



## PUBLIC DISCLOSURE

December 1, 2025

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Commercial Bank & Trust, National Association  
Charter Number: 1154

701 LaSalle Street  
Ottawa, Illinois 61350

Office of the Comptroller of the Currency

211 Fulton Street  
Suite 604  
Peoria, Illinois 61602

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

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The Lending Test is rated: Satisfactory.**

**The Community Development Test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on:
  - The bank exhibits a reasonable geographic distribution of loans by income category of the geography.
  - The bank exhibits a poor borrower distribution of loans by borrower income.
  - A majority of the bank's loans are originated or purchased inside its assessment areas (AAs).
  - The loan-to-deposit (LTD) ratio is more than reasonable.
- The Community Development (CD) Test rating is based on excellent responsiveness to community development needs through community development loans, investments, and services.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio was more than reasonable.

The quarterly average LTD ratio was 97.0 percent for the 12-quarter period between January 1, 2022, and December 31, 2024. Over the period, the bank's LTD ratio ranged between a low of 92.3 percent to a high of 100.7 percent.

The bank's quarterly average LTD ratio for the period ranked second highest out of 12 similarly situated Federal Deposit Insurance Corporation (FDIC) insured institutions that compete with the bank for deposits in the AAs. The comparable institutions range in total asset size from \$1.0 billion to \$2.4 billion and reported quarterly average LTD ratios from 39.2 percent to 125.8 percent.

## Lending in Assessment Area

A majority of the bank's loans were inside its AAs.

The bank originated and purchased 72.1 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	414	71.50	165	28.50	579	137,777	65.35	73,065	34.65	210,842
Small Business	25	83.33	5	16.67	30	7,350	95.13	376	4.87	7,726
<b>Total</b>	<b>439</b>	<b>72.09</b>	<b>170</b>	<b>27.91</b>	<b>609</b>	<b>145,127</b>	<b>66.40</b>	<b>73,441</b>	<b>33.60</b>	<b>218,568</b>

*Source: HMDA data and sample of business loans originated or purchased from 1/1/2022 to 12/31/2024.  
Due to rounding, totals may not equal 100.0%*

## Description of Institution

American Commercial Bank & Trust, N.A. (ACB&T or bank) is an intrastate bank headquartered in Ottawa, Illinois with total assets of \$1.7 billion as of December 31, 2024. ACB&T is wholly owned by First Ottawa Bancshares Inc., a one bank holding company headquartered in Ottawa, Illinois.

The bank has one rating area, the state of Illinois, and two legal delineated AAs. Both AAs are located within the Chicago-Naperville-Elgin, IL-IN-WI combined statistical area (Chicago CSA).

The bank serves its customers through 11 branches spread across the AA along with four drive-up only locations. Additionally, the bank serves its customer through 10 ATMs, of which none are deposit taking. All branches are open Monday through Friday with four of these branches offering services on Saturdays. Three branches are by appointment only. The bank has no stand-alone ATMs and all ATMs are located at branch locations, with the exception of the Goose Island branch in Chicago, Illinois, which does not have an ATM. Customers have additional banking access through the bank's website and mobile platforms.

The bank is primarily a commercial lender and offers traditional loan products for agricultural, commercial, consumer, and residential purposes. Commercial loans represent the largest portion of the loan portfolio as \$1.3 billion (86.7 percent of the total loan portfolio). Commercial loans are followed by residential at \$140.5 million, agricultural at \$30.2 million, and consumer at \$22.4 million, per call report data as of December 31, 2024.

ACB&T reported a net loans and leases to total assets ratio of 83.1 percent and a tier 1 leverage capital ratio of 9.1 percent as of December 31, 2024.

There are no legal or financial circumstances that impede the bank's ability to meet the credit needs of the AA.

The previous CRA rating for ACB&T utilizing the Intermediate Small Bank criterion, was Needs to Improve, as detailed in the Performance Evaluation dated January 2, 2024.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period covers the period from January 1, 2022, through December 31, 2024. We evaluated ACB&T under the Intermediate Small Bank evaluation procedures, which includes a Lending Test and a Community Development Test.

During the evaluation period, the bank's AA within the Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area (MSA) changed names to the Chicago-Naperville-Elgin, IL-IN MSA (Chicago MSA) due to Office of Management and Budget Bulletin No. 23-01, which resulted in the Lending Test evaluating loans originated or purchased between two analysis periods, January 1, 2022, through December 31, 2023, and January 1, 2024, through December 1, 2024.

