2020	16.9	17.4	42	18.2	5,988	11.2
2021	16.9	--	66	27.3	10,560	20.1
Middle						
2019	19.3	20.5	27	17.0	5,714	16.0
2020	19.3	19.9	42	18.2	8,113	15.1
2021	19.3	--	49	20.2	9,438	18.0
Upper						
2019	42.2	36.1	73	45.9	19,203	53.9
2020	42.2	37.6	125	54.1	35,824	66.7
2021	42.2	--	101	41.7	28,330	54.0
Not Available						
2019	0.0	15.6	6	3.8	3,579	10.0
2020	0.0	18.1	7	3.0	2,080	3.9
2021	0.0	--	7	2.9	1,799	3.4
Totals						
2019	100.0	100.0	159	100.0	35,654	100.0
2020	100.0	100.0	231	100.0	53,698	100.0
2021	100.0	--	242	100.0	52,447	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

CIBM's performance exceeds aggregate with both low- and moderate income borrowers in 2019. While performance declines in 2020, it is consistent with aggregate performance. In 2021, performance improves with both low and moderate-income borrowers, though is particularly strong with moderate-income borrowers. Given the strong performance in both 2019 and 2021 with both income categories and reasonable 2020 performance with both income categories, overall, the borrower distribution of home mortgage loans is excellent.

Small Business

The distribution of loans to borrowers of different sizes reflects excellent penetration among businesses of different sizes. Examiners focused on the bank’s lending to businesses less than \$1 million in revenues. The following table provides details:

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: CIBM Indiana AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2019	85.1	44.8	11	37.9	1,682	20.2
2020	87.3	36.8	28	48.3	3,066	26.8
2021	89.3	--	22	51.2	4,338	42.6
>\$1,000,000						
2019	5.2	--	17	58.6	5,934	71.3
2020	4.3	--	24	41.4	7,596	66.3
2021	3.4	--	18	41.9	5,602	55.0
Revenue Not Available						
2019	9.7	--	1	3.4	712	8.5
2020	8.3	--	6	10.3	792	6.9
2021	7.2	--	3	7.0	249	2.4
Totals						
2019	100.0	100.0	29	100.0	8,328	100.0
2020	100.0	100.0	58	100.0	11,454	100.0
2021	100.0	--	43	100.0	10,189	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

CIBM’s 2019 performance trails aggregate. However, in 2020, performance improves, significantly exceeding aggregate. Further improvement is noted in 2021, when more than half of all small business loans were originated to businesses with revenues less the \$1 million.

While, performance in 2019 is somewhat weak, given the solid 2020 and 2021 performance and increasing trend, despite a decline in aggregate performance from 2019 to 2020, overall, the distribution of small business loans to businesses of different sizes is excellent.

COMMUNITY DEVELOPMENT TEST

CIBM demonstrated adequate responsiveness to the community development needs of the Indiana assessment area through qualified community development loans, investments, and services. Examiners considered the institution’s capacity and the need and availability of such opportunities. As previously discussed, the bank maintains 5.8 percent of total deposits, 18.2 percent of home mortgage and small business loans originations, and 10 percent of branches in the Indiana assessment area.

Community Development Loans

CIBM originated 4 CD loans totaling \$2.8 million in the assessment area. This level accounts for 13.3 percent by number and 8.0 percent by dollar of total CD lending. CD lending declined in dollars since the previous evaluation when CIBM originated four loans totaling \$6.6 million. The current level is generally consistent with CIBM’s presence in the assessment area. The table below provides details:

Community Development Lending – Indiana Assessment Area										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
5/20/19-12/31/19	1	274	0	0	0	0	1	857	2	1,131
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	1	836	0	0	1	836
2022 YTD*	0	0	0	0	1	836	0	0	1	836
Total	1	274	0	0	2	1,672	1	857	4	2,803

*Source: Bank Records; * 01/01/22 to 06/21/22.*

CIBM’s CD loans include the following:

- The two economic development loans consist of SBA 504 loans. These loans supported the creation or retention of jobs, including jobs for LMI individuals.
- A \$274,000 loan for a 92-unit apartment complex with a majority of the units leased at affordable rates. Ten of the 92 units are set aside to support Section 8 housing through the Indiana Housing Authority.
- An \$857,000 loan to renovate a former hospital in a low-income tract and convert the building to 14 apartments. The loans supports efforts to revitalize the area.

