

PUBLIC DISCLOSURE

October 28, 2024

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

The following points summarize Williamsville State Bank & Trust's Community Reinvestment Act (CRA) 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 geographic distribution of loans reflects reasonable dispersion throughout the AA.
- The distribution of borrowers reflects reasonable penetration of loans among businesses of different sizes and individuals of different income levels (including low- and moderate-income).
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.

DESCRIPTION OF INSTITUTION

Williamsville State Bank & Trust (WSBT) is a \$98.0 million financial institution headquartered in Williamsville, Illinois (population 1,425). WSBT is a wholly-owned subsidiary of WSB Financial, Ltd., a one-bank holding company. The bank received a Satisfactory rating at its previous CRA performance evaluation conducted October 22, 2018, based on Interagency Small Institution Examination procedures.

The bank operates two additional full-service branch offices in Sherman, Illinois (population 4,673) and Springfield, Illinois (population 114,394). All offices are located in Sangamon County, Illinois, which is part of the Springfield, IL Metropolitan Statistical Area (MSA). The main office and two branch offices are all located in upper-income census tracts.

The bank has four subsidiaries; however, all are either inactive or have very limited activity. These entities include: Willcor, Inc., WSBT Development Company (WSB Mortgage Services and Will Service Corporation - WSB Insurance Agency, Ltd.), WSB Investment Services, Ltd., and Lincoln Land Title and Abstract Company. None of the bank's subsidiaries currently offer credit products.

The bank has not changed its business strategy, markets or delivery channels since the prior examination. The bank offers home mortgage, commercial, agricultural and consumer loans, primarily focusing on home mortgage and commercial lending. Home mortgage lending products include fixed-rate mortgage loans sold directly to the secondary market, as well as, balloon and construction loans. Consumer loan offerings include installment and vehicle loans, credit cards, personal lines of credit and manufactured home loans.

The institution offers a variety of deposit products including checking and savings accounts and certificates of deposit. An automated teller machine (ATM) is available at each of the three locations. Online and telephone banking services are available, as well as mobile banking that provides bill payment capabilities. These alternative systems provide customers with flexibility to carry out their banking needs. The bank did not open or close any branches, and no merger or acquisition activities have occurred since the last evaluation.

During the evaluation period, WSBT participated in the Paycheck Protection Program (PPP), which was created and administered by the Small Business Administration in response to the COVID-19 pandemic to assist qualified small businesses maintain operations, including to fund payroll costs, pay mortgage interest, rent, utilities, and worker protection costs. In 2020 and 2021, the bank originated 48 PPP loans totaling \$1.9 million.

The bank's outreach efforts in the community include membership in the Sherman, Springfield, and Springfield Black Chamber of Commerce organizations. Additionally, during the review period, bank activities included participation in mortgage homebuyer seminars in low- and moderate-income tracts of the AA.

According to the Consolidated Reports of Conditions and Income (Call Report) dated June 30, 2024, WSBT reported total assets of \$98.0 million, which included total loans of \$31.7 million and total deposits of \$88.5 million. Since the prior evaluation, total assets have decreased by 3.5

percent and total loans by 14.8 percent, with the greatest decline in commercial loans from 19.5 percent to 13.7 percent. Although management has indicated that home mortgage and commercial lending remains the focus of the bank, consumer loans have been increasing due to demand for manufactured home loans.

The following table illustrates the bank’s loan portfolio distribution:

Loan Portfolio Distribution as of 06/30/2024		
Loan Category	\$(000s)	%
Construction, Land Development and Other Land Loans	633	2.0
Secured by Farmland	754	2.4
Secured by 1-4 Family Residential Properties	21,870	68.9
Secured by Multifamily (5 or more) Residential Properties	-	-
Secured by Nonfarm Nonresidential Properties	317	1.0
Total Real Estate Loans	23,574	74.3
Commercial and Industrial Loans	4,015	12.7
Agricultural Production and Other Loans to Farmers	-	-
Consumer Loans	4,058	12.8
Other Loans	-	-
Obligations of states and political subdivisions in the U.S.	85	0.2
Less: Unearned Income	-	-
Total Loans	31,732	100.0
<i>Source: Reports of Condition and Income</i>		

There were no legal, financial, or other impediments identified that would hinder the bank’s ability to meet the credit needs of its AA.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. The bank’s AA delineation has not changed as WSBT continues to designate a single AA in central Illinois. The following sections discuss demographic and economic information for the AA.

