



**PUBLIC DISCLOSURE**

January 2, 2024

**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 **Needs to Improve**.

**The Lending Test is rated: Needs to Improve.**

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

The major factors that support this rating include:

- The Lending Test rating is based on needs to improve performance in the state of Illinois.
- The Community Development (CD) Test rating is based on outstanding performance in the state of Illinois.
- The loan-to-deposit (LTD) ratio is more than reasonable.
- A majority of the bank's loans are originated or purchased inside its assessment area (AA).

### Loan-to-Deposit Ratio

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

The quarterly average LTD ratio was 101.3 percent for the six-quarter period between September 30, 2020, and December 31, 2021. Over the period, the bank's LTD ratio ranged between a low of 92.1 percent to a high of 113.3 percent.

The bank ranked 2nd of 10 similarly situated FDIC insured institutions that compete with the bank for deposits in the AA. The comparable institutions range in total asset size from \$902.5 million to \$1.8 billion and reported quarterly average LTD ratios from 55.0 percent to 109.0 percent.

### Lending in Assessment Area

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

The bank originated and purchased 80.7 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,798	80.8	427	19.2	2,225	393,844	75.7	126,109	24.3	519,953
Small Business	46	76.7	14	23.3	60	29,583	69.5	12,997	30.5	42,579
Total	1,844	80.7	441	19.3	2,285	423,427	75.3	139,106	24.7	562,532

Source: HMDA data and sample of business loans originated or purchased from January 1, 2020, to December 31, 2021.

## 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 \$1.5 billion at September 30, 2023. The bank is wholly owned by First Ottawa Bancshares, Inc., a one-bank holding company headquartered in Ottawa, Illinois. The holding company does not negatively impact the bank's ability to meet the credit needs of the community.

The bank has one rating area, the state of Illinois and two delineated AAs, the Chicago-Naperville-Elgin, IL-IN-WI Metropolitan Statistical Area AA (Chicago MSA) and a Non-MSA AA (Non-MSA). Both AAs are located in the Chicago-Naperville, IL-IN-WI combined statistical area (Chicago CSA). For the purpose of this Performance Evaluation (PE), the Chicago MSA and Non-MSA AAs are combined and evaluated as a single AA, the Chicago CSA.

There were two branch openings during the evaluation period. The Schaumburg branch opened in February 2020 and the Goose Island, Chicago branch opened in September 2021. The Lisle and Schaumburg branches were not previously included in the prior CRA PE as the Lisle branch was opened too late in 2019 to be factored into the analysis and the Schaumburg branch was opened outside of the Lending Test evaluation period of the prior CRA PE. The bank has 11 branches and 10 ATMs. All 10 of the bank's ATMs are located at branches, with the Goose Island, Chicago branch not having an ATM. The bank provides additional banking access to customers through internet and mobile platforms.

ACB&T offers traditional loan products for agricultural, commercial, consumer, and residential purposes in all its market areas. Commercial loans represent the largest portfolio at \$684.7 million, followed by residential at \$116.2 million, agricultural at \$26.5 million, and consumer at \$16.5 million, per call report data as of December 31, 2021. ACB&T typically originates home mortgage loans with the intention of selling them into the secondary market.

ACB&T reported a net loans and leases to total assets ratio of 85.8 percent and a tier 1 leverage capital ratio of 9.0 percent, as of December 31, 2021.

There are no legal or financial circumstances that impede the bank's ability to meet the credit needs of its AAs. The previous CRA rating, which the OCC determined using the Small Bank evaluation procedures, was Satisfactory, as detailed in the PE dated October 26, 2020.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period covers the period from January 1, 2020, through December 31, 2021. We did not include activities from calendar year 2022 as 2022 aggregate peer lending data was not available at the time of our evaluation and the analysis would not be meaningful without this data. We evaluated ACB&T under the Intermediate Small Bank evaluation procedures, which includes a Lending Test and Community Development Test.

The Lending Test evaluated loans originated or purchased between January 1, 2020, and December 31, 2021. Home mortgage loans were compared to the 2015 American Community Survey Census Data and business loans were compared to 2021 D&B Data.

The primary loan products for the evaluation were determined to be business loans and home mortgage loans. The bank originated 1,460 business loans and 1,983 home mortgage loans for a total of 3,443 loans accounting for 41.9 and 56.9 percent, respectively, per bank data between January 1, 2020, and December 31, 2021.

The Community Development Test evaluated eligible community development investments, loans, and services between January 1, 2020, and December 31, 2021.

### **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 assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) 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 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) 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, 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 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:** Needs to Improve

**The Lending Test is rated:** Needs to Improve

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

The major factors that support this rating include:

- The bank exhibits a poor distribution of loans by income level of geography.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank's performance under the Community Development Test in the state of Illinois is rated Outstanding.

