



Office of the  
Comptroller of the Currency  
Washington, DC 20219

**SMALL BANK**

## **PUBLIC DISCLOSURE**

July 22, 2019

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

The Old Exchange National Bank of Okawville  
Charter Number 11780

110 E. Walnut Street  
Okawville, IL 62271

Office of the Comptroller of the Currency  
500 North Broadway, Suite 1700  
St. Louis, MO 63103

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

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## Overall CRA Rating

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

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

The Lending Test rating is based on The Old Exchange National Bank's (OENB or bank) performance in the state of Illinois (IL). The major factors that support this rating include:

- OENB's average loan-to deposit (LTD) ratio is reasonable.
- A majority of the bank's small farm loans are inside the assessment area (AA).
- The overall borrower distribution of loans to small farms is excellent given the bank's size, product offerings and market share, combined with the local demographic and economic conditions. This factor was given the most weight in arriving at the bank's overall rating.
- There were no complaints with respect to the bank's CRA performance during the evaluation period.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition and credit needs of the AA, OENB's LTD ratio is reasonable.

The bank's average quarterly LTD ratio averaged 58.2 percent over the 15 quarters since the last CRA evaluation. During this timeframe, the bank's LTD ratio had a quarterly low of 49.2 percent and a high of 65.8 percent. The bank's average quarterly LTD ratio compares similarly with other community institutions of similar size, location, and product offerings. OENB ranks fifth among six similarly situated institutions under \$181 million in total assets serving the AA. The other five institutions had quarterly LTD ratios ranging from 41.7 percent to 91.9 percent, averaging 70.9 percent.

## Lending in Assessment Area

A majority of the bank's loans are inside its assessment area (AA).

The bank originated 65 percent of the total number and 77.8 percent of the total dollar volume of loans inside its AA during the evaluation period. This ratio is a bank-wide calculation, and not calculated by individual rating area or AA.

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		
	#	%	#	%		\$	%	\$	%	
Small Farm	13	65.0	7	35.0	20	1,612	77.8	461	22.2	2,073
Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data Due to rounding, totals may not equal 100.0										

## Description of Institution

OENB is an intrastate bank with one office located in Okawville, IL, a rural agricultural community. The office is located in a middle-income census tract (CT 9502); however, prior to 2017, the CT was designated as upper-income. OENB is wholly owned by Okawville Bancshares, Inc.; a one-bank holding company located in Okawville, IL. The bank does not have any branches or affiliates. OENB has one full service automated teller machine (ATM) located at its main office. There have been no changes in the bank's corporate structure, including merger or acquisition activities since the last CRA examination.

OENB offers traditional bank services and loan products normally associated with a community bank. As of December 31, 2018, OENB had total assets of \$70.9 million, total deposits of \$63.5 million, and tier 1 capital of \$7.5 million. Net loans and leases totaled \$35.2 million, representing 49.6 percent of total assets. The following table represents the loan portfolio mix as of December 31, 2018:

Loan Portfolio Summary by Loan Product December 31, 2018		
Loan Type	Dollars (000)	Percentage of Loan Portfolio
Residential Loans	\$ 6,131	17.3%
Commercial Loans	\$ 1,449	4.1%
Consumer Loans	\$ 450	1.3%
Agricultural Loans	\$ 27,125	76.3%
Other Loans & Leases	\$ 387	1.1%
<b>Total Loans</b>	<b>\$ 35,542</b>	<b>100%</b>
<i>Source: 12/31/18 FFIEC Call Report.</i>		

There are no legal, financial, or other factors impeding OENB's ability to help meet the credit needs of the AA it serves. The OCC concluded OENB's performance was "Satisfactory" at its last CRA evaluation dated May 4, 2015.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation is an assessment of the bank's record of meeting the credit needs of the communities in which it operates. We evaluated OENB using the Small Bank performance criteria, which includes a Lending Test. The Lending Test evaluates OENB's record of helping to meet the credit needs of its AA through its lending activities.

OENB's AA consists of four CTs within Washington County, IL. The AA received a full-scope review. The scope of the CRA evaluation period is May 5, 2015 through December 31, 2018. We based our conclusions regarding the bank's lending performance on loans to small farms, OENB's primary loan products.