Business loans were compared to 2023 and 2024 Dunn and Bradstreet small business data and 2023 aggregate data. Home mortgage loans were compared to the 2020 U.S. Census Data and to 2023 and 2024 aggregate data.

During the evaluation period, the bank originated or purchased 1,961 loans totaling \$1.6 billion with business loans accounting for 90.1 percent by dollar volume and 64.8 percent by number, per bank data. Mortgage lending accounted for 8.2 percent by dollar volume and 32.7 percent by number. Based on this data, the primary loan product for the evaluation was determined to be business loans. Home mortgage loans are included in this evaluation at the request of bank management. Business loans received more consideration in arriving at conclusions since these loans represented the largest volume of loan activity during the evaluation period. The OCC evaluated business loans through a sample of small business loans and evaluated home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) originated or purchased between January 1, 2022, and December 31, 2024.

The Community Development Test evaluated eligible community development investments, loans, and services between January 1, 2022, and December 31, 2024.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated Non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### Ratings

The bank's overall rating is based on the performance in the state of Illinois. Refer to the "Scope" section under the State Rating section for details regarding how the areas and lending products were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

## State Rating

### State of Illinois

**CRA rating for the state of Illinois<sup>1</sup>:** Satisfactory.

**The Lending Test is rated:** Satisfactory.

**The Community Development Test is rated:** Outstanding.

The major factors that support this rating include:

- The bank exhibits a poor distribution of loans by borrower income. The borrower distribution of home mortgage loans was excellent while the borrower distribution of small business loans was poor.
- The bank exhibits a reasonable distribution of loans by income level of geography. The geographic distribution of home mortgage loans was very poor while the geographic distribution of small business loans was reasonable.
- The bank exhibited excellent responsiveness to community development needs, including excellent responsiveness through community development loans and investments.

### Description of Institution's Operations in Illinois

The bank has two legal AAs in the state of Illinois, the Chicago MSA and the Non-MSA. The Chicago MSA includes seven counties in the Chicago MSA, including all of DeKalb, DuPage, Grundy, Kane, and Kendall counties along with portions of Cook and Will counties. The Non-MSA includes LaSalle County and one census tract in northern Livingston County. Both the Chicago MSA and Non-MSA are within the boundaries of the Chicago CSA and are combined as a single AA for analysis purposes in this evaluation. Refer to Appendix A, Scope of Examination, for a list of AAs.

The bank serves its customers through 11 branches spread across the AA along with four drive-up only locations. Additionally, the bank serves its customers through 10 ATMs, of which none are deposit taking. All branches are open Monday through Friday with four of these branches offering services on Saturdays. Three branches are by appointment only. The bank has no stand-alone ATMs and all ATMs are located at branch locations, with the exception of the Goose Island, Chicago, Illinois branch, which does not have an ATM. Customers have additional banking access through the bank's website and mobile platforms.

Major employment sectors in the AA include health care, manufacturing, retail trade, and education services.

There were no changes in the number of census tracts or income categories of low- and moderate-income census tracts during the evaluation period. Two middle-income census tracts in LaSalle County became upper-income census tracts in 2024. During the review period, the AA contained 201 low-

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

income census tracts and 361 moderate-income census tracts. The AA contained 21 unclassified census tracts.

Competition for deposits is high among financial institutions. The bank held a deposit market share position of 0.3 percent in the Chicago CSA, with \$1.4 billion in deposits. The bank ranked 36th out of 148 FDIC insured financial institutions competing for the area's \$531.9 billion in deposits, as of June 30, 2024.

Unemployment rates peaked in 2024 after a slight decline in 2023. According to the U.S. Bureau of Labor Statistics, the annual unemployment rate (AUR) in the state of Illinois was 4.6 percent in 2022, which then increased to 5.0 percent in 2024. Unemployment rates for seven of nine counties in the AA compared favorably or equally to the state of Illinois unemployment rate for 2022. Unemployment rates for six of nine counties in the AA compared favorably or equally to the state of Illinois unemployment rate for 2023. Unemployment rates for five of nine counties in the AA compared favorably or equally to the state of Illinois unemployment rate for 2024.