Qualified Investments

CIBM originated five qualified investments totaling approximately \$2.1 million, maintained 24 prior period investments totaling approximately \$1.8 million, and made 10 donations totaling \$29,000 in the assessment area. This level accounts for 21.0 percent by number and 25.1 percent by dollar of total qualified investments. Qualified investments compared to the previous exam when CIBM originated 31 qualifying investments totaling \$2.4 million. The current level exceeds bank’s branch, loan, and deposit presence in the area. The table below provides details:

Community Development Investments – Indiana Assessment Area										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	24	1,765	0	0	0	0	0	0	24	1,765
5/20/2019-12/31/2019	0	0	0	0	0	0	0	0	0	0
2020	0	0	2	6	0	0	0	0	2	6
2021	5	2,123	0	0	0	0	0	0	5	2,123
2022 YTD*	0	0	0	0	0	0	0	0	0	0
Subtotal	29	3,888	2	6	0	0	0	0	31	3,894
Donations & Grants	0	0	10	29	0	0	0	0	10	29
Total	29	3,888	12	35	0	0	0	0	41	3,923
<i>Source: Bank Data; * 01/01/22 to 06/21/22.</i>										

CIBM has been generally responsive to the community development needs of the area. All of the bank's affordable housing investments consist of investments in mortgage-backed securities, which consist of mortgage loans to low- and moderate-income borrowers.

Community Development Services

Bank representatives provided 14 instances of financial expertise or technical assistance to community development-related organizations in the Indiana assessment area during the evaluation period. This accounts for 12.2 percent of all CD services, which is consistent CIBM's presence in the assessment area. It also represents an increase from the prior evaluation, when bank representatives provided 6 community development services. The table below provides details on CIBM's community service activities:

Community Development Services – Indiana Assessment Area					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
5/20/19-12/31/19	0	1	1	0	2
2020	0	4	0	0	4
2021	0	5	0	0	5
2022 YTD*	0	3	0	0	3
Total	0	13	1	0	14
<i>Source: Bank Records; ; * 01/01/22 to 06/21/22.</i>					

Examples of CIBM's CD Service activities include:

- An employee serves on the loan committee of Small Business Development Corporation (SBDC). The SBDC provides financing to small business that struggle to obtain traditional bank financing.
- An employee serves as a director of an affordable housing organization. The organization provides financial education and fosters relationships with state, local, and federal officials to promote affordable housing throughout the State of Indiana.

- Employees provide two financial education seminars for students of a local high school with a majority of LMI students.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Community Development Test	Rating
Illinois	Satisfactory	Satisfactory	Satisfactory
Wisconsin	Satisfactory	Satisfactory	Satisfactory
Indiana	Outstanding	Satisfactory	Satisfactory

