



PUBLIC DISCLOSURE

November 29, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Bank and Trust Company, National Association
Charter Number 24369

4301 East 53rd Street
Davenport, IA 52807

Office of the Comptroller of the Currency

13710 FNB Parkway, Suite 110
Omaha, NE 68154

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: Satisfactory.

The major factors that support this rating include:

- American Bank and Trust Company, National Association's (ABT or bank) loan-to-deposit ratio (LTD) is reasonable when considering the bank's size, financial condition, and the credit needs of its assessment areas (AAs).
- Management originates and purchases a majority of its loans to customers located in the bank's AAs.
- ABT's distribution of loans to borrowers of different income levels and businesses of different sizes is outstanding.
- ABT's geographic distribution of loans to census tracts (CTs) of different income levels is satisfactory.
- There were no complaints regarding the bank's performance in meeting the credit needs of its AA.
- Community development (CD) activities represent adequate responsiveness to AA needs and opportunities.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable. ABT's average LTD ratio was 81 percent for the 12 quarters from March 31, 2018, to December 31, 2020. The ratio ranged from a quarterly low of 62 percent and a quarterly high of 96 percent.

ABT's average LTD ratio is comparable to the average LTD ratio of other community banks operating in ABT's AAs. The average quarterly LTD ratio for competitor banks was 76 percent for the 12 quarters from March 31, 2018 to December 31, 2020. The ratio ranged from an average quarterly low of 69 percent to an average quarterly high of 88 percent.

Lending in Assessment Area

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

The bank originated and purchased 76 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage Loans	1,637	76.7	498	23.3	2,135	260,830	67.1	127,704	32.9	388,533
Business Loans	7	35.0	13	65.0	20	1,230	16.0	6,390	84.0	7,620
Total	1,644	76.3	511	23.7	2,155	262,060	66.2	134,094	33.8	396,153

Description of Institution

ABT is a multistate financial institution headquartered in Davenport, Iowa. ABT had total assets of \$438 million and tier 1 capital of \$40 million as of December 31, 2020. ABT is wholly owned by AmBank Holdings, Inc., a one-bank holding company located in Davenport, Iowa. As of December 31, 2020, AmBank Holdings, Inc. had total assets of \$43 million.

ABT maintains operations in Iowa and Illinois. ABT operates seven branch locations, including their main branch. Branches are located in Davenport, Iowa, and Elburn, Geneva, Moline, and Rock Island, Illinois. ABT operates three deposit-taking automatic teller machines (ATMs), and one cash dispensing ATM. All ATMs are located within bank office locations. ABT did not merge with or acquire any banking institutions during the evaluation period.

ABT's primary business focus is consistent with the traditional community bank model. ABT offers a full range of credit products within its AAs, including home mortgage, commercial, and consumer loans. As of December 31, 2020, total loans were \$263 million and represented 60 percent of total assets. The December 31, 2020 call report identifies \$191 million in business loans, \$61 million in home mortgage loans, and \$11 million in consumer loans.

In addition to lending products, ABT offers a wide range of retail deposit products, including free checking accounts with no minimum balance and savings accounts with low opening and minimum balance requirements. ABT also offers free online and mobile banking, free debit cards, and free mobile deposit with all checking accounts.

There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AAs. ABT received a Satisfactory rating in its previous Performance Evaluation dated October 9, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

ABT was evaluated under the Intermediate Small Bank examination procedures, which include a Lending Test and a CD Test for the Davenport-Moline-Rock Island IA-IL multi-state MSA and the State of Illinois. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities. The CD test evaluates the bank's record of responding to the CD needs of its AAs through CD lending and providing qualified investments, donations, and services.

The Lending Test covers ABT's performance from January 1, 2018, to December 31, 2020. The Lending Test evaluated home mortgage loans originated during the evaluation period for the Quad Cities AA and evaluated home mortgage loans and business loans originated during the evaluation period for the Kane County AA. These loan types were determined to be the primary loan products originated by ABT from each of their respective AAs during the evaluation period. The following table summarizes the percentage of loan originations by loan type over the evaluation period.