	2022 AUR	2023 AUR	2024 AUR
State of Illinois	4.6	4.5	5.0
DeKalb County	4.4	4.7	4.7
DuPage County	3.7	3.5	4.3
Grundy County	4.6	4.3	5.3
Kane County	4.5	5.0	5.0
Kendall County	4.0	4.5	4.5
Cook County	5.0	4.5	5.4
Will County	4.5	4.2	5.1
LaSalle County	5.0	5.7	5.7
Livingston County	4.1	4.1	4.1

Source: U.S. Bureau of Labor Statistics

Based on information in the demographic table below, in 2024, low-income families earned less than \$41,400 to \$56,850 and moderate-income families earned less than \$66,240 to \$90,960, depending on the Metropolitan Division (MD)/MSA. One method used to determine housing affordability assumes a minimum monthly principal and interest payment of not more than 30 percent of the applicant's income. Depending on the MD/MSA, this calculated to a maximum monthly mortgage payment between \$1,035 to \$1,421 for low-income borrowers and between \$1,656 to \$2,274 for moderate-income borrowers. Assuming a 30-year mortgage with a five percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the CSA median housing value would be \$1,389. Most low-income borrowers in the AA would be unable to afford a mortgage loan while most moderate-income borrowers would be able to afford a mortgage.

We relied on information from six community contact interviews to understand area needs and opportunities for the Chicago CSA. The contacts represented organizations primarily focused on financial counseling services, housing, and small business development. The contacts noted the economic condition as relatively stable although low levels of affordable housing and unemployment stemming from the pandemic remain pervasive issues in the AA. The contacts noted that while income levels have increased, they do not match the increases in housing costs which further prevent

homeownership. Financial education and support for small businesses continue to be needs in the community. Multiple contacts noted that while local area banks aid the AA, assistance gaps are apparent in micro and small business lending, flexible credit underwriting, and down payment assistance, particularly in low- and moderate-income (LMI) geographies. The contacts had no negative perceptions of ACB&T.

The bank created a loan program on July 1, 2024, to help borrowers achieve home ownership in LMI geographies and provide up to \$2,500 in credits for either closing costs or interest rate buydown. This program helped three borrowers in moderate-income geographies with credits totaling \$4,526, during the evaluation period

## Chicago CSA

Assessment Area – Chicago CSA						
						2022-2023
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
<b>Geographies (Census Tracts)</b>	1,667	12.06	21.66	31.37	33.65	1.26
<b>Population by Geography</b>	6,833,076	9.18	21.32	33.76	35.13	0.62
<b>Housing Units by Geography</b>	2,740,855	9.40	20.37	33.45	36.11	0.68
<b>Owner-Occupied Housing by Geography</b>	1,554,390	4.29	16.80	36.70	41.90	0.32
<b>Occupied Rental Units by Geography</b>	971,873	15.28	25.71	29.75	28.12	1.15
<b>Vacant Units by Geography</b>	214,592	19.72	22.02	26.65	30.46	1.15
<b>Businesses by Geography</b>	280,138	5.57	14.85	31.34	47.64	0.61
<b>Farms by Geography</b>	5,367	3.89	15.33	38.29	42.05	0.43
<b>Family Distribution by Income Level</b>	1,587,468	22.81	16.22	18.84	42.14	0.00
<b>Household Distribution by Income Level</b>	2,526,263	25.09	15.11	16.71	43.09	0.00
<b>Unemployment rate (%)</b>	5.85	14.91	7.50	5.01	3.77	12.88
<b>Households Below Poverty Level (%)</b>	11.37	30.12	15.57	9.31	6.29	29.01
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)	\$92,622	<b>Median Housing Value</b>				\$258,900
Median Family Income (20994 - Elgin, IL MD)	\$97,326	<b>Median Gross Rent</b>				\$1,173
Median Family Income (Non-MSAs - IL)	\$68,958	<b>Families Below Poverty Level</b>				8.09
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2023	\$109,800					
Median Family Income (20994 - Elgin, IL MD) for 2023	\$113,500					
Median Family Income (Non-MSAs - IL) for 2023	\$82,300					
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area – Chicago CSA						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,667	12.06	21.66	31.25	33.77	1.26
Population by Geography	6,833,076	9.18	21.32	33.67	35.22	0.62
Housing Units by Geography	2,740,855	9.40	20.37	33.34	36.22	0.68
Owner-Occupied Housing by Geography	1,554,390	4.29	16.80	36.59	42.00	0.32
Occupied Rental Units by Geography	971,873	15.28	25.71	29.67	28.19	1.15
Vacant Units by Geography	214,592	19.72	22.02	26.46	30.65	1.15
Businesses by Geography	275,049	5.49	15.09	31.58	47.26	0.58
Farms by Geography	5,161	3.70	15.60	38.62	41.85	0.23
Family Distribution by Income Level	1,587,468	22.79	16.22	18.83	42.15	0.00
Household Distribution by Income Level	2,526,263	25.08	15.10	16.71	43.11	0.00
Unemployment rate (%)	5.85	14.91	7.50	5.01	3.77	12.88
Households Below Poverty Level (%)	11.37	30.12	15.57	9.30	6.30	29.01
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD)		\$92,622			<b>Median Housing Value</b>	\$258,900
Median Family Income (20994 - Elgin, IL MD)		\$97,326			<b>Median Gross Rent</b>	\$1,173
Median Family Income (Non-MSAs - IL)		\$67,835			<b>Families Below Poverty Level</b>	8.09
Median Family Income (16984 - Chicago-Naperville-Schaumburg, IL MD) for 2023		\$109,800				
Median Family Income (20994 - Elgin, IL MD) for 2023		\$113,700				
Median Family Income (Non-MSAs - IL) for 2023		\$82,800				
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## Scope of Evaluation in Illinois

