LONGVIEW
BANK

Greetings to our customers...
We have important information for you.

As your financial institution, we are involved in a program that directly affects you and our entire community. Please take a few moments to learn about the Community Reinvestment Act.

The Community Reinvestment Act (CRA) was developed by Congress in 1977. It requires financial institutions to help communities meet local financial needs. To you, our customer, that means: we provide credit services to fit your needs, make many types of loans available, and ask for your suggestions and comments about our credit policies. In addition, we work with community groups, local businesses, and all levels of government to improve the area we serve.

We invite you to learn more about CRA by continuing through this document. CRA is intended to make a difference - for you and for our community.

LONGVIEW
BANK

Our Products and Services

Do you have plans and dreams for your future but dont know how to make them come true? Or, do you have a problem that a loan would set right? We can help!

Our loans are available to anyone in our community who meets the lending guidelines set by our board of directors. These sound lending practices protect your credit rating and our institution. They must also comply with antidiscimination laws, including fair lending and fair housing laws.

Ask to see a loan officer. Our people are familiar with the many credit services we offer; they will be happy to advise you about getting the funds you need. Our loan products and policies are tailored to meet the credit needs of our community.

Loan Services

Residential Mortgage Loans

Home Equity Loans

Real Estate Loans

Consumer Loans

Agricultural Farm Loans

Commercial Loans

Agricultural

Equipment
Farmland
Operating Line

Consumer

Auto
Personal

Commercial

Equipment
Inventory
Operating
Property

Residential Mortgage Loans

Conventional Adjustable Rate Mortgage
Conventional Fixed Rate Mortgage
FHA (Federal Housing Administration) Program
VA (Veterans Assistance) Program
Rural Development Program (USDA Loan)
Bridge Loans

Real Estate Loans

Construction
Residential
Land Development
Refinancing
Business
Farm

Deposit Services

Regular Checking
Unlimited check writing
No service with a minimum balance of $100
Monthly service charge if minimum balance falls below $100 (waived for student and over customers over 62)
Minimum balance to open account $100
Available for Business or Personal

EChecking
Unlimited check writing
No minimum balance required
E-Statement required
Monthly service charge of $5 if statement is mailed

Interest Checking
Competitive interest rate
Unlimited check writing
Minimum balance to open account $500
No monthly service charge with a minimum balance of $500.00
Monthly service charge of $5.00 if minimum falls below $500.00
Available as a Business or Personal

Student Plus
Competitive interest rate up to $5,000
E-Statements Required
No minimum balance
Free Internet/Mobile Banking
Available to customers 16-23 years of age

Health Savings Accounts
Competitive interest rate
Unlimited check writing
Minimum balance to open $50
$25 account set up fee with a $2 monthly service charge

Money Market
Interest paid on balance with tiered rates for larger balances
Limited to 10 transactions per month, service charge of $2/transaction after 10.
No monthly service charge with a minimum balance of $1,000
Monthly service charge of $10 if minimum falls below $1,000
Minimum balance to open account $2,500

Coverdell Education Savings Account
The CESA is a non-deductible account that features tax free withdrawals for a child’s higher education expenses. Qualified higher education distributions are tax free and may be made without penalty.

Passbook Savings
Competitive interest rate
No monthly service charge with a minimum balance of $50
Monthly service charge of $2 if minimum falls below $50 (waived for minor children)
Withdrawals are limited to 10 per month; 10 or more transactions will be charged $2 each
Minimum balance to open account $50 (waived for minor children)

Christmas or Vacation Club
Competitive interest rate
Minimum balance $5.00
Funds disbursed annually on a predetermined date
No withdrawals; If you close your account before interest is credited you will not receive he accrued interest
Minimum balance to open $5

Certificates of Deposit
Certificates of Deposit are a great way to earn a higher rate of interest on your money. Your rate of interest will depend on the amount of your investment and the length of time you wish to deposit your money. FDIC Insurance guarantees Certificate of Deposit Accounts, along with other deposit accounts at Longview Bank.

Little Chief CD
The Little Chief CD is a CD with a competitive interest rate for kids up to the age of 16
Deposits of up to $600 per year with an opening deposit as little as $10.00
The account will mature the month of the child's 16th birthday
Only one CD allowed per child's Tax ID number
Requires a parent, guardian, or grandparent to be on the account as joint owner
The responsible adult on the account must maintain an active checking account
The APY can change annually
Penalty for early withdrawal

Individual Retirement Accounts
Traditional IRA: The Traditional IRA is an account, which allows you to defer taxes on your earnings until the time of withdrawal. Also, certain contributions are tax deductible* in the year they are made.
Roth IRA: The Roth IRA is a non-deductible account that features tax-free withdrawals for certain distribution reasons. Since Roth IRA contributions are non-deductible and taxed in the year they are earned*, individuals who expect to be in a higher tax bracket when they retire may benefit more from a Roth IRA account than from a Traditional IRA.

Locations & Hours

Longview Bank Chrisman
121 South Pennsylvania
P.O. Box 167
Chrisman, IL 61924
Phone: 217-269-2339
Lobby Hours:
Mon-Fri: 9 am to 3 pm
Sat: 9 am to 12 pm
Drive-Up Hours:
Mon-Thurs: 7:30 am to 4:30 pm
Fri: 7:30 am to 5 pm
Sat: 7:30 am to 12 pm

Longview Bank Marshall
1408 N Michigan Ave
Marshall, IL 62441
Phone: 217-826-1110
Lobby Hours:
Mon-Fri: 9 am to 3 pm
Sat: 8 am to 12 pm
Walk-Up Window Hours
Mon-Fri: 8 am to 5 pm
Sat: 8 am to 12 pm
Drive-Up Hours:
Mon-Fri: 8 am to 5 pm
Sat: 8 am to 12 pm

Longview Bank Newman
2481 E. US Highway 36
P.O. Box 466
Newman, IL 61942
Phone: 217-837-2404
Lobby Hours:
Mon-Wed: 8 am to 4 pm
Fri: 8 am to 6 pm
Sat: 8 am to Noon
Drive-Up Hours:
Mon-Wed: 8 am to 4 pm
Thur: 8 am to 5 pm
Fri: 8 am to 6 pm
Sat: 8 am to Noon

Longview Bank Ogden
102 S. East Ave
P.O. Box 47
Ogden, IL 61859
Phone: 217-582-2175
Lobby Hours:
Mon-Thur: 8 am to 4 pm
Fri: 8 am to 4 pm
Sat: 8 am to Noon
Drive-Up Hours:
Mon-Thur: 8 am to 4 pm
Fri: 8 am to 6 pm
Sat: 8 am to Noon

Longview Bank Paris
600 E. Jasper Street
Paris, IL 61944
Phone: 217-465-6360
Lobby Hours:
Mon-Fri: 9 am to 3 pm
Sat: 9 am to 12 pm
Drive-Up Hours:
Mon-Thurs: 7:30 am to 5 pm
Fri: 7:30 am to 6 pm
Sat: 7:30 am to 12 pm

Longview Bank Ogden
102 S. East Ave.
P.O. Box 47
Ogden, IL 61859
Phone: 217-582-2175
Lobby Hours:
Mon-Thur: 8 am to 4 pm
Fri: 8 am to 4 pm
Sat: 8 am to Noon
Drive-Up Hours:
Mon-Thur: 8 am to 4 pm
Fri: 8 am to 6 pm
Sat: 8 am to Noon

Locations & Hours

Longview Bank Tuscola
600 E. Southline Rd
Tuscola, IL 61953
Phone: 217-253-1015
Lobby Hours:
Mon-Thurs: 8 am to 4 pm
Fri: 8 am to 5 pm
Sat: 8 am to Noon
Drive-Up Hours:
Mon-Thur: 8 am to 5 pm
Fri: 7 am to 6 pm
Sat: 8 am to Noon

Longview Bank Villa Grove
6 E. Harrison
Villa Grove, IL 61956
Phone: 217-832-8179
Lobby Hours:
Mon-Thur: 8 am to 4 pm
Fri: 8 am to 5 pm
Sat: 8 am to Noon
Drive-Up Hours:
Mon-Thur: 8 am to 5 pm
Fri: 7 am to 6 pm
Sat: 8 am to Noon

Longview Bank Tilton
1619 Georgetown Rd
Tilton, IL 61832
Phone: 217-474-4533
Lobby Hours:
Mon-Fri: 9 am to 4 pm
Sat: 9 am to Noon
Drive-Up Hours:
Mon-Fri: 8 am to 5 pm
Sat: 8 am to Noon

Longview Bank Royal
102 N. Park
P.O. Box 10
Royal, IL 61871
Phone: 217-583-3101
Lobby Hours:
Mon-Thur: 8 am to 2 pm
Fri: 8 am to 2 pm
Drive-Up Hours:
Mon-Thur: 8 am to 2 pm
Fri: 8 am to 2 pm
Sat: 8 am to Noon

Longview Bank Sidney
414 West Main
Sidney, IL 61877
Phone: 217-688-3150
Lobby Hours:
Mon-Thur: 8 am to 4 pm
Fri: 8 am to 5 pm
Sat: 8 am to Noon
Drive-Up Hours:
Mon-Thur: 7 a m to 6 pm
Fri: 7 am to 6 pm
Sat: 7 am to Noon

Longview Bank St. Joseph
220 E. Grand
P.O. Box 198
St. Joseph, IL 61873
Phone: 217-469-8866
Lobby Hours:
Mon-Thur: 8 am to 4 pm
Fri: 8 am to 5 pm
Sat: 8 am to Noon
Drive-Up Hours:
Mon-Fri: 7 am to 6 pm
Sat: 7 am to Noon

Locations & Hours

Danville Loan Production Office
110 N. North Street
Danville, IL 61832
Phone: 217-443-5315
or 217-260-8761
Hours:
By appointment

Longview Bank Danville
4102 N. Vermillion St.
Danville, IL 61834
Phone: 217-474-0546
Lobby Hours:
Mon-Fri: 9 am to 4 pm
Sat: 9 am to Noon
Drive-Up Hours:
Mon-Fri: 8 am to 5 pm
Sat: 8 am to Noon

Services & Fees

Automatic Transfers

ATM

Safe Deposit Boxes

Notary Public

Wire Transfers

Cashiers Checks

Night Depository

Credit Card Applications

Crop Insurance

Trust Services: Executor or Administrator of an Estate, Trustee, Guardian, Agent, Custodian, Escrows, Investment, Management, Professional Farm Management, & Land Trusts

Zelle

Bill Pay

iCHECK

Shazam Bolt$

Online Banking

Voice Access Telephone Banking

Real Estate Tax Payments

Fees

Stop Payments....$30 per item

Bank statement copy.....$2 per page

Bulk coin counting (non-customer).....5%

Canadian check/ foreign item.....$20

Checks received or sent for collection.....$10

Dormant accounts....$5 per month

Return check - overdraft....$30 with $90 max per day

Recycling fee for coin....$5 per bag of coin

Transfer from savings for overdraft....$3

Indemnity Bond for missing Instrument - CD....$50

Loan coupon book replacement....$5

Legal (Levy, Summons, or Lien).... $75

Account balancing/reconciliation/research....$25 per hour

Counter/Temporary checks.... $.10 per check, $1 minimum

Check cashing for non-customer....2% of check w/ $5 minimum

Debit cards: replacement...$15, card capture.... $15, foreign item....$1

Excessive savings withdrawal...$2 per withdrawal (exceeding 10 per month)

