



**CRA**

**PUBLIC FILE**

**COMMUNITY REINVESTMENT POLICY**  
The Clay City Banking Company

Clay City Bank Shares, Inc., is a one-bank holding company for The Clay City Banking Company, main office is located at 331 S Main Street, PO Box 465 in Clay City, Clay County, Illinois. The Flora Banking Company, a branch of The Clay City Banking Company, is located at 207 Gary Hagen Drive, PO Box 98 in Flora, Clay County, Illinois. The Flora Branch opened in December of 2001. The Louisville Banking Company, a branch of The Clay City Banking Company, is located at 225 Rt 45 N in Louisville, Clay County, Illinois. The Louisville Branch opened March 3, 2010. The Fairfield Banking Company, a branch of The Clay City Banking Company, is located at 915 Commerce Dr in Fairfield, Wayne County, Illinois. The Fairfield Banking Company opened in May 2011.

The boundary of The Clay City Banking Company's assessment area is defined as Clay County and Wayne County, Illinois. Clay County includes the towns of Clay City, Flora, Xenia, Louisville, and Sailor Springs, and several other small towns and villages. Wayne County includes Fairfield, Cisne, Geff, Mt. Erie, Johnsonville, Wayne City, and several other small unincorporated villages. Approximately 90% of our lending activity originates in these two counties. Credit is extended from time to time in surrounding counties, to other areas of the state, and the nation due to the fact that the borrower has a current or past satisfactory banking relationship with our institution.

The credit The Clay City Banking Company offers must meet our lending requirements, meet safety and soundness requirements of the Federal and State Banking Regulators, and meet or exceed the standards according to The Clay City Banking Company's Loan Policy.

The types of credit we can extend include:

- A) Real Estate Loans
  - 1) Residential 1-4 family
  - 2) Business (residential rentals, retail, etc.)
  - 3) Home Improvement
  - 4) Secondary Market 1-4 family Residential (Conventional, RD, VA)
  - 5) Farm related loans (FSA, FDA, interest assist, etc.)
  - 6) Multi-Family Residential
- B) Commercial and Industrial loans (including FSA, FDA, SBA regular and LowDoc programs)
- C) Loans for Agricultural purpose other than Real Estate
- D) All types of Consumer loans – Including low dollar loans. (excluding any private education loans).

YOU SHOULD KNOW THAT:

- 1) You may send signed, written comments about our CRA Statements or The Clay City Banking Company's performance in helping to meet the needs of our community to:

The Clay City Banking Company  
Attn: President  
P.O. Box 465  
Clay City, IL 62824

And/or to: Regional Director of the FDIC  
500 West Monroe, Suite 3300  
Chicago, IL 60661

Your comment letter, together with any responses made by the Clay City Banking Company, may be made public.

- 2) You may look at the Comment File of all signed, written comments received by us within the last two years, any responses we have made to the comments, and all CRA Statements in effect during the past two years. This Comment File will be available in the main office of The Clay City Banking Co., located at 331 S. Main Street, Clay City, Illinois. [Comments that reflect adversely upon the good name or reputation of any person will not be made public.]
- 3) Effective April 1, 2024 all information required to be available to the public will be posted on the bank's website [www.claycitybanking.bank](http://www.claycitybanking.bank).
- 4) The Clay City Banking Company has long had a reputation of being committed to the people in the Village of Clay City, the city of Flora, the Village of Louisville, the City of Fairfield, and the surrounding communities.
- 5) The Clay City Banking Company has historically been a "people" institution, not focusing primarily on "numbers" or "dollars". The economy in our area is dominated by agriculture and energy production. During inevitable downturns in the economy, the Bank has always strived to work with our customers and their problems associated with economic hardship and recession. The Bank also accommodates not-for-profit organizations by extending the credit for organizations to benefit the specific groups such as church, education, civic, local government, and health fields.
- 6) The Clay City Banking Company strives to provide as many customer conveniences as possible, some of which are listed below:

A) Hours of Operation

Clay City, Flora, Louisville, and Fairfield Locations:

Lobby	
Monday thru Thursday	8:30 AM to 4:00 PM
Friday	8:30 AM to 5:00 PM
Saturday	8:30 AM to Noon

Drive through:	
Monday thru Thursday	8:00 AM to 5:00 PM
Friday (Drive-up)	8:00 AM to 6:00 PM
Saturday	8:00 AM to Noon

Walk Up –window- (Clay City location only)	
Monday thru Thursday	8:00 AM to 8:30 AM
And	4:00 PM to 5:00 PM
Friday and Saturday	8:00 AM to 8:30 AM

**(Special Holiday hours, and Holiday closings are published in the local newspaper and are posted in the lobby of the Bank)**

B) Check Cashing

With adequate identification, Federal and State government checks will be cashed

C) No Service Charge Checking

The Bank offers regular checking accounts with no service charge with the customer purchasing their own checks. The Bank supplies the customer with Image Statements. The actual checks are not returned to the customer.

D) Service Charges

The Clay City Banking Company policy for service charges is generally conservative. Our fees and services are listed in our “Banking Products Guide” a copy of which is attached.

E) ATMS

The Clay City Banking Company has an ATM at the main location in Clay City and all three branch locations.

