



## PUBLIC DISCLOSURE

December 1, 2025

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Albany Bank and Trust Company, National Association  
Charter Number: 14688

3400 West Lawrence Ave.  
Chicago, Illinois 60625

Office of the Comptroller of the Currency

Downers Grove Field Office  
2001 Butterfield Road, Suite 400  
Downers Grove, Illinois 60515

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

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## Overall CRA Rating

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

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

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

The major factors that support this rating include:

- The Lending Test rating is based on Albany Bank and Trust Company, National Association's (Albany or bank) performance in the state of Illinois.
- The bank's quarterly average loan-to-deposit (LTD) ratio is more than reasonable.
- The majority of loans originated by Albany are inside the bank's designated assessment area (AA).
- The geographic distribution of home mortgage loans to low- and moderate-income (LMI) census tracts (CTs) is excellent.
- The Community Development (CD) Test rating is based on Albany's excellent responsiveness to CD needs in the AA primarily through CD loans during the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD was more than reasonable. Albany's LTD averaged 84.54 percent over the evaluation period, with a low of 73.77 percent (as of March 31, 2021) to a high of 98.69 percent (as of June 30, 2023).

We compared Albany's LTD to nine similar banks based in Cook County with asset sizes greater than \$500 million and less than \$1 billion. Albany's LTD was higher than seven out of the nine banks in the peer group. The combined average quarterly LTD for the similarly situated banks was 73.99 percent, with high of 89.02 percent and a low of 52.3 percent.

### Lending in Assessment Area

A majority of the bank's loans were inside its AA. The bank originated or purchased 74.04 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	77	74.04	27	25.96	104	150,044	72.24	57,653	27.76	207,697
<b>Total</b>	77	74.04	27	25.96	104	150,044	72.24	57,653	27.76	207,697

*Source: 1/1/2021 - 12/31/2022 Bank Data and 1/1/2023 - 12/31/2023 HMDA Loan Application Register (LAR) data.  
Due to rounding, totals may not equal 100.0%*

## Description of Institution

Albany Bank and Trust Company, National Association is a \$742 million intrastate community bank located in Chicago, Illinois. The bank is a wholly owned subsidiary of Albank Corporation, a one-bank holding company. The bank is a full-service institution that operates four offices. In addition to the main location in the Albany Park neighborhood of Chicago, the bank has two other branches in Chicago and one in Skokie. The bank owns and operates seven automated teller machines (ATM), five of which accept deposits. Six of the ATMs are located at branches, and one is a stand-alone ATM located on the campus of North Park University in Chicago. The bank has not experienced any merger or acquisition activity since its prior CRA evaluation. The bank has only one AA within the state of Illinois.

The bank's strategic focus is serving the needs of businesses, professionals, and organizations within its local area. Lending is centered in real estate, specifically multifamily rentals and investor-owned 1-4 family properties. As of December 31, 2023, the bank's loan portfolio totaled \$573 million (77 percent of total assets), and tier 1 capital totaled \$115 million. The loan portfolio consists of multifamily real estate loans (49.77 percent), commercial real estate loans (33.0 percent), 1-4 family residential real estate loans (6.36 percent), construction loans (6.41 percent), and other loans (4.46 percent).

The bank does not have any legal or financial impediments that hinder its ability to meet the needs of its AA. Albany received a "Satisfactory" rating at its last CRA evaluation, dated January 10, 2022.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

Albany was evaluated under Intermediate Small Bank (ISB) examination procedures which include a lending test and a CD test to assess compliance with the CRA. The lending test evaluates the bank's record of meeting the credit needs of its AA through lending activities. Our review focused on the bank's primary lending product of home mortgage loans, primarily multifamily and investor-owned properties. We analyzed all home mortgage loans originated by the bank in 2021 through 2023. The bank was not a HMDA reporter in 2021 and 2022, but management did collect HMDA data that we utilized for this evaluation. We used HMDA LAR data for 2023. Due to a change in census tracts beginning in 2022, we reviewed 2021 data separately from 2022 and 2023. The CD test evaluates the bank's responsiveness to the CD needs in its AA through qualified lending, investments, and services. The evaluation period for this review is from January 1, 2021, to December 31, 2023.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was 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 a blend of the state ratings, and where applicable, multistate ratings.

