



WILLIAMSVILLE
STATE BANK AND TRUST

COMMUNITY REINVESTMENT ACT

PUBLIC FILE

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COMMUNITY REINVESTMENT ACT

Written Comments and Responses

No written comments have been received from the public related to Williamsville State Bank & Trust's CRA performance for the current year 2024 or preceding two (2) calendar years.

PUBLIC DISCLOSURE

October 22, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Williamsville State Bank & Trust
Certificate Number: 12388

512 West Main Street
Williamsville, Illinois 62693

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 (AA) including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Williamsville State Bank & Trust (WSBT) "Satisfactory" Community Reinvestment Act (CRA) performance under the Lending Test supports this rating. Examiners did not identify any evidence of discriminatory or other illegal credit practices. The following points summarize WSBT's performance.

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

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated March 27, 2013, to the current evaluation dated October 22, 2018. Examiners used the Interagency Small Institution Examination Procedures to evaluate WSBT's CRA performance. The procedures include the CRA Small Bank Lending Test, which considers the institution's performance according to the following criteria:

- LTD Ratio
- AA Concentration
- Borrower Profile
- Geographic Distribution
- Response to CRA-related complaints

The U.S. Census Bureau revised its approach to collecting population and demographic data used in CRA evaluations. Federal Banking agencies now receive estimated census data from the Federal Financial Institutions Examination Council (FFIEC) on a five-year cycle. As such, the bank's lending data that examiners reviewed for the Performance Evaluation spanned two sets of census data. Examiners analyzed 2016 lending data using the 2010 U.S. Census data and the 2017 data using the 2015 American Community Survey (ACS).

Loan Products Reviewed

Examiners determined that the bank's major product lines are home mortgage and small business loans. This conclusion considered the bank's business strategy and the number and dollar volume of loans originated during the evaluation period. In addition, no other loan types, such as agricultural or consumer loans, represent a major product line.

The bank's record of originating home mortgage loans contributed more weight to the overall conclusions due to the larger volume by number when compared to small business lending. As of June 30, 2018, residential loans represented 65.2 percent of the total loan portfolio, while commercial loans represented 18.6 percent. The relative composition of the portfolio has changed only slightly during the evaluation period.

Examiners considered all home mortgage loans reported on the bank's 2016 and 2017 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LARs). The bank reported 69 loan originations totaling \$7.9 million in 2016 and 48 loan originations totaling \$4.8 million in 2017.

This evaluation considered all small business loans originated in 2016, 2017, and year-to-date (YTD) June 30, 2018. According to bank records, the bank originated 14 small business loans totaling \$2.0 million in 2016, 20 loans totaling \$2.7 million in 2017, and 11 loans totaling \$1.5 million for YTD June 30, 2018.

Examiners reviewed and presented all of the bank's loan data by both number and dollar volume; however, originations by number contributed more weight to overall conclusions since it is a better indicator of the number of individuals and businesses served.

DESCRIPTION OF INSTITUTION

Background

WSBT is a full service community bank headquartered in Williamsville, Illinois, which is located in Sangamon County, Illinois. WSBT is a wholly owned subsidiary of WSBT Financial, Ltd., a one-bank holding company, also located in Williamsville, Illinois. The bank has four subsidiaries: a non-active mortgage subsidiary, an investment/insurance agency, a title company, and a subsidiary that holds other real estate. WSBT received a Satisfactory rating at its previous CRA performance evaluation conducted March 27, 2013 using Interagency Small Institution Examination Procedures.

Operations

The bank operates three offices in Sangamon County including the main office in Williamsville, Illinois. Additional full service branches are located in Springfield, Illinois and in Sherman, Illinois. The close proximity of the branch locations allows the bank to readily service customers at the remaining location.

All offices are located in upper-income census tracts and have deposit-taking automated teller machines (ATMs). The bank formerly had two locations in Springfield but closed the shopping center branch on West Wabash Avenue when the lease expired in August 2016. This branch was located in a moderate-income tract approximately 2.5 miles from the remaining Springfield branch.

WSBT offers a traditional mix of lending products including home mortgage, home equity, construction, consumer and commercial loans. In addition, the bank continues to sell long-term residential mortgage loans on the secondary market. The bank offers a typical array of deposit products including personal and business checking, NOW accounts, IRAs, money market accounts and certificates of deposit. Alternative banking products include on-line and mobile banking.

Ability and Capacity

As of the June 30, 2018 Call Report, the bank's total assets were \$101.0 million, with total loans of \$38.7 million, total securities of \$49.2 million, and total deposits of \$88.4 million. The bank's loan portfolio decreased 24.5 percent since the prior evaluation. A significant majority of this decrease was in the residential loan portfolio, which declined by \$11.4 million over the evaluation period. Bank management attributes this decline in lending to temporary internal changes and external factors outside of the bank's control.

The following table details the composition of the loan portfolio as of June 30, 2018.