#### F) Internet Banking and Mobile Banking

The Clay City Banking Company offers internet banking as well as a web site both available to customers for added banking convenience. Bill Pay, Mobile Banking, and Person to Person (SPIN) payment have recently been implemented for additional customer convenience.

In conclusion, The Clay City Banking Company has and always will strive to meet the financial needs on a nondiscriminatory basis of individuals, businesses and organizations in our community. We will also promote the area economically, educationally and personally so that the Village of Clay City, the City of Flora, the Village of Louisville, and the City of Fairfield, and the surrounding areas will continue to be viable communities for years to come.

Listed below is the quarterly Loan to Deposit ratios for the years 2012 and forward:

March 2012	78%
June 2012	83%
September 2012	82%
December 2012	70%

March 2013	75%
June 2013	84%
September 2013	84%
December 2013	89%

March 2014	81%
June 2014	85%
September 2014	82%
December 2014	82%

March 2015	76%
June 2015	87%
September 2015	85%
December 2015	91%

March 2016	88%
June 2016	90%
September 2016	88%
December 2016	88%

March 2017	89%
June 2017	86%
September 2017	88%
December 2017	90%

March 2018	89%
June 2018	90%
September 2018	92%
December 2018	91%

March 2019	86%
June 2019	88%
September 2019	84%
December 2019	85%

March 2020	81%
June 2020	81%
September 2020	82%
December 2020	86%

March 2021	75%
June 2021	74%
September 2021	73%
December 2021	76%

March 2022	66%
June 2022	70%
September 2022	73%
December 2022	79%

March 2023	71%
June 2023	75%
September 2023	78%
December 2023	78%

Approved by the Board of Directors  
March 15, 2024

## COMMUNITY REINVESTMENT ACT

### Distribution of Branches

**Rev. 3.29.24**

The Clay City Banking Co. has 4 full-service facilities, three within Clay County and one in Wayne County. The Clay City, Flora and Fairfield locations are within middle-income areas, with the Louisville location being in a moderate-income area.

<b>Branch Address</b>	<b>Drive Up Facility</b>	<b>ATM's</b>	<b>Census Tracts</b>
<b>Main Bank: The Clay City Banking Co. 331 S Main St Clay City IL 62824</b>	<b>YES</b>	<b>YES</b>	<b>9722.00 Middle</b>
<b>Flora Branch The Flora Banking Co. 207 Gary Hagen Dr Flora, IL 62839</b>	<b>YES</b>	<b>YES</b>	<b>9721.00 Moderate</b>
<b>Louisville Branch The Louisville Banking Co. 225 Rt 45 N Louisville, IL 62858</b>	<b>YES</b>	<b>YES</b>	<b>9720.00 Middle</b>
<b>Fairfield Branch The Fairfield Banking Co. 915 Commerce Dr Fairfield, IL 62837</b>	<b>YES</b>	<b>YES</b>	<b>9552.00 Middle</b>

### Branch Opening/Closing Record

full-service facilities – in Louisville and in Fairfield and both locations include drive-ups. .

<b>The Louisville Banking Co. 225 Rt 45 N Louisville, IL 62858</b>	<b>Opened</b>	<b>March 3, 2010</b>	<b>Tract 9720.00</b>
<b>The Fairfield Banking Co.</b>	<b>Opened</b>	<b>February 21, 2012</b>	<b>Tract 9552.00</b>

915 Commerce Dr  
Fairfield, IL 62837

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## **Loan Production Office**

**\*\*\*A new Loan Office was established at 1103 W Delaware St in Fairfield, IL 62837 in May 2011. The Loan Office was open from May 2011 until it's closing on February, 17, 2012. Then the new Fairfield Banking Co Branch facility opened at the new location (temporary mobile unit) listed above on February 21, 2012. The Fairfield Banking Co. Branch moved into the permanent building (same site/address) as of January, 2015.**

## **Available Loan and Deposit Products (refer to “Banking Products Guide” for a complete list of products and services offered).**

Residential Mortgage loans for 1-4 family  
Home Equity Loans  
Automobile Loans  
Consumer Loans (small dollar loans) (Excluding any private education loans).  
Business Loans (residential rentals, retail, Secondary market, etc.)  
Home improvement Loans  
Secondary Market Residential Mortgage Loans (Conventional, RD, FHA, VA)  
Farm Related Loans (FSA, FDA, Young Farmers)  
Multi-Family Residential Loans  
Commercial and Industrial Loans (FSA, IFDA, SBA)  
Agriculture Loans (FSA, FDA)  
Checking Accounts (Regular, Checking Plus, Hometown Rewards with Interest, Hometown Rewards with Cash Back, Founders)  
Savings Accounts (Regular Savings, Hometown Saver, HSA – Health Savings Accounts  
MMDA Accounts (Money Market and Hometown Money Market)  
Christmas Club Accounts  
Certificates of Deposit (IRA's)

## **The Clay City Banking Company offers the capability to perform banking functions through various delivery systems:**

\*\*Our deposit operations department is available - 50 hours a week- (same as the drive-up hours).

\*\* CCBC offers direct deposit payroll services as a “stress reliever” to small businesses.

\*\* CCBC offers its own check printing services – for quick turn around and a savings to the customer.