To evaluate OENB's lending performance, we selected a random sample of farm loans originated in 2016, 2017, and 2018 (20 loans originated during in 2016 and 20 loans originated during the period of

2017-2018). After our initial sampling to analyze the bank's lending inside its AA, we only used loans made in the AA to evaluate the other Lending Test factors. Please refer to the following table for a summary of loan originations by loan type during the evaluation period:

<b>Loan Originations by Loan Type from January 1, 2016 through December 31, 2018</b>				
<b>Loan Category</b>	<b>Dollars (000s)</b>	<b>% of Dollars</b>	<b>Number of Loans</b>	<b>% of Number of Loans</b>
Residential Loans	\$5,136	11.6%	46	8.2%
Commercial Loans	\$2,265	5.1%	22	3.9%
Consumer Loans	\$795	1.8%	108	19.3%
Agricultural Loans	\$36,035	81.5%	385	68.6%
<b>Total Loans</b>	<b>\$44,231</b>	<b>100%</b>	<b>561</b>	<b>100%</b>
<i>Source: Bank Records January 1, 2016 – December 31, 2018</i>				

We completed two separate analyses of the bank's lending performance. For the bank's 2016 lending performance, we used the comparators of demographic data from the 2010 United States (U.S.) Census. For the bank's 2017 and 2018 lending performance, we used the comparators of demographic data from the 2015 American Community Survey (ACS).

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

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

### **Ratings**

OENB's overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from the bank's observed performance under the CRA Small Bank Lending Test, as well as related performance context information from the bank's IL Non-MSA. With the exception of the bank's LTD ratio (based on the bank's entire lending portfolio), all weight for performance under the CRA Small Bank Lending Test was based on the bank's lending performance in relation to its primary product - small farm loans. Agricultural loans made up the largest segment of the bank's lending activity during the evaluation period, representing 81.5 percent of the dollar amount and 68.6 percent of the number of loans originated.

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

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## **State Rating**

### **State of Illinois**

**CRA rating for the State of Illinois:** Outstanding.

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

The major factors that support this rating include:

- The average loan-to deposit (LTD) ratio is reasonable given the bank's size, financial condition and level of local competition.
- The majority of small farm loans are inside the AA.
- The overall borrower distribution of loans to small farms is reasonable given the bank's size, product offerings and market share, combined with the local demographic and economic conditions. This factor was given the most weight in arriving at the bank's overall rating.

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

OENB's AA includes CTs: 9501, 9502, 9503, & 9504, comprising all of Washington County, IL. The AA is a Non-Metropolitan Statistical Area (Non-MSA). The bank operates one full-service branch in Okawville, IL and an onsite ATM. There are no low- or moderate-income census tracts in this AA. In 2016, the AA contained two middle (9501 & 9503) and two upper-income (9502 & 9504) CTs. However, in 2017-18, CTs 9502 and 9504 changed from upper to middle-income. All four CTs are now identified as being middle-income. OENB's AA meets regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

Competition for deposits is modest due to the limited number and size of financial institutions within the AA. The June 30, 2018 FDIC Summary of Deposits Report showed there were 8 total depository institutions in the AA operating 13 branches. OENB's deposits in the AA totaled \$58.5 million, representing 14.4 percent of the market or second place. The first four depository institutions by market share are The Farmers and Merchants NB of Nashville (34.7 percent); OENB; Nashville Savings Bank (12.6 percent); and The FNB of Okawville (12.5 percent). These institutions accounted for a combined 74.2 percent of total deposits.

Competition for farm loans was strong in both the 2016 and 2017-18 review periods. Based on 2016 aggregate market share data, 35 lenders originated or purchased a total of 191 small farm loans in the AA. The top five lenders accounted for less than 10 percent of the total. In 2017-18, 34 lenders originated or purchased a total of 197 small farm loans. The top five lenders accounted for less than 15 percent (14.4 percent) of the total. OENB and other local lenders are not included in the data due to their location and size.

Based upon our review, OENB originated 137 small farm loans in 2016; 132 small farm loans in 2017 and 116 small farm loans in 2018, which would rank them well ahead of the reporting institutions. OENB's total by dollar amount is \$36 million, or on average, just over \$12 million per year.