As Albany has only one rating area, the State of Illinois, the overall rating mirrors the state rating. While the bank's AA is part of a MMSA 16980, Chicago-Naperville-Elgin, IL-IN-WI, all retail banking locations are within the State of Illinois. Therefore, the MMSA is not a separate rating area.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas 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 banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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>: Outstanding**

**The Lending Test is rated: Outstanding**

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

The major factors that support this rating include:

- As previously mentioned at the bank level, a majority of loans that Albany originated during the evaluation period were inside its AA. Additionally, the bank's quarterly average LTD ratio is more than reasonable given the bank's size, financial condition, and the credit needs of its AA.
- Albany's distribution of home mortgage loans to low- and moderate-income CTs is excellent.
- Albany demonstrates excellent responsiveness to CD needs primarily through CD loans helping to provide affordable housing to LMI in the AA, which is an identified need.

### Description of Institution's Operations in Illinois

Albany has one AA (Cook) consisting of a portion of Cook County in the State of Illinois. Cook County is in the Chicago-Naperville-Evanston IL Metropolitan Division (MD) 16984, which is part of the Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area (MSA) 16980. Despite the changes in the CT information in 2022 related to the 2020 Census, the bank's AA remains unchanged. Cook contains 303 CTs primarily located within the city of Chicago but also includes a limited number of CTs within the community of Skokie, Evanston, Lincolnwood, and Niles.

Cook meets regulatory requirements, consists of whole geographies, and does not arbitrarily exclude LMI CTs or reflect any illegal discrimination. While the 2020 census data did not alter the number of CTs in Cook during the evaluation period, it did change some of the income designations from 2021 to 2022-2023. During 2021, the 303 CTs included 16 (5.28 percent) low-income CTs, 100 (33.0 percent) moderate-income CTs, 70 (23.1 percent) middle-income CTs, 115 (37.95 percent) upper-income CTs, and 2 (0.66 percent) with no income information. During 2022-2023, the 303 CTs included 11 (3.63 percent) low-income CTs, 72 (23.76 percent) moderate-income CTs, 97 (32.01 percent) middle-income CTs, 121 (39.93 percent) upper-income CTs, and 2 (0.66 percent) with no income information. The primary change between the 2021 and 2022-2023 CT designations were moderate-income CTs being reclassified as middle- and upper-income CTs.

#### Competition

Competition for deposits within Cook is strong. According to the 2023 FDIC Deposit Market Share Report, Albany had \$578 million in deposits within Cook County and ranked 41<sup>st</sup> out of 100 institutions with a 0.14 percent deposit market share. The top five depository banks hold a significant portion of the deposits within the County, and include J.P. Morgan Chase Bank, N.A. (23 percent), BMO Harris Bank N.A. (19.3 percent), Bank of America, N.A. (10.7 percent), CIBC Bank USA (8.7 percent), and the

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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.

Northern Trust Company (6.1 percent). Competition for home mortgage loans within Cook is strong. According to the 2023 HMDA Market Share Report, Albany obtained just 0.07 percent of total market share of applications in 2023.