\*\* 24 hour night drops at all four facilities for after-hour transactions and bank-by-mail.



- \*\* No service charge checking.
- \*\* Same day ACH services
- \*\* Internet Banking for 24/7 account access/transfers.
- \*\* On-line Bill Pay services.
- \*\* Mobile Banking
- \*\* Remote Deposit Capture
- \*\* Mobile Wallet
- \*\* Person to Person P2P
- \*\* Card at Once

## **Hours of Operation:**

Clay City/Flora/Louisville/Fairfield Location hours:

Lobby:

Monday thru Thursday	8:30 AM to 4:00 PM
Friday	8:30 AM to 5:00 PM
Saturday	8:30 AM to Noon

Drive through:

Monday thru Thursday	8:00 AM to 5:00 PM
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Walk Up- window- (Clay City location only)

Monday thru Thursday	8:00 AM to 8:30 AM
And	4:00 PM to 5:00 PM
Friday and Saturday	8:00 AM to 8:30 AM

(Special holiday hours, and holiday closings are published in the local newspapers and are posted in the lobby of the Banks).

# **PUBLIC DISCLOSURE**

June 21, 2021

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The Clay City Banking Co.  
Certificate Number: 10845

331 South Main Street  
Clay City, Illinois 62824

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

300 South Riverside Plaza, Suite 1700  
Chicago, Illinois 60606

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION RATING

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

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

The Clay City Banking Company's Community Reinvestment Act (CRA) performance under the lending test supports the overall rating. The following factors support the institution's rating:

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

## DESCRIPTION OF INSTITUTION

### **Background**

Clay City Banking Company (CCBC) is headquartered in Clay City, Illinois, and operates primarily in the rural southeastern portion of the state. The bank is wholly-owned by a one-bank holding company, Clay City Bank Shares, Inc., which is also located in Clay City. CCBC received a Satisfactory CRA rating at its previous FDIC Performance Evaluation, dated March 16, 2015, based on Interagency Small Institution Examination Procedures.

### **Operations**

CCBC operates four full-service offices in southeastern Illinois. Along with the main office, the bank operates locations in Flora, Louisville, and Fairfield. The bank primarily offers home mortgage, commercial, and agricultural loans, along with other loan types including consumer installment and single-payment loans. The bank offers traditional deposit services which include regular checking, savings, negotiable orders of withdrawal, money market deposit accounts, and certificates of deposit. Alternative banking services include online banking and bill pay, mobile banking, and mobile check deposit.

**Ability and Capacity**

Bank assets totaled approximately \$187.5 million as of March 31, 2021, and included total loans of \$124.6 million and total securities of \$28.6 million. There are no significant changes to the loan portfolio composition, and the bank continues to focus on residential, commercial, and farm lending. The loan portfolio is illustrated below.

<b>Loan Portfolio Distribution as of 03/31/2021</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	3,782	3.0
Secured by Farmland	17,452	14.0
Secured by 1-4 Family Residential Properties	43,327	34.8
Secured by Multifamily (5 or more) Residential Properties	271	0.2
Secured by Nonfarm Nonresidential Properties	23,285	18.7
<b>Total Real Estate Loans</b>	<b>88,117</b>	<b>70.7</b>
Commercial and Industrial Loans	15,619	12.5
Agricultural Production and Other Loans to Farmers	14,876	11.9
Consumer Loans	3,892	3.1
Obligations of State and Political Subdivisions in the U.S.	2,119	1.7
Other Loans	0	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
<b>Total Loans</b>	<b>124,623</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

There are no financial, legal, or other impediments that would limit the institution’s ability to meet the credit needs of its assessment area.

**DESCRIPTION OF ASSESSMENT AREA**

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. CCBC designated one assessment area consisting of the nine census tracts comprising Clay and Wayne Counties, which is not considered part of a metropolitan statistical area (MSA), and is therefore considered part of the Illinois Non-Metropolitan area (IL Non-MSA). The assessment area is in conformance with CRA requirements and does not arbitrarily exclude low- and moderate-income geographies.

**Economic and Demographic Data**

The assessment area includes Clay and Wayne Counties in rural southeastern Illinois. According to the 2015 American Community Survey (ACS), the nine census tracts in these two counties includes one moderate-income census tract and eight middle-income census tracts. The sole moderate-income tract is mostly comprised of the City of Flora. The bank’s Flora branch location is located in the moderate-income tract. The following table illustrates select demographic characteristics of the Illinois Non-MSA assessment area. Demographic information is based on the 2015 ACS and 2020 D&B data.

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Clay &amp; Wayne County</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	9	0.0	11.1	88.9	0.0	0.0
Population by Geography	30,137	0.0	17.7	82.3	0.0	0.0
Housing Units by Geography	14,285	0.0	17.3	82.7	0.0	0.0
Owner-Occupied Units by Geography	10,044	0.0	14.6	85.4	0.0	0.0
Occupied Rental Units by Geography	2,524	0.0	26.3	73.7	0.0	0.0
Vacant Units by Geography	1,717	0.0	20.0	80.0	0.0	0.0
Businesses by Geography	1,610	0.0	23.4	76.6	0.0	0.0
Farms by Geography	204	0.0	3.4	96.6	0.0	0.0
Family Distribution by Income Level	8,688	22.7	19.5	22.9	35.0	0.0
Household Distribution by Income Level	12,568	23.8	17.4	20.2	38.5	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$75,868
			Median Gross Rent			\$539
			Families Below Poverty Level			11.2%
<i>Source: 2015 ACS and 2020 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The FFIEC-updated median family income levels are used to analyze home mortgage loans under the borrower profile criterion. The low-, moderate-, middle-, and upper-income categories are presented in the following table.