ADDITIONAL INFORMATION ON THE LIMITED-SCOPE ASSESSMENT AREAS IN ILLINOIS

Champaign, IL AA

Demographic Information of the Assessment Area						
Assessment Area: CIBM Champaign IL AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	17.0	14.9	42.6	21.3	4.3
Population by Geography	222,261	13.2	15.5	45.0	21.3	5.0
Housing Units by Geography	96,302	13.9	16.2	47.9	20.1	1.8
Owner-Occupied Units by Geography	49,446	4.9	10.8	58.1	26.1	0.1
Occupied Rental Units by Geography	37,111	24.7	22.4	35.5	13.5	3.9
Vacant Units by Geography	9,745	19.3	20.5	43.2	14.9	2.1
Businesses by Geography	14,454	10.2	17.0	42.8	27.8	2.2
Farms by Geography	859	2.6	5.7	68.8	22.8	0.1
Family Distribution by Income Level	47,285	21.8	16.5	20.7	41.0	0.0
Household Distribution by Income Level	86,557	27.6	14.5	15.2	42.7	0.0
Median Family Income MSA - 16580 Champaign-Urbana, IL MSA		\$70,634	Median Housing Value			\$137,205
			Median Gross Rent			\$835
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Geographic Distribution of Home Mortgage Loans						
Assessment Area: CIBM Champaign IL AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	4.9	5.0	1	2.0	101	2.1
2020	4.9	3.1	0	0.0	0	0.0
2021	4.9	--	2	11.1	119	4.8
Moderate						
2019	10.8	9.2	3	6.0	230	4.8
2020	10.8	6.9	1	6.7	56	2.5
2021	10.8	--	2	11.1	252	10.2
Middle						
2019	58.1	57.3	34	68.0	3,372	69.6
2020	58.1	58.4	10	66.7	1,606	70.6
2021	58.1	--	8	44.4	1,220	49.4
Upper						
2019	26.1	28.4	12	24.0	1,141	23.5
2020	26.1	31.4	4	26.7	612	26.9
2021	26.1	--	6	33.3	877	35.5
Not Available						
2019	0.1	0.1	0	0.0	0	0.0
2020	0.1	0.3	0	0.0	0	0.0
2021	0.1	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	50	100.0	4,844	100.0
2020	100.0	100.0	15	100.0	2,273	100.0
2021	100.0	--	18	100.0	2,468	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

Geographic Distribution of Small Business Loans						
Assessment Area: CIBM Champaign IL AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	10.1	10.3	1	7.1	368	15.8
2020	9.9	10.8	7	12.5	353	9.7
2021	10.2	--	4	11.1	149	5.2
Moderate						
2019	17.3	16.8	2	14.3	620	26.6
2020	17.1	15.8	7	12.5	535	14.7
2021	17.0	--	5	13.9	724	25.2
Middle						
2019	41.9	44.2	5	35.7	740	31.8
2020	42.4	44.0	24	42.9	1,329	36.5
2021	42.8	--	15	41.7	1,034	35.9
Upper						
2019	28.1	27.7	6	42.9	600	25.8
2020	28.2	28.6	18	32.1	1,427	39.2
2021	27.8	--	11	30.6	963	33.5
Not Available						
2019	2.6	1.0	0	0.0	0	0.0
2020	2.4	0.8	0	0.0	0	0.0
2021	2.2	--	1	2.8	8	0.3
Totals						
2019	100.0	100.0	14	100.0	2,328	100.0
2020	100.0	100.0	56	100.0	3,644	100.0
2021	100.0	--	36	100.0	2,878	100.0
Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: CIBM Champaign IL AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	21.8	9.7	10	20.0	699	14.4
2020	21.8	7.5	3	20.0	253	11.1
2021	21.8	--	4	22.2	527	21.4
Moderate						
2019	16.5	18.6	16	32.0	1,553	32.1
2020	16.5	17.2	6	40.0	762	33.5
2021	16.5	--	2	11.1	337	13.6
Middle						
2019	20.7	20.4	9	18.0	971	20.0
2020	20.7	20.8	2	13.3	277	12.2
2021	20.7	--	7	38.9	937	38.0
Upper						
2019	41.0	35.9	15	30.0	1,621	33.5
2020	41.0	40.0	4	26.7	982	43.2
2021	41.0	--	4	22.2	400	16.2
Not Available						
2019	0.0	15.4	0	0.0	0	0.0
2020	0.0	14.5	0	0.0	0	0.0
2021	0.0	--	1	5.6	267	10.8
Totals						
2019	100.0	100.0	50	100.0	4,844	100.0
2020	100.0	100.0	15	100.0	2,274	100.0
2021	100.0	--	18	100.0	2,468	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: CIBM Champaign IL AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2019	78.5	47.6	9	64.3	1,378	59.2
2020	79.8	35.8	33	58.9	1,536	42.2
2021	81.8	--	19	52.8	1,415	49.2
>\$1,000,000						
2019	5.3	--	5	35.7	950	40.8
2020	4.8	--	11	19.6	1,754	48.1
2021	4.3	--	6	16.7	1,094	38.0
Revenue Not Available						
2019	16.3	--	0	0.0	0	0.0
2020	15.4	--	12	21.4	354	9.7
2021	13.9	--	11	30.6	369	12.8
Totals						
2019	100.0	100.0	14	100.0	2,328	100.0
2020	100.0	100.0	56	100.0	3,644	100.0
2021	100.0	--	36	100.0	2,878	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