Loan Portfolio Distribution as of 06/30/2018		
Loan Category	\$(000s)	%
Construction and Land Development	977	2.5
Secured by Farmland	409	1.1
Secured by 1-4 Family Residential Properties	25,201	65.2
Secured by Multifamily (5 or more) Residential Properties	0	0
Secured by Nonfarm Nonresidential Properties	355	0.9
Total Real Estate Loans	26,942	69.7
Commercial and Industrial Loans	7,178	18.6
Agricultural Loans	239	0.6
Consumer Loans	3,652	9.4
Other Loans	672	1.7
Less: Unearned Income	0	0
Total Loans	38,683	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet the credit needs of the AA.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires financial institutions to define one or more AAs within which examiners will evaluate CRA performance. WSBT maintains one AA composed of the entirety of Sangamon County in the Springfield, IL MSA. Sangamon County is centrally located in Illinois, approximately 200 miles southwest of Chicago and 100 miles northeast of St. Louis, Missouri, and includes the City of Springfield, which is the State Capitol. The bank made no changes to the AA since the last evaluation. The AA conforms to CRA regulatory requirements, consists of contiguous, whole geographies in which the bank has offices and deposit-taking ATMs, does not reflect discrimination, and does not arbitrarily exclude low- or moderate-income tracts.

Economic and Demographic Data

The AA contains 53 census tracts with the following 2015 ACS income designations:

- 11 low-income census tracts
- 10 moderate-income census tracts
- 21 middle-income census tracts
- 11 upper-income census tracts

Based on the 2015 ACS, the demographics of the AA changed somewhat from the 2010 U.S. Census, resulting in an increase of two low-income tracts and a one tract decrease in moderate-income tracts. At the 2010 Census, the bank's AA consisted of nine low-income, 11 moderate-

income, 19 middle-income, 13 upper-income census tracts, and one tract with no income designation. The following table illustrates select demographic characteristics of the AA based on the 2015 ACS data.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	53	20.8	18.9	39.6	20.8	0.0
Population by Geography	199,016	15.9	14.6	40.8	28.7	0.0
Housing Units by Geography	90,433	16.3	16.9	40.0	26.8	0.0
Owner-Occupied Units by Geography	57,654	9.9	13.3	42.2	34.6	0.0
Occupied Rental Units by Geography	25,231	28.6	21.7	36.8	12.8	0.0
Vacant Units by Geography	7,548	24.2	28.7	33.9	13.2	0.0
Businesses by Geography	11,326	15.8	18.0	37.4	28.8	0.0
Farms by Geography	523	7.5	8.0	51.6	32.9	0.0
Family Distribution by Income Level	50,928	22.8	16.2	20.4	40.5	0.0
Household Distribution by Income Level	82,885	25.4	15.7	17.2	41.7	0.0
Median Family Income MSA - 44100 Springfield, IL MSA		\$73,402	Median Housing Value			\$126,507
			Median Gross Rent			\$737
			Families Below Poverty Level			10.8%
<i>Sources: 2010 U.S. Census, 2015 ACS Census, and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to 2018 D&B data, there were 11,326 non-farm businesses within the AA with the following gross annual revenue (GAR) levels:

- 74.4 percent had GARs of \$1.0 million or less
- 7.3 percent had GARs of more than \$1.0 million
- 18.3 percent have unknown revenues

Examiners use the GAR level to analyze small business loans under the Borrower Profile criterion. Service industries represent the largest portion of businesses within the AA at 43.5 percent; followed by retail trade (14.1 percent); finance, insurance and real estate (8.7 percent); construction (6.7 percent); and public administration (5.2 percent). No other AA business types are more than 5.0 percent and 8.5 percent are non-classifiable establishments. In addition, 60.8 percent of AA businesses have fewer than five employees, and 80.9 percent operate from a single location. Significant employers in the region include the State of Illinois, healthcare, and insurance companies.

Examiners used the FFIEC-adjusted Median Family Incomes (MFI) to analyze home mortgages under the Borrower Profile criterion. The following table shows the low-, moderate-, middle-, and upper-income levels for the AA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Springfield, IL MSA Median Family Income (44100)				
2016 (\$73,300)	<\$36,650	\$36,650 to <\$58,640	\$58,640 to <\$87,960	≥\$87,960
2017 (\$75,500)	<\$37,750	\$37,750 to <\$60,400	\$60,400 to <\$90,600	≥\$90,600
<i>Source: FFIEC</i>				
<i>Due to rounding, totals may not equal 100.0</i>				

Based on the 2015 ACS, the population of the AA is 199,016. The area contains 82,885 households with 50,928 considered families. Approximately 10.8 percent of families have incomes below poverty level.

There are 90,433 total housing units within the AA. Of these, 63.8 percent are owner-occupied, 27.9 percent are occupied rental units, and 8.4 percent are vacant. The geographic distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units by census tract income level.

Data obtained from the U.S. Bureau of Labor Statistics shows a decreasing trend in state and national unemployment rates. The unemployment rate in the AA has historically trailed the State of Illinois. However, due to labor force contraction in recent years, the current unemployment largely matches the state.