<b>Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>IL NA Median Family Income (99999)</b>				
2020 (\$65,800)	<\$32,900	\$32,900 to <\$52,640	\$52,640 to <\$78,960	≥\$78,960
<i>Source: FFIEC</i>				

The analysis of small business and small farm loans under the borrower profile criterion compares the distribution of loans to the distribution of businesses and farms by revenue category. According to 2020 D&B data, the assessment area contained 1,610 businesses. Gross annual revenues (GARs) for these businesses are below:

- 78.2 percent have GARs of \$1 million or less,
- 4.6 percent have GARs over \$1 million, and
- 17.2 percent have unknown GARs.

The assessment area also contains 204 farms. GARs for these farms are as follows:

- 96.0 percent have GARs of \$1 million or less,
- 2.0 percent have GARs over \$1 million, and
- 2.0 percent have unknown GARs.

Among all farm and non-farm businesses, service industries represent the largest portion of businesses (32.2 percent), followed by non-classifiable establishments (14.7 percent), retail trade (13.2 percent), and agriculture (11.3 percent). In addition, 87.9 percent of assessment area businesses have nine or fewer employees, and 84.7 percent operate from a single location.

Data obtained from the U.S. Bureau of Labor and Statistics indicates that the unemployment rate in both Clay and Wayne Counties as of April 2021 was lower than the rate for the State of Illinois and United States for the same month. These rates reflect a significant decrease in unemployment since April 2020, the peak of unemployment due to the coronavirus pandemic in which the two counties were higher than the state and national averages.

Unemployment Rates		
County or Area	April 2020	April 2021
	%	%
Clay County	22.6	5.7
Wayne County	20.3	5.2
State of Illinois	16.3	7.1
National Average	14.7	6.1
<i>Source: Bureau of Labor Statistics</i>		

**Competition**

The assessment area is moderately competitive in the market for financial services. According to the FDIC Deposit Market Share as of June 30, 2020, there were 11 financial institutions operating 17 full-service branches within this assessment area. Of these institutions, CCBC ranked second with an 18.2 percent deposit market share.

While the assessment area may not be particularly competitive for deposits, it is highly competitive for home mortgage loans. CCBC is not required to collect or report loan data pursuant to the requirements of the Home Mortgage Disclosure Act (HMDA). However, aggregate HMDA data shows that 69 lenders who do report data originated 299 home mortgage loans in the assessment area in 2019. Based on the bank’s loan information compared to aggregate data, it appears that CCBC is a very active home mortgage lender in the assessment area.

The bank is not required to collect or report its small business or small farm loan data, and it has not elected to do so. Therefore, the analysis of small business and small farm loans does not include comparisons against aggregate data. However, the aggregate data reflects the level of demand for small business and small farm loans and is therefore included here for reference. Aggregate data for 2018 shows that 26 institutions reported 235 small business loans and 13 institutions reported 85 small farm loans in the assessment area. Considering the demographics of the assessment area, these levels of lending reflect a moderate degree of competition for these products.

### **Community Contacts**

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

One community contact was made with a representative of a real-estate sales agency in the assessment area. The contact mentioned that most people stay local for employment, however some commute to higher paying jobs in local towns. However, some people have left the area because of economic conditions. Many who seek higher education do not return to live in the area. The contact stated there is currently a shortage of workers. The contact identified home mortgage lending, especially to new home developments, as a prevalent need in this assessment area. They also stated that there is a moderate degree of competition between local financial institutions. Overall, the contact felt that local financial institutions are responsive to credit and community development needs in the area.

### **Credit Needs**

Considering information from the community contacts, bank management, and demographic and economic data, examiners determined that home mortgage, small business, and small farm loans represent the primary credit needs for this assessment area. Opportunities exist for originating such loans throughout the assessment area.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from CCBC's prior performance evaluation dated March 16, 2015 to the current evaluation date. This CRA evaluation used the Interagency Small Institution Examination Procedures to evaluate the bank's performance. These procedures focus on the bank's lending according to the following criteria under the Lending Test:

- LTD ratio,
- Assessment Area Concentration,
- Borrower Profile,
- Geographic Distribution, and
- Response to CRA-related complaints.

### **Activities Reviewed**

Bank records and management discussion revealed that the bank's major product lines are home mortgage, small business, and small farm loans. These conclusions considered the bank's business strategy and the number and dollar volume of loans originated during the evaluation period, specifically focusing on 2020 as a representative year.

Examiners evaluated the bank's performance using home mortgage, small business, and small farm loan data from January 1, 2020, to December 31, 2020. Based on the bank's loan portfolio composition and originations during the review period, the bank's record of originating each loan



type was given equal weight in the overall conclusions. Furthermore, no other loan types, such as consumer loans, represent a major product or provide material support for the conclusions or rating.