Cashier's Check.....$4

One-time ACH origination....$25

Check image.... $3 per item/page

IRA closeout fee....$25

Fax - incoming and outgoing....$2

License sticker....$5 per sticker

Photocopies...$.25 per page

Wires:

Incoming....$10

Outgoing....$25

Foreign.......$50

Lock Boxes:

2x5,3x5,3x6....$25

3x10, 5x5........$40

5x10...............$55

10x10.............$80

LONGVIEW BANK

Branches Opened/Closed

Tilton 1619 Georgetown Rd Tilton, IL 61832	Opened March 2024
Danville 4102 N Vermillion St. Danville, IL 61834	Opened April 2025

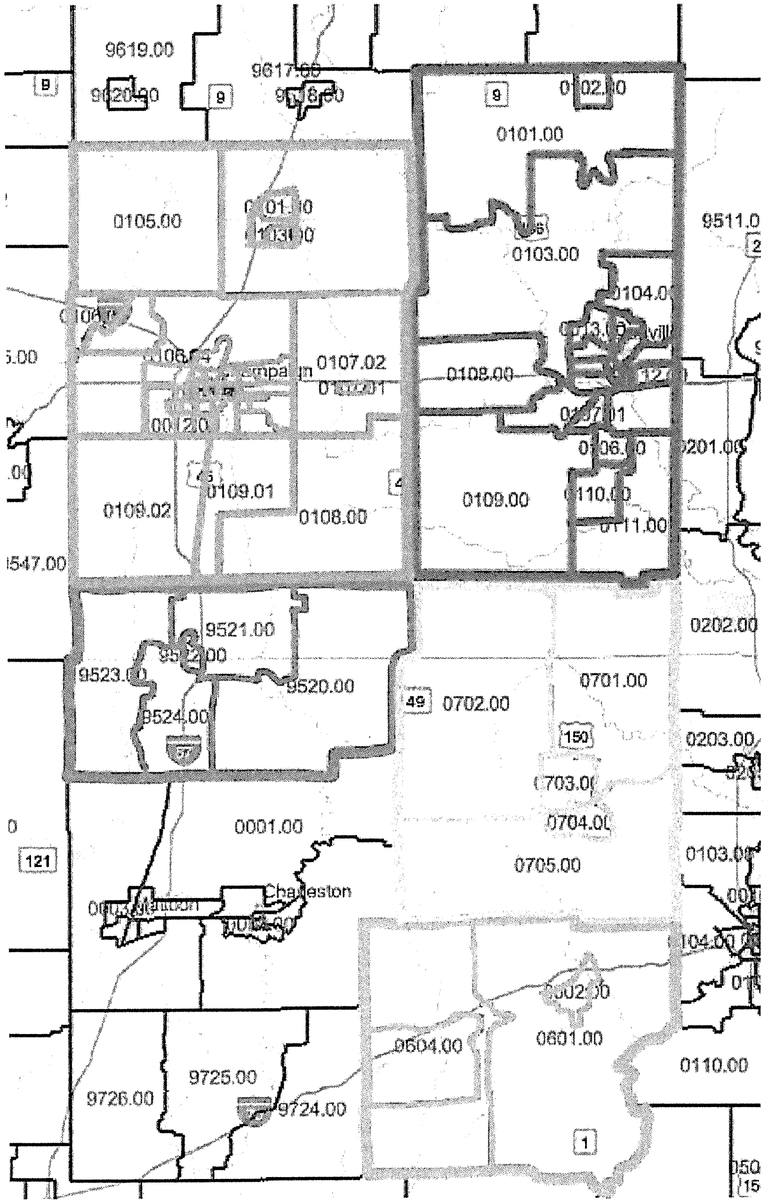
Longview Bank

Effective February 11, 2025

Account balancing/Reconciliation/Research	$25 per hour
Bank statement copy	$2 per page
Bulk coin counting (Customer - no charge)	5% non-customer
Canadian check/Foreign Item	$20
Cashier's Check	$4 customer
Check cashing for non-customer	2% of check with $5 minimum
Check image - Copy of cancelled check	$3 per item/page
Checks received or sent for collection	$10
Counter checks/Temporary checks	$0.10 per check - $1 minimum
Recycling fee for coin	$5 per bag of coin
Debit Cards:	
Card replacement	$15 per occurrence
Cardcapture	$15
Foreign item/inquiry	$1 per occurrence
Dormant accounts	$5 per month dormant
Excessive savings withdrawal	$2 per withdrawal (exceeding 10 per calendar month)
Fax-Incoming and outgoing	$2
Return Charge*	$30 per item with a $90 max per day
Overdraft Charge*	$30 per item with a $90 max per day
IRA closeout fee (transfer out fee)	$25
Legal (Levy, Summons, or Lien)	$75
License sticker	$5 per sticker - non-customer cash only
Loan coupon book replacement	$5
Medallion Signature Guarantee (Ogden only)	$25
Photocopies	$0.25 per page
Stop payment	$30 per item
Safe Deposit Boxes:	
-Drill out box	Actual cost
-Replacement of lost keys	Actual cost
-2 X 5 box	$25
-3 X 5 box	$25
-3 X 6 box	$25
-3 X 10 box	$40
-5 X 5 box	$40
-5 X 10 box	$55
-10 X 10 box	$80
Transfer from savings for overdraft	$3 per transfer
Wires:	
Incoming	$10
Outgoing	$25
Foreign	$50
One-time ACH origination	$25
Indemnity Bond for missing Instrument - Certificate of deposit	$50

*Return charges or Overdraft charges may be imposed by any of the following means: check, in-person withdrawal, ACH Payment or other electronic means.

CRA Assessment Area



Champaign:

0002.00	0003.01	0003.02	0004.01	0004.02
0005.00	0007.00	0008.00	0009.01	0009.02
0010.00	0011.00	0012.01	0012.03	0012.04
0012.05	0012.06	0013.01	0013.02	0014.00
0053.00	0054.01	0054.02	0055.00	0056.01
0056.02	0057.01	0057.02	0058.00	0059.01
0059.02	0060.00	0101.00	0102.04	0103.00
0104.00	0105.00	0106.01	0106.03	0106.04
0107.01	0107.02	0108.00	0109.01	0109.02
0110.01	0110.02	0111.00		

Douglas:

9520.00	9521.00	9522.00	9523.00	9524.00

Vermilion:

0001.00	0002.00	0003.00	0004.00	0005.00
0006.00	0007.00	0008.00	0009.00	0012.00
0013.00	0101.00	0102.00	0103.00	0104.00
0105.00	0106.00	0107.01	0107.02	0108.00
0109.00	0110.00	0111.00	0112.00	

Edgar:

0701.00	0702.00	0703.00	0704.00	0705.00

Clark:

0601.00	0602.00	0603.00	0604.00

Loan to Deposit Ratios

LONGVIEW BANK

Call Report Date	Loan to Deposit
3/31/2023	77.56%
6/30/2023	80.73%
9/30/2023	88.04%
12/31/2023	87.94%
3/31/2024	88.68%
6/30/2024	90.42%
9/30/2024	93.20%
12/31/2024	88.40%

Loan to Deposit Ratios

LONGVIEW BANK

Call Report Date	Loan to Deposit
3/31/2023	77.56%
6/30/2023	80.73%
9/30/2023	88.04%
12/31/2023	87.94%
3/31/2024	88.68%
6/30/2024	90.42%
9/30/2024	93.20%
12/31/2024	88.40%

LONGVIEW BANK

Our Community

To serve you well, we regularly analyze our performance as your financial institution; the resulting report is part of our evaluation by CRA examiners.

We gather facts to study: (1) how evenly our credit is distributed throughout the area we serve; (2) how well our products and services meet our customers' needs; (3) if our location(s) and business hours are convenient; and (4) if our officers are readily available to confer with our customers.

Our conclusions guide our board of directors and officers as they plan to improve our policies and services.

Please feel free to make suggestions about our credit service to you. Contact any member of our staff with your ideas. We appreciate your help.

COMMUNITY DEVELOPMENT ACTIVITIES

2026 Activity Summary

Community Development Loans

-Financed a nonprofit's purchase of a facility providing housing, shelter, and food services to homeless individuals.

·Purchased a participation in a loan for expansion of patient care services at a hospital in a distressed/underserved area.

·Financed development and pool expansion of a community recreation facility in a distressed/underserved area.

·Provided a line of credit supporting construction-related expenses for the recreation facility expansion.

·Financed purchase and renovation of a school and daycare facility in a distressed/underserved area.

·Financed a hospital's acquisition of a nursing home facility within the assessment area.

Qualified Investments and Donations

·Donations to nonprofits providing housing, shelter, and food services to low- and moderate-income individuals.

·Contributions supporting financial literacy and community service programs targeted to low- and moderate-income populations.

·Support for community initiatives promoting economic stability within the assessment area.

2026 Activity Summary Continued

Community Development Services

·Delivered financial literacy education to low- and moderate-income individuals through community partnerships.
·Served on boards of organizations providing housing and community services.
·Provided technical assistance to small businesses and community organizations.
·Sponsored, supported, and volunteered in the RAM (Remote Area Medical) program, which provided free healthcare services—including dental, vision, and medical care—to community members in need. Longview Bank staff actively volunteered to support and ensure the success of this no-cost community event.

2025 Activity Summary

Community Development Loans

·Financed community development projects including healthcare, housing support, and community facility expansion.
·Supported nonprofit and community-based organizations serving low- and moderate-income individuals and underserved areas.

Qualified Investments and Donations

·Provided financial support to nonprofit organizations serving low- and moderate-income individuals and communities.

Community Development Services

·Participated in financial literacy, volunteer, and board service activities supporting community development.

FEDERAL DEPOSIT INSURANCE CORPORATION

COMMUNITY REINVESTMENT ACT (CRA) PUBLIC NOTICE

Under the Federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination for the next two quarters. This list is available from the Regional Director, FDIC, Division of Depositor and Consumer Protection, 300 S Riverside Plaza, Suite 1700 Chicago IL 60606. You may send written comments about our performance in helping to meet community credit needs to Lora Fisher, Compliance and CRA Officer, Longview Bank, 102 S. East Ave., PO Box 47, Ogden, IL 61859 and FDIC Regional Director. You may also submit comments electronically through the FDIC's website at www.fdic.gov/regulations/cra. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC.

We are an affiliate of Longview Capital Corporation, a bank holding company. You may request from Christopher Koopmans, Senior Vice President, Federal Reserve Bank of Chicago, 230 South LaSalle Street, Chicago, IL 60604-1413, an announcement of applications covered by the CRA filed by bank holding companies.

STATE OF ILLINOIS COMMUNITY REINVESTMENT ACT NOTICE

Under the Illinois Community Reinvestment Act (ILCRA), the Secretary of the Department of Financial and Professional Regulation (Secretary) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Secretary also take this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the ILCRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent ILCRA Performance Evaluation, prepared by the Secretary; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Secretary publishes a list of the banks that are scheduled for ILCRA examination in that quarter. This list is available from the Secretary at 320 West Washington Street, 3rd Floor Springfield, IL 62786 and 555 West Monroe Street, 5th Floor, Chicago, IL 60661. You may send written comments about our performance in helping to meet community credit needs to Lora Fisher, Compliance and CRA Officer, Longview Bank, 102 S. East Ave., PO Box 47, Ogden, IL 61859 and Secretary. You may also submit comments electronically through the Department's Web site at https://idfpr.illinois.gov/admin/cra.html. Your letter, together with any response by us, will be considered by the Secretary in evaluating our ILCRA performance and may be made public.