The combined AAs within the Chicago CSA received a full-scope review. More consideration was given to the lending performance in the 2022-2023 analysis period than the 2024 analysis period as a greater volume of lending occurred in this period.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Illinois was reasonable.

### Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the state.

### *Home Mortgage Loans*

Refer to Table 7 in the state of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans is very poor. More weight was placed on the performance in moderate-income geographies due to these geographies having more opportunities for owner-occupied housing lending than in low-income geographies.

2022-2023:

The distribution of home mortgage loans is very poor.

The proportion of lending in low- and moderate-income geographies was significantly below both the percent of owner-occupied housing units and the aggregate distribution of all reporting lenders.

2024:

The distribution of home mortgage loans is poor.

There was no lending in low-income geographies. The proportion of lending in moderate-income geographies was below both the percent of owner-occupied housing units and the aggregate distribution of all reporting lenders.

### ***Small Loans to Businesses***

Refer to Table 9 in the state of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The overall distribution of small loans to businesses is reasonable. More consideration was placed on the performance in moderate-income geographies due to these geographies having more opportunities for business lending than in low-income geographies.

2022-2023:

The distribution of small loans to businesses is excellent.

The proportion of lending in low-income geographies was below both the percent of businesses in those geographies and the aggregate distribution of all reporting lenders. The proportion of lending in moderate-income geographies exceeded both the percent of businesses in those geographies and the aggregate distribution of all reporting lenders.

2024:

The distribution of small loans to businesses is reasonable.

The proportion of lending in low-income geographies exceeded both the percent of businesses in those geographies and the aggregate distribution of all reporting lenders. The proportion of lending in moderate-income geographies was near to both the percent of businesses in those geographies and the aggregate distribution of all reporting lenders.

### ***Lending Gap Analysis***

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed and did not identify any such gaps. Examiners reviewed summary reports, maps, and analyzed the bank's lending activity over the evaluation period.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a poor distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

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

Refer to Table 8 in the state of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans is excellent. Home mortgage lending to moderate-income families received greater consideration due to home affordability challenges impacting low-income families in the AA.

2022-2023:

The distribution of home mortgage loans is excellent.

The proportion of lending to low-income borrowers was significantly below the percent of low-income families but exceeded the aggregate distribution of all reporting lenders. The aggregate distribution of all reporting lenders was also significantly below the percent of low-income families likely due to challenges in home affordability among low-income families. The proportion of lending to moderate-income borrowers exceeded the percent of moderate-income families and was near to the aggregate distribution of all reporting lenders.

2024:

The distribution of home mortgage loans is reasonable.

The proportion of lending to low-income borrowers was significantly below the percent of low-income families but exceeded the aggregate distribution of all reporting lenders. The aggregate distribution of all reporting lenders was also significantly below the percent of low-income families likely due to challenges in home affordability among low-income families. The proportion of lending to moderate-income borrowers was near to both the percent of moderate-income borrowers and the aggregate distribution.

### ***Small Loans to Businesses***

Refer to Table 10 in the state of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The overall distribution of small loans to businesses is poor.

2022-2023:

The distribution of small loans to businesses is poor.

The proportion of small loans to businesses with revenues of \$1 million or less was significantly below the percent of businesses and below the aggregate distribution of all reporting lenders.

2024:

The distribution of small loans to businesses is poor.

The proportion of small loans to businesses with revenues of \$1 million or less was significantly below the percent of businesses and below the aggregate distribution of all reporting lenders.

### Responses to Complaints

ACB&T did not receive any complaints about its performance in helping to meet the credit needs of its AA during the evaluation.