For this evaluation, examiners reviewed the universe of 2020 loan originations for each loan type. While all loans were reviewed for the Assessment Area Concentration criterion, only those inside the assessment area were analyzed for the geographic and borrower distributions. All assessment area loans were considered for the Geographic Distribution analysis, and examiners reviewed a sample of home mortgage, small business, and small farm loans for the Borrower Profile portion of this review. This sample is considered indicative of the bank's overall lending performance.

As of March 31, 2021, residential home mortgage loans represented the largest portion of the bank's total loan portfolio by dollar volume at 35.0 percent. For this evaluation, examiners reviewed all 206 home mortgage loans originated in 2020 totaling approximately \$18.4 million. For the Borrower Profile analysis, examiners reviewed a sample of 55 home mortgage loans totaling \$4.6 million.

As of March 31, 2021, commercial lending represented 31.0 percent of the bank's loan portfolio by dollar volume, and farm lending represented 26.0 percent. Examiners reviewed all outstanding small business and small farm loans originated or renewed in 2020. In 2020, CCBC originated 245 small business loans totaling \$17.6 million. The sample reviewed for the Borrower Profile analysis includes 55 small business loans totaling \$3.3 million. Finally, the bank originated 131 small farm loans totaling \$16.9 million in 2020, and examiners sampled 55 small farm loans totaling \$6.7 million for the Borrower Profile review.

The 2015 ACS data provides a standard of comparison for the bank's home mortgage lending, while 2020 D&B data provides a standard of comparison for small farm and small business lending.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

CCBC demonstrated reasonable performance under the Lending Test. Reasonable Geographic Distribution and reasonable Borrower Profile performance primarily supports this conclusion.

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

The LTD ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs. The LTD ratio, calculated from Call Report data, averaged 85.6 percent over the past 25 calendar quarters from March 31, 2015, to March 31, 2021. The ratio reached a high of 91.6 percent as of September 30, 2018, and has steadily declined to a low of 74.1 percent as of March 31, 2021. A similar declining trend was noted in both similarly-situated banks reviewed. An increase in consumer deposits in 2020 contributed to the bank's decrease in LTD ratio.

Examiners evaluated CCBC's LTD ratio by comparing it to similarly-situated banks. Examiners selected these comparator banks based on asset size, geographic location, and lending focus. Both are headquartered and operate in Clay and Wayne Counties and have a similar lending focus in commercial and residential loans. As shown in the following table, CCBC's ratio was above that of

both comparator banks. Furthermore, the bank does sell a number of its home mortgage loans on the secondary market. In the past two years, CCBC originated and sold over 35 home mortgage loans totaling nearly \$5.1 million, and this lending activity is not captured in the LTD ratio. Considering these factors, CCBC’s LTD ratio is more than reasonable and as such, reflects a strong willingness to lend.

<b>Loan-to-Deposit (LTD) Ratio Comparison</b>		
<b>Bank</b>	<b>Total Assets as of 03/31/2021 (\$000s)</b>	<b>Average Net LTD Ratio (%)</b>
<b>Clay City Banking Company</b>	<b>187,485</b>	<b>85.6</b>
Similarly-Situated Institution #1	96,112	71.3
Similarly-Situated Institution #2	107,059	70.6
<i>Source: Reports of Condition and Income 03/31/2015 – 03/31/2021</i>		

**Assessment Area Concentration**

A substantial majority of the bank’s loans in 2020 by number and dollar volume for each of the three products reviewed were made within the delineated assessment area. The following table shows the bank’s concentration of loans inside and outside of the assessment area.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage	175	85.0	31	15.0	206	15,160	82.6	3,192	17.4	18,352
Small Business	217	88.6	28	11.4	245	15,120	85.7	2,530	14.3	17,650
Small Farm	122	93.1	9	6.9	131	15,998	94.8	882	5.2	16,880
<b>Total</b>	<b>514</b>	<b>88.3</b>	<b>68</b>	<b>11.7</b>	<b>582</b>	<b>46,278</b>	<b>87.5</b>	<b>6,604</b>	<b>12.5</b>	<b>52,882</b>
<i>Source: Evaluation Period: 1/1/2020-12/31/2020. Bank Data</i>										

**Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion of home mortgage, small business, and small farm loans throughout the assessment area. This assessment is supported by excellent performance for small farm lending and reasonable performance for home mortgage and small business lending.

**Home Mortgage Loans**

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. Examiners compared the bank’s performance to the percentage of owner-occupied housing units by tract income category.

In 2020, CCBC originated 13.7 percent of its home mortgage loans in the sole moderate-income tract, which is comparable to the 14.6 percent of owner-occupied housing units within the tract. Considering the bank’s performance along with the fact that they are a significant lender in the assessment area,

performance is considered reasonable. The following table reflects the geographic distribution of home mortgage loans within the assessment area.