Loan Originations		
Loan Type	% by Number	% by Dollar
Mortgage Loans	63%	59%
Quad Cities AA	67%	71%
Kane County AA	41%	29%
Business Loans	15%	35%
Quad Cities AA	10%	23%
Kane County AA	43%	68%
Consumer Loans	22%	6%
Quad Cities AA	23%	7%
Kane County AA	16%	4%
Agricultural Loans	0%	0%

Source: Bank-provided loan origination reports; 2018- 2020

To evaluate lending performance, we relied on the bank's Home Mortgage Disclosure Act (HMDA) data and selected a sample of business loans originated and purchased during the evaluation period. The CD Test covers ABT's performance from January 1, 2018 to December 31, 2020. We reviewed all CD loans, investments, donations, and services submitted by ABT management to ensure they met the regulatory definition of CD. We excluded some items submitted for consideration because they did not meet the definition or purpose of CD.

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 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 a blend of the state ratings, and where applicable, multistate ratings. The rating for the Davenport-Moline-Rock Island IA-IL MMSA was weighted more heavily than the rating for the State of Illinois because the MMSA accounts for the largest portion of ABT’s branch locations, deposit activity, and loan volume.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank’s or federal savings association’s 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 Bureau of Consumer Financial Protection, 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.

Multistate Metropolitan Statistical Area Rating

Davenport-Moline-Rock Island IA-IL MMSA

CRA rating for the Davenport-Moline-Rock Island IA-IL MMSA¹: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The distribution of loans to borrowers of different income levels is excellent.
- The distribution of loans to CTs of different income levels is reasonable.
- ABT's CD activities demonstrated reasonable responsiveness to the CD needs and opportunities in the AA.

Description of Institution's Operations in Davenport-Moline-Rock Island IA-IL MMSA

ABT operates one AA in the Davenport-Moline-Rock Island IA-IL MMSA, referred to as the Quad Cities AA.

The Quad Cities AA includes all of Scott County in Iowa, all of Rock Island County in Illinois, part of Henry County in Illinois, and one CT in Mercer County in Illinois. ABT operates five branches, three deposit-taking ATMs, and one cash-dispensing ATM in the Quad Cities AA. This AA represents ABT's primary market and includes the bank's head office, which is home to ABT's senior management team. ABT reported \$324 million in deposits in the Quad Cities AA as of June 30, 2020, representing 86 percent of ABT's total deposits as of that date. According to the FDIC market share information as of June 30, 2020, ABT ranked eighth in deposit market share in the AA with a market share of 3.56 percent. Management originated \$395 million in loans out of the Quad Cities AA branches during the evaluation period. This represents 72 percent of ABT's loan originations by dollar during the evaluation period.

The Quad Cities AA includes 93 CTs. Four CTs are low-income, 26 are moderate-income, 47 are middle-income, and 16 are upper-income. The Quad Cities AA had a population of 347 thousand according to the 2015 ACS U.S. Census. The population included 89 thousand families and 140 thousand households. Nineteen percent of families are low-income, 18 percent are moderate-income, 22 percent are middle-income, and 41 percent were upper-income. The median family income was \$66,600. Nine percent of households lived below the poverty level.

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

There were 151 thousand housing units in the Quad Cities AA in 2020. Sixty-five percent of the total housing units are owner-occupied, and 28 percent are renter-occupied. The median age of housing units in the AA is 57 years, and the weighted-average median housing cost is \$136 thousand. The weighted-average monthly gross rent is \$714.

Competition in the Quad Cities AA is moderate. As of June 30, 2020, there were 32 institutions operating 134 banking branches in the AA. Competition in the AA primarily includes a few large national institutions, along with a few larger regional and small community banks.

We relied on a community representative to gain additional insight of the AA to conduct the examination. The community contact indicated that local economic conditions were stable, but that some industries such as manufacturing were seeking to expand and grow. The contact indicated that there is a shortage of housing the area, and that homes are typically selling for higher than asking price. The contact stated that the local financial institutions are generally doing well at serving the community.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Quad Cities						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	93	4.3	28.0	50.5	17.2	0.0
Population by Geography	347,497	2.6	21.1	55.6	20.8	0.0
Housing Units by Geography	151,245	3.0	20.8	56.1	20.1	0.0
Owner-Occupied Units by Geography	98,093	0.7	16.5	59.1	23.6	0.0
Occupied Rental Units by Geography	41,697	6.8	28.1	51.4	13.7	0.0
Vacant Units by Geography	11,455	8.3	31.0	47.3	13.4	0.0
Businesses by Geography	24,409	6.1	17.4	49.5	27.0	0.0
Farms by Geography	1,134	1.1	6.3	62.2	30.3	0.0
Family Distribution by Income Level	88,805	19.4	17.8	21.6	41.2	0.0
Household Distribution by Income Level	139,790	23.0	16.3	18.6	42.1	0.0
Median Family Income MSA - 19340 Davenport-Moline-Rock Island, IA-IL MSA		\$66,600	Median Housing Value			\$136,430
			Median Gross Rent			\$714
			Families Below Poverty Level			9.3%
<i>Source: 2015 ACS and 2020 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.</i>						