You may ask to look at any comments received by the Secretary. You may also request from the Secretary an announcement of our applications covered by the ILCRA filed with the Secretary.

We are an affiliate of Longview Capital Corporation, a bank holding company. You may request from Christopher Koopmans, Senior Vice President, Federal Reserve Bank of Chicago, 230 South LaSalle Street, Chicago, IL 60604-1413, an announcement of applications covered by the ILCRA filed by bank holding companies.

LONGVIEW BANK

Public Comments 2025

None

Public Comments 2024

None

Public Comments 2023

None

Longview Bank has received no written comments from the public during the periods listed above specifically relating to the Bank's performance in helping to meet community credit needs.

FDIC
Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection

Chicago Regional Office
300 South Riverside Plaza, Suite 1700, Chicago, Illinois 60606

January 11, 2024

Board of Directors
Longview Bank
102 S East Ave
Ogden, Illinois 61859

Re: Consumer Compliance Report and Community Reinvestment Act Performance Evaluation

Members of the Board:

Please review the enclosed Compliance Report of Examination (Report) and the Community Reinvestment Act (CRA) Performance Evaluation at an official meeting of the Board of Directors. Be advised that the findings from the consumer compliance examination are subject to the confidentiality restrictions pursuant to Part 309 of the FDIC's Rules and Regulations. The CRA Performance Evaluation must be placed in the institution's CRA public file within thirty (30) business days of receipt. The format and content of this evaluation may not be altered or abridged in any manner. Upon request, a copy of your current evaluation must be provided to the public. You are authorized to charge a fee not to exceed the cost of reproduction and mailing (if applicable).

Please provide a written response describing the measures taken to address the examiner recommendations listed on page four of the Report. The written response should be provided to this office no later than February 25, 2024.

Written correspondence can be sent to this office as a PDF document through the FDIC's Secure Email portal (securemail.fdic.gov) using the following e-mail address: CHIMailRoom@FDIC.gov. Information about how to use secure email and FAQs about the service can be found at fdic.gov/secureemail. If there are any questions about the Secure Email process or the examination findings, please contact me at (312) 718-8045.

We encourage management to complete the online Post-Examination Survey. The survey is part of our continuing effort to improve the quality and efficiency of our examination process.

Sincerely,

David P. Lafleur
Review Examiner

Enclosure(s)

cc: State, Federal Reserve

FDIC
Federal Deposit Insurance Corporation
3501 Fairfax Drive, E-2022, Arlington, VA 22226

Office of the Ombudsman

January 11, 2024

Board of Directors
Longview Bank
102 S East Ave
Ogden, Illinois 61859

Subject: Post-Examination Survey

Members of the Board:

The FDIC uses the Post-Examination Survey (Survey) as part of a continuing effort to maintain and improve the quality and efficiency of our examinations. Soon, you will receive an email from fdicsurveys-noreply@fdic.gov inviting you to complete an online survey regarding the recently completed consumer compliance examination and/or CRA examination.

The Survey allows you to rate and provide further comments on several areas: the pre-examination process, examination staff, virtual aspects of the examination, the examination process, the report of examination, and the overall process.

As a confidential resource to the banking industry, the Office of the Ombudsman is independent of the supervisory process, reports directly to the FDIC Chairman's Office, and preserves the confidentiality of Survey responses.

We thank you for your valuable time and look forward to receiving your feedback.

Charmion L. Haley

Charmion L. Haley
Acting Director, Office of the Ombudsman

FDIC

COMPLIANCE REPORT OF EXAMINATION

THIS REPORT OF EXAMINATION IS STRICTLY CONFIDENTIAL

This report of examination has been made by an examiner appointed by the Federal Deposit Insurance Corporation for use in the supervision of the financial institution. The information contained in this report is based upon the books and records of the financial institution, upon statements made to the examiner by directors, officers, and employees, and upon information obtained from other sources believed to be reliable.

In accordance with the responsibilities to both shareholders and depositors, each director should thoroughly review the report. In making this review, it should be kept in mind that while an examination includes some audit tests, it is not to be construed as an audit, and this report should not be considered an audit report.

This copy of the report is the property of the Federal Deposit Insurance Corporation and is furnished to the financial institution examined for its confidential use. Under no circumstances shall the financial institution or any of its directors, officers, or employees disclose or make public in any manner the report or any portion thereof. If a subpoena or other legal process is received calling for the reproduction of this report, the Regional Office of the Federal Deposit Insurance Corporation should be notified immediately. The attorney at whose instance the process was issued and, if necessary, the court that issued it should be advised of these restrictions set forth above and referred to in Part 309 of the Federal Deposit Insurance Corporation Rules and Regulations.

Longview Bank

Ogden **Illinois**

Region	Chicago	Certificate Number	1786
Examiner-in-Charge	Kelly Robinson		
Examination Date	November 16, 2023		

FEDERAL DEPOSIT INSURANCE CORPORATION

Examiner's Comments and Conclusions	**1786**

Examiner-in-Charge (EIC) Kelly Robinson conducted the consumer compliance examination and Community Reinvestment Act (CRA) evaluation of Longview Bank as of November 16, 2023.

CONSUMER COMPLIANCE EXAMINATION SCOPE AND RATING

Examiners performed a risk-focused review of the consumer compliance management system (CMS), with an emphasis on areas exhibiting potential risk of consumer harm. The review period for this examination covers bank activities conducted from the prior examination date through the current examination date. As part of the consumer compliance examination, examiners conducted a fair lending review using the Federal Financial Institutions Examination Council's Fair Lending Examination Procedures. The following table summarizes the consumer compliance examination findings.

Consumer Compliance Rating	**Current Examination 11/16/2023**	**Prior Examination 11/2/2020**
	2	1
Current rating definition: *An institution in this category maintains a CMS that is satisfactory at managing consumer compliance risks in the institution's products and services and at substantially limiting violations of law and consumer harm.*		
Board and Management Oversight	Adequate	Strong
Compliance Program	Adequate	Strong

COMPLIANCE MANAGEMENT SYSTEM

Board and Management Oversight

Examiners considered strengths and weaknesses in oversight and commitment; change management; comprehension, identification and management of risk; and corrective action and self-identification.

Oversight and Commitment

The Board of Directors (Board) and management provide adequate oversight and generally allocate appropriate resources towards the compliance program. The Board remains apprised of compliance matters through external audit reports. Management completes a risk assessment for most products and services. In addition, management maintains a vendor management report, which monitors the inherent risk of critical vendors. While the bank holds periodic compliance meetings to discuss training needs and regulatory changes, there are no formal Compliance or Audit Committees.

The Board designated responsibilities for maintaining a sound CMS to Compliance Officer (CO) William Glaze. CO Glaze assumed the role of CO following the August 2023 merger with Longview Bank & Trust. He has the necessary authority to manage consumer protection responsibilities. However, CO Glaze continues to serve as the President of Longview Community Bank in Mt. Pulaski, Illinois and as Director, Vice President, and Risk Manager for Longview Capital Corporation, Longview Bank's holding company. While management was quick to address findings identified during the examination, many of the adverse findings in the examination were due to deficiencies in oversight. Therefore, enhanced management oversight of Longview Bank's CMS is needed.

Change Management

Management responds timely and adequately to internal and external changes, including changes in applicable regulations. The Board and management remain apprised of regulatory changes and emerging issues, and adapt accordingly. For example, the Board and management addressed non-sufficient funds (NSF) fees for re-presented items as the issue emerged and updated disclosures prior to the examination. Management also proactively conducted a lookback and voluntarily reimbursed customers who were assessed multiple NSF fees for re-presented items. Furthermore, Longview Bank began collecting 2023 Home Mortgage Disclosure Act (HMDA) data prior to the merger with Longview Bank & Trust in preparation of becoming a HMDA reporter.

Comprehension, Identification, and Management of Risk
Management comprehends and adequately identifies compliance risk, including emerging risks, in the financial institution's products, services and other activities. Management stays updated on emerging risks by subscribing to compliance resources that provide monthly and quarterly regulatory updates. Additionally, the compliance risk assessment assigns a risk rating to most consumer compliance regulations and bank services. Individual ratings help determine the frequency and scope of external audits. Despite these efforts, management did not identify risks within mortgage servicing operations that contributed to the Level 2/Medium Severity Violations of the Homeowners Protection Act (HPA) and Truth In Lending Act (TILA).

Corrective Action and Self-Identification
The Board engages third party auditor Regulation Management Corporation (RMC) to perform audits based on the bank's audit schedule. Management uses an audit tracking log for adverse findings and provides it to the Board. Each finding is assigned a manager to oversee and document corrective action. Management takes corrective actions to remedy errors identified by the external audit. However, examiners noted weaker performance in self-identifying CMS deficiencies that were not included in the external audit scope.

Compliance Program
Examiners considered strengths and weaknesses in policies and procedures, training, monitoring and/or audit, and consumer complaint response.

Policies and Procedures
Compliance policies and procedures adequately manage the bank's compliance risk in products, services, and activities. Senior management established written policies and procedures, including a Compliance Policy that addresses all of the components of an adequate CMS. The Board reviews and approves compliance policies annually, or more often when substantial changes occur. While senior management maintains policies and procedures for most areas, the Loan Policy does not contain clear underwriting standards and parameters for each credit criterion, making policy exceptions difficult to track. Additionally, the bank did not maintain policies or procedures that address HPA Private Mortgage Insurance (PMI) requirements or Electronic Funds Transfer Act (EFTA) dispute requirements. The lack of policies and procedures in these areas contributed, in part, to the Level 2/Medium Severity Violations.

Training
Compliance training is adequate. Training is multifaceted, employing in-person meetings, online programs, and external webinars and seminars. Training is position-specific, and management monitors completion of assigned courses. Management provides additional training if exceptions in a particular regulatory area are identified. The Board receives annual executive level training, including fair lending. However, management was unaware of PMI disclosure requirements, initial rate change notice requirements for adjustable rate mortgages (ARMs), and notice requirements when handling EFTA disputes, which contributed to violations and restitution to borrowers. Refer to the Level 2/Medium Severity Violations pages for details.

Monitoring and/or Audit
While management maintains an adequate audit program, weaknesses exist in monitoring. As previously discussed, RMC conducts ongoing compliance audits that are risk-focused based on the annual compliance risk assessment. The bank uses the risk assessment to identify regulations that pertain to the bank's lines of business and assign a risk rating based on the inherent risk each area presents. Audit findings are tracked on an audit tracking log, and management is responsible for completing and documenting corrective action. Corrective action is reported to the Board monthly.

Monitoring activities are limited to a secondary review of loan denials for concurrence with denial reasons. Additionally, an informal accuracy review of account opening and/or loan origination documents is performed. Management does not formally track or monitor exceptions to underwriting criteria to ensure consistent treatment of all loan applicants. Furthermore, products and services not included in the RMC audit scope do not receive technical reviews to ensure compliance. As a result, management did not detect errors within ARM rate change and PMI notices because these areas were not subject to monitoring processes.

Consumer Complaint Response
The consumer complaint response process is adequate. The Board adopted a Consumer Complaint Policy, which is embedded within the Compliance Policy. Management is responsible for responding to complaints forwarded by regulatory agencies and those received directly by the bank. Under the bank's policy, management researches and responds to complaints in writing, within 30 days. Management also reports complaints and resolutions to the Board. Since the previous examination, the FDIC's Consumer Resource Center received one complaint, which the bank addressed in a timely manner.