### Demographics

#### **Albany**

Assessment Area(s) - Cook						
2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	303	5.28	33.00	23.10	37.95	0.66
Population by Geography	1,166,310	4.83	36.43	26.89	31.47	0.38
Housing Units by Geography	511,145	4.34	33.22	26.00	35.94	0.50
Owner-Occupied Housing by Geography	214,688	2.24	27.39	31.77	38.36	0.24
Occupied Rental Units by Geography	247,807	5.86	37.28	21.45	34.71	0.70
Vacant Units by Geography	48,650	5.79	38.28	23.72	31.55	0.65
Businesses by Geography	45,979	2.67	25.75	27.54	43.79	0.26
Farms by Geography	607	1.81	25.21	28.34	44.65	0.00
Family Distribution by Income Level	242,091	26.34	16.48	16.62	40.56	0.00
Household Distribution by Income Level	462,495	27.46	15.76	16.52	40.26	0.00
Unemployment rate (%)	7.68	10.84	10.12	7.76	4.91	9.17
Households Below Poverty Level (%)	14.75	28.95	20.53	12.48	9.33	31.94
Median Family Income (16984 - Chicago-Naperville-Evanston, IL MD)		\$75,024	Median Housing Value			\$282,000
Median Family Income (16984 - Chicago-Naperville-Evanston, IL MD) for 2021		\$87,100	Median Gross Rent			\$999
			Families Below Poverty Level			12.05
FFIEC File - 2010 Census 2021 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(s) – Cook						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	303	3.63	23.76	32.01	39.93	0.66
Population by Geography	1,172,777	4.07	26.40	35.61	33.57	0.36
Housing Units by Geography	514,776	4.10	23.88	34.99	36.56	0.47
Owner-Occupied Housing by Geography	226,505	2.51	20.39	37.95	38.89	0.26
Occupied Rental Units by Geography	246,388	5.52	26.91	32.23	34.67	0.67
Vacant Units by Geography	41,883	4.28	24.94	35.20	35.13	0.45
Businesses by Geography	41,946	2.49	20.23	34.92	41.99	0.37
Farms by Geography	520	3.08	16.54	37.31	42.88	0.19
Family Distribution by Income Level	248,688	24.10	15.49	17.71	42.70	0.00
Household Distribution by Income Level	472,893	25.20	15.60	16.60	42.60	0.00
Unemployment rate (%)	4.75	5.48	6.09	4.88	3.62	7.53
Households Below Poverty Level (%)	11.76	24.74	15.10	11.57	8.15	26.39
Median Family Income (16984 - Chicago-Naperville-Evanston, IL MD)		\$92,622			Median Housing Value	\$347,200
Median Family Income (16984 - Chicago-Naperville-Evanston, IL MD) for 2023		\$109,800			Median Gross Rent	\$1,243
					Families Below Poverty Level	8.21
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						

### Population

According to 2020 Census data and 2023 Dun and Bradstreet data, Cook's population was 1,172,777 people with 4.07 percent residing in low-income CTs, 26.4 percent residing in moderate-income CTs, 35.61 percent residing in middle-income CTs, 33.57 percent residing in upper-income CTs, and 0.36 percent with no income information. The distribution of families by income level was 24.1 percent low income, 15.49 percent moderate income, 17.71 percent middle income, and 42.7 percent upper income. The median family income was \$92,622.

### Employment and Economic Factors

According to the Bureau of Labor Statistics, the 2021 average unemployment rate in Cook Country was 7.0 percent, which was higher than the state unemployment rate of 6.1 percent. Unemployment rates in Cook County significantly improved in 2022 and 2023 to 5.0 percent and 4.4 percent, respectively. Unemployment rates in Cook during 2022 and 2023 were comparable to the Cook County average of 4.7 percent.

The 2023 Illinois Economic Report from the Illinois Department of Employment Security (IDES), reports on the 12 months ending June 30, 2023. The report noted unemployment levels recovered from COVID disruptions and improved to pre-pandemic levels. The leisure and hospitality industry saw the largest growth in payrolls in the state of Illinois for the 12 months ending June 30, 2023. According to 2023 US Census Bureau data, the health care and social assistance; professional, scientific, and technical

services; educational services; accommodation and food services; and administrative and support and waste management and remediation services industries represent the largest employers in Cook County.

### Housing

According to 2020 Census data and 2023 FFIEC data, there were 516,252 housing units in Cook. Of the 516,252, 44 percent were owner-occupied, 47.9 percent were rentals, and 8.1 percent were vacant. The percent of vacant units in low- and moderate-income CTs was 4.3 and 24.9 percent, respectively. The median monthly gross rent was \$1,241, the median age of the housing units was 27 years, and the median value was \$345,850.

Based on 2023 FFIEC data, low-income families earned less than \$47,852, and moderate-income families earned less than \$76,562. One method used to determine housing or rental affordability assumes a maximum housing cost of no more than 30 percent of the applicant's income. This calculated a maximum monthly housing payment (mortgage or rent) of \$1,196 for low-income borrowers and \$1,914 for moderate-income borrowers.