Peoria, IL AA

Demographic Information of the Assessment Area						
Assessment Area: CIBM Peoria IL AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	87	13.8	14.9	47.1	24.1	0.0
Population by Geography	361,915	8.1	13.9	47.6	30.5	0.0
Housing Units by Geography	156,759	8.6	15.1	47.7	28.6	0.0
Owner-Occupied Units by Geography	102,460	3.8	13.4	50.3	32.6	0.0
Occupied Rental Units by Geography	42,311	16.9	18.5	43.9	20.7	0.0
Vacant Units by Geography	11,988	21.1	18.1	38.4	22.3	0.0
Businesses by Geography	22,092	11.2	12.1	44.3	32.4	0.0
Farms by Geography	1,266	2.1	5.1	56.5	36.3	0.0
Family Distribution by Income Level	94,211	20.6	17.8	21.2	40.4	0.0
Household Distribution by Income Level	144,771	23.2	16.2	18.3	42.2	0.0
Median Family Income MSA - 37900 Peoria, IL MSA		\$67,308	Median Housing Value			\$135,981
			Median Gross Rent			\$713
			Families Below Poverty Level			9.2%
<i>Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Geographic Distribution of Home Mortgage Loans						
Assessment Area: CIBM Peoria IL AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	3.8	1.6	0	0.0	0	0.0
2020	3.8	1.2	0	0.0	0	0.0
2021	3.8	--	0	0.0	0	0.0
Moderate						
2019	13.4	11.6	2	33.3	134	27.7
2020	13.4	10.0	3	33.3	537	36.4
2021	13.4	--	0	0.0	0	0.0
Middle						
2019	50.3	50.4	3	50.0	150	31.1
2020	50.3	48.2	4	44.4	603	40.9
2021	50.3	--	3	75.0	395	63.3
Upper						
2019	32.6	36.4	1	16.7	198	41.1
2020	32.6	40.6	2	22.2	336	22.7
2021	32.6	--	1	25.0	229	36.7
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	6	100.0	482	100.0
2020	100.0	100.0	9	100.0	1,475	100.0
2021	100.0	--	4	100.0	624	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