WSBT’s AA is consistent with CRA regulatory requirements, as it does not arbitrarily exclude any low- or moderate-income census tracts, does not reflect illegal discrimination, and otherwise meets the requirements of the regulation.

Economic and Demographic Data

The AA is comprised of the entirety of Sangamon County, Illinois, which is made up of 54 census tracts. The tracts in the AA reflect the following income designations according to 2020 U.S. Census Data:

- 10 low-income tracts,
- 14 moderate-income tracts,
- 14 middle-income tracts, and
- 16 upper-income tracts.

The majority of the low- and moderate-income census tracts in the AA are located within the City of Springfield encompassing the eastern portions of the downtown area and surrounding neighborhoods. Moderate-income tracts primarily border the low-income tracts to the north and west of downtown and along the southeastern side of Springfield.

Changes occurred in each of the census tract income designations based on 2020 U.S. Census data versus the prior evaluation, which utilized the 2015 American Community Survey (ACS) data. Overall, the number of tracts in the AA increased from 53 to 54 and the changes resulted in decreases of one low- and seven middle-income and increases of four moderate- and five upper-income tracts. The prior designated middle-income tract 14 moved to the low-income category. Two previously designated low-income tracts (2.02 and 3) and five previously middle-income tracts (5.03, 11, 12, 25 and 38.01) moved to the moderate-income category. New tract 42, located in downtown Springfield, was previously designated as low-income tracts 15 and 17, which are now combined into one low-income tract. Tract 38.01 in the northern part of the AA which includes Riverton, Illinois changed from middle- to moderate-income, which expands the low and moderate contiguous tracts outside of the Springfield city limits.

From January 2020 through May 2023, the AA was declared a major disaster area due to the impact of the COVID-19 Pandemic. Additionally, Sangamon County was included as part of a Federal Emergency Management Agency (FEMA) federal disaster area due to severe storms and flooding that occurred in late June and early July 2023.

The following table provides a summary of the demographics, housing, and business information for the AA:

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	18.5	25.9	25.9	29.6	0.0
Population by Geography	196,343	13.1	20.8	28.9	37.2	0.0
Housing Units by Geography	91,952	14.6	23.4	30.1	31.9	0.0
Owner-Occupied Units by Geography	58,861	7.9	19.5	31.9	40.7	0.0
Occupied Rental Units by Geography	25,232	28.0	29.2	26.9	15.8	0.0
Vacant Units by Geography	7,859	21.8	34.4	26.3	17.5	0.0
Businesses by Geography	23,200	12.2	22.4	19.0	46.3	0.0
Farms by Geography	846	6.1	12.6	38.3	42.9	0.0
Family Distribution by Income Level	50,068	23.8	15.8	20.8	39.6	0.0
Household Distribution by Income Level	84,093	25.1	15.9	16.9	42.0	0.0
Median Family Income MSA - 44100 Springfield, IL MSA		\$83,948	Median Housing Value			\$137,014
			Median Gross Rent			\$823
			Families Below Poverty Level			9.7%
Sources: 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.						

The analysis of home mortgage lending under the Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units and aggregate lending data, as it represents a better indicator of the opportunities to lend in the market. Examiners use the Federal Financial Institutions Examination Council (FFIEC)-updated median family income (MFI) level to analyze home mortgage lending performance under the Borrower Profile criterion. The following table contains information on the MFIs by category:

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)				
2022 (\$95,400)	<\$47,700	\$47,700 to <\$76,320	\$76,320 to <\$114,480	≥\$114,480
2023 (\$99,300)	<\$49,650	\$49,650 to <\$79,440	\$79,440 to <\$119,160	≥\$119,160
Source: FFIEC				

The analysis of small business loans under the borrower profile criterion compares the distribution of businesses by gross annual revenue (GAR). According to 2023 D&B data, there were 23,200 non-farm businesses in the AA with the following GAR levels:

- 86.2 percent have \$1 million or less,
- 3.3 percent have more than \$1 million, and
- 10.5 percent have unknown revenues.