### Description of Institution's Operations in Illinois

The bank has two AAs in the state of Illinois, the Chicago MSA and the Non-MSA. The Chicago MSA consists of seven of 13 counties in the Chicago MSA, including all of DeKalb, DuPage, Grundy, Kane, and Kendall counties and a portion of Cook and Will counties. The Non-MSA includes LaSalle County and one census tract (CT) in northern Livingston County. The Chicago MSA and Non-MSA are combined for analysis purposes under the Chicago CSA.

The bank serves its customers through 11 branches spread across the AA and 10 ATMs. Eight branches are open Monday through Friday and four of these branches offer 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 Chicago 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 and social assistance, manufacturing, and retail trade.

Unemployment rates were high in 2020 due to the COVID-19 pandemic and then subsequently declined in 2021. According to the U.S. Bureau of Labor Statistics, the annual unemployment rate in the state of Illinois was 9.3 percent in 2020, which then declined to 6.1 percent in 2021.

Unemployment rates for six of nine counties in the AA compared favorably to the state of Illinois unemployment rate for 2020 and unemployment rates for eight of nine counties compared favorably to the state of Illinois unemployment rate for 2021.

Competition for deposits is high among financial institutions. The bank held a deposit market share position of 0.2 percent in the Chicago CSA, with \$833.8 million in deposits. The bank ranked 42<sup>nd</sup> out of 149 FDIC insured financial institutions competing for the area's \$511.2 billion in deposits, as of December 31, 2021.

Based on information in Table A, low-income families earned less than \$29,662-\$40,450 and moderate-income families earned less than \$47,458-\$64,719, depending on the MD/MSA. One method used to determine housing affordability assumes a maximum monthly principal and

interest payment of no more than 30 percent of the applicant's income. Depending on the MD/MSA, this calculated to a maximum monthly mortgage payment between \$742-\$1,011 for low-income borrowers and between \$1,186-\$1,618 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 \$1,372. 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 loan.

We relied on information from three community contact interviews to understand area needs and opportunities for the Chicago CSA. The contacts represented organizations focused on housing and small business development. The contacts noted the economic condition as stable. Affordable housing remains a primary need and increasing housing costs and utility costs have provided further barriers to homeownership. Small business support and financial education continue to be needs in the community. The contacts shared a similar feeling that local area banks are providing some affordable housing, but more needs to be done to assist low- and moderate-income (LMI) persons in homeownership. The contacts had no negative perceptions of ACB&T.

## Chicago CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,603	15.2	23.2	27.9	32.9	0.9
Population by Geography	6,749,974	10.9	23.0	30.5	35.2	0.4
Housing Units by Geography	2,700,244	11.1	21.7	30.2	36.5	0.4
Owner-Occupied Units by Geography	1,501,712	4.7	16.9	34.3	43.9	0.2
Occupied Rental Units by Geography	948,260	18.1	28.2	25.3	27.6	0.8
Vacant Units by Geography	250,272	23.3	25.7	24.3	26.2	0.6
Businesses by Geography	606,662	6.5	16.1	26.9	49.9	0.6
Farms by Geography	8,686	3.8	14.4	39.1	42.6	0.1
Family Distribution by Income Level	1,573,717	23.5	16.1	18.3	42.1	0.0
Household Distribution by Income Level	2,449,972	25.4	15.2	16.8	42.6	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$255,640
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Gross Rent			\$1,053
Median Family Income Non-MSAs - IL		\$59,323	Families Below Poverty Level			10.6%

Source: 2015 ACS and 2021 D&B Data  
 Due to rounding, totals may not equal 100.0%  
 (\*) The NA category consists of geographies that have not been assigned an income classification.



## **Scope of Evaluation in Illinois**

The bank has one AA in the state of Illinois. Lending performance for home mortgage lending is based on the full population of originated or purchased HMDA reportable loans and received a greater weighting in our analysis as it represented the largest amount of loans originated and purchased based on number of loans. Lending performance for business loans is based on a sample of loans originated or purchased, not the full population of data, and is considered in context. More weight was placed on lending to LMI geographies than lending to LMI borrowers as our geographic distribution analysis indicated gaps in lending to LMI geographies.

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

### **LENDING TEST**

The bank's performance under the Lending Test in Illinois is rated Needs to Improve.

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

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

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

The bank exhibits poor geographic distribution of loans in the state.

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

Refer to Table O 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 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.

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

Refer to Table Q 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 distribution of small loans to businesses is reasonable.

The proportion of lending in low-income geographies is significantly below both the percent of businesses and the aggregate distribution of all reporting lenders. The proportion of lending in moderate-income geographies exceeds both the percent of businesses and the aggregate distribution of all reporting lenders.