Geographic Distribution of Small Business Loans						
Assessment Area: CIBM Peoria IL AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	11.2	10.9	5	31.2	1,480	41.4
2020	11.0	9.8	11	30.6	1,948	52.0
2021	11.2	--	6	27.3	1,942	63.2
Moderate						
2019	12.3	10.9	1	6.2	100	2.8
2020	11.9	10.8	3	8.3	144	3.8
2021	12.1	--	4	18.2	162	5.3
Middle						
2019	44.6	43.8	7	43.8	580	16.2
2020	44.6	46.3	16	44.4	1,342	35.8
2021	44.3	--	10	45.5	807	26.3
Upper						
2019	31.9	34.4	3	18.8	1,415	39.6
2020	32.5	33.0	6	16.7	312	8.3
2021	32.4	--	2	9.1	160	5.2
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	16	100.0	3,575	100.0
2020	100.0	100.0	36	100.0	3,746	100.0
2021	100.0	--	22	100.0	3,071	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: CIBM Peoria IL AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	20.6	10.0	3	50.0	152	31.6
2020	20.6	8.4	0	0.0	0	0.0
2021	20.6	--	1	25.0	54	8.6
Moderate						
2019	17.8	18.8	1	16.7	71	14.8
2020	17.8	17.1	2	22.2	225	15.3
2021	17.8	--	0	0.0	0	0.0
Middle						
2019	21.2	18.6	0	0.0	0	0.0
2020	21.2	18.6	2	22.2	296	20.0
2021	21.2	--	0	0.0	0	0.0
Upper						
2019	40.4	30.2	2	33.3	258	53.6
2020	40.4	35.2	4	44.4	548	37.1
2021	40.4	--	3	75.0	570	91.4
Not Available						
2019	0.0	22.4	0	0.0	0	0.0
2020	0.0	20.6	1	11.1	407	27.6
2021	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	6	100.0	482	100.0
2020	100.0	100.0	9	100.0	1,476	100.0
2021	100.0	--	4	100.0	624	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: CIBM Peoria IL AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2019	77.8	42.8	7	43.8	933	26.1
2020	78.7	45.9	21	58.3	681	18.2
2021	80.5	--	9	40.9	368	12.0
>\$1,000,000						
2019	6.8	--	9	56.3	2,642	73.9
2020	6.4	--	12	33.3	2,853	76.2
2021	5.8	--	9	40.9	2,619	85.3
Revenue Not Available						
2019	15.4	--	0	0.0	0	0.0
2020	14.9	--	3	8.3	212	5.7
2021	13.7	--	4	18.2	84	2.7
Totals						
2019	100.0	100.0	16	100.0	3,575	100.0
2020	100.0	100.0	36	100.0	3,746	100.0
2021	100.0	--	22	100.0	3,071	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

Bloomington, IL AA

Demographic Information of the Assessment Area						
Assessment Area: CIBM Bloomington IL AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	41	9.8	17.1	53.7	19.5	0.0
Population by Geography	173,114	6.4	13.6	53.5	26.5	0.0
Housing Units by Geography	70,897	5.9	15.3	55.1	23.7	0.0
Owner-Occupied Units by Geography	42,905	2.3	14.3	53.9	29.5	0.0
Occupied Rental Units by Geography	22,441	10.9	16.4	57.4	15.3	0.0
Vacant Units by Geography	5,551	13.3	19.0	54.5	13.2	0.0
Businesses by Geography	10,457	8.4	12.6	54.2	24.7	0.0
Farms by Geography	647	1.7	7.1	68.6	22.6	0.0
Family Distribution by Income Level	40,488	19.4	17.3	22.2	41.1	0.0
Household Distribution by Income Level	65,346	25.4	14.9	17.4	42.3	0.0
Median Family Income MSA - 14010 Bloomington, IL MSA		\$83,034	Median Housing Value			\$155,857
			Median Gross Rent			\$790
			Families Below Poverty Level			6.8%
<p><i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

Geographic Distribution of Home Mortgage Loans						
Assessment Area: CIBM Bloomington IL AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	2.3	2.7	0	0.0	0	0.0
2020	2.3	1.8	1	5.0	70	0.7
2021	2.3	--	1	4.8	50	1.8
Moderate						
2019	14.3	11.6	4	13.8	378	14.2
2020	14.3	10.6	7	35.0	8,650	84.9
2021	14.3	--	3	14.3	311	11.0
Middle						
2019	53.9	50.5	17	58.6	1,349	50.5
2020	53.9	47.2	11	55.0	1,331	13.1
2021	53.9	--	13	61.9	1,696	60.0
Upper						
2019	29.5	35.2	8	27.6	944	35.3
2020	29.5	40.4	1	5.0	139	1.4
2021	29.5	--	4	19.0	769	27.2
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	29	100.0	2,671	100.0
2020	100.0	100.0	20	100.0	10,189	100.0
2021	100.0	--	21	100.0	2,825	100.0
Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.						