A total of 57.3 percent of businesses in the AA employ between one and four employees, while 34.4 percent employ five to nine employees. Services (35.3 percent), retail trade, non-classifiable establishments (25.5 percent), retail trade (10.2 percent), and finance, insurance and real estate (10.1 percent) make up the majority of the businesses. According to Moody's Analytics, Sangamon County's largest employers include government, health care systems, education and insurance providers. State and local government jobs provide the greatest portion of employment opportunities in the area.

Illinois Department of Employment Security data from August 2024 shows the unemployment rate in Sangamon County at 4.7 percent, which has declined 0.2 percent from the prior year. It remains higher than the U.S. unemployment rate of 4.4 percent, but lower than the State of Illinois at 5.5 percent as of August 2024.

Competition

WSBT operates in a competitive environment. According to FDIC Deposit Market Share data as of June 30, 2024, 24 financial institutions operate 75 offices with total deposits of \$8.7 billion in Sangamon County. The largest four competitors hold 47.9 percent of the deposit base. The bank ranks 16th with a 1.0 percent market share. While this data only includes FDIC-insured institutions, WSBT also faces competition in the AA from credit unions and other financial services entities, such as investment firms.

There is also a high level of competition for home mortgage loans among banks, credit unions and non-depository mortgage lenders. Most of the competition is from institutions that, based on their size and location, are required to report loans under the Home Mortgage Disclosure Act (HMDA). Aggregate HMDA data provides an indication of area competition for home mortgage loans. In 2023, the most recent HMDA data available, 26 lenders originated 4,453 loans totaling approximately \$648.5 million in the AA. The top five lenders are all local banks and accounted for approximately 36.0 percent of total originations. WSBT ranks 23rd and holds a 1.0 percent market share. The data indicates that there is a preference for utilizing local area financial institutions for mortgage lending needs, rather than larger national lenders or non-depository lenders.

Community Contacts

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs and opportunities in the area. The information from community contacts helps determine whether local financial institutions are responsive to these needs and what credit opportunities may be available.

Examiners conducted an interview with a community contact involved in business development activities primarily in Sangamon County, but also in the surrounding contiguous counties. The interview concentrated on Sangamon County, as that is the area where the bank is operating. The contact discussed local demographics, economic conditions and challenges, housing trends and local credit needs. The contact stated that the local economic outlook is generally positive due to the main sources of employment of government, schools and healthcare. Currently, these employers are experiencing a shortage of qualified candidates for open job positions. Healthcare is

expected to continue to grow for the next 30 years due to the aging of the population. Local and state government is likely to be expanded. Although, the number of schools are not likely increase, they will continue to provide stable jobs in the community. Recent public announcements of two new distribution centers moving to the area will drive new employment opportunities in the services sector. Sangamon County was noted to be significantly more economically stable than surrounding counties.

The contact stated that the area is experiencing a significant housing inventory shortage over the last several years. Housing inventory was estimated to be one-third of what it might typically be. Availability of quality homes under \$100,000 is severely lacking in the Springfield area and availability in the \$100,000 to \$300,000 range is very tight. Outside of higher-end custom homes filling in lots in existing developments, there is little home building underway.

The contact was not aware of any unmet credit needs or unwillingness to lend in the local area. The contact reported that local area banks operate in a very competitive environment and felt that many loans get originated that might not if there was not for the competition. A lack of equity for a business project is generally the largest barrier toward receiving a loan approval. Local banks have been generous with their support of community outreach activities with their participation and sponsorships.

Credit Needs

Considering information from the community contact, bank management, and economic and demographic data, examiners determined that home mortgage and small business loans represent the primary credit needs of the AA. The bank demonstrated reasonable performance for meeting the credit needs of the area, as detailed throughout this evaluation.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation, dated October 22, 2018, to the current evaluation dated October 24, 2024. Examiners used the Interagency Small Institution Examination Procedures to evaluate WSBT's CRA performance, which includes the following lending test criterion:

- Loan-to-deposit ratio,
- Assessment area concentration,
- Geographic distribution,
- Borrower profile, and
- Response to CRA-related complaints.

Activities 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 focus, as well as the number

and dollar volume of loans originated during the evaluation period. The bank's record of originating the two credit products contributed to the overall conclusions; however, less weight was given to small business lending due to its lower concentration in the loan portfolio. Bank records indicate that the lending focus and product offerings remained consistent throughout the evaluation period and management also confirmed this conclusion. Examiners did not analyze any other loan types, such as small farm or consumer loans, because they do not represent major product lines and would not provide material support for conclusions drawn or the rating.