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

We performed a lending gap analysis that included a review of dot density maps for HMDA loans, a geocoded sample of business loans, and compared the distribution to AA maps and location of branches. We identified conspicuous gaps in home mortgage lending around LMI CTs in Cook, DuPage, Will, and Kane counties.

Reports and maps for HMDA data detailing LMI CTs encompassing Melrose Park and much of the city of Chicago, city of Joliet, city of Schaumburg, city of Wheeling, city of Elgin, and city of Aurora indicate minimal lending in these areas. The bank cited challenges to lending in these areas including the bank's branches being located further away from these areas than other CTs, lack of marketing in these areas, new lending staff at the bank's branches in these areas, the bank's lending practices that HMDA-reportable lending is done on a personal relationship basis, the COVID-19 pandemic that inhibited lenders' ability to meet with borrowers, and physical barriers to lending in the Schaumburg and Wheeling areas due to forest preserves and a large cemetery.

We reviewed peer data for these CTs and found these areas are lendable. Per peer data, for 2020, peer lenders did not lend in four LMI CTs included within the bank's AA. For 2021, peer lenders did not lend in two LMI CTs included within the bank's AA. Of the CTs where there was no activity from either the bank or peer lenders, one includes a prison, and the remaining three have minimal to no owner-occupied housing units. Given the total population, number of owner-occupied units, and the absence of identified geographic barriers, these CTs presented sufficient lending opportunities.

In total, the bank originated HMDA reportable loans in seven low-income CTs and 25 moderate-income CTs in the AA in 2020 but had no lending activity in 97.1 percent of the 243 low-income CTs and no activity in 93.3 percent of the 372 moderate-income CTs. For 2021, this further worsened, with the bank only originating HMDA reportable loans in two low-income CTs and 21 moderate-income CTs in the AA, and having no lending activity in 99.2 percent of low-income CTs and 94.4 percent of moderate-income CTs.

By county level in 2020, the bank had no activity in (1) in 97.4 percent of low-income CTs and 95.4 percent of moderate-income CTs in Cook County, (2) in 100.0 percent of low-income CTs and 20.0 percent of moderate-income CTs in DeKalb County, (3) in 90.0 percent moderate-income CTs DuPage County, (4) in 100.0 percent of low-income CTs and 96.6 percent of moderate-income CTs in Kane County, (5) in 33.3 percent of moderate-income CTs LaSalle County, (6) in 88.9 percent of low-income CTs and 84.2 percent of moderate-income CTs in Will County.

By county level in 2021, the bank had no activity in (1) in 99.6 percent of low-income CTs and 96.7 percent of moderate-income CTs in Cook County, (2) in 100.0 percent of low-income CTs and 60.0 percent of moderate-income CTs in DeKalb County, (3) in 100.0 percent moderate-income CTs DuPage County, (4) in 100.0 percent of low-income CTs and 93.1 percent of moderate-income CTs in Kane County, (5) in 88.9 percent of low-income CTs and 78.9 percent of moderate-income CTs in Will County

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

The bank exhibits a reasonable 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 P 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 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 was near to the aggregate distribution of all reporting lenders. The proportion of lending to moderate-income borrowers was near to both the percent of moderate-income families and the aggregate distribution of all reporting lenders.

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

Refer to Table R 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 distribution of small loans to businesses is reasonable.

The proportion of lending to businesses with revenues less than \$1 million is substantially less than both the percent of businesses and the aggregate distribution of all reporting lenders. However, 48.6 percent of the sample are Paycheck Protection Program (PPP) loans in which revenue information is not available. Performance under this criterion is reasonable.

## **Responses to Complaints**

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

## **COMMUNITY DEVELOPMENT TEST**

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

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

Based on a full-scope review, the bank exhibits outstanding 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 assessment area.

## **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.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Chicago CSA	23	100.0	33,507	100.0

Source: Bank submitted activity from January 2, 2020 to December 31, 2021.

The number and amount of Community Development Loans represents excellent responsiveness to the needs of the AA. During the evaluation period, ACB&T made 23 CD loans totaling \$33.5 million, which represented 38.3 percent of tier 1 capital. Of the 23 CD loans, 21 were PPP loans eligible for CD credit, totaling \$29.6 million, that helped to stabilize small businesses and communities. By dollar volume, CD loans provided for revitalization or stabilization of LMI areas at 88.4 percent, benefited economic development activities at 10.4 percent, and community services at 1.2 percent.