Unemployment Rates			
Area	2016	2017	June 2018
	%	%	%
Sangamon County	4.8	4.2	4.3
State	5.8	5.0	4.3
National Average	4.9	4.4	4.0
<i>Source: Bureau of Labor Statistics</i>			

Competition

WSBT operates in a highly competitive environment. According to FDIC Deposit Market Share data as of June 30, 2018, 24 financial institutions operate 80 offices with total deposits of \$5.8 billion in Sangamon County. The bank's largest competitors are Illinois National Bank, United Community Bank, JP Morgan Chase Bank, and Bank of Springfield, which taken together, hold 50.4 percent of the deposit base. The bank ranks 14th with 1.5 percent of the market share. While this data considers only FDIC-insured institutions, WSBT also faces competition from credit unions and other financial services entities.

Competition is also high for loans in the AA. Most of the competition is from institutions that based on their size and location, are required to report loans under HMDA. Aggregate HMDA data provides an indication of area competition for home mortgage loans. In 2017, the most recent HMDA data available, 254 lenders originated 7,661 loans totaling approximately \$974

billion in the AA. Based on the number of loans originated, the top five lenders were Marine Bank, Bank of Springfield, United Community Bank, Illinois National Bank and Diamond Residential Mtg. Corp. These top five lenders combined accounted for approximately 34.4 percent of the total originations. Thirty peer banks originated more home mortgage loans than WSBT and only the 20 top originators had a market share in excess of 1.0 percent. The data indicates that most of the competition is from large national institutions and mortgage companies.

Community Contact

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

For this evaluation, examiners used an existing community contact with a local realtor. The contact indicated that reduced employment at state agencies and frozen salaries for state employees have contributed to a stagnant local economy. The contact indicated that there is insufficient affordable housing stock in Sangamon County and a continued need for affordable housing loans in the area. According to the contact, the deterioration of housing stock and the improvements needed to pass inspections results in limited affordable housing opportunities. The contact also indicated that businesses have been lost in the City of Springfield and that growth is limited to the west side of the city.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The bank demonstrated satisfactory performance under the Lending Test. AA Concentration and Borrower Profile performance primarily support this conclusion.

Loan-to-Deposit Ratio

The bank's average net LTD is reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and AA credit needs. WSBT's LTD ratio, calculated from Call Report data, averaged 46.5 percent over the last 22 quarters from March 31, 2013, through June 30, 2018. This represents a slight decline from the previous evaluation where the LTD ratio was 51 percent. The ratio ranged from a high of 50.8 percent on June 30, 2013, to a low of 42.7 percent on September 30, 2017. The bank experienced a decrease in both net loans (25.4 percent) and total deposits (14.5 percent) since the previous evaluation, which resulted in an overall downward trend in the LTD ratio. Bank management attributed the decline in net loans to strong competition, turnover in the loan administration area, and a generally increasing interest rate market. The LTD ratio does not include residential loans that the bank originated and sold on the secondary market during the review period. In 2016, the bank sold 23 residential loans totaling \$3.6 million or approximately 45.5 percent of its residential

loan originations, and in 2017, it sold 17 residential loans totaling \$2.0 million or approximately 41.6 percent.

As shown in the following table, WSBT maintained a ratio lower than two comparable institutions, and higher than one comparable institution. Examiners selected comparable institutions based on their geographic location, lending focus, and asset size.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 06/30/2018 (\$000s)	Average Net LTD Ratio (%)
Williamsville State Bank & Trust	100,962	46.5
Similarly-Situated Institution #1	94,657	21.4
Similarly-Situated Institution #2	131,985	64.4
Similarly-Situated Institution #3	123,931	84.5
<i>Source: Reports of Condition and Income 03/31/2013 through 06/30/2018</i>		

Assessment Area Concentration

WSBT originated a majority of home mortgage and small business loans by both number and dollar volume within the AA during the evaluation period, as shown in the following table.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	61	88.4	8	11.6	69	6,761	85.8	1,117	14.2	7,878
2017	43	89.6	5	10.4	48	4,147	85.8	685	14.2	4,832
Subtotal	104	88.9	13	11.1	117	10,908	85.8	1,802	14.2	12,701
Small Business										
2016	13	92.9	1	7.1	14	1,903	96.9	60	3.1	1,963
	14	70.0	6	30.0	20	1,660	61.7	1,032	38.3	2,692
YTD 2018	8	72.7	3	27.3	11	1,177	77.5	342	22.5	1,519
Subtotal	35	77.8	10	22.2	45	4,740	76.8	1,434	23.2	6,174
<i>Sources: HMDA and Bank Data Evaluation Period: HMDA 01/01/2016 – 12/31/2017; Small Business 1/1/2016 - 6/30/2018 Bank Data</i>										

Borrower Profile

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

Home Mortgages

Overall, the distribution of home mortgage reflects reasonable penetration among individuals of different income levels, including low- and moderate-income borrowers given performance context. Lending to low-income borrowers is noticeably below the aggregate HMDA data for 2016 but only slightly below the comparative factor in 2017 which also shows that other lenders in the area don't have strong penetration levels either. In contrast, the bank's performance significantly trails the percentage of low-income families in the AA for both years, but an improving trend is noted. Further, 10.8 percent of families live below the poverty level. Due to their limited financial resources, families below the poverty level generally do not have the capacity to support a home mortgage, limiting demand and opportunity for lending to low-income borrowers.

