



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

February 11, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank in Olney
Charter Number 14217

101 East Main Street
Olney, IL 62450

Office of the Comptroller of the Currency

2001 Butterfield Road
Suite 400
Downers Grove, IL 60515

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

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Overall CRA Rating

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

The Lending Test is rated: Outstanding.

The Community Development test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on outstanding performance in the State of Illinois. The First National Bank in Olney's (FNBO) distribution of loans to individuals of different incomes and farms of different sizes is excellent throughout the assessment areas (AA).
- FNBO's distribution of loans across geographies of different income levels is excellent throughout the AA.
- The Community Development (CD) Test rating is based on outstanding performance in the State of Illinois. FNBO demonstrated excellent responsiveness to CD needs by engaging in a combination of CD loans, qualified investments, and CD services.
- FNBO originated or purchased a majority of loans within the AA.
- FNBO's loan-to-deposit (LTD) ratio is reasonable.

Loan-to-Deposit Ratio

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

FNBO's quarterly LTD ratio averaged 58.2 percent over the 12-quarter period ending December 31, 2023. Over this period, the bank's quarterly LTD ratio ranged from a low of 54.6 percent to a high of 61.3 percent.

We analyzed the quarterly LTD ratios of four similarly situated federal and state banks in the AA based on a combination of size, location, and lending opportunities. The banks range in asset size of \$219 million to \$696 million, with a combined average quarter LTD ratio of 75.0 percent over the same evaluation period. FNBO's LTD ratio is the lowest compared to this group.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA.

The bank originated and purchased 87.5 percent of its total loans sampled inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Farm	18	90.0	2	10.0	20	\$2,729,346	85.6	\$458,397	14.4	\$3,187,743
Consumer	17	85.0	3	15.0	20	\$213,298	94.1	\$13,367	5.9	\$226,665
Total	35	87.5	5	12.5	40	\$2,942,644	86.2	\$471,764	13.8	\$3,414,408
Source: Bank Data Due to rounding, totals may not equal 100.0%										

Description of Institution

FNBO is a \$433.2 million (total assets) intrastate financial institution headquartered in Olney, Illinois. The bank is wholly owned subsidiary of Summit Bancshares, Ltd, a one-bank holding company. The bank is a full-service banking institution and operates seven banking offices in southeastern Illinois located in Olney (3), Ingraham (1), Oblong (1), Newton (1) and Robinson (1). The bank owns and operates seven automated teller machines (ATMs); three deposit-taking ATMs located in Newton (1), Olney (1) and Robinson (1), four cash-dispensing ATMs located at the Olney (2), Oblong (1), and Robinson (1) branches. FNBO has established one contiguous AA containing Crawford, Jasper, and Richland Counties and two census tracts (CTs) in Clay County. There has been no merger or acquisition activities since the last evaluation. Since the last evaluation, the bank opened a new branch in July 2021 in Newton, Illinois, which expanded the AA to include Jasper County.

FNBO offers conventional deposit and loan products, and asset management services. In addition, the bank offers retail nondeposit investment products at its main office in Olney and the branch office in Robinson through LPL Financial, LLC.

As of December 31, 2023, the bank's loan portfolio totaled \$238.7 million, or 55.1 percent of total assets. Tier 1 capital was \$47.8 million. The following table represents the loan portfolio mix:

Loan Portfolio Summary by Loan Product	
Loan Category	% of Outstanding Dollars
Farm Loans, including farmland	48.2%
Home Loans	25.7%
Business Loans, including Commercial Real Estate	21.9%
Consumer loans	4.2%

FNBO's business strategy is to deliver superior financial services and promote good business and community relationships. There are no known impediments limiting the bank's ability to help the credit needs of its local community, including low- and moderate- income families, and neighborhoods.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNBO's CRA performance using the intermediate small bank evaluation procedures, which reviewed the bank's record of meeting the credit needs of its AA through lending activities and CD activities. The Lending Test reflects an evaluation of FNBO's record of meeting the credit needs of the AA through its lending activities. The CD Test reflects an evaluation of FNBO's responsiveness to CD needs of the AA through loans, donations, and services with a CD purpose. The evaluation period for this review is from January 1, 2021, to December 31, 2023.

Based on both the number and dollar volume of loan origination data supplied by the bank, FNBO's primary lending products are agriculture and consumer loans. Consumer loans represent 39.1 percent of the number and 5.7 percent of the dollar volume of originations during the evaluation period. Agriculture loans represent 26.8 percent of the number and 43.3 percent of the dollar volume of originations for the same period. As a result, we sampled consumer and agriculture loans for this evaluation.