Examiners used the entire universe of home mortgage and small business loans from 2022 and 2023 to assess the AA concentration, geographic distribution and borrower profile criterion performance. In 2022, the bank originated 59 home mortgage loans totaling \$6.2 million and 45 loans totaling \$4.0 million in 2023. The bank's home mortgage lending for 2022 and 2023 was compared to aggregate data for all HMDA reporters. For small business lending, the bank originated 21 loans totaling \$1.7 million in 2022, and 8 loans totaling \$745,000 in 2023. D&B data for 2022 and 2023 was used as a comparative factor to assess small business lending.

While the number and dollar volume of loans are presented, the performance by the number of loans is emphasized because it is a better indicator of the number of individuals and businesses served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

WSBT demonstrated reasonable performance under the Lending Test. The Loan-to-Deposit (LTD) ratio, Assessment Area Concentration, Geographic Distribution, and Borrower Profile support this conclusion.

Loan-to-Deposit Ratio

The LTD ratio is reasonable given the institution's size, financial condition and AA credit needs. The bank's LTD ratio, calculated from Call Report data, averaged 41.3 percent over the past 23 quarters from December 31, 2018 to June 30, 2024. The LTD ratio was stable at approximately 43 percent from December 31, 2018 until March 30, 2020, at which time it increased quarterly to its high of 48.2 percent as of December 31, 2020. The LTD ratio has been generally decreasing since that time to its lowest point of 35.6 percent as of June 30, 2024. The bank attributes this to lower loan demand due to competition and higher interest rates.

Examiners selected four institutions similarly situated to the subject bank based on asset size, geographic location and lending focus. The bank maintained a LTD ratio higher than one institution, but lower than the other three institutions. In addition, all four similarly situated institutions experienced a general decline in their LTD ratios during similar evaluation periods. Lastly, the net LTD does not account for the significant volume of home mortgage loans sold on the secondary market. During the review period, WSBT originated and sold 74 loans totaling \$10.4 million, which further reflects reasonable levels of lending activity.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 06/30/2024 (\$000s)	Average Net LTD Ratio (%)
Similarly-Situated Institution #1	71,607	38.6
Williamsville State Bank & Trust	98,040	41.3
Similarly-Situated Institution #2	219,014	53.7
Similarly-Situated Institution #3	69,096	73.3
Similarly-Situated Institution #4	65,916	80.9
<i>Source: Reports of Condition and Income 12/31/2018 – 06/30/2024</i>		

Assessment Area Concentration

Examiners analyzed all home mortgages and small business loans originations and renewals for 2022 and 2023 to determine the percentage of loans extended inside and outside the assessment area.

Overall, for the period reviewed, WSBT originated a majority of home mortgage and small business loans within its assessment area. In 2022 and 2023, a substantial majority of home mortgage loans by number and dollar amount were originated within the bank’s AA. Due to competition for small business loans in the AA, the bank purchased out of market commercial loans from another lender in 2022. This activity resulted in a majority of small business loans originated outside of the AA in 2022. In 2023, a majority of the small business loans by number and dollar amount were made within the bank’s AA. The following table provides further detail:

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans(\$000s)				Total \$000
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$000	%	\$000	%	
Home Mortgage										
2022	56	94.9	3	5.1	59	6,130	98.5	95	1.5	6,225
2023	42	93.3	3	6.7	45	3,870	96.4	145	3.6	4,015
Subtotal	98	94.2	6	5.8	104	10,000	97.7	240	2.3	10,240
Small Business										
2022	7	33.3	14	66.7	21	479	28.0	1,231	72.0	1,710
2023	5	62.5	3	37.5	8	307	41.2	438	58.8	745
Subtotal	12	41.4	17	58.6	29	786	32.0	1,669	68.0	2,455
Total	110	82.7	23	17.3	133	10,786	85.0	1,909	15.0	12,695
<i>Source: Bank Data</i>										

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. The bank's reasonable performance of home mortgage and small business lending supports this conclusion. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts. This analysis only includes loans originated inside the assessment area.

Home Mortgage Loans

The bank's home mortgage lending reflects reasonable dispersion throughout the AA. Geographic distribution of home mortgage loans compares the bank's lending performance to aggregate data, and the percentage of owner-occupied units located in each census tract.