Additionally, as noted above, the deterioration of housing stock and the improvements needed to pass inspections limits affordable housing opportunities. The bank's lending to moderate-income borrowers exceeds aggregate performance and significantly exceeds demographic data. Given the considerations for low-income challenges, and aggregate data performance is not stellar, and the performance for moderate-income individuals, the bank's performance is reasonable overall.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2016	22.3	10.5	2	3.3	77	1.1
2017	22.8	11.0	3	7.0	87	2.1
Moderate						
2016	15.9	18.6	17	27.9	1,627	24.1
2017	16.2	20.3	10	23.3	737	17.8
Middle						
2016	21.8	20.1	13	21.3	1,448	21.4
2017	20.4	19.9	8	18.6	783	18.9
Upper						
2016	39.9	35.8	28	45.9	3,574	52.9
2017	40.5	31.4	21	48.8	2,517	60.7
Not Available						
2016	0.0	15.0	1	1.6	35	0.5
2017	0.0	17.5	1	2.3	23	0.6
Totals						
2016	100.0	100.0	61	100.0	6,761	100.0
2017	100.0	100.0	43	100.0	4,147	100.0

Sources: 2010 U.S. Census, 2015 ACS Census, 1/1/2016 - 12/31/2017 Bank Data, and 2016 & 2017 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0

Small Business Loans

The distribution of small business loans overall reflects more than reasonable penetration of loans to small businesses with GARs of \$1 million or less. The volume of small business lending has moderately increased since the previous evaluation. Only one of the 35 small business loans in the review period was to a business with GARs of greater than \$1 million. The following table presents the bank's performance, as well as the percentage of businesses in each revenue category within the AA.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2016	75.3	12	92.3	903	47.5
2017	74.9	14	100.0	1,660	100.0
YTD 2018	74.4	6	75.0	987	83.9
>1,000,000					
2016	7.0	1	7.7	1,000	52.5
2017	7.3	0	0.0	0	0.0
YTD 2018	7.3	0	0.0	0	0.0
Revenue Not Available					
2016	17.6	0	0.0	0	0.0
2017	17.8	0	0.0	0	0.0
YTD 2018	18.3	2	25.0	190	16.1
Total					
2016	100.0	13	100.0	1,903	100.0
2017	100.0	14	100.0	1,660	100.0
YTD 2018	100.0	8	100.0	1,177	100.0

Sources: 2016, 2017, and June 2018 D&B Data; 1/1/2016 – 06/30/2018 Bank Data.

Geographic Distribution

The geographic distribution of home mortgage and small business lending reflects reasonable dispersion throughout the AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects overall reasonable penetration throughout the AA. Although home mortgage originations lagged both the aggregate data and the percentage of owner-occupied units in low-income tracts in 2016, the bank's performance in these tracts increased significantly in 2017. The improved performance is partially due to the re-designation of two census tracts in the AA to low-income in the 2015 ACS. Performance in moderate-income tracts was consistently above the aggregate performance of HMDA-reporting institutions and the percentage of owner-occupied housing units in those tracts.

The following table reflects the bank's geographic distribution of home mortgage loans.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2016	6.4	3.6	1	1.6	35	0.5
2017	9.9	6.7	6	14.0	326	7.9
Moderate						
2016	17.5	13.8	14	23.0	1,089	16.1
2017	13.3	13.8	8	18.6	220	5.3
Middle						
2016	40.5	39.6	12	19.7	1,323	19.6
2017	42.2	44.9	15	34.9	1,441	34.7
Upper						
2016	35.6	42.9	34	55.7	4,314	63.8
2017	34.6	34.5	14	32.6	2,160	52.1
Not Available						
2016	0.0	0.1	0	0.0	0	0.0
2017	0.0	0.0	0	0.0	0	0.0
Totals						
2016	100.0	100.0	61	100.0	6,761	100.0
2017	100.0	100.0	43	100.0	4,147	100.0
Sources: 2010 U.S. Census, 2015 ACS Census, 1/1/2016 - 12/31/2017 Bank Data and 2016 & 2017 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0						

Small Business

The geographic distribution of small businesses loans reflects reasonable dispersion throughout the AA given performance context. While lending to small businesses in low- and moderate-income tracts was less than business demographics, bank performance has improved since the previous evaluation when the bank only made one loan in a moderate-income tract and none in low-income tracts. Further, all of the bank's offices are located in upper-income census tracts with none of the locations in close proximity to the low- and moderate-income census tracts in the designated assessment area. Additionally, the level of competition from well-established financial lenders in the AA limits the available lending opportunities for small business loans. Such lenders include Illinois National Bank, United Community Bank, JP Morgan Chase Bank, and Bank of Springfield which makes it challenging for the bank to attract small businesses seeking financing. Lastly, a majority of businesses in the AA are very small with less than five employees (60.8 percent) and 80.9 percent operate from a single location. Small business owners sometimes seek non-traditional financing, such as credit cards and home equity loans as opposed to conventional business financing. Given the aforementioned performance context factors, the bank's geographic distribution is reasonable, overall.