Geographic Distribution of Small Business Loans						
Assessment Area: CIBM Bloomington IL AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	8.5	8.0	1	20.0	100	19.6
2020	8.3	9.1	1	7.1	9	0.9
2021	8.4	--	0	0.0	0	0.0
Moderate						
2019	13.0	12.6	0	0.0	0	0.0
2020	12.6	12.8	1	7.1	6	0.6
2021	12.6	--	0	0.0	0	0.0
Middle						
2019	55.6	47.0	4	80.0	410	80.4
2020	55.2	51.5	10	71.4	695	67.3
2021	54.2	--	8	88.9	1,108	82.1
Upper						
2019	22.9	32.5	0	0.0	0	0.0
2020	23.8	26.5	2	14.3	322	31.2
2021	24.7	--	1	11.1	241	17.9
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	5	100.0	510	100.0
2020	100.0	100.0	14	100.0	1,032	100.0
2021	100.0	--	9	100.0	1,349	100.0
Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: CIBM Bloomington IL AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	19.4	12.0	3	10.3	165	6.2
2020	19.4	11.7	6	30.0	536	5.3
2021	19.4	--	5	23.8	520	18.4
Moderate						
2019	17.3	19.8	9	31.0	1,066	39.9
2020	17.3	18.3	8	40.0	1,084	10.6
2021	17.3	--	10	47.6	1,284	45.5
Middle						
2019	22.2	21.0	4	13.8	414	15.5
2020	22.2	22.6	3	15.0	329	3.2
2021	22.2	--	2	9.5	263	9.3
Upper						
2019	41.1	28.1	13	44.8	1,026	38.4
2020	41.1	27.3	2	10.0	337	3.3
2021	41.1	--	3	14.3	709	25.1
Not Available						
2019	0.0	19.1	0	0.0	0	0.0
2020	0.0	20.2	1	5.0	7,903	77.6
2021	0.0	--	1	4.8	50	1.8
Totals						
2019	100.0	100.0	29	100.0	2,671	100.0
2020	100.0	100.0	20	100.0	10,189	100.0
2021	100.0	--	21	100.0	2,825	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: CIBM Bloomington IL AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2019	79.4	44.8	4	80.0	350	68.6
2020	80.2	38.0	6	42.9	319	30.9
2021	81.6	--	4	44.4	645	47.8
>\$1,000,000						
2019	5.7	--	1	20.0	160	31.4
2020	5.3	--	3	21.4	601	58.2
2021	4.8	--	3	33.3	599	44.4
Revenue Not Available						
2019	14.8	--	0	0.0	0	0.0
2020	14.5	--	5	35.7	112	10.9
2021	13.5	--	2	22.2	105	7.8
Totals						
2019	100.0	100.0	5	100.0	510	100.0
2020	100.0	100.0	14	100.0	1,032	100.0
2021	100.0	--	9	100.0	1,349	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

Danville, IL AA

Demographic Information of the Assessment Area						
Assessment Area: CIBM Danville IL AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.2	20.8	41.7	33.3	0.0
Population by Geography	80,368	4.3	18.6	47.2	29.9	0.0
Housing Units by Geography	36,093	4.1	17.1	47.6	31.2	0.0
Owner-Occupied Units by Geography	21,751	2.8	11.4	49.6	36.2	0.0
Occupied Rental Units by Geography	9,780	7.0	24.7	46.6	21.7	0.0
Vacant Units by Geography	4,562	4.0	28.6	40.0	27.4	0.0
Businesses by Geography	3,984	3.9	23.2	42.4	30.4	0.0
Farms by Geography	330	0.0	4.2	44.5	51.2	0.0
Family Distribution by Income Level	20,188	21.7	16.8	20.7	40.8	0.0
Household Distribution by Income Level	31,531	23.4	16.2	18.3	42.1	0.0
Median Family Income MSA - 19180 Danville, IL MSA		\$53,880	Median Housing Value			\$73,747
			Median Gross Rent			\$630
			Families Below Poverty Level			14.2%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Geographic Distribution of Home Mortgage Loans						
Assessment Area: CIBM Danville IL AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	2.8	1.1	0	0.0	0	0.0
2020	2.8	1.0	1	8.3	26	2.8
2021	2.8	--	1	4.5	25	1.2
Moderate						
2019	11.4	3.8	0	0.0	0	0.0
2020	11.4	3.5	0	0.0	0	0.0
2021	11.4	--	2	9.1	98	4.9
Middle						
2019	49.6	49.3	1	25.0	31	11.3
2020	49.6	46.8	5	41.7	410	44.1
2021	49.6	--	11	50.0	846	41.9
Upper						
2019	36.2	45.8	3	75.0	243	88.7
2020	36.2	48.7	6	50.0	495	53.1
2021	36.2	--	8	36.4	1,052	52.1
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	4	100.0	274	100.0
2020	100.0	100.0	12	100.0	931	100.0
2021	100.0	--	22	100.0	2,021	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