## **Community Contact**

A community contact from a not-for-profit organization that serves OENB's AA provided insight on potential community needs. The contact stated the community would benefit from banks providing a form of pre-purchase financial counseling for lower-income borrowers to ensure there is an understanding around the type of budgeting required for larger purchases (house, car, etc.). This contact also noted their clients often face issues related to poor credit scores due to past delinquency issues and stated there are community development opportunities to provide financial education around underlying credit issues.

The contact noted that current economic conditions have improved somewhat in the last few years. She believes that local banks are actively participating in their local communities. She identified the following needs for their respective areas, including:

- Affordable housing (including first time homebuyer programs and down payment and closing assistance);
- Financial education and literacy programming in order to address the needs of the unbanked population; and
- Small business development and lending.



**Illinois Non-MSA**

Table A – Demographic Information of the Assessment Area						
2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	0.0	50.0	50.0	0.0
Population by Geography	14,716	0.0	0.0	45.5	54.5	0.0
Housing Units by Geography	6,544	0.0	0.0	45.6	54.4	0.0
Owner-Occupied Units by Geography	5,038	0.0	0.0	43.4	56.6	0.0
Occupied Rental Units by Geography	1,019	0.0	0.0	57.1	42.9	0.0
Vacant Units by Geography	487	0.0	0.0	44.8	55.2	0.0
Businesses by Geography	780	0.0	0.0	57.4	42.6	0.0
Farms by Geography	239	0.0	0.0	33.5	66.5	0.0
Family Distribution by Income Level	4,273	14.0	15.6	21.6	48.8	0.0
Household Distribution by Income Level	6,057	17.7	13.4	19.2	49.8	0.0
Median Family Income Non-MSAs - IL		\$54,499	Median Housing Value			\$104,028
			Median Gross Rent			\$597
			Families Below Poverty Level			5.5%
Source: 2010 U.S. Census and 2016 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.						

Table A – Demographic Information of the Assessment Area						
2017-18						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	0.0	100.0	0.0	0.0
Population by Geography	14,457	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	6,575	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	4,553	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,224	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	798	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	758	0.0	0.0	100.0	0.0	0.0
Farms by Geography	216	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,868	15.1	16.5	21.8	46.5	0.0
Household Distribution by Income Level	5,777	19.1	15.3	17.6	47.9	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housing Value			\$107,166
			Median Gross Rent			\$620
			Families Below Poverty Level			9.4%
Source: 2015 ACS Census and 2018 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.						

## Population and Employment

According to the 2015 ACS census data, the total population in the AA has not changed significantly since 2010. The population was slightly down from the 2010 Census, declining from 14,716 to 14,457. The number of household and families both decreased between 2010 and 2015. The number of households decreased by 280 from 6,057 in 2010 to 5,777 in 2015. The number of families decreased by 405 from 4,273 in 2010 to 3,868 in 2015. However, the rate of poverty for both households and families increased. Households below poverty increased from 8.6 to 11.3 percent, while families below poverty increased from 5.5 to 9.4 percent. The annual unemployment rate in Washington County decreased from 3.8 percent in 2016 to 3.0 percent in 2018. The unemployment in Washington County is historically lower than the Illinois statewide and national unemployment rates.

<b>Unemployment Rates 2016-2018</b>			
<b>Area</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Washington County	3.8%	3.0%	3.0%
State of Illinois	5.8%	4.9%	4.3%
National USA	4.7%	4.1%	3.9%
<i>Source: U.S. Dept. of Labor; Bureau of Labor Statistics</i>			

The AA economy is concentrated within the agricultural and service industries. Based on ACS business demographic data, the primary industries in the area are services (29.6 percent), agriculture, forestry, and fishing (22.2 percent) and retail trade (11.7 percent). Over 65 percent of businesses in the AA report having one to four employees. Major employers in the area are agriculture production or related industries and the public school system.

## Housing and Affordability

The 2015 ACS Census reported total housing units increased by 31 housing units to 6,575 for the Non-MSA. Of the total number of housing units in the AA, 4,553 or 69 percent are owner occupied, 1,224 or 18.6 percent are renter occupied, and 798 or 12 percent are vacant. Vacant housing increased 63 percent between 2010 and 2015.

Homeownership affordability was an issue that limited mortgage demand, particularly among low-income borrowers. Based on the 2018 FFIEC median family income of \$63,900, low income families made less than \$31,950. The weighted average median housing value for the AA was \$107,166 or 3.3 times the annual income of a low-income family.