The following table reflects the bank's geographic distribution of home mortgage loans.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2016	11.8	0	0.0	0	0.0
2017	16.1	2	14.3	423	25.5
YTD 2018	15.8	0	0.0	0	0.0
Moderate					
2016	21.9	0	0.0	0	0.0
2017	18.1	0	0.0	0	0.0
YTD 2018	18.1	1	12.5	450	38.2
Middle					
2016	31.7	5	38.5	298	15.7
2017	37.8	4	28.6	213	12.8
YTD 2018	37.4	5	62.5	388	33.0
Upper					
2016	30.2	8	61.5	1,605	84.3
2017	28.0	8	57.1	1,024	61.7
YTD 2018	28.8	2	25.0	339	28.8
NA					
2016	4.4	0	0.0	0	0.0
2017	0.0	0	0.0	0	0.0
YTD 2018	0.0	0	0.0	0	0.0
Totals					
2016	100.0	13	100.0	1,903	100.0
2017	100.0	14	100.0	1,660	100.0
YTD 2018	100.0	8	100.0	1,177	100.0
<i>Sources: 2016, 2017 & June 2018 D&B Data; 1/1/2016 - 06/30/2018 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 rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal practices; therefore, this consideration did not affect the CRA rating.

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.

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).

Family Income: Includes the income of all members of a family that are age 15 and older.

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 (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, 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 Disclosure Loan Application Register (HMDA LAR): The HMDA LARs record all applications received for residential purchase, refinance, home improvement, and temporary-to-permanent construction loans.

Home Mortgage Loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans to purchase manufactured homes, and refinancings of home improvement and home purchase loans.

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.

Household Income: Includes the income of the householder and all other persons that are age 15 and older in the household, whether related to the householder or not. Because many households are only one person, median household income is usually less than median family income.

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 (for example, 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.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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: 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.



Williamsville State Bank and Trust has designated all of Sangamon County, Illinois as its assessment area. Sangamon County consists of fifty – three (53) census tracts.