VIOLATIONS OF LAW AND CONSUMER HARM

Examiners identified Level 2/Medium Severity Violations during the examination. The violations resulted from modest CMS weaknesses in oversight, procedures, training, and monitoring. These violations were not self-identified, but management began implementing corrective measures during the examination to limit the duration of consumer harm. Refer to the Level 2/Medium Severity Violations pages for details.

COMMUNITY REINVESTMENT ACT SCOPE AND RATING

Examiners evaluated the bank's CRA performance using Interagency Small Institution Examination Procedures, focusing on activities since the prior evaluation date. The following table summarizes the bank's CRA performance. Please refer to the enclosed Performance Evaluation for details.

<table>
<tr><th rowspan="2">Community Reinvestment Act Rating</th><th>Current Evaluation
11/16/2023</th><th>Prior Evaluation
9/5/2017</th></tr>
<tr><th>Satisfactory</th><th>Satisfactory</th></tr>
<tr><td colspan="3">Current rating definition: An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area(s), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.</td></tr>
<tr><td>Lending Test</td><td>Satisfactory</td><td>Satisfactory</td></tr>
</table>

RECOMMENDATION(S)

Examiners provided several recommendations to address the violations. Prior to the conclusion of the examination, management addressed nearly all of the recommendations. The following represent recommendations where actions are underway, but not yet complete. These recommendations, as well as those completed during the examination, are discussed further on the Level 2/Medium Severity Violations pages.

- TILA: Implement monitoring of ARM loans, correct the timing and content of rate adjustment notices, and review each ARM loan that experienced a rate change during the review period to ensure the correct rate is charged.

Additionally, examiners provided the following recommendations related to Fair Lending:

- Clarify underwriting standards and parameters for each credit criterion in the Loan Policy for consumer installment and portfolio mortgage loans.
- Implement a process to formally track and monitor underwriting exceptions for portfolio mortgage and consumer installment loans.

MEETING WITH MANAGEMENT

On January 9, 2024, EIC Robinson, Acting EIC Morgan Lebold and Supervisory Examiner Katie Citro met with bank management to discuss the results of the consumer compliance examination and CRA evaluation. President Jim Chandler, CO Glaze, and Executive Vice Presidents (EVP) Andrew Lucas, Lynn Gardner, and Christina Decker represented the bank. Also in attendance were Chairman of the Board David Albin, Vice Chairman of the Board William Coolley, and Director Christopher Hausman. EIC Robinson and Acting EIC Lebold discussed the scope of the examination, CMS assessment, examiner recommendations, violations, and the fair lending review. The CRA Performance Evaluation was also discussed. EIC Robinson and Acting EIC Lebold disclosed the proposed consumer compliance and CRA ratings and informed management that the ratings are subject to additional review. Acting EIC Lebold provided senior management with an agenda and draft copy of the violations. Management concurred with the proposed ratings and agreed to implement all recommendations.

Examiner-in-Charge Kelly L. Robinson	Approved by David P. Lafleur 1/11/24

Level 2/Medium Severity Violations	1786

Level 2 violations include systemic, recurring or repetitive errors that represent a failure of the bank to meet a key purpose of the underlying regulation or statute but do not rise to a Level 3 violation.

HOMEOWNERS PROTECTION ACT

Section 4(a)(3) of the Homeowner's Protection Act of 1998 (12 U.S.C. § 4903(a)(3)), requires annual written statements for residential mortgage transactions that require private mortgage insurance (PMI). The annual statement must set forth the borrower's rights to cancellation or termination of the PMI and must identify the servicer's mailing address and telephone number so the borrower may contact the servicer to determine if the borrower may cancel the PMI. [HPA 4(a)(3)]

Examiners reviewed the bank's annual PMI notification procedures. The bank currently services 189 loans with PMI. In 162 instances, the bank did not provide the annual written PMI statement as required by this Section. Management subsequently mailed an annual notice to all borrowers with PMI during the examination on November 24, 2023.

Section 5(a) of the Homeowner's Protection Act of 1998 (12 U.S.C. § 4904(a)), requires the servicer to notify the borrower in writing not later than 30 days after the private mortgage insurance (PMI) is cancelled or terminated. The notice shall disclose that the PMI has terminated and the borrower no longer has PMI, and that no further premiums, payments, or other fees are due or payable by the borrower in connection with the PMI. [HPA 5(a)]

During the examination period, the bank automatically terminated PMI on 25 loans, but failed to notify each borrower in writing that PMI was terminated.

Although borrowers were aware their loans included PMI through the initial PMI disclosure and through line items on the Loan Estimate, Closing Disclosures, and Initial and Annual Escrow Disclosures, they were not reminded of certain rights under the Act because they never received annual PMI notices. For example, annual PMI disclosures inform borrowers that they may request cancellation of PMI when the loan balance reaches 80.0 percent of the original value of the property securing the loan based on either the initial amortization schedule or actual payments. Of the 189 borrowers with PMI during the examination cycle, 20 could have requested cancellation of PMI had they been notified of their rights under the Act. Instead, the bank terminated PMI when the loan balance reached 78.0 percent of the original value or upon payoff in once instance.

The violations are systemic and occurred because the bank was not aware that the HPA requires written annual borrower notifications and notices upon cancellation or termination of PMI. Additionally, the bank does not have written policies or procedures for HPA. Lastly, the bank's audit scopes did not include applicable PMI notices.

Examiners recommend the following:
1) Develop comprehensive policies and procedures that address applicable HPA requirements;
2) Develop a written notice to be provided within 30 days of PMI cancellation or termination;
3) Provide training to applicable personnel concerning all notice and timing requirements;
4) Implement monitoring and/or audit processes to ensure ongoing compliance applicable requirements.

Management Response: Management developed, and the Board approved, a new written HPA policy. Management also committed to provide the annual PMI and PMI cancellation notices. EVP Lucas reviewed these issues with applicable staff, and all Loan Officers and Loan Administrators received training on the new HPA policy in December. Lastly, CO Glaze committed to add a review of compliance with the HPA policy to the bank's 2024 audit schedule.

In addition to the procedural, training, and audit actions to address the violations, management also addressed the consumer harm to the aforementioned 20 borrowers who could have requested cancellation of their PMI earlier than when the bank automatically terminated it. Because the bank did not alert the borrowers of their cancellation rights, on December 13, 2023, management voluntarily reimbursed the 20 borrowers a total of $5,442.72 for the monthly premiums remitted after the date the loan balances reached 80.0 percent of the original value of the properties.

TRUTH IN LENDING

The Truth in Lending Act (15 U.S.C. § 1601 et seq.), as implemented by Regulation Z, 12 C.F.R. § 1026.20(d), requires that, in connection with the initial interest rate adjustment of a covered adjustable rate mortgage, the creditor, assignee, or servicer provide certain disclosures within the prescribed timeframes and in a separate document, in accordance with the content requirements of § 1026.20(d)(2) and the formatting requirements described in § 1026.20(d)(3). [TILA-C 1026.20(d)]

Examiners reviewed three ARM loans that underwent rate changes since the previous examination and identified one instance where the bank charged a higher interest rate at the first rate change than permitted by the promissory note. In instance shown in the following table, bank personnel did not adhere to the disclosed maximum interest rate at the first rate change, which resulted in a higher monthly payment for the borrower.

Examiners expanded the review to include 20 ARM loans subject to rate changes during the examination period. Examiners identified no additional instances in the expanded review. The bank has 304 ARM loans, of which 50 were subject to at least one rate adjustment during the examination period.

Name	Loan Number	New Payment Date	Maximum Rate at First Change	Rate Charged	Payment Charged	Corrected Payment	Reimbursement Amount
Norman	202117	5/1/2023	7.0%	7.375%	$524.40	$512.90	$92.00

The violation is attributed to weaknesses in oversight. Bank personnel do not periodically ensure notices comply with the terms of the legal obligations. As such, personnel were unaware that they applied an incorrect interest rate in one instance.

Examiners recommend management implement periodic monitoring of rate change notices and system settings to ensure ongoing compliance. Management should also correct the rate adjustment notice and system settings for the one harmed customer. Additionally, management should review each ARM loan that experienced a rate adjustment during the examination period, determine if any other customers were financially harmed, and reimburse customers if applicable.

Management Response: EVP Lucas implemented several changes to address the violation. First, when an ARM adjusts and the system generates the customer notice, Loan Administrators now review the rate change notices to determine accuracy based on the terms of the note. Second, staff is reviewing all ARMs to determine that the proper index, margin, ceiling and floor rates are accurate based on the terms of the customer's obligation. Lastly, management committed to reimburse customers should staff discover additional rate adjustment errors.

In addition to the procedural changes, management addressed the consumer harm for the transaction listed above. Management corrected the interest rate and monthly payment amount, and refunded $92 to the borrower on January 5, 2024.

The Truth in Lending Act (15 U.S.C. § 1601 et seq.), as implemented by Regulation Z, 12 C.F.R. § 1026.20(d), requires that, in connection with the initial interest rate adjustment of a covered adjustable rate mortgage, the creditor, assignee, or servicer provide certain disclosures within the prescribed timeframes and in a separate document, in accordance with the content requirements of § 1026.20(d)(2) and the formatting requirements described in § 1026.20(d)(3). [TILA-C 1026.20(d)]

Examiners reviewed three interest rate adjustment disclosures for ARM loans. As shown in the following table, in each case, the bank did not provide the disclosures a minimum of 210 days prior to the due dates of the first payment change.

Name	Loan Number	New Payment Date	Change Notice Sent	# of Days before New Payment
Norman	202117	5/1/2023	2/16/2023	74
Cottle	202138	4/1/2023	1/3/2023	88
Batdorj	202379	8/1/2023	4/28/2023	95

In addition to the timing of disclosures, in each case, examiners also noted that the disclosures did not adhere to the content in model forms H-4(D)(3) and H-4(D)(4) included in Appendix H of the TILA regulations.

The root cause of this violation is inadequate oversight and a misunderstanding of disclosure content and timing requirements. Examiners recommend that management update the disclosures to accurately reflect required content and ensure that notices are provided to borrowers within the timeframes required by the regulations. Examiners also recommend that applicable personnel receive training regarding rate change disclosure timing and content requirements, and that management implement periodic monitoring of rate change disclosures to ensure continued compliance.

Management Response: EVP Gardner began a project to correct the violation, with completion targeted for the first quarter of 2024. Specifically, management is in the process of correcting the core system to ensure that applicable ARM notices are issued at least 210 days prior to rate adjustments. Management also committed to update the notices based on the model form in the regulations.

ELECTRONIC FUND TRANSFERS

The Electronic Fund Transfers Act (15 U.S.C. § 1693 et seq.), as implemented by Regulation E, 12 C.F.R. § 1005.11(d), requires a financial institution, when it determines that no error occurred or that an error occurred in a manner or amount different than described by the consumer, to provide a written explanation of its findings and notify the consumer upon debiting the provisionally credited amount, as prescribed under § 1005.11(d)(1) and (d)(2). [EFTA-A 1005.11(d)]

Examiners reviewed a sample of seven Electronic Funds Transfer (EFT) disputes, of which three had a reversal of provisional credit because the investigation found that no error occurred. In two of the three instances, the bank did not provide the required written notification to the customers. In the third instance, the bank provided a notice, but it did not contain all of the information required by the regulation. The following table contains details of the three instances.

Name	Account Number	Dispute Date	Provisional Credit Date	Provisional Credit Reversed Date	Error
Burnham	59238	11/7/2022	11/10/2022	2/3/2023	Notice did not contain required disclosures.
Lane	77354	7/31/2023	8/3/2023	8/25/2023	No written notification provided.
Oreill	64303	6/1/2023	6/2/2023	6/7/2023	No written notification provided.