<b>Table B – Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>IL Non-MSA Median Family Income</b>				
2016 (\$58,000)	<\$29,000	\$29,000 to <\$46,400	\$46,400 to <\$69,600	≥\$69,600
2017 (\$60,400)	<\$30,200	\$30,200 to <\$48,320	\$48,320 to <\$72,480	≥\$72,480
2018 (\$63,900)	<\$31,950	\$31,950 to <\$51,120	\$51,120 to <\$76,680	≥\$76,680
<i>Source: FFIEC</i>				

## **Scope of Evaluation in Illinois**

We performed a full-scope evaluation of the bank's only AA. Refer to Appendix A for more information.

## **LENDING TEST**

The bank's performance under the Lending Test in Illinois is rated Outstanding.

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

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

The geographic distribution of loans analysis is not meaningful as the bank's entire AA consists of middle income census tracts.

### ***Lending Gap Analysis***

We reviewed summary reports and maps and analyzed FNB's consumer lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

### ***Small Farm Loans***

Refer to Table T in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of loans to small farms.

#### **2016**

The borrower distribution of OENB's loans to small farms for the 2016 evaluation period is excellent. The bank originated 90 percent of its farm loans to small farms, which compares favorably to the percentage of small farms in the AA (97.5 percent) and indicates the bank is serving the needs of the small farms in its AA. We noted the bank performance in 2016 was significantly above the 2016 CRA aggregate data for lending to small farms in the same AA (18.4 percent), however we did not place weight on this information as most rural lenders do not report small farm data to the U.S. Census Bureau.

#### **2017-2018**

The borrower distribution of OENB's loans to small farms for the 2017-2018 evaluation period is excellent. The bank originated 90 percent of its farm loans to small farms, which compares favorably to the percentage of small farms in the AA (97.2) and indicated the bank is serving the needs of the small farms in its AA. We noted the bank performance in 2017-2018 was significantly above the 2017 CRA aggregate data for lending to small farms in the same AA (35.2 percent), however we did not place weight on this information as most rural lenders do not report small farm data to the U.S. Census Bureau.

### **Responses to Complaints**

During the evaluation period, neither the bank nor the OCC received any complaints in regards to the bank's CRA performance within the AA.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	05/05/2015 to 12/31/2018	
<b>Bank Products Reviewed:</b>	Small Farm	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
No affiliates	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Illinois		
Illinois Non-MSA	Full-Scope	All of Washington County, Illinois – CTs 9501-9504

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS:      The Old Exchange National Bank of Okawville</b>	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
The Old Exchange National bank	Outstanding
<b>State:</b>	<b>Lending Test Rating</b>
Illinois	Outstanding

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.



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

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

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -**  
Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																	2016		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	
Illinois Non-MSA	20	1,827	100.0	49	0.0	0.0	0.0	0.0	0.0	0.0	33.5	25.0	34.7	66.5	75.0	65.3	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>1,827</b>	<b>100.0</b>	<b>49</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>33.5</b>	<b>25.0</b>	<b>34.7</b>	<b>66.5</b>	<b>75.0</b>	<b>65.3</b>	<b>0.0</b>	<b>0.0</b>	

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography															2017-18			
Assessment Area:	Total Loans to Farms			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans
Illinois Non-MSA	20	2,250	100.0	54	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>2,250</b>	<b>100.0</b>	<b>54</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues										2016
Assessment Area:	Total Loans to Farms				Farms with Revenues ≤ 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Bank Loans
Illinois Non-MSA	20	1,827	100.0	49	97.5	90.0	18.4	2.5	10.0	0.0
<b>Total</b>	<b>20</b>	<b>1,827</b>	<b>100.0</b>	<b>49</b>	<b>97.5</b>	<b>90.0</b>	<b>18.4</b>	<b>2.5</b>	<b>10.0</b>	<b>0.0</b>
Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "... data not available. Due to rounding, totals may not equal 100.0										

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues										2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues ≤ 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Bank Loans
Illinois Non-MSA	20	2,250	100.0	54	97.2	90.0	35.2	2.3	10.0	0.0
<b>Total</b>	<b>20</b>	<b>2,250</b>	<b>100.0</b>	<b>54</b>	<b>97.2</b>	<b>90.0</b>	<b>35.2</b>	<b>2.3</b>	<b>10.0</b>	<b>0.0</b>
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "... data not available. Due to rounding, totals may not equal 100.0										

## **Old Exchange National Bank**

**Main Office:**

110 East Walnut Street  
Okawville, IL 62271

**Hours of Operation:**

Monday through Thursday  
8:30 a.m. to 3:00 p.m.