Sangamon County Census Tracts

****See list on following page****

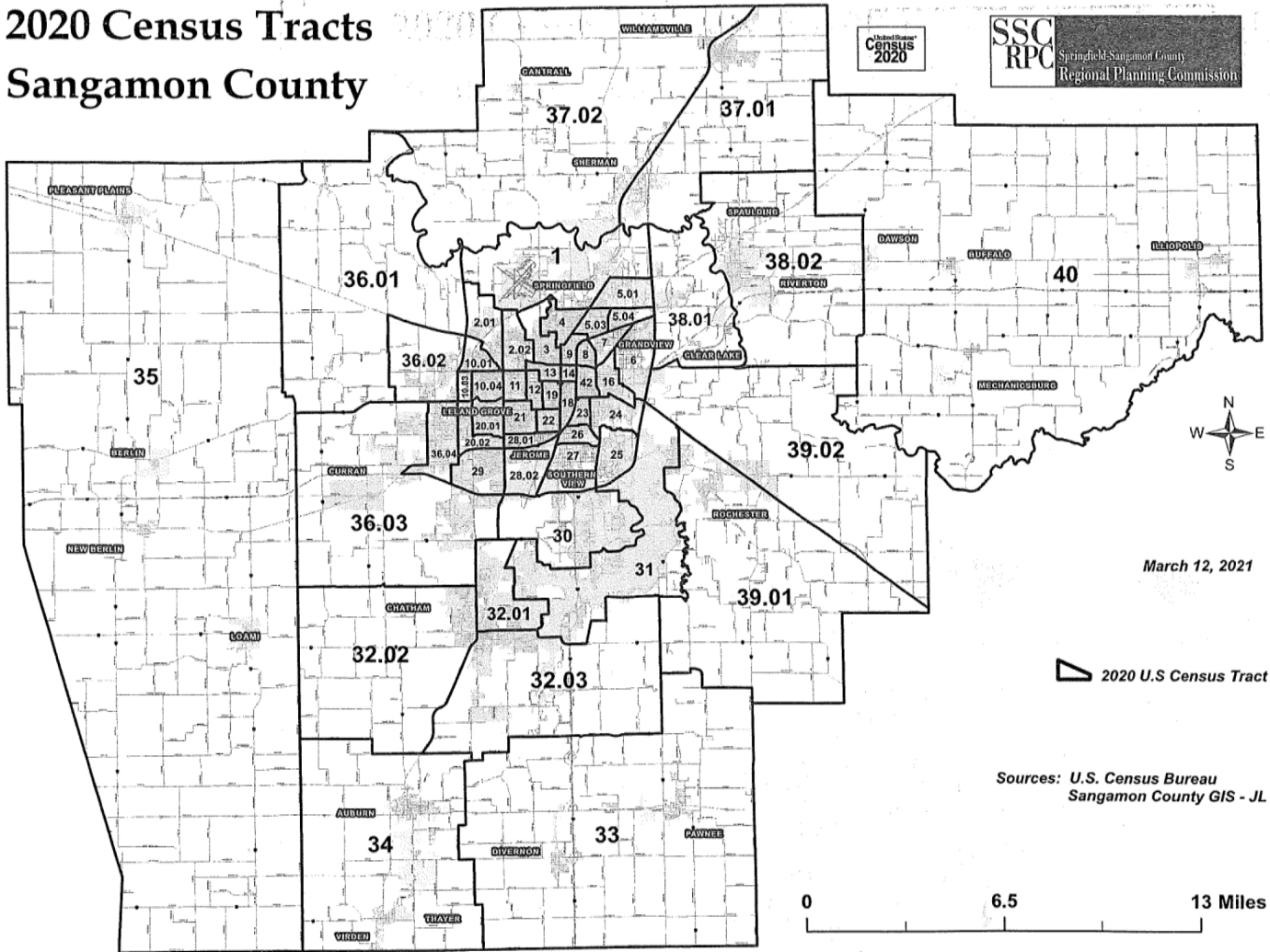
SANGAMON COUNTY, IL 2020 CENSUS TRACTS

Tract;	17167000201;	17;	167;	1.00
Tract;	17167000201;	17;	167;	2.01
Tract;	17167000202;	17;	167;	2.02
Tract;	17167000300;	17;	167;	3.00
Tract;	17167000400;	17;	167;	4.00
Tract;	17167000501;	17;	167;	5.01
Tract;	17167000503;	17;	167;	5.03
Tract;	17167000504;	17;	167;	5.04
Tract;	17167000600;	17;	167;	6.00
Tract;	17167000700;	17;	167;	7.00
Tract;	17167000800;	17;	167;	8.00
Tract;	17167000900;	17;	167;	9.00
Tract;	17167001001;	17;	167;	10.01
Tract;	17167001003;	17;	167;	10.03
Tract;	17167001004;	17;	167;	10.04
Tract;	17167001100;	17;	167;	11.00
Tract;	17167001200;	17;	167;	12.00
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Tract;	17167001400;	17;	167;	14.00
Tract;	17167001600;	17;	167;	16.00
Tract;	17167001800;	17;	167;	18.00
Tract;	17167001900;	17;	167;	19.00
Tract;	17167002001;	17;	167;	20.01
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Tract;	17167002400;	17;	167;	24.00
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Tract;	17167002600;	17;	167;	26.00
Tract;	17167002700;	17;	167;	27.00
Tract;	17167002801;	17;	167;	28.01
Tract;	17167002802;	17;	167;	28.02
Tract;	17167002900;	17;	167;	29.00
Tract;	17167003000;	17;	167;	30.00
Tract;	17167003100;	17;	167;	31.00
Tract;	17167003201;	17;	167;	32.01
Tract;	17167003202;	17;	167;	32.02
Tract;	17167003203;	17;	167;	32.03
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Tract;	17167003500;	17;	167;	35.00
Tract;	17167003601;	17;	167;	36.01
Tract;	17167003602;	17;	167;	36.02
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Tract;	17167003604;	17;	167;	36.04
Tract;	17167003701;	17;	167;	37.01
Tract;	17167003702;	17;	167;	37.02
Tract;	17167003801;	17;	167;	38.01
Tract;	17167003802;	17;	167;	38.02
Tract;	17167003901;	17;	167;	39.01
Tract;	17167003902;	17;	167;	39.02
Tract;	17167004000;	17;	167;	40.00
Tract;	17167004200;	17;	167;	42.00

2020 Census Tracts Sangamon County

United States
Census
2020

**SSC
RPC**
Springfield-Sangamon County
Regional Planning Commission



March 12, 2021

Sources: U.S. Census Bureau
Sangamon County GIS - JL



Loan to Deposits

June 2024	35.63%
March 2024	36.18%
December 2023	37.61%
September 2023	36.21%
June 2023	36.86%



WILLIAMSVILLE STATE BANK AND TRUST

PRODUCTS AND SERVICES

DEPOSIT PRODUCTS

BUSINESS

BASIC BUSINESS CHECKING
REGULAR COMMERCIAL CHECKING
COMMERCIAL NOW ACCOUNT
BUSINESS SAVINGS
COMMERCIAL MONEY MARKET AND MONEY MARKET PLUS