Examples of CD loans in the Chicago CSA:

- A loan totaling \$3.5 million for the construction of a New Markets Tax Credit supported project that will include a 57,500 square foot healthy living facility in a moderate-income geography that will include group classes, a community kitchen, a children's adventure center, multi-use gymnasium, along with a 7,500 square foot healthcare facility that will focus on physical, speech, and occupation therapies. The bank's role represents leadership role among local banks involved in the construction phase.
- One loan totaling \$400 thousand to an organization that provides housing and shelter services to LMI families and homeless children.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Chicago CSA	0	0	16	2,027	16	100.0	2,027	100.0	0	0

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

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

The number and amount of qualified investments represents adequate responsiveness to the needs of the AA. During the evaluation period, ACB&T made one investment and 15 donations totaling \$2.0 million. The dollar volume of qualifying investments and donations represent 2.4 percent of tier 1 capital. By dollar volume, 98.7 percent provided affordable housing, 1.3 percent funded community services to LMI individuals, and less than 1 percent funded economic development.

The bank made a \$2.0 million investment supporting a multi-family housing facility consisting of 92 units that were all allocated to LMI persons.

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

The extent to which the bank provides community development services represents poor responsiveness to the needs of the AA. During the evaluation period, ACB&T provided four service activities, of which two were in a leadership roles. These bank employees completed 338 services hours total in the Chicago CSA. Three persons representing the five branches in the Non-MSA completed 290 hours, while one person representing the six branches in the Chicago MSA completed 48 hours. All activities supported community services.

Examples of CD services in the Chicago CSA:

- A bank officer served as the treasurer of a health department assisting in developing and administering health-related benefits to LMI residents in the county.
- A bank officer served as a Board member of an organization that provides community food pantry services.
- A mortgage lender served as a financial advisor for a financial education program that informs LMI persons of available resources and provides skill development services to LMI persons.

## 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>	January 1, 2020, to December 31, 2021	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans 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>
<b>State</b>		
Illinois		
Chicago CSA	Full Scope	All of DeKalb, DuPage, Grundy, Kane, Kendall, LaSalle, and portions of Cook, Livingston, and Will

## Appendix B: Summary of MMSA and State Ratings

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RATINGS American Commercial Bank & Trust, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Overall	Needs to Improve	Outstanding	Needs to Improve
State:			
State of Illinois	Needs to Improve	Outstanding	Needs to Improve

(\*) 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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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/assessment area. 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 O. 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 P. 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/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - 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 compared 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 assessment area.
- Table R. 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2020-21</b>		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% of Total	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	1,798	393,844	100.0	358,645	4.7	0.6	3.5	16.9	4.4	13.5	34.3	46.8	31.6	43.9	48.3	51.3	0.2	0.0	0.2			
<b>Total</b>	<b>1,798</b>	<b>393,844</b>	<b>100.0</b>	<b>358,645</b>	<b>4.7</b>	<b>0.6</b>	<b>3.5</b>	<b>16.9</b>	<b>4.4</b>	<b>13.5</b>	<b>34.3</b>	<b>46.8</b>	<b>31.6</b>	<b>43.9</b>	<b>48.3</b>	<b>51.3</b>	<b>0.2</b>	<b>0.0</b>	<b>0.2</b>			

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2020-21</b>		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers					
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate			
Chicago CSA	1,798	393,844	100.0	358,645	23.5	4.8	5.5	16.1	14.9	15.3	18.3	26.4	20.8	42.1	51.7	42.8	0.0	2.3	15.6			
<b>Total</b>	<b>1,798</b>	<b>393,844</b>	<b>100.0</b>	<b>358,645</b>	<b>23.5</b>	<b>4.8</b>	<b>5.5</b>	<b>16.1</b>	<b>14.9</b>	<b>15.3</b>	<b>18.3</b>	<b>26.4</b>	<b>20.8</b>	<b>42.1</b>	<b>51.7</b>	<b>42.8</b>	<b>0.0</b>	<b>2.3</b>	<b>15.6</b>			

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2020-21</b>		
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Chicago CSA	46	29,583	100.0	236,158	6.5	2.2	7.5	16.1	23.9	18.2	26.9	34.8	29.0	49.9	39.1	44.9	0.6	0.0	0.4		
<b>Total</b>	<b>46</b>	<b>29,583</b>	<b>100.0</b>	<b>236,158</b>	<b>6.5</b>	<b>2.2</b>	<b>7.5</b>	<b>16.1</b>	<b>23.9</b>	<b>18.2</b>	<b>26.9</b>	<b>34.8</b>	<b>29.0</b>	<b>49.9</b>	<b>39.1</b>	<b>44.9</b>	<b>0.6</b>	<b>0.0</b>	<b>0.4</b>		

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2020-21</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Chicago CSA	46	29,583	100.0	236,158	86.3	13.0	43.4	5.2	34.8	8.5	52.2		
<b>Total</b>	<b>46</b>	<b>29,583</b>	<b>100.0</b>	<b>236,158</b>	<b>86.3</b>	<b>13.0</b>	<b>43.4</b>	<b>5.2</b>	<b>34.8</b>	<b>8.5</b>	<b>52.2</b>		

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.