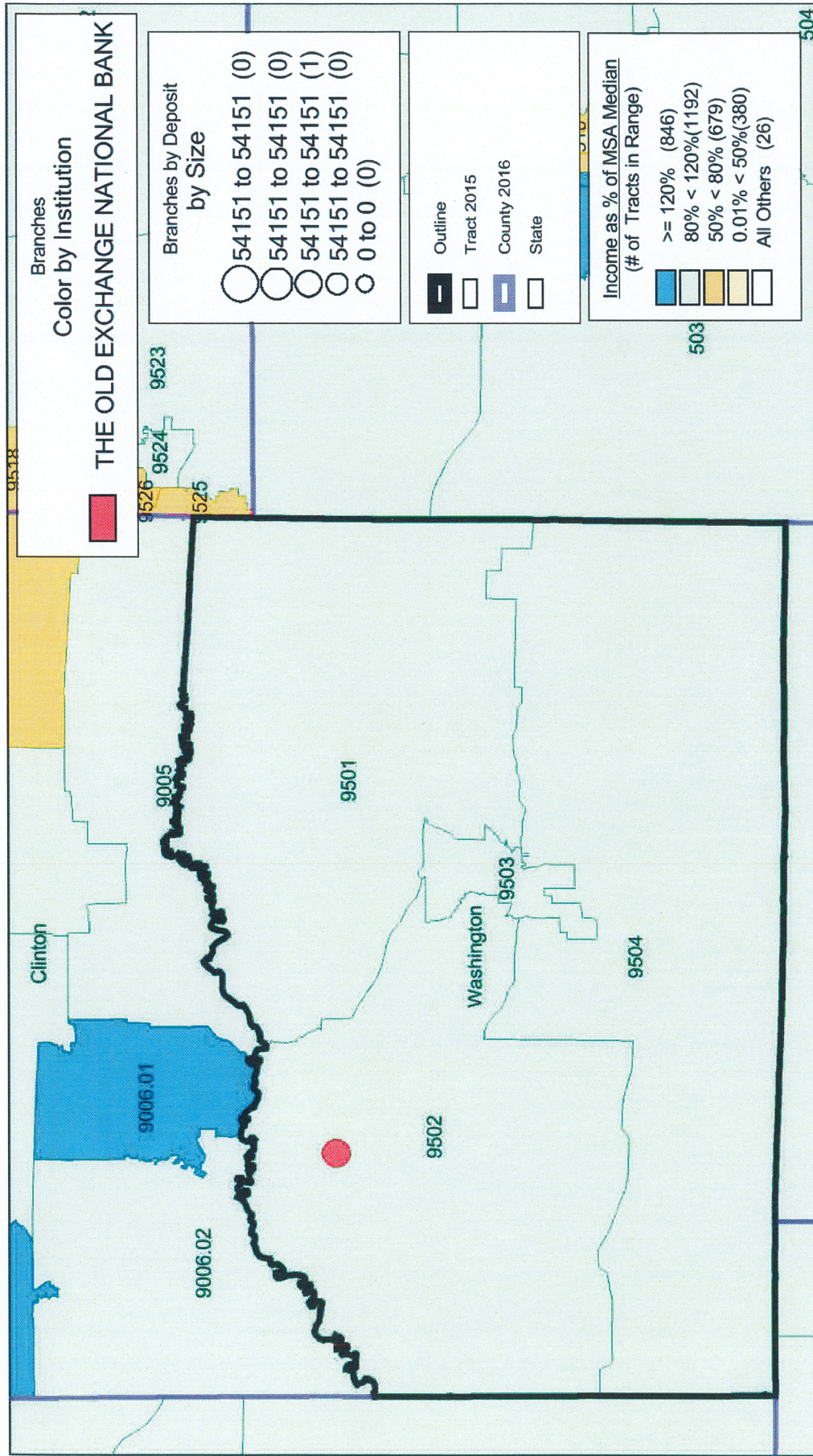
Friday  
8:30 a.m. to 6:00 p.m.