### Community Contacts

We held conversations with community contacts for community services and reviewed details of previous community contacts from affordable housing organizations to determine Cook's needs. Many of our contacts stressed that affordable housing is a need within Cook. The contracts also stressed the opportunities that banks in the area have to develop affordable housing loans to match local neighborhood needs related to age of housing stock. One contact mentioned the limited inventory available at an affordable price range is a challenge to local LMI homebuyers.

## **Scope of Evaluation in Illinois**

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

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS**

### **LENDING TEST**

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

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

Based on a full-scope review, the bank's lending performance in the state of Illinois was outstanding. Our analysis focused solely on the geographic distribution of loans. All of the bank's home loans originated during the evaluation period were loans to real-estate investors; therefore, an analysis of borrower distribution would not be meaningful.

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

The bank exhibited excellent 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.

We evaluated the data using two separate analysis periods pursuant to changes in the CTs following the 2020 census.

Albany's distributions of loans to moderate-income CTs in 2021 and 2022-2023 was excellent. The bank originated 35 percent and 33.33 percent of loans in each period, respectively, significantly higher than both the demographic comparators and the aggregate lending comparators in Cook. Though the bank originated no loans in low-income census tracts in 2021, in 2022-2023, both the origination rate was comparable to both the demographic comparator and the aggregate lending comparator at 2.22 percent.

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

We evaluated the lending distribution in Cook to determine if any unexplained conspicuous gaps existed. Examiners analyzed the bank's lending activity over the evaluation period and did not identify any unexplained conspicuous gaps.

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

As mentioned above, this analysis was not conducted, as the home loans originated by the bank were to investors, primarily limited liability companies, and not individual homeowners. Per HMDA, income is not reportable for covered loans secured by multifamily dwellings or for covered loans when applicant is not a natural person.

### **Responses to Complaints**

Albany did not receive any written comments or complaints regarding efforts to meet the credit needs of Cook during the evaluation period. The OCC has not received any written complaints, comments, or inquiries concerning Albany and its efforts to comply with the spirit and intent of the CRA.

### **COMMUNITY DEVELOPMENT TEST**

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

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

Based on a full-scope review, the bank exhibited excellent responsiveness to community development needs in Cook primarily through community development loans. The bank also helped respond to

community development needs through qualified investments and community development services, although to a lesser extent. Examiners considered the institution's capacity and availability of opportunities for CD in Cook. Examiners also reviewed similarly situated institutions' most recent performance evaluations to better understand the impact of the bank's performance in Cook.

### Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate Albany'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 \$
Cook	16	72.73	46,378	75.87
Broader Statewide or Regional Area	6	27.27	14,747	24.13
<b>Total</b>	<b>22</b>	<b>100.00</b>	<b>61,125</b>	<b>100.00</b>

Albany's level of CD lending provided excellent responsiveness to community needs in Cook and the greater region. CD loans in Cook totaled \$46.38 million, or 40.49 percent of tier 1 capital during the evaluation period. Albany originated an additional \$14.75 million in CD loans, or 12.88 percent of tier 1 capital that benefit the broader statewide or regional area. During the evaluation period, the majority of Albany's community development lending centered in affordable rental properties for LMI and in COVID pandemic-related relief. The bank financed the purchase or construction of 10 multifamily rental properties that are likely to provide affordable housing for low- and moderate-income individuals or include a low-income housing set-aside. Affordable housing is a primary need in the assessment area. Albany also financed six loans in 2021 that supported continued access to healthcare services during the COVID pandemic.

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

- Albany financed a \$11.7 million construction loan that aligns with a community development plan from the City of Chicago and Village of Oak Park to revitalize business and quality of life in the North Avenue corridor, including LMI CTs.
- A \$11.5 million loan to construct a multifamily rental housing with a portion of units set aside as affordable housing for LMI families.
- The bank financed seven loans totaling \$12.56 million to purchase multifamily rental properties that are likely to provide affordable housing for LMI families.

Broader Statewide or Regional Area:

- The bank financed two purchases or construction loans totaling \$2.46 million for multifamily rental properties in the greater statewide area that set aside a portion of units as low-income housing.
- In 2021, the bank provided financing to support economic development and access to healthcare during the COVID-19 pandemic, including lending to skilled nursing facilities, financing to

locations housing healthcare services in low-income CTs, and a business with economic development employing a majority of employees that are LMI.