Lending in low-income tracts is reasonable. The bank's lending in low-income tracts was comparable to aggregate performance in 2022 and exceeded aggregate performance in 2023, WSBT's performance in moderate-income tracts is also reasonable, supported by excellent penetration in 2022 and reasonable penetration in 2023. The bank's performance indicates its willingness to lend in low- and moderate-income tracts in the AA.

Geographic Distribution of Home Mortgage Loans						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	7.9	6.3	3	5.4	75	1.2
2023	7.9	6.7	5	11.9	215	5.6
Moderate						
2022	19.5	24.4	19	33.9	1,635	26.7
2023	19.5	23.4	8	19.0	770	19.9
Middle						
2022	31.9	28.9	13	23.2	1,025	16.7
2023	31.9	30.3	13	31.0	835	21.6
Upper						
2022	40.7	40.4	21	37.5	3,395	55.4
2023	40.7	39.6	16	38.1	2,050	53.0
Not Available						
2022	0.0	0.0	0	0.0	0	0.0
2023	0.0	0.0	0	0.0	0	0.0
Totals						
2022	100.0	100.0	56	100.0	6,130	100.0
2023	100.0	100.0	42	100.0	3,870	100.0
<i>Sources: 2020 U.S. Census; Bank Data, 2022 & 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA.

Lending in low-income tracts is reasonable, supported by the bank's performance in 2022. The bank made three small business loans in low-income census tracts or 42.9 percent, which significantly exceeds the area demographic of 13.4 percent; however, it's a nominal number of loans. In 2023, WSBT did not originate any loans in low-income tracts.

Lending in moderate-income tracts is reasonable, supported by the bank's performance in 2023. One loan was made in a moderate-income census tract equating to 20.0 percent of small business loan volume for the year, comparable to the area demographic of 22.4 percent, however, again, the volume of activity is low.

Competition for small business loans in these tracts is high with multiple financial institutions located within the low- and moderate-income tracts or in closer proximity than WSBT. Overall, the limited lending opportunities closer to the bank's branches, coupled with the level of competing financial institutions in the low and moderate-income tracts, result in limited lending demand and opportunities for the bank.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes and borrowers of different income levels. Examiners focused on the percentage by number of home mortgage loans to low- and moderate-income borrowers and small business loans to businesses with GARs of \$1 million or less. Only loans located inside the AA are included in the analyses.

Home Mortgage Loans

Overall, the distribution of home mortgage loans to individuals of different income levels, including low- and moderate-income borrowers, is reasonable. Examiners compared the bank's performance to aggregate performance for 2022 and 2023.

Home mortgage lending to low-income borrowers is reasonable. In 2022, the bank's performance, at 26.8 percent, significantly exceeded aggregate performance of 14.1 percent. In 2023, the bank's performance at 11.9 percent was comparable to aggregate performance of 13.7 percent. As shown in the following table, the bank's performance of lending to moderate-income borrowers in both 2022 and 2023 was comparable to aggregate data and exceeded area demographics and is reasonable.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2022	23.8	14.1	15	26.8	975	15.9
2023	23.8	13.7	5	11.9	225	5.8
Moderate						
2022	15.8	19.1	12	21.4	1,220	19.9
2023	15.8	21.8	10	23.8	800	20.7
Middle						
2022	20.8	18.1	9	16.1	805	13.1
2023	20.8	20.4	15	35.7	1,385	35.8
Upper						
2022	39.6	27.3	17	30.4	2,875	46.9
2023	39.6	27.2	12	28.6	1,460	37.7
Not Available						
2022	0.0	21.5	3	5.4	255	4.2
2023	0.0	16.9	0	0.0	0	0.0
Totals						
2022	100.0	100.0	56	100.0	6,130	100.0
2023	100.0	100.0	42	100.0	3,870	100.0
<i>Sources: 2020 U.S. Census; Bank Data, 2022 & 2023 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%</i>						

Small Business Loans

The dispersion of small business loans to businesses of different sizes is reasonable. This conclusion is drawn based on the bank's lending activity to businesses reporting GARs of less than or equal to \$1 million. The bank originated seven loans totaling \$479,000 in 2022 and five loans totaling \$307,000 in 2023, all of which were made to businesses with GARs of less than or equal to \$1 million. This exceeds the percentage of businesses in the AA of 84.4 percent and 86.2 percent, respectively.