Examiners attributed the violation to unfamiliarity with the regulatory requirements and a lack of written procedures for EFT disputes. Examiners recommend that applicable personnel receive additional training. Additionally, the bank should implement written EFT dispute procedures for personnel to use as guidance when handling disputes.

Management Response: *The Board approved a written EFT/Reg E policy. CO Glaze reviewed Regulation E notice requirements with staff, and applicable employees involved with EFT disputes are now aware of the requirement for a written customer notice when provisional is reversed.*

PUBLIC DISCLOSURE

November 16, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Longview Bank
Certificate Number: 1786

102 South East Ave
Ogden, Illinois 61859

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

300 South Riverside Plaza, Suite 1700
Chicago, Illinois 60606

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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 loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- A substantial majority of loans and other lending-related activities are in the institution's assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration among individuals of different income levels, and farms and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.

DESCRIPTION OF INSTITUTION

Longview Bank is headquartered in Ogden, Illinois and operates across five counties in east central Illinois. The bank is a wholly owned subsidiary of Longview Capital Corporation, a holding company headquartered in Newman, Illinois. In addition to Longview Bank, the holding company owns two other banks that operate in central Illinois: Bank of Gibson City (Gibson City, Illinois) and Longview Community Bank (Mount Pulaski, Illinois). Longview Bank received a Satisfactory rating at its previous FDIC Performance Evaluation dated September 5, 2017, based on Interagency Small Institution CRA Examination Procedures.

Longview Bank is primarily an agricultural lender, with agricultural and farmland-secured loans collectively making up approximately 44.0 percent of the total loan portfolio. Residential and commercial loans also make up sizeable portions of the total portfolio. The bank offers consumer loans, but consumer lending makes up a relatively small portion of the loan portfolio at 2.4 percent. The bank offers traditional deposit products including checking, savings, certificates of deposit, and individual retirement accounts. The bank also offers alternative delivery systems including online banking, mobile banking, and ATMs.

In August 2023, Longview Bank merged with Longview Bank and Trust (Longview B&T), a community bank operating in roughly the same geographic area as Longview Bank. The two institutions were previously affiliated, both owned by Longview Capital Corporation. Longview B&T operated four offices in Clark, Edgar, and Vermilion Counties. The merger roughly doubled the total asset size of Longview Bank. At the time of the merger, agricultural loans made up slightly more than half of Longview B&T's total loan portfolio.

Longview Bank currently operates 11 full-service offices across five counties, compared to 6 offices at the previous evaluation in 2017. The bank's assets totaled $576.2 million as of September 30, 2023. This figure includes total loans of $427.2 million and total securities of $74.7 million. The bank has total deposits of $485.2 million. The following table provides a breakdown of the bank's loan portfolio by category.

Loan Portfolio Distribution as of 9/30/2023		
Loan Category	**$(000s)**	**%**
Construction, Land Development, and Other Land Loans	17,257	4.0
Secured by Farmland	95,375	22.3
Secured by 1-4 Family Residential Properties	72,716	17.0
Secured by Multifamily (5 or more) Residential Properties	48,803	11.4
Secured by Nonfarm Nonresidential Properties	46,795	11.0
Total Real Estate Loans	**280,946**	**65.7**
Commercial and Industrial Loans	34,626	8.1
Agricultural Production and Other Loans to Farmers	95,269	22.3
Consumer Loans	10,425	2.4
Obligations of State and Political Subdivisions in the U.S.	4,316	1.0
Other Loans	127	<0.1
Lease Financing Receivable (net of unearned income)	1,494	0.4
Less: Unearned Income	(0)	(0.0)
Total Loans	**427,203**	**100.0**
Source: Reports of Condition and Income		

Examiners did not identify any financial, legal, or other impediments that would limit the institution'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. Longview Bank designated three assessment areas. One assessment area is located in the nonmetropolitan portion of Illinois (Illinois Non-MSA), and the other two assessment areas are located in the Champaign-Urbana, Illinois Metropolitan Statistical Area (MSA) (Champaign MSA) and the Danville, Illinois MSA (Danville MSA). The following table provides a breakdown of specific counties, census tracts, and bank offices by assessment area.

Description of Assessment Areas			
Assessment Area	**Counties in Assessment Area**	**# of Census Tracts**	**# of Bank Offices**
Illinois Non-MSA	Clark, Douglas, Edgar	14	6
Champaign MSA	Champaign	48	4
Danville MSA	Vermilion	24	1
Source: 2020 U.S. Census, Bank Data			

At their previous CRA evaluations, Longview Bank's assessment areas included Champaign and Douglas counties, while Longview B&T's assessment areas included Edgar and Vermilion counties. Clark County was not included in the prior assessment areas of either bank, as Longview B&T did not establish a branch there until November 2020.

The assessment areas conform to CRA requirements as they consist of whole geographies in which the bank has offices, do not reflect illegal discrimination, and do not arbitrarily exclude any low- or moderate -income geographies. Refer to the separate assessment area sections of this evaluation for more details on each area.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated September 5, 2017, to the current evaluation dated November 16, 2023. Examiners used the Interagency Small Institution Examination Procedures to evaluate Longview Bank's CRA performance. The appendices include a list of the specific criteria used to evaluate the bank's performance.

Given the timing of the merger with Longview B&T, examiners conducted the current evaluation using combined, pre-merger loan data from both Longview Bank and Longview B&T. As such, this evaluation reflects combined loan data for both institutions. Both banks operated in roughly the same geographic area and were subsidiaries of the same holding company prior to the merger. Additionally, none of the loan data was included in the previous evaluations of either Longview Bank or Longview B&T. The FDIC conducted Longview B&T's previous CRA evaluation in June 2017, just three months prior to the previous evaluation of Longview Bank. Longview B&T received a Satisfactory CRA rating at that evaluation based on Interagency Small Institution Examination Procedures.

For the current evaluation, examiners conducted full-scope reviews of all three assessment areas. In arriving at overall performance conclusions, the Illinois Non-MSA assessment area carried the most weight as this assessment area contained the highest loan volumes and the largest number of bank offices. The Champaign MSA and Danville MSA assessment areas carried less, and roughly equal, weight. By number of loans, loan origination volumes in each of these two assessment areas were generally less than half of the volume in the Illinois Non-MSA assessment area.

Activities Reviewed

For this evaluation, examiners reviewed home mortgage, small farm, and small business lending. Based on data availability, examiners reviewed home mortgage loans from 2021 and 2022, and small farm and small business loans from 2022 only. Home mortgage loans include all loans that Longview B&T reported under Home Mortgage Disclosure Act (HMDA) data collection requirements in 2021 and 2022. Although Longview Bank was not subject to HMDA data collection requirements in 2021 or 2022, the bank collected home mortgage data during this timeframe. Therefore, examiners combined the reported Longview B&T HMDA data with non-reported Longview Bank data to analyze home mortgage lending for 2021 and 2022. Similarly, using bank data, examiners analyzed combined pre-merger small farm and small business loan data for 2022.

Examiners analyzed the full universe of home mortgage loans for both 2021 and 2022. Examiners also reviewed full universe of small farm and small business loans for 2022 under the Assessment Area Concentration and Geographic Distribution criteria. However, based on revenue data availability, examiners selected and analyzed random samples of small farm and small business loans for the Borrower Profile criterion. The following table details the number and dollar volumes for each loan product reviewed.

Loan Products Reviewed				
Loan Category	**Universe**		**Reviewed**	
	#	**$(000s)**	**#**	**$(000s)**
Home Mortgage (2021)	466	60,215	466	60,215
Home Mortgage (2022)	375	76,251	375	76,251
Small Farm (2022)	471	61,635	70*	8,045*
Small Business (2022)	217	22,581	65*	5,780*
*Source: Bank Data. *Random samples analyzed for Borrower Profile criterion only.*				

Based on the number and dollar volume of annual originations, home mortgage and small farm lending carried the most weight in arriving at overall conclusions. These two products carried roughly equal weight, and small business lending carried the least weight.

Examiners evaluated Longview Bank's CRA performance through comparisons to applicable demographic data. For 2021 home mortgage lending, examiners used 2015 American Community Survey (ACS) demographic data. For 2022 home mortgage lending, examiners used the more recent 2020 U.S. Census demographic data. For small farm and small business lending, examiners used 2022 D&B business demographic data. Finally, Longview Bank was not subject to HMDA or CRA data collection requirements in either 2021 or 2022; therefore, this evaluation does not include direct comparisons to HMDA or CRA aggregate data.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Overall, Longview Bank demonstrated reasonable performance under the Lending Test. Performance under each criterion supports this conclusion.

Loan-to-Deposit Ratio

The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. The bank's loan-to-deposit ratio averaged 82.3 percent over the past 25 calendar quarters from September 30, 2017, to September 30, 2023.

Examiners evaluated Longview Bank's loan-to-deposit ratio through comparisons to five similarly situated banks. Examiners selected these banks based on asset size, geographic location, and lending focus. As shown in the following table, Longview Bank maintained an average loan-to-deposit ratio higher than three of these banks and below two banks. Additionally, prior to the merger with Longview Bank, Longview B&T maintained a similar loan-to-deposit ratio, averaging 80.7 percent over the 24 calendar quarters from September 30, 2017, to June 30, 2023.

Loan-to-Deposit Ratio Comparison		
Bank	**Total Assets as of 9/30/2023 ($000s)**	**Average Net LTD Ratio (%)**
Longview Bank	**576,201**	**82.3**
First Neighbor Bank (Toledo IL)	594,737	89.3
Casey State Bank (Casey IL)	459,888	81.4
The Fisher National Bank (Fisher IL)	332,155	85.7
Bank of Rantoul (Rantoul IL)	240,422	50.0
The Gifford State Bank (Gifford IL)	191,313	81.0
Source: Reports of Condition and Income 9/30/2017 - 9/30/2023		

Assessment Area Concentration

A substantial majority of loans and other lending related activities are in the institution's assessment areas. As shown in the following table, among the three loan products reviewed, the bank originated 86.1 percent of loans by number inside the assessment areas.

Lending Inside and Outside of the Assessment Area										
Loan Category	**Number of Loans**				**Total**	**Dollar Amount of Loans $(000s)**				**Total**
	Inside		**Outside**			**Inside**		**Outside**		
	#	**%**	**#**	**%**	**#**	**$**	**%**	**$**	**%**	**$(000s)**
Home Mortgage										
2021	396	85.0	70	15.0	466	48,993	81.4	11,222	18.6	60,215
2022	313	83.5	62	16.5	375	62,153	81.5	14,099	18.5	76,251
Subtotal	**709**	**84.3**	**132**	**15.7**	**841**	**111,146**	**81.5**	**25,321**	**18.5**	**136,466**
Small Farm										
2022	430	91.3	41	8.7	471	56,578	91.8	5,057	8.2	61,635
Subtotal	**430**	**91.3**	**41**	**8.7**	**471**	**56,578**	**91.8**	**5,057**	**8.2**	**61,635**
Small Business										
2022	178	82.0	39	18.0	217	17,565	77.8	5,016	22.2	22,581
Subtotal	**178**	**82.0**	**39**	**18.0**	**217**	**17,565**	**77.8**	**5,016**	**22.2**	**22,581**
Total	**1,317**	**86.1**	**212**	**13.9**	**1,529**	**185,289**	**84.0**	**35,394**	**16.0**	**220,682**
Source: Bank Data *Due to rounding, totals may not equal 100.0%*										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. Excellent performance in the Illinois Non-MSA assessment area and reasonable performance in the Champaign MSA and Danville MSA assessment areas support this conclusion. Although overall performance was reasonable, examiners identified weaknesses in the geographic distribution of small business loans in both the Champaign MSA and Danville MSA assessment areas. Refer to the separate assessment area sections of this evaluation for more detailed information.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels, and farms and businesses of different sizes. Reasonable performance in each assessment area supports this conclusion. Refer to the separate assessment area sections of this evaluation for more detailed information.