<b>Geographic Distribution of Home Mortgage Loans</b>					
<b>Assessment Area: Clay &amp; Wayne County</b>					
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate					
2020	14.6	24	13.7	1,346	8.9
Middle					
2020	85.4	151	86.3	13,814	91.1
<b>Totals</b>					
<b>2020</b>	<b>100.0</b>	<b>175</b>	<b>100.0</b>	<b>15,160</b>	<b>100.0</b>
<i>Source: 2015 ACS; Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

***Small Business Loans***

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. Examiners compared the bank’s small business lending to the distribution of businesses by tract income level throughout the assessment area.

CCBC originated 23.0 percent of its small business loans in the sole moderate-income tract, which is comparable to the 23.4 percent of businesses that operate there. The following table reflects the geographic distribution of small business loans within the assessment area.

<b>Geographic Distribution of Small Business Loans</b>					
<b>Assessment Area: Clay &amp; Wayne County</b>					
<b>Tract Income Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate					
2020	23.4	50	23.0	3,164	20.9
Middle					
2020	76.6	167	77.0	11,956	79.1
<b>Totals</b>					
<b>2020</b>	<b>100.0</b>	<b>217</b>	<b>100.0</b>	<b>15,120</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

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

The geographic distribution of small farm loans reflects excellent dispersion throughout the assessment area. Examiners compared the bank’s small farm lending to the distribution of farms located within the assessment area by tract income level.

As shown in the following table, the bank originated 10.7 percent, by number, of its small farm loans in the sole moderate-income tract within the assessment area in 2020. This is more than three times the percentage of farms within the assessment area located within this tract and represents excellent performance.

<b>Geographic Distribution of Small Farm Loans</b>					
<b>Assessment Area: Clay &amp; Wayne County</b>					
<b>Tract Income Level</b>	<b>% of Farms</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate					
2020	3.4	13	10.7	2,217	13.9
Middle					
2020	96.6	109	89.3	13,781	86.1
<b>Totals</b>					
<b>2020</b>	<b>100.0</b>	<b>122</b>	<b>100.0</b>	<b>15,998</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

### **Borrower Profile**

The distribution of loans to borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses and farms of different sizes.

### ***Home Mortgage Loans***

The distribution of home mortgage loans to individuals of different income levels, including low- and moderate-income borrowers, is reasonable. Examiners compared the bank’s performance to demographic data.

The following table shows the percentage of low-income borrowers (demographic) in this assessment area was 22.7 percent. Notably, 11.2 percent of the assessment area’s families had incomes below the poverty level. These families typically do not possess the financial means to qualify for or afford a traditional home mortgage loan due to financial constraints. As a result, comparing the bank’s performance to an adjusted 11.5 percent of families is more indicative of its lending performance. In 2020, CCBC originated 18.2 percent of its home mortgage loans to low-income borrowers. Although this is slightly below the demographic, it is above the 11.5 percent of low-income families reasonably expected to be able to afford a home mortgage loan. Additionally, the bank’s percentage of home mortgage loans to moderate-income families is comparable to the percentage of moderate-income families in the assessment area. Overall, this represents reasonable performance.

<b>Distribution of Home Mortgage Loans by Borrower Income Level</b>					
<b>Assessment Area: Clay &amp; Wayne County</b>					
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low					
2020	22.7	10	18.2	356	7.7
Moderate					
2020	19.5	11	20.0	665	14.3
Middle					
2020	22.9	14	25.5	1,113	24.0
Upper					
2020	35.0	20	36.4	2,501	54.0
<b>Totals</b>					
<b>2020</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>4,635</b>	<b>100.0</b>
<i>Source: 2015 ACS; Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

### ***Small Business Loans***

The distribution of small business loans reflects reasonable penetration of loans to businesses of different sizes. As shown in the following table, CCBC originated 85.5 percent of its small business loans in this assessment area to businesses with GARs of \$1 million or less, which is comparable to the percentage of businesses in the assessment area (78.2 percent). This demonstrates a willingness to lend to businesses of all sizes; therefore, performance is reasonable.

<b>Distribution of Small Business Loans by Gross Annual Revenue Category</b>					
<b>Assessment Area: Clay &amp; Wayne County</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000					
2020	78.2	47	85.5	2,175	65.1
>1,000,000					
2020	4.6	6	10.9	1,092	32.7
Revenue Not Available					
2020	17.2	2	3.6	73	2.2
<b>Totals</b>					
<b>2020</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>3,340</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

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

The distribution of small farm loans reflects reasonable penetration of loans to farms of different sizes. As shown in the following table, in 2020, the bank originated over 85.0 percent of its small

farm loans to farms with GARs of \$1 million or less. While these levels are below the percentage of farms in the assessment area with GARs of \$1 million or less, the demographic data reflects all farms and does not necessarily reflect the percentage of these farms that are actually seeking financing. Overall, the bank’s small farm lending demonstrates a willingness to lend to farms of all sizes and reflects reasonable performance.

<b>Distribution of Small Farm Loans by Gross Annual Revenue Category</b>					
<b>Assessment Area: Clay &amp; Wayne County</b>					
<b>Gross Revenue Level</b>	<b>% of Farms</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000					
2020	96.1	47	85.5	5,502	81.6
>1,000,000					
2020	2.0	8	14.5	1,242	18.4
Revenue Not Available					
2020	2.0	--	--	--	--
<b>Totals</b>					
<b>2020</b>	<b>100.0</b>	<b>55</b>	<b>100.0</b>	<b>6,744</b>	<b>100.0</b>
<i>Source: 2020 D&amp;B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

**Response to Complaints**

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

**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 evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution’s overall CRA rating.