Response to Complaints

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

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

GLOSSARY

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

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

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

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

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

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

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

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent in the case of a geography.

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

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

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

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

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.



WILLIAMSVILLE
STATE BANK AND TRUST

COMMUNITY REINVESTMENT ACT

PUBLIC FILE

P.O. BOX 9317
SPRINGFIELD, IL 62711
PHONE: 217-698-9728

P.O. BOX 267
SHERMAN, IL 62684
PHONE: 217-698-9728

P.O. BOX 379
WILLIAMSVILLE, IL 62693
PHONE: 217-698-9728



COMMUNITY REINVESTMENT ACT

WRITTEN COMMENTS AND RESPONSES

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

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COMMUNITY REINVESTMENT ACT

Williamsville State Bank and Trust has designated all of Sangamon County, Illinois as its assessment area. Sangamon County consists of fifty-four (54) census tracts.

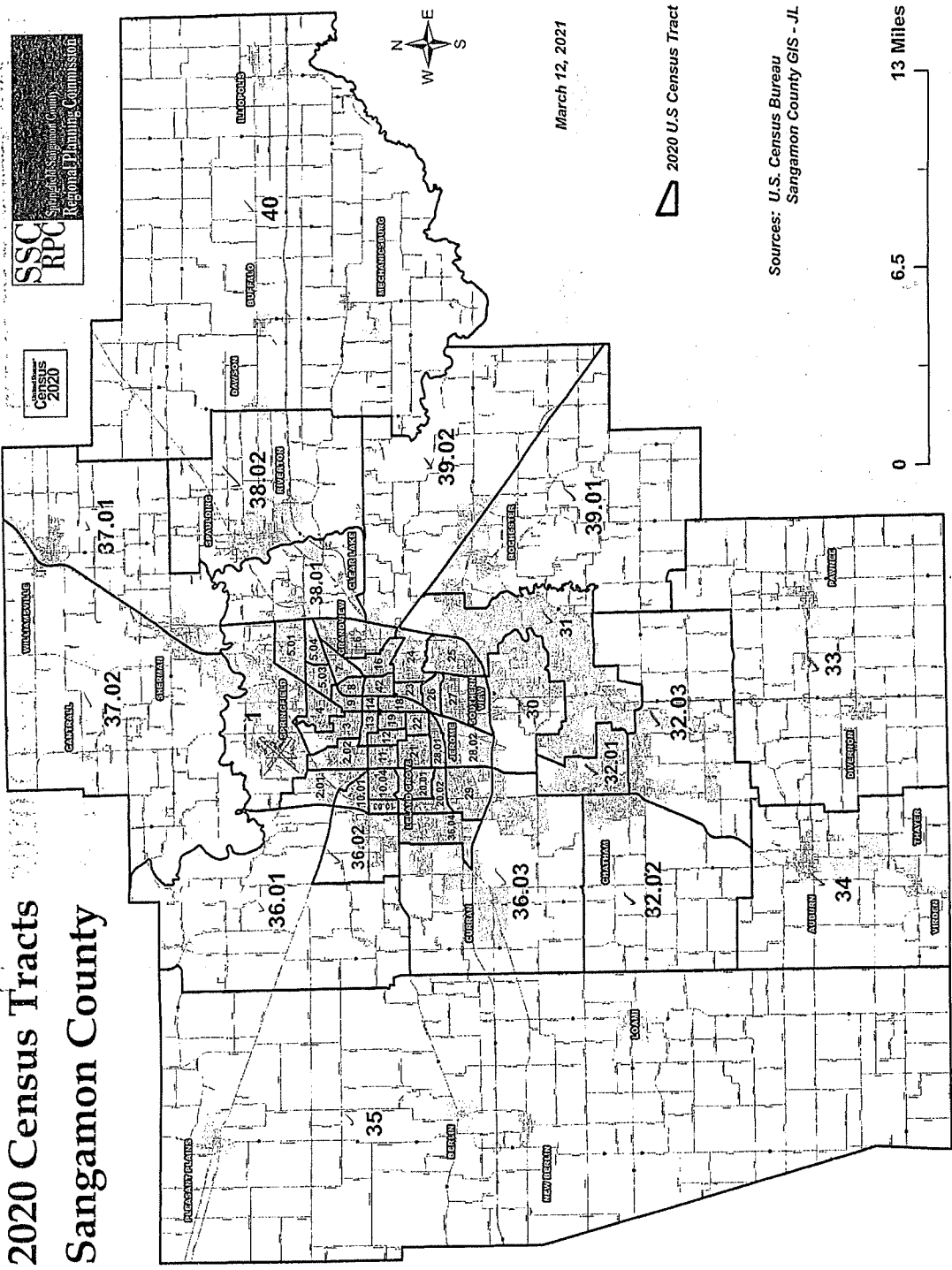
****See list of census tracts and maps on following page****