Response to Complaints

The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the CRA rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's CRA rating.

NONMETROPOLITAN ILLINOIS – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN ILLINOIS

This assessment area includes the entirety of Clark, Douglas, and Edgar counties in Illinois. These three counties are contiguous and located along the Indiana border. Longview Bank operates six full-service branch offices in this assessment area: three in Douglas County, two in Edgar County, and one in Clark County.

Of the six offices in this assessment area, the three Douglas County branches were Longview Bank branches prior to the merger with Longview B&T. The Clark and Edgar county branches were former Longview B&T offices. Prior to the merger, Longview Bank opened one office and closed one office in Douglas County in September 2022. Also prior to the merger, Longview B&T opened a new office in Clark County in November 2020. Collectively, these changes had a minimal impact on low- and moderate-income areas as both Clark and Douglas counties consist entirely of middle- and upper-income census tracts.

Economic and Demographic Data

The assessment area contains 14 census tracts. According to 2020 U.S. Census data, one tract is moderate-income, one tract is upper-income, and the remaining tracts are middle-income. The assessment area does not contain any low-income tracts. The sole moderate-income tract is located in Paris in Edgar County. Longview Bank's Paris branch is in a middle-income tract immediately adjacent to this moderate-income tract. Furthermore, the assessment area previously had two moderate-income tracts, both in Edgar County, according to 2015 ACS data.

The following table details select economic and demographic characteristics of the assessment area.

Demographic Information of the Assessment Area Assessment Area: Illinois Non-MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	14	0.0	7.1	85.7	7.1	0.0
Population by Geography	52,061	0.0	7.5	83.5	9.0	0.0
Housing Units by Geography	25,118	0.0	8.1	83.2	8.7	0.0
Owner-Occupied Units by Geography	16,848	0.0	8.3	83.8	7.8	0.0
Occupied Rental Units by Geography	5,329	0.0	5.5	81.8	12.7	0.0
Vacant Units by Geography	2,941	0.0	11.7	81.8	6.4	0.0
Businesses by Geography	3,804	0.0	5.7	84.6	9.7	0.0
Farms by Geography	541	0.0	4.3	92.8	3.0	0.0
Family Distribution by Income Level	15,223	18.5	19.7	21.9	39.8	0.0
Median Family Income Non-MSAs - IL		$68,958	Median Housing Value			$99,504
			Median Gross Rent			$696
			Families Below Poverty Level			8.9%

Source: 2020 U.S. Census and 2022 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.

The assessment area is primarily rural and has the lowest population of the bank's three assessment areas. Paris (Edgar County) is the largest city among the three counties, with a population of slightly more than 8,000. The total population of the assessment area has declined by approximately 1,900 compared to 2015 ACS data. With over 500 farms located in the assessment area, agriculture remains an important driver of the local economy.

Unemployment rates throughout the assessment area have generally declined over the past several years following spikes at the onset of the COVID-19 pandemic in 2020. After reaching 3.5 percent or lower in 2022, unemployment rates began gradually increasing in the latter half of 2023. As of September 2023, the unemployment rate was 4.8 percent in Clark County, 4.1 percent in Douglas County, and 4.1 percent in Edgar County. For comparison, the Illinois statewide unemployment rate was 4.9 percent for this same timeframe. Throughout the evaluation period, unemployment was consistently highest in Clark County and lowest in Douglas County.

Examiners used the FFIEC-adjusted median family income levels to analyze home mortgage lending performance under the Borrower Profile criterion. The following table depicts the income levels by year.

Median Family Income Ranges – Illinois Non-MSA (99999)				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
2021 ($66,700)	<$33,350	$33,350 to <$53,360	$53,360 to <$80,040	≥$80,040
2022 ($76,100)	<$38,050	$38,050 to <$60,880	$60,880 to <$91,320	≥$91,320

Source: FFIEC

Competition

The assessment area has a moderate level of competition in the market for financial services. According to FDIC Deposit Market Share data as of June 30, 2023, 13 banks operated 32 offices in the assessment area. Of these banks, Longview Bank ranked 12th with a deposit market share of 2.3 percent. As of the same date, Longview B&T ranked fifth with a deposit market share of 8.4 percent. The top three banks in the assessment area each had deposit market shares of approximately 16.0 percent.

According to HMDA aggregate data, 112 lenders reported 874 home mortgage loans originated or purchased in 2022. Longview Bank is not included in the aggregate data given that the bank did not report HMDA data that year. However, Longview B&T ranked second among this group of lenders with a market share of 13.4 percent. Furthermore, according to 2021 CRA aggregate data, 19 lenders reported 490 small farm loans originated or purchased in the assessment area, and 45 lenders reported 982 small business loans originated or purchased.

Community Contact

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 those needs. It also shows what credit and community development opportunities are available.

Examiners contacted a representative of an agriculture-related organization in the assessment area. The contact noted that agricultural conditions have been favorable over the past several years, but crop prices have declined in recent months. Demand for farm loans remains strong. The contact noted healthy competition among area lenders and was not aware of any unmet credit needs.

Credit Needs

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that home mortgage, small business, and small farm loans all represent credit needs in the assessment area. As noted by the community contact, small farm lending is especially important in this assessment area given the local economy's reliance on agriculture.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NONMETROPOLITAN ILLINOIS

LENDING TEST

Longview Bank demonstrated reasonable performance in the Illinois Non-MSA assessment area. Geographic Distribution and Borrower Profile performance support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the assessment area. Home mortgage and small business lending performance primarily support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the assessment area. In 2021, the bank's home mortgage lending by number in moderate-income tracts represented nearly one third of total bank lending in this assessment area and was nearly double the demographic data. Lending remained strong in 2022, exceeding the demographic data. The following table details the distribution of home mortgage loans by tract income category.

Geographic Distribution of Home Mortgage Loans Assessment Area: Illinois Non-MSA					
Tract Income Level	**% of Owner-Occupied Housing Units**	**#**	**%**	**$(000s)**	**%**
Moderate					
2021	17.2	74	32.2	6,797	28.7
2022	8.3	22	13.9	2,078	13.5
Middle					
2021	82.8	156	67.8	16,874	71.3
2022	83.8	125	79.1	12,072	78.4
Upper					
2021	0.0	0	0.0	0	0.0
2022	7.8	11	7.0	1,240	8.1
Totals					
2021	**100.0**	**230**	**100.0**	**23,672**	**100.0**
2022	**100.0**	**158**	**100.0**	**15,390**	**100.0**
Source: 2015 ACS, 2020 U.S. Census, Bank Data Due to rounding, totals may not equal 100.0%					

Small Farm Loans

The geographic distribution of small farms loans reflects reasonable dispersion throughout the assessment area. As shown in the following table, the bank originated four small farm loans in the moderate-income tract in 2022, which was slightly below the demographic data. However, given the very small percentage of assessment area farms located in this single moderate-income tract, the bank's performance is reasonable.

Geographic Distribution of Small Farm Loans Assessment Area: Illinois Non-MSA					
Tract Income Level	**% of Farms**	**#**	**%**	**$(000s)**	**%**
Moderate					
2022	4.3	4	1.6	685	2.3
Middle					
2022	92.8	245	98.0	28,874	97.5
Upper					
2022	3.0	1	0.4	62	0.2
Totals					
2022	**100.0**	**250**	**100.0**	**29,621**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

Small Business Loans

The geographic distribution of small business loans reflects excellent dispersion throughout the assessment area. As shown in the following table, by number of loans, the bank's origination of small business loans in the moderate-income tract was double the percentage of businesses located in that tract in 2022.

Geographic Distribution of Small Business Loans Assessment Area: Illinois Non-MSA					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Moderate					
2022	5.7	10	11.4	403	5.2
Middle					
2022	84.6	74	84.1	6,704	87.1
Upper					
2022	9.7	4	4.5	590	7.7
Totals					
2022	**100.0**	**88**	**100.0**	**7,697**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels, and farms and businesses of different sizes. Home mortgage and small farm lending performance primarily support this conclusion.

Home Mortgage Loans

The distribution of home mortgage borrowers reflects reasonable penetration among individuals of different income levels. Although lending to low-income borrowers lagged the demographic data in both 2021 and 2022, the bank's performance is reasonable given that many low-income individuals have incomes below the poverty line and are therefore unlikely to qualify for a traditional home mortgage loan. Lending to moderate-income borrowers was stronger, exceeding demographic data in both years and supporting reasonable performance under this criterion.

Distribution of Home Mortgage Loans by Borrower Income Level Assessment Area: Illinois Non-MSA					
Borrower Income Level	**% of Families**	**#**	**%**	**$(000s)**	**%**
Low					
2021	20.1	30	13.0	1,650	7.0
2022	18.5	16	10.1	1,055	6.9
Moderate					
2021	18.1	60	26.1	4,799	20.3
2022	19.7	33	20.9	2,473	16.1
Middle					
2021	22.7	53	23.0	4,514	19.1
2022	21.9	34	21.5	2,998	19.5
Upper					
2021	39.1	74	32.2	11,318	47.8
2022	39.8	45	28.5	5,659	36.8
Not Available					
2021	0.0	13	5.7	1,391	5.9
2022	0.0	30	19.0	3,204	20.8
Totals					
2021	**100.0**	**230**	**100.0**	**23,672**	**100.0**
2022	**100.0**	**158**	**100.0**	**15,390**	**100.0**
Source: 2015 ACS, 2020 U.S. Census, Bank Data *Due to rounding, totals may not equal 100.0%*					

Small Farm Loans

The distribution of small farm loans reflects reasonable penetration among farms of different sizes. As shown in the following table, lending to farms with revenues of $1 million or less lagged the demographic data in 2022. However, with more than 80.0 percent of loans originated to farms in this revenue category, the lending distribution reflects the bank's willingness to lend to farms of all sizes and supports reasonable performance.

Distribution of Small Farm Loans by Gross Annual Revenue Category Assessment Area: Illinois Non-MSA					
Gross Revenue Level	**% of Farms**	**#**	**%**	**$(000s)**	**%**
≤$1,000,000					
2022	97.8	33	82.5	3,259	75.5
>$1,000,000					
2022	1.3	7	17.5	1,055	24.5
Revenue Not Available					
2022	0.9	0	0.0	0	0.0
Totals					
2022	**100.0**	**40**	**100.0**	**4,314**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

Small Business Loans

The distribution of small business loans reflects excellent penetration among businesses of different sizes. As shown in the following table, 92.0 percent of the bank's small business loan originations in 2022 were to businesses with revenues of $1 million or less, significantly exceeding the demographic data.

Distribution of Small Business Loans by Gross Annual Revenue Category Assessment Area: Illinois Non-MSA					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
≤$1,000,000					
2022	80.7	23	92.0	808	28.8
>$1,000,000					
2022	4.8	2	8.0	2,000	71.2
Revenue Not Available					
2022	14.5	0	0.0	0	0.0
Totals					
2022	**100.0**	**25**	**100.0**	**2,808**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

CHAMPAIGN, ILLINOIS MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CHAMPAIGN, ILLINOIS MSA

This assessment area includes the entirety of Champaign County in east central Illinois. Longview Bank operates its main office and three additional full-service branches in this assessment area. All four offices are located in the rural eastern portions of the county, roughly five or more miles from the more populated Cities of Champaign and Urbana. Additionally, Longview B&T did not maintain any offices in this assessment area prior to the merger with Longview Bank.