## COMMUNITY DEVELOPMENT TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Chicago CSA	19	90.5	29,095	92.7
Statewide, No PMF	2	9.5	2,258	7.3
Total	21	100.0	31,353	100.0

The number and amount of Community Development Loans represent excellent responsiveness to the needs of the AA. During the evaluation, ACB&T made 19 CD loans in the AA totaling \$29.1 million, which represents 19.1 percent of tier 1 capital. By dollar volume, CD loans in the AA provided for economic development of LMI areas at 50.6 percent, benefited affordable housing at 47.8 percent, and benefited community services at 1.6 percent. Two additional qualifying CD loans totaling \$2.3 million benefited affordable housing in the statewide area, which represents 1.5 percent of tier 1 capital.

The following are examples of CD loans the bank originated or purchased in the AA:

- A \$10.8 million loan to support the expansion of business operations in a moderate-income census tract that created 20 jobs for LMI persons.
- A \$1.3 million loan to support affordable housing, which provided 40 units to LMI persons
- A \$472 thousand loan to a community organization that provides food pantry services to LMI persons.

## Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago CSA	1	2,000	21	22,443	22	100.0	24,443	100.0	0	0
<b>Total</b>	<b>1</b>	<b>2,000</b>	<b>21</b>	<b>22,443</b>	<b>22</b>	<b>100.0</b>	<b>24,443</b>	<b>100.0</b>	<b>0</b>	<b>0</b>

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

The number and dollar amount of qualified investments represent excellent responsiveness to the needs of the AA. During the evaluation period, ACB&T made four investments and 17 donations totaling \$22.4 million in qualified investments. The dollar volume of current qualifying investments represents 14.8 percent of tier 1 capital. By dollar volume of total qualified investments, 99.9 percent provided affordable housing and 0.1 percent funded community services to LMI persons.

The dollar volume of prior period investments represents 1.3 percent of tier 1 capital. This is made up of one \$2 million prior period investment that continues to benefit affordable housing in the AA with all 92 units allocated as affordable housing.

The following are examples of qualified investments in the AA:

- A \$15 million investment benefiting affordable housing through multiple properties in the AA. In total, the investment supports 2,173 units of affordable housing within the AA.
- A \$2 million investment in a multifamily property in which 160 units out of 192 provide affordable housing.
- Seven donations totaling \$6.3 thousand to an organization that provides food pantry services to LMI persons.

### Extent to Which the Bank Provides Community Development Services

The extent to which the bank provided community development services represents adequate responsiveness to the needs of the AA. During the evaluation period, five employees provided 736 total CD service hours to seven different organizations. Of these hours, four employees provided 588 CD service hours through board and committee participation. One activity supported affordable housing while all other activities supported community services.

Examples of CD Services in the AA:

- A bank officer served as a facilitator for a housing development project in a moderate-income census tract that correlates with the identified need for affordable housing in the AA.
- A mortgage lender served in an educational program designed to provide financial education for LMI persons.
- A bank officer served as a treasurer for a community organization that provides food pantry services.

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

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation and loan products considered. The table also reflects the MSA(s) and Non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	January 1, 2022 – December 31, 2024	
<b>Bank Products Reviewed:</b>	Home mortgage and small business Community development loans, qualified investments, community development services	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Illinois		
Chicago CSA	Full-scope	Portions of Cook, Livingston, and Will counties. All of DeKalb, DuPage, Grundy, Kane, Kendall, and LaSalle counties.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
ACB&T	Satisfactory	Outstanding	Satisfactory
MMSA or State:			
Illinois	Satisfactory	Outstanding	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Low-Income:** Individual income that is at 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 state/assessment area.

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

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

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

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

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

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

**Multistate Metropolitan Statistical Area (MMSA):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: (1) the percentage distribution of businesses with revenues of greater than \$1 million; and, (2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

**Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2022-2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Chicago CSA	300	75,668	100.00	284,520	4.29	0.67	4.35	16.80	5.67	15.36	36.70	55.67	35.61	41.90	38.00	44.28	0.32	--	0.40
<b>Total</b>	<b>300</b>	<b>75,668</b>	<b>100.00</b>	<b>284,520</b>	<b>4.29</b>	<b>0.67</b>	<b>4.35</b>	<b>16.80</b>	<b>5.67</b>	<b>15.36</b>	<b>36.70</b>	<b>55.67</b>	<b>35.61</b>	<b>41.90</b>	<b>38.00</b>	<b>44.28</b>	<b>0.32</b>	<b>--</b>	<b>0.40</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Chicago CSA	146	62,109	100.00	125,553	4.29	--	4.44	16.80	10.27	15.35	36.59	49.32	35.60	42.00	39.73	44.17	0.32	0.68	0.44
<b>Total</b>	<b>146</b>	<b>62,109</b>	<b>100.00</b>	<b>125,553</b>	<b>4.29</b>	<b>--</b>	<b>4.44</b>	<b>16.80</b>	<b>10.27</b>	<b>15.35</b>	<b>36.59</b>	<b>49.32</b>	<b>35.60</b>	<b>42.00</b>	<b>39.73</b>	<b>44.17</b>	<b>0.32</b>	<b>0.68</b>	<b>0.44</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022-2023**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Chicago CSA	300	75,668	100.00	284,520	22.81	9.00	8.36	16.22	18.00	20.63	18.84	20.00	21.31	42.14	41.67	33.70	--	11.33	16.02
<b>Total</b>	<b>300</b>	<b>75,668</b>	<b>100.00</b>	<b>284,520</b>	<b>22.81</b>	<b>9.00</b>	<b>8.36</b>	<b>16.22</b>	<b>18.00</b>	<b>20.63</b>	<b>18.84</b>	<b>20.00</b>	<b>21.31</b>	<b>42.14</b>	<b>41.67</b>	<b>33.70</b>	<b>--</b>	<b>11.33</b>	<b>16.02</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2024**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Chicago CSA	146	62,109	100.00	125,553	22.79	6.85	5.87	16.22	15.07	17.99	18.83	15.75	21.36	42.15	47.26	36.59	--	15.07	18.18
<b>Total</b>	<b>146</b>	<b>62,109</b>	<b>100.00</b>	<b>125,553</b>	<b>22.79</b>	<b>6.85</b>	<b>5.87</b>	<b>16.22</b>	<b>15.07</b>	<b>17.99</b>	<b>18.83</b>	<b>15.75</b>	<b>21.36</b>	<b>42.15</b>	<b>47.26</b>	<b>36.59</b>	<b>--</b>	<b>15.07</b>	<b>18.18</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2022-2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Chicago CSA	39	13,005	100.00	399,866	5.57	2.56	4.54	14.85	17.95	15.13	31.34	53.85	33.87	47.64	25.64	45.97	0.61	0.00	0.49
<b>Total</b>	<b>39</b>	<b>13,005</b>	<b>100.00</b>	<b>399,866</b>	<b>5.57</b>	<b>2.56</b>	<b>4.54</b>	<b>14.85</b>	<b>17.95</b>	<b>15.13</b>	<b>31.34</b>	<b>53.85</b>	<b>33.87</b>	<b>47.64</b>	<b>25.64</b>	<b>45.97</b>	<b>0.61</b>	<b>0.00</b>	<b>0.49</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2024**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Chicago CSA	29	9,764	100.00	399,866	5.49	6.90	4.54	15.09	10.34	15.13	31.58	41.38	33.87	47.26	41.38	45.97	0.58	0.00	0.49
<b>Total</b>	<b>29</b>	<b>9,764</b>	<b>100.00</b>	<b>399,866</b>	<b>5.49</b>	<b>6.90</b>	<b>4.54</b>	<b>15.09</b>	<b>10.34</b>	<b>15.13</b>	<b>31.58</b>	<b>41.38</b>	<b>33.87</b>	<b>47.26</b>	<b>41.38</b>	<b>45.97</b>	<b>0.58</b>	<b>0.00</b>	<b>0.49</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2022-2023**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago CSA	39	13,005	100.00	399,866	85.84	28.21	54.47	5.63	71.79	8.53	0.00
<b>Total</b>	<b>39</b>	<b>13,005</b>	<b>100.00</b>	<b>399,866</b>	<b>85.84</b>	<b>28.21</b>	<b>54.47</b>	<b>5.63</b>	<b>71.79</b>	<b>8.53</b>	<b>0.00</b>

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, 2023 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2024**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago CSA	29	9,764	100.00	399,866	85.49	31.03	54.47	5.29	68.97	9.22	0.00
<b>Total</b>	<b>29</b>	<b>9,764</b>	<b>100.00</b>	<b>399,866</b>	<b>85.49</b>	<b>31.03</b>	<b>54.47</b>	<b>5.29</b>	<b>68.97</b>	<b>9.22</b>	<b>0.00</b>

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%