P.O. BOX 9317
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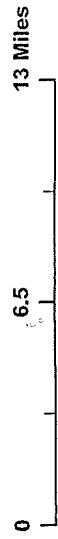
2020 Census Tracts Sangamon County



March 12, 2021

2020 U.S. Census Tract

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





COMMUNITY REINVESTMENT ACT

Loan to Deposit Ratios

December 2024	35.73%
September 2024	35.21%
June 2024	35.63%
March 2024	36.18%
December 2023	37.61%

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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

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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.

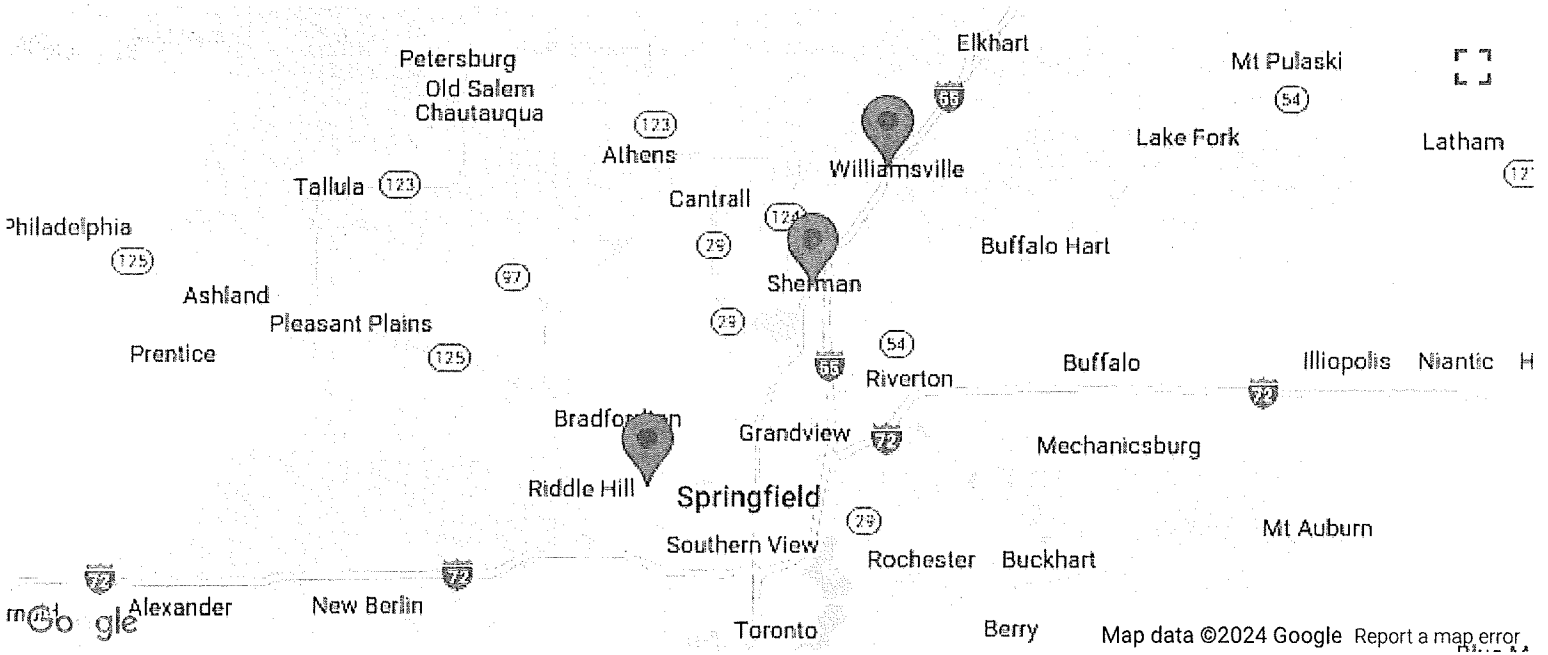
These data are available online at the Consumer Financial Protection Bureau's website (www.consumerfinance.gov/hmda).