Due to changes between the 2015 U.S Census American Community Survey (ACS) and the 2020 U.S. Census, examiners performed separate analysis periods for 2021 and 2022-2023 to evaluate geographic distribution and borrower income criteria. Performance in Tables O and Table P in Appendix C reflect data from both analysis periods.

For analysis purposes, we compared FNBO's lending performance with the demographic data from the 2015 U.S Census American Community Survey (ACS) and the 2020 U.S. Census, 2021 and 2023 HMDA aggregate peer data, 2021 and 2023 Dun & Bradstreet (D&B) data, and the Federal Deposit Insurance Corporation (FDIC) deposit market share data as of June 30, 2021, and June 30, 2023. No affiliate activity was included in this analysis. Refer to the table in Appendix A for more information reading the scope of the review.

Selection of Areas for Full-Scope Review

FNBO has one AA in the state of Illinois, and we completed a full-scope review of the AA. Community profiles for the AA are provided in the "Scope" section of the State of Illinois rating.

Ratings

FNBO's overall rating is based on the full-scope review of the AA in the state of Illinois, and the state of Illinois rating is based on the bank's performance under the CRA Intermediate Small

Bank Lending Test, the Community Development Test, as well as related performance context information from the AA.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Illinois

CRA rating for the State of Illinois:

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on outstanding performance in the State of Illinois. FNBO's distribution of loans to individuals of different incomes and farms of different sizes is excellent throughout the AA.
- FNBO's distribution of loans across geographies of different income levels is excellent throughout the AA.
- The CD Test rating is based on outstanding performance in the State of Illinois. FNBO demonstrated excellent responsiveness to CD needs by engaging in a combination of CD loans, qualified investments, and CD services.

Description of Institution's Operations in Illinois

The AA consists of the entirety of Crawford, Jasper, Richland counties, and CTs #9719 and #9720 in Clay County in Illinois. Clay county has a total of four CTs and the two Clay County CTs in the AA are near the Ingraham branch in the northeast corner of the county. It would be difficult for the bank to service all of Clay County given its location. The subject counties are adjacent and located in the East Central Illinois approximately 122 miles east of St. Louis Missouri, and 32 miles west of Indiana state line. None of these counties are located within an MSA. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

During the 2021 evaluation period, there were no low-income CTs, three moderate-income CTs, 10 middle-income CTs, and three upper-income CTs in the AA. Richland County had three underserved middle-income CTs representing 18.7 percent of AA CTs.

During the 2022-2023 evaluation period, there were no low-income CTs, two moderate-income CTs, 13 middle-income CTs, and one upper-income CT in the AA. CT #9782 changed from moderate-income to middle-income during this evaluation period. Richland County had four underserved middle-income CTs representing 25.0 percent of AA CTs. A nonmetropolitan middle-income geography is designated underserved if it meets the criteria for population size, density, and dispersion that indicate the area's populations is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs. This designation status is determined annually as of June 30

each year. Three branches in Olney and one branch in Robinson are located in moderate-income CTs.

Competition

Competition for deposits is moderate among financial institutions. According to the June 30, 2021, FDIC Deposit Market Share Report, during the 2021 evaluation period, the bank faces competition from national banks and state banks. The bank held a deposit market share of 19.5 percent in the counties comprising the AA with \$356 million in deposits. The bank ranked first out of 16 deposit-taking institutions competing for the area's \$1.8 billion in deposits, as of June 30, 2021.

According to the June 30, 2023, FDIC Deposit Market Share Report, the bank continued to hold a deposit market share of 19.5 percent in the counties comprising the AA with \$384 million in deposits. The bank ranked first out of 16 deposit-taking institutions competing for the area's \$1.9 billion in deposits.