## 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 bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

## GLOSSARY

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

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

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

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

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

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

**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.



# The Clay City Banking Co

331 S Main St., PO Box 465  
Clay City IL 62824  
Phone 618-676-1511

Branch Locations:  
The Flora Banking Company 618-662-8000  
The Louisville Banking Company 618-665-4611  
The Fairfield Banking Company 618-842-5130

<b>Fee Schedule effective June 1, 2023</b>	
Account Printout	\$2.00
Balance Inquiry	No Charge
Statement Reprint (per month, no images)	\$2.00
Statement Reprint (per month, with images)	\$3.00
Research Fee (per hour, 1 hour min.)	\$15.00
Checkbook Balancing (per hour, 1 hour min.)	\$15.00
Automatic Transfer (\$100 increments)	\$10.00 one time setup fee
Fax Fee (per page)	\$1.00
Photocopy Fee (per page)	\$0.25
Notary Service (non customer)	\$5.00
Non Customer Check Cashing	\$10.00 or 1% (whichever is higher)
Stop Payment	\$35.00
Return Item Charge (daily return item fee limit is \$150.00)	\$30.00
Overdraft Charge (daily overdraft fee limit is \$150.00)	\$30.00
Dormant Account Fee (annually)	\$10.00
Levies & Garnishments	\$50.00
Check Printing	Price Varies
Counter Checks (per check)	\$0.50
Cashier's Check	\$5.00
Money Order (per \$100)	\$1.00
<b>ATM</b>	
- Foreign Transaction Fee (non-customer)	\$5.00
- Foreign ATM Usage Fee (customer uses CCBC debit card at an ATM we do not own or operate)	\$2.00
- Replacement Card	\$10.00
Bill Pay (will be disabled if not used every 4 months)	No Charge
Lock Box	Price Varies
- Lost Key	\$25.00
- Drilling	\$100.00
<b>Wire Transfers</b>	
- Domestic Incoming	\$25.00
- Domestic Outgoing	\$35.00
- International Incoming	\$45.00
- International Outgoing	\$55.00

## SUMMARY OF ANNUAL CRA CUSTOMER COMPLAINTS

<b><u>1/28/2010</u></b>	No CRA customer complaints were recorded for 2009. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>2/1/2011</u></b>	No CRA customer complaints were recorded for 2010. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>2/8/2012</u></b>	No CRA customer complaints were recorded for 2011. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>2/9/2013</u></b>	No CRA customer complaints were recorded for 2012. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>2/1/2014</u></b>	No CRA customer complaints were recorded for 2013. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>2/13/2015</u></b>	No CRA customer complaints were recorded for 2014. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>2/23/2016</u></b>	No CRA customer complaints were recorded for 2015. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>2/25/2017</u></b>	No CRA customer complaints were recorded for 2016. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>3/21/2018</u></b>	No CRA customer complaints were recorded for 2017. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>4/1/2019</u></b>	No CRA customer complaints were recorded for 2018. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>3/16/2020</u></b>	No CRA customer complaints were recorded for 2019. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>3/15/2021</u></b>	No CRA customer complaints were recorded for 2020. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>3/18/2022</u></b>	No CRA customer complaints were recorded for 2021. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>1/31/2023</u></b>	No CRA customer complaints were recorded for 2022. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.
<b><u>1/30/2024</u></b>	No CRA customer complaints were recorded for 2023. These are monitored by the Compliance Officer and sent to the Board with the quarterly and periodic reviews.

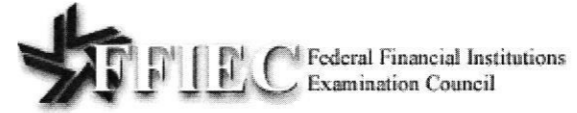
\*Complaints are monitored by the Compliance Officer to determine if they are indicative of a weakness in a particular function or department. A Primary Contact has been appointed for each area of the Bank.

The CRA Officer is the designated Primary Contact for CRA complaints.

2023 FFIEC Census Report - Summary Census Demographic Information

State: 17 - ILLINOIS (IL)

County: 025 - CLAY COUNTY

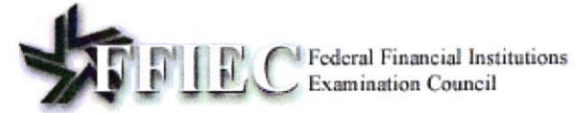


State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
17	025	9719.00	Middle	No	82.57	\$82,300	\$67,955	\$56,944	2376	4.59	109	879	1157
17	025	9720.00	Middle	No	89.82	\$82,300	\$73,922	\$61,944	2829	4.84	137	932	1331
17	025	9721.00	Middle	No	90.18	\$82,300	\$74,218	\$62,188	5155	7.90	407	1323	2181
17	025	9722.00	Middle	No	114.60	\$82,300	\$94,316	\$79,028	2928	5.26	154	1030	1528
17	025	9999.99	Middle	No	92.54	\$82,300	\$76,160	\$63,819	13288	6.07	807	4164	6197