CONSUMER

FREE CHECKING
NOW CHECKING
GOLDEN CLUB CHECKING
HEALTH CARE SAVINGS
SAVINGS ACCOUNTS
CHRISTMAS CLUB SAVINGS
MONEY MARKET ACCOUNT AND MONEY MARKET PLUS
CERTIFICATE OF DEPOSITS
IRA CD

LOAN PRODUCTS

BUSINESS

COMMERCIAL REAL ESTATE
INVESTMENT PROPERTY
OPERATING LOANS
COMMERCIAL CONSTRUCTION
BUSINESS EQUIPMENT
AGRICUTURAL
SBA

NON- REAL ESTATE

PERSONAL INSTALLMENT AND SINGLE PAY
OVERDRAFT PROTECTION
TITLED COLLATERAL LOANS

REAL ESTATE LOANS

OWNER OCCUPIED CONVENTIONAL
CONSTRUCTION
FIXED RATE TERMS
ARM
HELOC
FIXED RATE SECOND MORTGAGE

ELECTRONIC BANKING SERVICES

**ONLINE BANKING
BILL PAY
PHONE BANKING
E – STATEMENTS**

CARD SERVICES

MASTERCARD – CONSUMER AND BUSINESS

MISC PRODUCTS AND SERVICES

**ATM'S
SAFE DEPOSIT BOX
WIRE TRANSFERS
NIGHT DEPOSITORY
CASHIERS CHECKS AND MONEY ORDERS
TRUST SERVICES**

Fee Schedule

WILLIAMSVILLE STATE BANK & TRUST
 480 S CROSSING DRIVE
 SHERMAN, IL 62684
 www.wsbt.net

Standard Account Fees

Charge Description	Charge Amt.	Charge %	Frequency
Account Closeout within 180 days	\$25.00	0.00	each
ATM Fees - Non-Shazam Privileged Terminal	\$2.00	0.00	per transaction
Bags - Night Deposit with Keys	\$25.00	0.00	per bag
Bags - Zipper Bag	\$10.00	0.00	per bag
Business - Financial Standby 1 day Action	\$5.00	0.00	per day
Business - Letter of Credit (min \$50.00) Per request	\$0.00	1.00	per request
Business - Replace Loan Book	\$5.00	0.00	per request
Cashier's Check (Customer)	\$5.00	0.00	per check
Cashier's Check (In Club - Golden Now - Golden Regular)	\$2.50	0.00	per check
Cashier's Check (Noncustomer)	\$7.50	0.00	per check
Coin Counting (minimum fee \$0.50)	\$0.00	2.50	per transaction
Coin Rolled	\$0.10	0.00	per roll
Collection - On Us Check	\$10.00	0.00	per check
Collection - Other Checks (plus cost)	\$10.00	0.00	per check
Copies - Photo Copies (after first three)	\$0.50	0.00	per page
Copies - Photo Copies (Noncustomer)	\$1.00	0.00	per page
Counter Checks	\$0.25	0.00	per check
Debit Card - PIN Request	\$5.00	0.00	per request
Debit Card/ATM Card Replacement	\$10.00	0.00	per card
Dormant Account Fee (when balance < \$5 for 6 mo. or more)	\$2.00	0.00	per month
FAX (minimum fee \$3.00)	\$1.00	0.00	per page
Garnishment/Levy Fee	\$100.00	0.00	per occurrence
Medallion Guarantee Stamp	\$20.00	0.00	each
Money Order (Customer)	\$5.00	0.00	per check
Money Order (In Club - Golden Now - Golden Regular)	\$2.50	0.00	per check
Money Order (Noncustomer)	\$7.50	0.00	per check
Negative Balance Fee**	\$10.00	0.00	per day
Noncustomer Check Cashing (maximum fee \$10.00)	\$5.00	0.00	per \$100.00
Notary Fee	\$1.00	0.00	per page
Overdraft Item Fee *	\$30.00	0.00	per item
Research	\$30.00	0.00	per hour
Return Item Fee*	\$30.00	0.00	per check
Safe Deposit Box 10 x 10	\$100.00	0.00	per year
Safe Deposit Box 15 x 15	\$300.00	0.00	per year
Safe Deposit Box 3 x 10	\$30.00	0.00	per year
Safe Deposit Box 3 x 5	\$20.00	0.00	per year
Safe Deposit Box 4 x 10	\$40.00	0.00	per year
Safe Deposit Box 4 x 5	\$25.00	0.00	per year
Safe Deposit Box 5 x 10	\$50.00	0.00	per year
Safe Deposit Box Drilling	\$150.00	0.00	per box

Fee Schedule

WILLIAMSVILLE STATE BANK & TRUST
 480 S CROSSING DRIVE
 SHERMAN, IL 62684
 www.wsbt.net

Safe Deposit Box Replacement Key	\$10.00	0.00	per key
Statements - Interim Screen Print	\$3.00	0.00	per request
Statements - Special Statement w/copies	\$5.00	0.00	per request
Statements - Weekly	\$2.50	0.00	per account
Stop Payment Orders	\$20.00	0.00	per item
Transfers - Sweeps/Telephone	\$2.00	0.00	per transaction
Wire Transfer - Incoming	\$15.00	0.00	per transaction
Wire Transfer - Outgoing	\$25.00	0.00	per transaction
Wire Transfer - International Foreign Currency	\$40.00	0.00	per wire
Wire Transfer - International US Currency	\$65.00	0.00	per wire

Limits and Fees - The above may be assessed against your account and the above transaction limitations, if any, apply to your account.