Economic and Demographic Data

The assessment area contains 48 tracts. According to 2020 U.S. Census data, these tracts reflect the following income designations:

- 7 low-income tracts
- 8 moderate-income tracts
- 10 middle-income tracts
- 18 upper-income tracts
- 5 tracts with no income designation

The low- and moderate-income tracts are largely concentrated in the central portion of the county in the Cities of Champaign and Urbana. Rantoul, a smaller city in the northern portion of the county, also contains one low- and two moderate-income tracts. The total number of tracts in Champaign County increased from 43 under 2015 ACS data to 48 under 2020 U.S. Census data; however, the total number of low- and moderate-income tracts remained unchanged at 15. Furthermore, of the five tracts currently with no income designation, most of these contain portions of the University of Illinois Urbana-Champaign campus.

The following table details select economic and demographic characteristics of the assessment area.

Demographic Information of the Assessment Area Assessment Area: Champaign MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	48	14.6	16.7	20.8	37.5	10.4
Population by Geography	205,865	13.6	19.8	22.2	37.1	7.3
Housing Units by Geography	93,679	14.8	22.2	23.9	33.4	5.7
Owner-Occupied Units by Geography	44,088	5.0	21.3	28.4	44.7	0.7
Occupied Rental Units by Geography	38,971	23.1	23.6	18.5	24.1	10.7
Vacant Units by Geography	10,620	25.3	20.7	25.1	20.9	8.0
Businesses by Geography	15,573	11.0	18.9	24.5	39.8	5.8
Farms by Geography	768	3.4	9.9	43.6	42.1	1.0
Family Distribution by Income Level	42,618	23.4	16.4	19.8	40.4	0.0
Median Family Income MSA - 16580 Champaign-Urbana, IL MSA		$83,169	Median Housing Value			$141,762
			Median Gross Rent			$878
			Families Below Poverty Level			8.8%

Source: 2020 U.S. Census and 2022 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.

The assessment area's population has remained stable since the previous evaluation, in contrast to the bank's two other assessment areas that have experienced population loss. According to Moody's Analytics, the Champaign MSA has a healthy local economy anchored by the presence of the University of Illinois Urbana-Champaign, which is the top employer in the assessment area. Other major employers include Carle Foundation Hospital, Parkland College, and Kraft Foods.

After nearing 3.0 percent in 2022, unemployment rates in the assessment area began trending upward in 2023. As of September 2023, the unemployment rate in Champaign County was 4.8 percent, slightly below the Illinois statewide rate of 4.9 percent for the same timeframe.

Among the bank's three assessment areas, the Champaign MSA has the highest median family income, the highest median housing value, and the lowest percentage of families below the poverty level. Additionally, this assessment area has the highest portion of rental units, representing 41.6 percent of all housing units in Champaign County. The following table presents the assessment area's median family income levels for 2021 and 2022, as updated by the FFIEC.

Median Family Income Ranges – Champaign MSA (16580)				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
2021 ($82,600)	<$41,300	$41,300 to <$66,080	$66,080 to <$99,120	≥$99,120
2022 ($91,300)	<$45,650	$45,650 to <$73,040	$73,040 to <$109,560	≥$109,560

Source: FFIEC

Competition

The assessment area has a moderate level of competition in the market for financial services. According to FDIC Deposit Market Share data as of June 30, 2023, 29 banks operated 71 offices in the assessment area. Of these banks, Longview Bank ranked fifth with a deposit market share of 3.1 percent.

According to HMDA aggregate data, 248 lenders reported 4,288 home mortgage loans originated or purchased in 2022. Had Longview Bank reported HMDA data in 2022, the bank would have ranked 19th with a market share of approximately 1.7 percent. Furthermore, according to 2021 CRA aggregate data, 17 lenders reported 211 small farm loans originated or purchased in the assessment area, and 78 lenders reported 3,324 small business loans originated or purchased.

Community Contact

Examiners reviewed a recent contact with a representative of an economic development organization in the assessment area. The contact stated that a housing shortage in the county is driving up housing costs. Single-family housing is particularly in demand. The contact stated that local banks are highly involved in the community and adequately meet the credit needs of local businesses, farms, and individuals.

Credit Needs

Considering information from the community contact, bank management, and economic and demographic data, examiners determined that home mortgage lending represents the primary credit need of the assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CHAMPAIGN, ILLINOIS MSA

LENDING TEST

Longview Bank demonstrated reasonable performance in the Champaign MSA assessment area. Geographic Distribution and Borrower Profile performance support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Although small business lending performance was poor, reasonable home mortgage and small farm lending performance support the overall conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. The bank demonstrated strong lending performance in low-income tracts, exceeding demographic data in both 2021 and 2022. As shown in the following table, the bank's performance by number was more than double the demographic data in 2022. Notably, in both years, more than one third of the bank's total lending by dollar volume was in low-income tracts, exceeding the demographic data each year. This is primarily due to the bank financing several large, multifamily housing properties in low-income tracts.

Lending in moderate-income tracts was weaker, lagging the demographic data in both years. Although lending in moderate-income tracts increased significantly from 2021 to 2022, lending remained below demographic data in 2022 due to changing demographics from year to year. However, given the increasing trend in lending in moderate-income tracts, along with the bank's excellent lending performance in low-income tracts, overall performance under this criterion is reasonable.

Geographic Distribution of Home Mortgage Loans

Assessment Area: Champaign MSA

Tract Income Level	**% of Owner-Occupied Housing Units**	**#**	**%**	**$(000s)**	**%**
Low					
2021	5.5	5	6.9	5,452	35.6
2022	5.0	8	10.8	15,227	39.3
Moderate					
2021	12.1	2	2.8	190	1.2
2022	21.3	10	13.5	3,223	8.3
Middle					
2021	57.6	57	79.2	8,380	54.7
2022	28.4	25	33.8	10,446	26.9
Upper					
2021	24.7	8	11.1	1,299	8.5
2022	44.7	31	41.9	9,885	25.5
Not Available					
2021	0.1	0	0.0	0	0.0
2022	0.7	0	0.0	0	0.0
Totals					
2021	**100.0**	**72**	**100.0**	**15,321**	**100.0**
2022	**100.0**	**74**	**100.0**	**38,782**	**100.0**

Source: 2015 ACS, 2020 U.S. Census, Bank Data
Due to rounding, totals may not equal 100.0%

Small Farm Loans

The geographic distribution of small farm loans reflects reasonable dispersion throughout the assessment area. As shown in the following table, lending in low-income tracts slightly exceeded the demographic data, but the bank did not originate any small farm loans in moderate-income tracts. However, this performance is reasonable given the limited opportunities for small farm lending in these tracts. All of the moderate-income tracts in Champaign County are located in the more populated portions of the county, in the Cities of Champaign, Urbana, and Rantoul. In contrast, more than 85.0 percent of assessment area farms are located in the more rural middle- and upper-income portions of the county. Given these factors, in conjunction with the bank's success in penetrating low-income tracts, overall performance under this criterion is reasonable.

Geographic Distribution of Small Farm Loans Assessment Area: Champaign MSA					
Tract Income Level	**% of Farms**	**#**	**%**	**$(000s)**	**%**
Low					
2022	3.4	3	3.7	214	1.8
Moderate					
2022	9.9	0	0.0	0	0.0
Middle					
2022	43.6	33	40.7	5,549	45.7
Upper					
2022	42.1	45	55.6	6,387	52.6
Not Available					
2022	1.0	0	0.0	0	0.0
Totals					
2022	**100.0**	**81**	**100.0**	**12,150**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

Small Business Loans

The geographic distribution of small business loans reflects poor dispersion throughout the assessment area. As shown in the following table, the bank originated only one small business loan in a low- or moderate-income tract in 2022, despite approximately 30.0 percent of assessment area businesses being located in these tracts.

Geographic Distribution of Small Business Loans Assessment Area: Champaign MSA					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Low					
2022	11.0	1	2.6	331	9.4
Moderate					
2022	18.9	0	0.0	0	0.0
Middle					
2022	24.5	15	38.5	1,072	30.5
Upper					
2022	39.8	23	59.0	2,112	60.1
Not Available					
2022	5.8	0	0.0	0	0.0
Totals					
2022	**100.0**	**39**	**100.0**	**3,515**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels, and farms and businesses of different sizes. Home mortgage, small farm, and small business lending performance all support this conclusion.

Home Mortgage Loans

The distribution of home mortgage borrowers reflects reasonable penetration among individuals of different income levels. Although lending to low-income borrowers lagged the demographic data in both 2021 and 2022, the bank's performance is reasonable given that many low-income individuals have incomes below the poverty line and are therefore unlikely to qualify for a traditional home mortgage loan. Lending to moderate-income borrowers was slightly below the demographic data in 2021 and nearly identical to the demographic data in 2022, supporting reasonable performance under this criterion.

Distribution of Home Mortgage Loans by Borrower Income Level Assessment Area: Champaign MSA					
Borrower Income Level	**% of Families**	**#**	**%**	**$(000s)**	**%**
Low					
2021	22.5	6	8.3	756	4.9
2022	23.4	6	8.1	556	1.4
Moderate					
2021	16.6	11	15.3	1,591	10.4
2022	16.4	12	16.2	1,441	3.7
Middle					
2021	20.4	19	26.4	2,426	15.8
2022	19.8	8	10.8	708	1.8
Upper					
2021	40.5	22	30.6	4,067	26.5
2022	40.4	6	8.1	1,177	3.0
Not Available					
2021	0.0	14	19.4	6,481	42.3
2022	0.0	42	56.8	34,900	90.0
Totals					
2021	**100.0**	**72**	**100.0**	**15,322**	**100.0**
2022	**100.0**	**74**	**100.0**	**38,782**	**100.0**
Source: 2015 ACS, 2020 U.S. Census, Bank Data *Due to rounding, totals may not equal 100.0%*					

Small Farm Loans

The distribution of small farm loans reflects reasonable penetration among farms of different sizes. As shown in the following table, 96.7 percent of assessment area farms have revenues of $1 million or less, and more than 90.0 percent of the bank's loans were in this category.

Distribution of Small Farm Loans by Gross Annual Revenue Category Assessment Area: Champaign MSA					
Gross Revenue Level	**% of Farms**	**#**	**%**	**$(000s)**	**%**
≤$1,000,000					
2022	96.7	11	91.7	1,194	91.7
>$1,000,000					
2022	0.9	1	8.3	108	8.3
Revenue Not Available					
2022	2.3	0	0.0	0	0.0
Totals					
2022	**100.0**	**12**	**100.0**	**1,302**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. As shown in the following table, 80.0 percent of the bank's small business loan originations in 2022 were to businesses with revenues of $1 million or less, which is comparable to the 84.3 percent of assessment area businesses in this revenue category.

Distribution of Small Business Loans by Gross Annual Revenue Category Assessment Area: Champaign MSA					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
≤$1,000,000					
2022	84.3	8	80.0	555	67.5
>$1,000,000					
2022	3.5	2	20.0	267	32.5
Revenue Not Available					
2022	12.2	0	0.0	0	0.0
Totals					
2022	**100.0**	**10**	**100.0**	**822**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

DANVILLE, ILLINOIS MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN DANVILLE, ILLINOIS MSA

This assessment area includes the entirety of Vermilion County in east central Illinois. Longview Bank operates one full-service branch office in this assessment area, which was previously a Longview B&T branch prior to the merger with Longview Bank. This office is located in Georgetown, approximately ten miles south of Danville. Additionally, the bank operates a loan production office in Danville, which opened in 2018.