## 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)
Cook	0	0	77	1,607	77	71.96	1,607	62.87	0	0
Broader Statewide or Regional Area	0	0	30	949	30	28.03	949	37.13	0	0
Total	0	0	107	2,556	107	100.00	2,556	100.00	0	0

Albany's level of qualified investments reflects adequate responsiveness to community needs in Cook. During this evaluation period, the bank made 77 qualified investments totaling \$1.61 million in Cook, representing 1.4 percent of tier 1 capital. Albany also made 30 qualified investments in the broader statewide or regional area totaling \$949,000, or 0.83 percent of tier 1 capital. The largest dollar amount of investments centered in municipal bonds, and a majority of the investments are donations and grants to local organizations.

The following are examples of qualified investments in Cook:

- Two municipal bonds totaling \$1.4 million to invest in public schools and improve lands and parks in 2021.
- Five in-kind grant/donations totaling \$44,948 in the form of parking spaces for volunteers, employees, and attendees for events held by local organizations providing community services.
- 11 grant/donations totaling \$42,764 that support job training, financial literacy education, and economic development opportunities for LMI individuals and geographies.
- 24 grant/donations totaling \$59,227 that support education for local students, either directly to schools, or through community organizations that provided educational opportunities for students primarily in LMI geographies.
- 35 grants/donations totaling \$49,280 to support affordable housing organizations, access to food and healthcare during the COVID-19 pandemic, and other community services.

### Broader Statewide or Regional Area

- Two municipal bonds totaling \$900,000, to fund capital improvements in a town with majority moderate-income CTs and a public library in Chicagoland.
- 28 CD grants/donations totaling \$48,499 that benefited the MMSA, state, or regional area. Specifically, Albany provided grants/donations to organizations assisting LMI individuals to receive education, health services, job training, and employment opportunities in the greater Chicagoland area or Midwest region, including some benefit to Cook, as well as to organizations that provided food assistance to LMI individuals in the greater Chicagoland area or the United States of America.

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

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

Albany's level of community development services reflects adequate responsiveness to community needs within Cook. Bank board members, officers, and directors are active in several community organizations, often acting as board members. Three (3) members of management and six (6) directors act as board members for a total of thirteen (13) organizations that support local businesses, schools, and charitable organizations supporting LMI within Cook. One of the bank's four offices is located in a moderate-income CT.

# Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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>	01/01/2021 to 12/31/2023	
<b>Bank Products Reviewed:</b>	Home mortgage loans, community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NONE		
<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>
Cook	Full Scope	303 contiguous CTs that are a portion of Cook County within the Chicago-Naperville-Evanston IL MD #16984. The MD is a portion of Chicago-Naperville-Elgin, IL-IN-WI MMSA #16980.

## 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
Albany Bank and Trust Company, N.A.	Outstanding	Outstanding	Outstanding
State:			
Illinois	Outstanding	Outstanding	Outstanding

(\*) 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 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
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
Cook	32	55,870	100.00	58,623	2.24	0.00	2.47	27.39	35.00	24.93	31.77	20.00	24.93	38.36	45.00	46.15	0.24	0.00	0.18
<b>Total</b>	32	55,870	100.00	58,623	2.24	0.00	2.47	27.39	35.00	24.93	31.77	20.00	24.93	38.36	45.00	46.15	0.24	0.00	0.18

Source: FFIEC File - 2010 Census; 1/1/2021 - 12/31/2021 Bank Data, -- HMDA Aggregate Data, "--"  
 Due to rounding, totals may not equal 100.0%

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
Albany	45	94,174	100.00	44,571	2.51	2.22	2.48	20.39	33.33	17.63	37.95	33.33	33.87	38.89	31.11	45.60	0.26	0.00	0.43
<b>Total</b>	45	94,174	100.00	44,571	2.51	2.22	2.48	20.39	33.33	17.63	37.95	33.33	33.87	38.89	31.11	45.60	0.26	0.00	0.43

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