* The categories of transaction for which an overdraft fee or returned fee may be imposed are those by any of the following means: check, in-person withdrawal, or ACH.

** The negative balance charge is assessed after your account has been negative for 5 calendar days. The categories of transactions for which this fee may be imposed are those by any of the following means: check, in-person withdrawal, ACH, or bank assessed fees.

HOME MORTGAGE DISCLOSURE ACT NOTICE

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials.

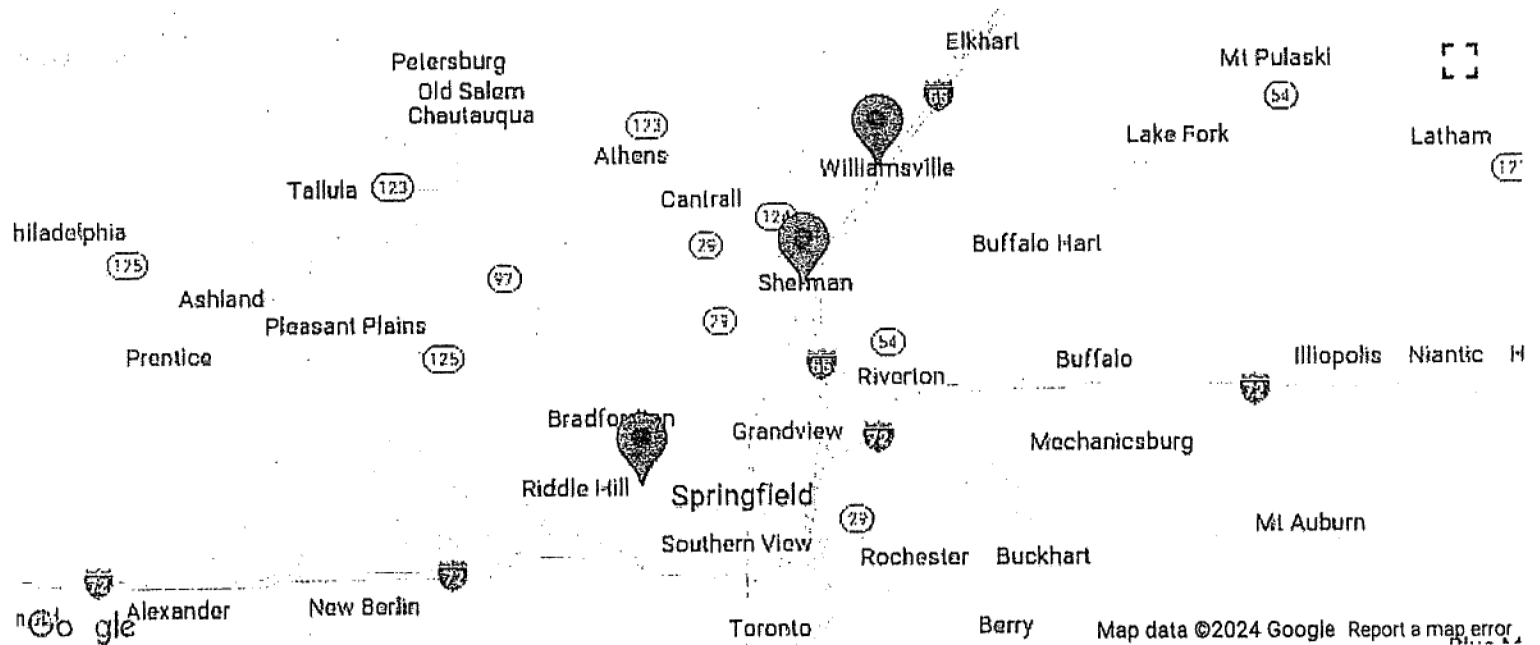
These data are available online at the Consumer Financial Protection Bureau's website (www.consumerfinance.gov/hmda).

HMDA data for many other financial institutions are also available at this website.

Convenient Locations

Conveniently Located

With Internet Banking, we are as close as your home or office computer! Our full service bank offices are located in Springfield on Old Jacksonville Road, in Sherman just off old Route 66, in Williamsville, or by email at bank@wsbt.net.





Springfield Branch

3341 Old Jacksonville Road
Springfield, IL 62711

Phone: (217) 698-9728

Fax: (217) 787-5150

Hours subject to change

ATM: Yes

Lobby Hours:

Monday-Friday 9:00 - 4:00

Saturday 9:00 - 12:00

Hours subject to change

Drive-Up Hours:

Monday-Friday 8:00 - 5:30

Saturday 8:30 - 12:00