Economic and Demographic Data

The assessment area contains 24 tracts. According to 2020 U.S. Census data, these tracts reflect the following income designations:

- 3 low-income tracts
- 2 moderate-income tracts
- 12 middle-income tracts
- 6 upper-income tracts
- 1 tracts with no income designation

The low- and moderate-income tracts are mostly contiguous and located in Danville. Under the previous 2015 ACS income designations, Vermilion County had 1 low- and 5 moderate-income tracts.

The following table details select economic and demographic characteristics of the assessment area.

Demographic Information of the Assessment Area Assessment Area: Danville MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	24	12.5	8.3	50.0	25.0	4.2
Population by Geography	74,188	8.9	10.1	51.1	28.1	1.8
Housing Units by Geography	36,035	9.9	9.0	52.1	26.9	2.1
Owner-Occupied Units by Geography	21,964	5.6	6.2	54.4	32.1	1.7
Occupied Rental Units by Geography	9,049	17.3	13.1	48.5	18.5	2.5
Vacant Units by Geography	5,022	14.9	14.0	48.7	19.2	3.2
Businesses by Geography	4,410	14.8	10.1	47.1	25.3	2.7
Farms by Geography	348	1.4	3.4	46.6	48.6	0.0
Family Distribution by Income Level	19,041	22.7	18.4	18.5	40.4	0.0
Median Family Income MSA - 19180 Danville, IL MSA		$60,958	Median Housing Value			$80,259
			Median Gross Rent			$660
			Families Below Poverty Level			14.7%

Source: 2020 U.S. Census and 2022 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.

Vermilion County's population continues to decline. According to the 2020 U.S. Census, total population decreased by more than 6,000, or approximately 7.7 percent, compared to 2015 ACS data. Of the bank's three assessment areas, the Danville MSA has the lowest median family income level, lowest median housing value, and highest unemployment rate. At 14.7 percent, Vermilion County also has the highest share of families below the poverty line, compared to approximately 9.0 percent in the other two assessment areas.

Moody's Analytics notes that local economic growth remains sluggish, with Danville generally lagging the performance of regional peers. The Danville MSA remains reliant on the manufacturing sector, including automobile parts manufacturing and food processing. Top employers in Vermilion County include the Danville Veterans Affairs Medical Center and McLane Company, which operates a food distribution center in Danville.

Vermilion County's unemployment rate dipped below 5.0 percent in 2022, but trended upward throughout most of 2023. As of September 2023, the unemployment rate was 6.3 percent, higher than the Illinois statewide rate of 4.9 percent for this same timeframe.

The following table presents the assessment area's median family income levels for 2021 and 2022, as updated by the FFIEC.

Median Family Income Ranges – Danville MSA (19180)				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
2021 ($59,300)	<$29,650	$29,650 to <$47,440	$47,440 to <$71,160	≥$71,160
2022 ($62,500)	<$31,250	$31,250 to <$50,000	$50,000 to <$75,000	≥$75,000
Source: FFIEC				

Competition

The assessment area has a moderate level of competition in the market for financial services. According to FDIC Deposit Market Share data as of June 30, 2023, 15 banks operated 23 offices in the assessment area. Longview Bank was not included in this data given that the bank did not maintain an office in the assessment area prior to the merger. However, Longview B&T ranked fifth with a deposit market share of 5.8 percent.

According to HMDA aggregate data, 117 lenders reported 1,214 home mortgage loans originated or purchased in 2022. Longview Bank is not included in the aggregate data given that the bank did not report HMDA data that year. However, Longview B&T ranked sixth among this group of lenders with a market share of 4.5 percent. Furthermore, according to 2021 CRA aggregate data, 12 lenders reported 137 small farm loans originated or purchased in the assessment area, and 61 lenders reported 851 small business loans originated or purchased.

Community Contact

Examiners reviewed a recent contact with a representative of a local government entity in the assessment area. The contact noted the rural nature of most of Vermilion County and observed that blight is a challenge facing communities in the assessment area. The contact stated that need exists for home improvement and rural development loans. However, noting the high poverty levels in the area, the contact stated that many residents may struggle to qualify for bank loans or otherwise do not have access to the financial system.

Credit Needs

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that home mortgage, small business, and small farm loans all represent credit needs in the assessment area. As noted by the community contact, need is especially pronounced among lower-income residents that may struggle to qualify for financing.

CONCLUSIONS ON PERFORMANCE CRITERIA IN DANVILLE, ILLINOIS MSA

LENDING TEST

Longview Bank demonstrated reasonable performance in the Danville MSA assessment area. Geographic Distribution and Borrower Profile performance support this conclusion.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Although small business lending performance was poor, reasonable home mortgage and small farm lending performance support the overall conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. As shown in the following table, the bank's performance in low-income tracts exceeded the demographic data in 2022. Lending in moderate-income was weaker, decreasing from three loans in 2021 to no loans in 2022.

Despite lagging the demographic data, HMDA aggregate data reflects the limited lending opportunities in this assessment area, particularly in moderate-income tracts. According to HMDA aggregate data, lenders originated only 4.1 percent of aggregate loans in moderate-income tracts in 2021, well below the demographic data and comparable to Longview Bank's performance. Additionally, aggregate lending in moderate-income tracts fell further in 2022, to only 3.2 percent of overall lending. Considering these limited lending opportunities, the bank's performance under this criterion is reasonable.

Geographic Distribution of Home Mortgage Loans Assessment Area: Danville MSA					
Tract Income Level	**% of Owner-Occupied Housing Units**	**#**	**%**	**$(000s)**	**%**
Low					
2021	2.8	1	1.1	70	0.7
2022	5.6	6	7.4	397	5.0
Moderate					
2021	11.4	3	3.2	330	3.3
2022	6.2	0	0.0	0	0.0
Middle					
2021	49.6	53	56.4	5,128	51.3
2022	54.4	55	67.9	4,350	54.5
Upper					
2021	36.2	37	39.4	4,472	44.7
2022	32.1	20	24.7	3,234	40.5
Not Available					
2021	0.0	0	0.0	0	0.0
2022	1.7	0	0.0	0	0.0
Totals					
2021	**100.0**	**94**	**100.0**	**10,000**	**100.0**
2022	**100.0**	**81**	**100.0**	**7,981**	**100.0**
Source: 2015 ACS, 2020 U.S. Census, Bank Data *Due to rounding, totals may not equal 100.0%*					

Small Farm Loans

The distribution of small farm loans reflects reasonable dispersion throughout the assessment area. As shown in the following table, the bank did not originate any small farm loans in low- or moderate-income tracts in 2022. However, the assessment area's low- and moderate-income tracts are concentrated in Danville, and according to D&B data, fewer than 20 farms are located in these tracts. Given the limited opportunities for small farm lending in low- and moderate-income tracts in this assessment area, the bank's performance is reasonable.

Geographic Distribution of Small Farm Loans Assessment Area: Danville MSA					
Tract Income Level	**% of Farms**	**#**	**%**	**$(000s)**	**%**
Low					
2022	1.4	0	0.0	0	0.0
Moderate					
2022	3.4	0	0.0	0	0.0
Middle					
2022	46.6	55	55.6	8,180	55.2
Upper					
2022	48.6	44	44.4	6,627	44.8
Not Available					
2022	0.0	0	0.0	0	0.0
Totals					
2022	**100.0**	**99**	**100.0**	**14,807**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

Small Business Loans

The distribution of small business loans reflects poor dispersion throughout the assessment area. As shown in the following table, the bank did not originate any small business loans in low- or moderate-income tracts in 2022, despite the presence of nearly one quarter of assessment area businesses in these tracts.

Geographic Distribution of Small Business Loans Assessment Area: Danville MSA					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Low					
2022	14.8	0	0.0	0	0.0
Moderate					
2022	10.1	0	0.0	0	0.0
Middle					
2022	47.1	35	68.6	3,127	49.2
Upper					
2022	25.3	16	31.4	3,226	50.8
Not Available					
2022	2.7	0	0.0	0	0.0
Totals					
2022	**100.0**	**51**	**100.0**	**6,353**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels, and farms and businesses of different sizes. Home mortgage and small farm lending performance primarily support this conclusion.

Home Mortgage Loans

The distribution of home mortgage borrowers reflects reasonable penetration among individuals of different income levels. As shown in the following table, lending to low-income borrowers significantly lagged the demographic data in both 2021 and 2022. However, as noted previously, this assessment area contains a relatively high percentage of families with incomes below the poverty line that are therefore unlikely to qualify for a traditional home mortgage loan. Lending to moderate-income borrowers was stronger, slightly below demographic data in 2021 and exceeding demographic data in 2022. As such, the bank's lending distribution reflects reasonable performance.

Distribution of Home Mortgage Loans by Borrower Income Level Assessment Area: Danville MSA					
Borrower Income Level	**% of Families**	**#**	**%**	**$(000s)**	**%**
Low					
2021	21.7	4	4.3	144	1.4
2022	22.7	2	2.5	206	2.6
Moderate					
2021	16.8	14	14.9	702	7.0
2022	18.4	18	22.2	1,114	14.0
Middle					
2021	20.7	18	19.1	1,612	16.1
2022	18.5	16	19.8	1,239	15.5
Upper					
2021	40.8	53	56.4	6,451	64.5
2022	40.4	26	32.1	3,549	44.5
Not Available					
2021	0.0	5	5.3	1,091	10.9
2022	0.0	19	23.5	1,873	23.5
Totals					
2021	**100.0**	**94**	**100.0**	**10,000**	**100.0**
2022	**100.0**	**81**	**100.0**	**7,981**	**100.0**
Source: 2015 ACS, 2020 U.S. Census, Bank Data *Due to rounding, totals may not equal 100.0%*					

Small Farm Loans

The distribution of small farm loans reflects reasonable penetration among farms of different sizes. As shown in the following table, lending to farms with revenues of $1 million or less lagged the demographic data in 2022. However, with more than three quarters of loans by number originated to farms in this revenue category, the lending distribution reflects the bank's willingness to lend to farms of all sizes and supports reasonable performance.

Distribution of Small Farm Loans by Gross Annual Revenue Category Assessment Area: Danville MSA					
Gross Revenue Level	**% of Farms**	**#**	**%**	**$(000s)**	**%**
≤$1,000,000					
2022	97.7	10	76.9	756	49.0
>$1,000,000					
2022	1.4	3	23.1	787	51.0
Revenue Not Available					
2022	0.9	0	0.0	0	0.0
Totals					
2022	**100.0**	**13**	**100.0**	**1,543**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

Small Business Loans

The distribution of small business loans reflects excellent penetration among businesses of different sizes. As shown in the following table, all of the bank's small business loan originations in 2022 were to businesses with revenues of $1 million or less.

Distribution of Small Business Loans by Gross Annual Revenue Category Assessment Area: Danville MSA					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
≤$1,000,000					
2022	79.7	16	100.0	910	100.0
>$1,000,000					
2022	4.7	0	0.0	0	0.0
Revenue Not Available					
2022	15.6	0	0.0	0	0.0
Totals					
2022	**100.0**	**16**	**100.0**	**910**	**100.0**
Source: 2022 D&B Data, Bank Data *Due to rounding, totals may not equal 100.0%*					

APPENDICES

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 institution'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).

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 institution 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.

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.

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.

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.

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 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.

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.