Demographics

Table A – Demographic Information of the Assessment Area						
Assessment Area: Olney AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	18.8	62.5	18.8	0.0
Population by Geography	50,465	0.0	15.8	65.9	18.3	0.0
Housing Units by Geography	22,857	0.0	17.9	64.7	17.4	0.0
Owner-Occupied Units by Geography	15,757	0.0	13.7	65.8	20.5	0.0
Occupied Rental Units by Geography	4,260	0.0	30.3	60.5	9.2	0.0
Vacant Units by Geography	2,840	0.0	22.3	64.8	13.0	0.0
Businesses by Geography	3,061	0.0	22.6	62.4	15.0	0.0
Farms by Geography	537	0.0	2.0	69.6	28.3	0.0
Family Distribution by Income Level	13,272	18.2	17.7	22.7	41.4	0.0
Household Distribution by Income Level	20,017	22.3	15.3	19.4	43.1	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$84,742
			Median Gross Rent			\$544
			Families Below Poverty Level			8.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Olney AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	12.5	81.3	6.3	0.0
Population by Geography	48,984	0.0	10.0	84.0	5.9	0.0
Housing Units by Geography	23,103	0.0	10.6	83.0	6.4	0.0
Owner-Occupied Units by Geography	15,657	0.0	7.2	85.0	7.8	0.0
Occupied Rental Units by Geography	4,624	0.0	17.4	79.3	3.3	0.0
Vacant Units by Geography	2,822	0.0	18.2	78.1	3.7	0.0
Businesses by Geography	3,735	0.0	14.0	81.3	4.7	0.0
Farms by Geography	589	0.0	1.5	90.5	8.0	0.0
Family Distribution by Income Level	13,597	21.0	18.7	20.7	39.5	0.0
Household Distribution by Income Level	20,281	23.9	16.1	18.6	41.4	0.0
Median Family Income Non-MSAs - IL		\$68,958	Median Housing Value			\$98,354
			Median Gross Rent			\$640
			Families Below Poverty Level			9.2%
Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Population

During the 2021 evaluation period, according to the 2015 ACS Census data, the area population was 50,465 individuals. There were no low-income CTs, 7,961 (15.8 percent) residing in moderate-income CTs, 33,252 (65.9 percent) residing in middle-income CTs, and 9,252 (18.3 percent) residing in upper-income CTs. There were 20,017 households in the AA. The distribution of households by income level was 4,457 (22.2 percent) low-income, 3,056 (15.3 percent) moderate-income, 3,886 (19.4 percent) middle-income, 8,618 (43.1 percent) upper income. The median family income for the 2021 evaluation period was \$59,323.

During the 2022-2023 evaluation period, according to the 2020 ACS Census data, the area population was 48,984 individuals. There were no low-income CTs, 4,903 (10.0 percent) residing in moderate-income CTs, 41,171 (84.1 percent) residing in middle-income CTs, and 2,910 (5.9 percent) residing in upper-income CTs. There were 20,281 households in the AA. The distribution of households by income level was 4,847 (23.9 percent) low-income, 3,272 (16.1 percent) moderate-income, 3,769 (18.6 percent) middle-income, 8,393 (41.4 percent) upper income. The median family income for the 2022-2023 evaluation period was \$68,958.

Employment and Economic Factors

Based on the Bureau of Labor Statistics, unemployment rates for all counties have improved from the peak unemployment rates in 2021 and are comparable with state levels but remain above national levels. Clay County had the highest annual unemployment rate of 5.3 percent as of December 31, 2023. Crawford County and Jasper County had the lowest annual unemployment rate of 4.0 percent as of December 31, 2023. The state and national annual unemployment rates were 4.5 percent and 3.8 percent in December 2023, respectively.

Annual Unemployment Rates			
Area	2021	2022	2023
Clay County	5.7%	4.9%	5.3%
Crawford County	5.2%	4.3%	4.0%
Jasper County	4.3%	3.9%	4.0%
Richland County	4.5%	3.9%	4.2%
State of Illinois	6.1%	4.6%	4.5%
National	3.9%	3.5%	3.8%
<i>Source: U.S. Department of Labor, Bureau of Labor Statistics. Rates are not seasonally adjusted. Unemployment rates are as of December 31 of each year.</i>			

According to the Illinois Department of Commerce, industries driving the local economy include manufacturing, health care and social assistance, retail trade, educational services, agriculture, and transportation and warehousing. The largest employers in the AA include Walmart Distribution Center, Carle Richland Memorial Hospital, and the local school districts. FNBO is headquartered in Olney, Illinois, which resides in Richland County. According to the Richland County Development Corporation, the top employers in the county also include Bridgemark Healthcare LLC and Pacific Cycle.

During the 2021 evaluation period, based on the 2015 ACS Census data and the 2021 Dun & Bradstreet data, 3,061 business are located in the AA. Of these businesses, 691 (22.6 percent) are in moderate-income CTs, 1,911 (62.4 percent) are in middle-income CTs, and 459 (15.0 percent) are in upper-income CTs. Business in the AA are 82.4 percent small businesses with gross annual revenues of \$1 million or less, 4.4 percent businesses with gross annual revenues over \$1 million, and 13.2 percent where businesses did not report revenue information.

During the 2022-2023 evaluation period, based on the 2020 ACS Census data and the 2023 Dun & Bradstreet data, 3,787 business are located in the AA. Of these businesses, 522 (13.8 percent) are in moderate-income CTs, 3,086 (81.5 percent) are in middle-income CTs, and 179 (4.7 percent) are in upper-income CTs. Business in the AA are 85.4 percent small businesses with gross annual revenues of \$1 million or less, 3.4 percent businesses with gross annual revenues over \$1 million, and 11.2 percent where businesses did not report revenue information.