2023 FFIEC Census Report - Summary Census Demographic Information

State: 17 - ILLINOIS (IL)

County: 191 - WAYNE COUNTY

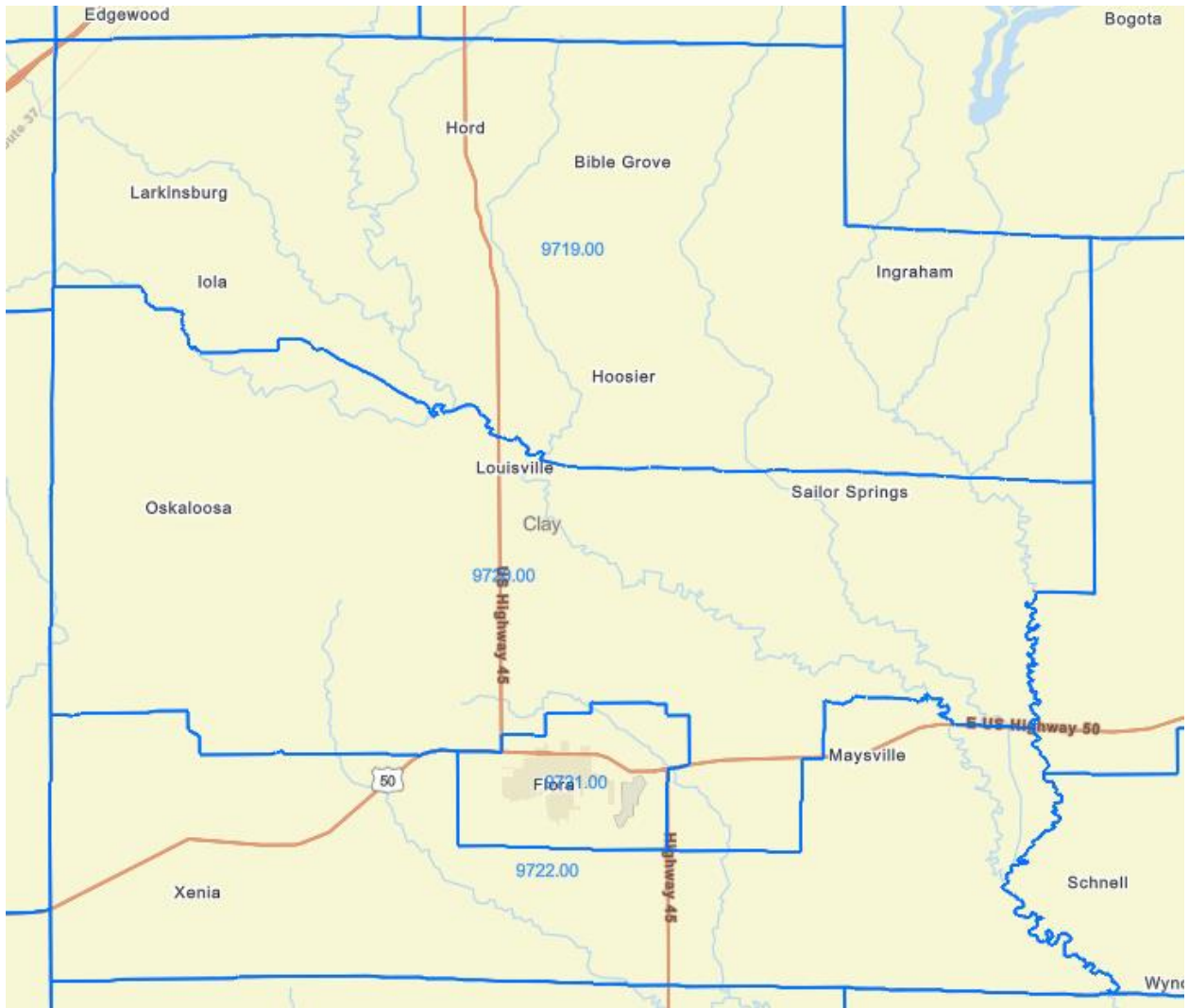


State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
17	191	9549.00	Middle	No	111.64	\$82,300	\$91,880	\$76,989	3266	4.04	132	1194	1605
17	191	9550.00	Middle	No	87.26	\$82,300	\$71,815	\$60,179	4335	4.13	179	1417	1886
17	191	9551.00	Middle	No	90.10	\$82,300	\$74,152	\$62,138	2714	5.27	143	959	1374
17	191	9552.00	Middle	No	86.48	\$82,300	\$71,173	\$59,636	3032	6.83	207	911	1437
17	191	9553.00	Middle	No	83.90	\$82,300	\$69,050	\$57,857	2832	4.17	118	978	1336
17	191	9999.99	Middle	No	91.52	\$82,300	\$75,321	\$63,114	16179	4.81	779	5459	7638

ASSESSMENT AREA – CLAY COUNTY- 025

CLAY COUNTY TRACTS- 9719, 9720, 9721, 9722

STATE: 17-ILLINOIS





ASSESSMENT AREA – WAYNE COUNTY- 191

WAYNE COUNTY TRACTS- 9549, 9550, 9551, 9552, 9553

STATE: 17-ILLINOIS