Saturday  
8:30 a.m. to 12:00 noon

**Branches:**

None







Old Exchange National Bank  
110 East Walnut Street, P.O. Box 6  
Okawville, IL 62271

**LISTING OF DEPOSIT PRODUCTS, LOAN PRODUCTS, AND ASSOCIATED  
SERVICE CHARGES**  
(as of August 2023)

- I. Deposit Products
  - A. Regular Checking Accounts
  - B. N.O.W. (Negotiable Order of Withdrawal) Accounts
  - C. Money Market Accounts
  - D. Passbook Savings Accounts
  - E. Christmas Club Accounts
  - F. Certificates of Deposits
  - G. Individual Retirement Accounts
  - H. Health Savings Accounts
  - I. Coverdell Education Savings Accounts
- II. Loan Products
  - A. Agricultural Loans
    - 1. Operating Lines of Credit
    - 2. Livestock Loans
    - 3. Machinery Loans
    - 4. Real Estate Loans
  - B. Commercial Loans
    - 1. Operating Lines of Credit
    - 2. Equipment Loans
    - 3. Real Estate Loans
  - C. Consumer Loans
    - 1. Real Estate Loans
      - a. Construction Loans
      - b. Adjustable Rate Mortgage Loans
      - c. Fixed Rate Loans
      - d. Home Equity Lines of Credit
    - 2. Personal Loans
      - a. Installment Loans
      - b. Term Loans
      - c. Individual Lines of Credit

### III. Associated Service Charges

Service	Fee
Check Printing	fee depends on style of check ordered
Cashier's Checks	\$5.00 per check
Dormant Account Fee	\$10.00 per year
Overdraft Item Fee	\$25.00 per day any item(s) is(are) paid
Non-sufficient Funds Item Fee	\$20.00 per item
Continuous Overdraft Fee	\$10.00 per day
Special Statement	\$2.00
Account Research	\$20.00 per hour \$10.00 minimum
Account Balancing Assistance	\$10.00 per hour \$ 5.00 minimum
Stop Payment Fee	\$20.00 per item
Lost Passbook Fee	\$5.00
Photocopies	\$.50 each
Collection Item Fee	\$20.00 per item
Bond Collection Fee	\$25.00 per bond
Amortization Schedule Fee	\$10.00
Indemnity Bond Fee	\$25.00
Fax Charges (sending and receiving)	\$1.50 per sheet
Wire Transfer Fee	\$25.00
Safety Deposit Box Fees	
Small - B Boxes	\$20.00 per year
Small - A Boxes	\$25.00 per year
Medium Boxes	\$40.00 per year
Large Boxes	\$50.00 per year
Direct Billing Charge	3.00 per year
Forced Entry into Box	\$75.00
Loss of Key Fee	\$15.00

Service	Fee
Foreign Currency Conversion Fee	1% of transaction amount
Notary Service	No charge for customers; \$5.00 per document for non-customers
Automatic Transfer of Funds from Savings to Checking Accounts	\$5.00
Initial Set-up of an Automatic Transfer	\$10.00
Replacement of Debit Card	\$20.00

#### IV. Other Services

##### A. Debit Cards

1. Can be used at cash-dispensing machines and at merchants accepting Mastercard.
2. On-site machine available 24-hours per day dispenses cash and accepts deposits.
3. Temporary Debit cards available (issued on-site – can be used at account opening or if an existing card is compromised).

##### B. Bank-by-Mail

##### C. Internet Banking –Allows customers to:

1. View current balances on accounts.
2. View recent history on accounts.
3. Pull up recent statements for viewing online.
4. Submit address and phone number changes.
5. Transfer funds between accounts.
6. Make loan payments online.
7. Issue stop payments.
8. Re-order checks.
9. Order cashier's checks for pick-up.
10. Obtain bank statements electronically.
11. Generate "bill pay" transactions.
12. Utilize "mobile banking" (for account balances, transaction history, making deposits with mobile deposit capture).

Old Exchange National Bank  
110 East Walnut Street, P.O. Box 6  
Okawville, IL 62271

### **Loan-to-Deposit Ratios**

<b>Date</b>	<b>Ratio</b>
March 31, 2023	40.27%
June 30, 2023	39.55%
September 30, 2023	40.68%
December 31, 2023	44.24%