Community Contact

The OCC relied on information from two community contact interviews within the AA to understand area needs and opportunities. The first contact noted the local economy was improving with an increase in manufacturing jobs primarily from Hershey Co. The contact did not note any concerns with financial institutions or other nonbank lenders not meeting the credit and banking needs in the local area. The contact also commented that all banks in the area properly meet the needs of the community and are proactive. The contact discussed a window of opportunity for housing projects in the local area given the recent high demand. This allows banks in the area to offer programs enticing first time home buyers with a lower interest rate if possible.

The second community contact representing a business development organization that provides resources, guidance, and education opportunities to start-up and existing small businesses throughout Richland County. The contact described the economic condition of the area to be stable to improving. The contact commented that the agriculture industry is the major driver for the area and has concerns related to reduced federal funding within this sector. The contact noted a need for residential construction and home loans in the area. They also had an overall positive perception of FNBO.

Scope of Evaluation in Illinois

FNBO has one AA in the state of Illinois, and we completed a full-scope review of this AA.

Conclusions in Respect to Performance Tests in Illinois

Lending Test

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibits **excellent** geographic distribution of loans in the state of Illinois. We did not identify any unexplained conspicuous gaps in the AA.

Small Loans to Farms

Refer to Table S in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

During the 2021 evaluation period, FNBO exhibited reasonable distribution of small loans to farms in the AA considering performance context factors. The analysis considered that only 11 farms are located in the moderate-income CTs in the AA. Our loan sample did not include any loans in the moderate-income CTs. The moderate-income CTs are primarily located in the towns of Olney and Robinson; farms are less likely to be located within city limits. This is reflected in the small percentage (2.0 percent) of farms located in the moderate-income CTs in the AA. There are no low-income CTs in the AA.

In addition, 10 loans (50.0 percent of the sample) were originated in underserved middle-income CTs in the AA. FNBO lending in underserved middle-income CTs supports reasonable distribution in the AA.

During the 2022-2023 evaluation period, FNBO exhibits excellent distribution of small loans to farms in the AA considering performance context factors. The analysis considered that only nine farms are located in the moderate-income CTs in the AA. Lending in the moderate-income CTs exceeded the demographic comparator of 1.5 percent for percentage of farms and the aggregate lending comparator of 0.7 percent.

In addition, nine loans (45.0 percent of the sample) were originated in underserved middle-income CTs in the AA supports excellent distribution in the AA.

Consumer Loans

Refer to Table U in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

For both the 2021 and 2022-2023 evaluation periods, FNBO exhibits excellent distribution of consumer loans in the AA. Lending in the moderate-income CTs exceeded the demographic comparator for percentage of households. Additionally, during the 2021 evaluation period, FNBO provided seven loans (35 percent of the sample) in distressed or underserved middle-income CTs and 12 loans (60 percent of the sample) during the 2022-2023 evaluation period. There are no low-income CTs in the AA.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Farms

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

For both the 2021 and 2022-2023 evaluation periods, FNBO exhibits excellent distribution of loans to farms of different sizes in the AA. Lending was near to the demographic comparator for percentage of farms and significantly exceeded the aggregate comparator. In 2021, 95.0 percent of the loans sampled were to small farms and in 2022-2023, 90.0 percent of loans sampled were to small farms.

Consumer Loans

Refer to Table V in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

For both the 2021 and 2022-2023 evaluation periods, FNBO exhibits excellent distribution of loans to low- and moderate-income borrowers. In 2021, FNBO's loans to low- and moderate-income individuals exceeded the comparator. In 2022-2023, FNBO's distribution of loans to low-income individuals was above the comparator. The distribution of loans to moderate-income individuals was near to the comparator. Although below the percentage of households with moderate-income borrowers, FNBO is 93.2 percent of the comparator which is reasonable.

Responses to Complaints

FNBO did not receive any complaints regarding its CRA performance during the evaluation period.

Community Development Test

The bank's performance under the Community Development Test in the state of Illinois is rated **Outstanding**.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

Number and Amount of Community Development Loans

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total
AA	504	84.7%	\$23,544	77.9%
Out of AA	91	15.3%	\$6,660	22.1%
Total	595	100.0%	\$30,204	100.0%

FNBO's level of CD lending provided excellent responsiveness to community credit needs. During the evaluation periods, the bank originated 595 qualifying loans totaling \$30.2 million, which represents 63.6 percent of tier 1 capital as of December 31, 2023, to businesses and farms through the Small Business Administration (SBA) guaranteed Paycheck Protection Program (PPP). The PPP was established under the CARES Act in response to the COVID-19 pandemic. PPP loans helped to revitalize and stabilize low- and moderate-income geographies by retaining business and helping them stay in operation during the pandemic.