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

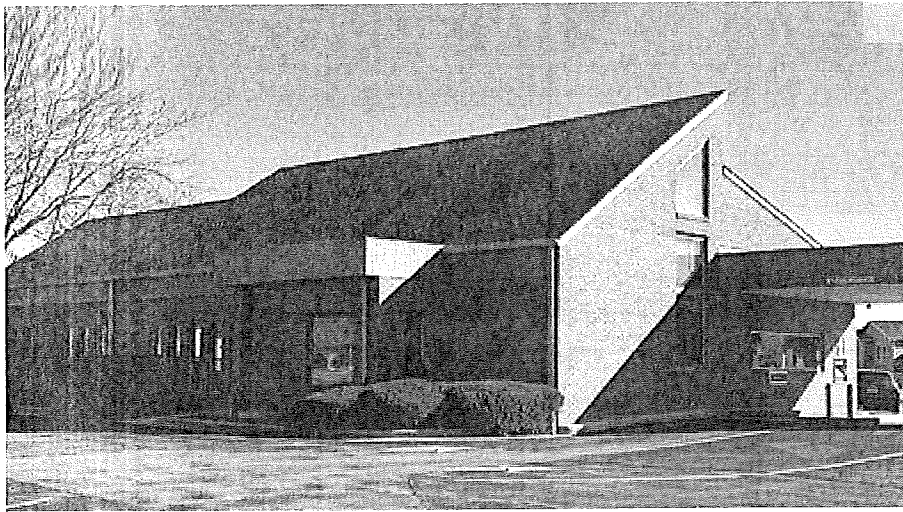
Saturday 9:00 - 12:00

Hours subject to change

Drive-Up Hours:

Monday-Friday 8:00 - 5:30

Saturday 8:30 - 12:00



Sherman Branch

480 S. Crossing Drive (just off Old Route 66)

Sherman, IL 62684

P.O. Box 267

Sherman, IL 62684

Phone: (217) 698-9728

Fax: (217) 496-2961

Hours subject to change

ATM: Yes

Lobby Hours:

Monday-Friday 9:00 - 4:00

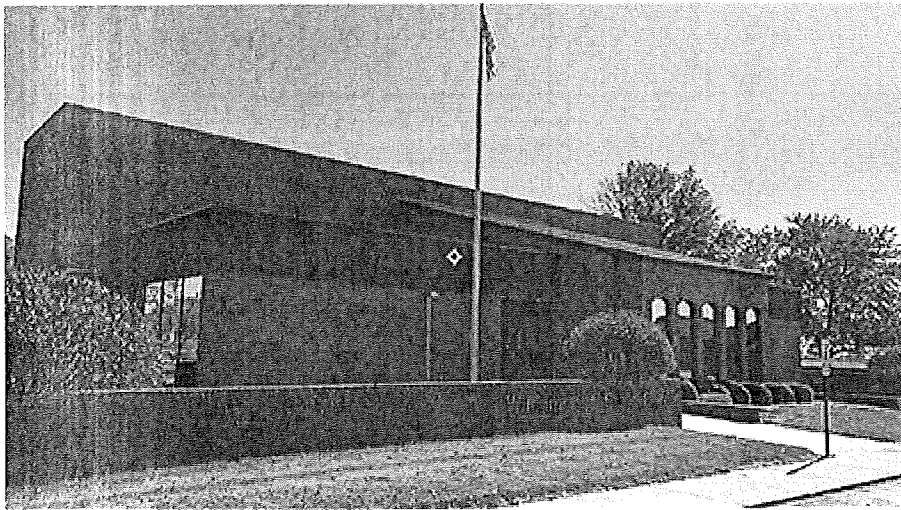
Saturday 9:00 - 12:00

Hours subject to change

Drive-Up Hours:

Monday-Friday 8:00 - 5:30

Saturday 8:30 - 12:00



Williamsville Branch

512 W. Main Street
Williamsville, IL 62693

P.O. Box 379
Williamsville, IL 62693
Phone: (217) 698-9728
Fax: (217) 566-3438
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-Thursday	8:00 - 5:00
Friday	8:00 - 5:30
Saturday	8:30 - 12:00