Geographic Distribution of Small Business Loans						
Assessment Area: CIBM Danville IL AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	3.9	3.7	1	20.0	75	25.0
2020	3.6	3.3	1	5.6	75	11.8
2021	3.9	--	2	18.2	111	24.6
Moderate						
2019	22.7	18.3	0	0.0	0	0.0
2020	22.6	19.8	4	22.2	52	8.2
2021	23.2	--	0	0.0	0	0.0
Middle						
2019	42.8	39.6	2	40.0	100	33.3
2020	42.8	43.3	7	38.9	229	36.1
2021	42.4	--	6	54.5	131	29.0
Upper						
2019	30.7	38.5	2	40.0	125	41.7
2020	31.0	33.6	6	33.3	279	43.9
2021	30.4	--	3	27.3	209	46.3
Not Available						
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
2021	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	5	100.0	300	100.0
2020	100.0	100.0	18	100.0	635	100.0
2021	100.0	--	11	100.0	451	100.0
Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.						

Distribution of Home Mortgage Loans by Borrower Income Level						
Assessment Area: CIBM Danville IL AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2019	21.7	5.9	0	0.0	0	0.0
2020	21.7	5.2	0	0.0	0	0.0
2021	21.7	--	3	13.6	231	11.4
Moderate						
2019	16.8	18.2	2	50.0	124	45.3
2020	16.8	14.2	3	25.0	241	25.9
2021	16.8	--	4	18.2	360	17.8
Middle						
2019	20.7	23.9	1	25.0	50	18.3
2020	20.7	21.0	3	25.0	346	37.2
2021	20.7	--	6	27.3	685	33.9
Upper						
2019	40.8	33.7	1	25.0	100	36.5
2020	40.8	39.9	6	50.0	344	36.9
2021	40.8	--	9	40.9	745	36.9
Not Available						
2019	0.0	18.3	0	0.0	0	0.0
2020	0.0	19.7	0	0.0	0	0.0
2021	0.0	--	0	0.0	0	0.0
Totals						
2019	100.0	100.0	4	100.0	274	100.0
2020	100.0	100.0	12	100.0	931	100.0
2021	100.0	--	22	100.0	2,021	100.0
<i>Source: 2015 ACS; Bank Data, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

Distribution of Small Business Loans by Gross Annual Revenue Category						
Assessment Area: CIBM Danville IL AA						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<=\$1,000,000						
2019	75.1	44.1	5	100.0	300	100.0
2020	75.9	30.4	14	77.8	416	65.5
2021	77.3	--	9	81.8	313	69.4
>\$1,000,000						
2019	6.0	--	0	0.0	0	0.0
2020	5.8	--	1	5.6	17	2.7
2021	5.4	--	0	0.0	0	0.0
Revenue Not Available						
2019	18.9	--	0	0.0	0	0.0
2020	18.4	--	3	16.7	202	31.8
2021	17.3	--	2	18.2	138	30.6
Totals						
2019	100.0	100.0	5	100.0	300	100.0
2020	100.0	100.0	18	100.0	635	100.0
2021	100.0	--	11	100.0	451	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data; 2019 & 2020 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0%.</i>						

GLOSSARY

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/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, 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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

Upper-Income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more in the case of a geography.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.