- \$2.7 million in 134 Small Business Administration loans through the guaranteed Paycheck Protection Program (PPP) located inside the AA.

- \$20.9 million in 370 agricultural loans through the PPP located inside the AA.
- \$368,829.75 in 26 Small Business Administration loans through the PPP located outside of the AA.
- \$6.1 million in 64 agricultural loans through the PPP located outside of the AA.
- \$210,000 in one loan for improvements to a building for a company that serves the needs of low-income individuals and families.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
AA	1	\$295	59	\$67	60	98.4%	\$362	99.7%	0	0
Out of AA	0		1	\$1	1	1.6%	\$1	0.3%	0	0
Total	1	\$295	60	\$68	61	100.0%	\$363	100.0%	0	0

*Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Number and Amount of Qualified Investments

The level of qualified investments reflects reasonable responsiveness to community needs in the AA. During the evaluation period, bank management made 0 investments and 61 grants/donations totaling in \$67,900, or 0.1 percent of total capital.

FNBO received credit for one prior period general obligation school bond benefiting one school district located in the AA that serves a majority of LMI students. FNBO did not purchase any qualified investments over the current examination period.

FNBO provided 59 grants/donations totaling \$67,000 to organizations providing community services and affordable housing to LMI individuals in the AA. Donations were made to 14 nonprofit community service organizations providing social assistance to LMI individuals.

Statewide/Regional

FNBO made one additional donation totaling \$1,000 to an adjacent county within the state of Illinois, outside of the AA. The donations benefited a business and financial education program through the school district.

Extent to Which the Bank Provides Community Development Services

FNBO provided an excellent level of CD services in the AA. The branch structure provides good accessibility to banking services in moderate-income CTs. The bank operates four branches located in moderate-income CTs in Olney and Robinson, representing 66.7 percent of all branches.

During the evaluation period, 12 employees, (18.8 percent of full-time employees) consisting of directors, officers, and staff, provided financial/technical expertise to nonprofit organizations, including holding leadership roles.

- Nine individuals served as board members and/or officers of nine different nonprofit community service organizations that provide services to LMI individuals and promote economic development supporting job creation and small business support.
 - One individual served on a board that focused on revitalization and stabilization projects and critical infrastructure support in LMI and underserved geographies in the AA.
 - One individual served on a board that taught a financial literacy program at one school district in the AA, that was targeted towards LMI students.

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/1/2021-12/31/2023	
Bank Products Reviewed:	Small farm, and consumer loans, Community development loans, qualified investments, community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Crawford, Jasper and Richland Counties and census tracts #9719 and #9720 in Clay County.	Full-Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS First National Bank in Olney			
Overall Bank:	Lending Test Rating	CD Test Rating	Overall Bank/State/ Multistate Rating
First National Bank in Olney	Outstanding	Outstanding	Outstanding
State:			
Illinois	Outstanding	Outstanding	Outstanding

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Olney AA	20	\$3,280	100.0	205	0.0	0.0	0.0	2.0	0.0	3.4	69.6	75.0	70.7	28.3	25.0	25.9	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Olney AA	20	\$3,506	100.0	142	0.0	0.0	0.0	1.5	10.0	0.7	90.5	80.0	88.7	8.0	10.0	10.6	0.0	0.0	0.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Olney AA	20	\$3,205	100.0	205	98.3	95.0	50.7	0.9	5.0	0.7	0.0
Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-23
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Olney AA	20	\$3,506	100.0	142	98.5	90.0	34.5	0.8	10.0	0.7	0.0
Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2021
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Olney AA	20	215,118	100.0	0.0	0.0	17.2	25.0	64.7	60.0	18.1	15.0	0.0	0.0
<i>Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.</i> <i>Due to rounding, totals may not equal 100.0%</i>													

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022-23
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Olney AA	20	\$221,799	100.0	0.0	0.0	9.5	30.0	83.7	70.0	6.8	0.0	0.0	0.0
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.</i> <i>Due to rounding, totals may not equal 100.0%</i>													

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2021
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Olney AA	20	215,118	100.0	22.3	25.0	15.3	20.0	19.4	20.0	43.1	35.0	0.0	0.0
Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%													

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022-23
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Olney AA	20	\$221,799	100.0	23.9	25.0	16.1	15.0	18.6	35.0	41.4	25.0	0.0	0.0
Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data. Due to rounding, totals may not equal 100.0%													