Scope of Evaluation in Davenport-Moline-Rock Island IA-IL MMSA

ABT operates one AA in the Davenport-Moline-Rock Island IA-IL MMSA. The rating for the MMSA is based solely on a full-scope review of this area.

Conclusions with Respect to Performance Tests in Davenport-Moline-Rock Island IA-IL MMSA

LENDING TEST

The bank's performance under the Lending Test in the Davenport-Moline-Rock Island MMSA is rated Satisfactory.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels given the product lines offered by the bank.

Home Mortgage Loans

The distribution of home mortgage loans to families of different income levels is excellent. Nineteen percent of AA families are low-income, but only seven percent of aggregate market loans reported by other financial institutions in the area were made to low-income families. The lower aggregate information is indicative of an external factor that is preventing banks from lending at the demographic level. Through further review of demographic and economic information, we found that the 19 percent of low-income families includes nine percent of families that re considered to be living below the poverty level. Furthermore, we determined that there are potential barriers to home ownership for low-income borrowers due to the moderately elevated cost of housing relative to the median family income in the AA. Our analysis determined that homeownership may not be affordable for low-income borrowers and that rent is a more affordable option for low income families in the AA. The cost of housing relative to income in the AA is likely why local financial institutions struggle to lend at the demographic level. Fourteen percent of ABT's mortgage loans were originated to low-income families, which exceeds the aggregate market level of other financial institutions of seven percent.

Twenty-three percent of ABT's mortgage loans were originated to moderate-income families, which exceeds the demographic and aggregate data. Approximately 18 percent of AA families are moderate-income, and 17 percent of aggregate market loans reported by other financial institutions in the area were made to moderate-income families.

Refer to Table P in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Distribution of Loans by Income Level of the Geography

ABT exhibits reasonable geographic distribution of loans in the MMSA. The AA has four low-income CTs and 26 moderate-income CTs.

Home Mortgage Loans

The geographic distribution of home mortgage loans originated or purchased in the AA is reasonable. ABT originated less than one percent of their home mortgage loans to borrowers in low-income CTs and 14 percent were made in moderate-income CTs. The bank's level of lending to low-income CTs within the AA is comparable to demographic data, which shows that less than one percent of owner-occupied housing units are in low-income CTs and less than one percent of aggregate market loans are originated in low-income CTs. The bank's level of lending to moderate-income CTs within the AA is also comparable to demographic data, which shows that 17 percent of owner-occupied housing units are in moderate-income CTs and 11 percent of aggregate market loans originated are in moderate-income CTs.

Refer to Table O in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Responses to Complaints

There were no complaints related to ABT's CRA performance in the Davenport-Moline-Rock Island IA-IL MMSA during the evaluation period.

Community Development Test

The bank's performance under the Community Development Test in the Davenport-Moline-Rock Island IA-IL MMSA is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the MMSA through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AAs.

CD activities demonstrated adequate responsiveness to CD needs and opportunities in the bank's AA. CD loans, investments, and donations totaled \$5.66 million during the evaluation period. This represents 16.4 percent of the AA's allocated tier 1 capital as of December 31, 2020. Bank employees provided 713 service hours to six qualified CD organizations during the evaluation period.

Number and Amount of Community Development Loans

Refer to the Community Development Loan table below for the facts 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 \$
Quad Cities AA	18	100	5,232	100

The level of CD loans within the MMSA reflects adequate responsiveness. Management originated 18 CD loans totaling \$5.23 million in the Quad Cities AA during the evaluation period. Fourteen loans were used to retain jobs of LMI individuals or within LMI CTs. Two loans totaling \$900 thousand provided CD services to LMI individuals, and one loan totaling \$650 thousand provided affordable housing.

Number and Amount of Qualified Investments

The level of CD investments within the MMSA reflects adequate responsiveness. ABT received credit for one CD investment that was made in a prior period and remained outstanding at the end of the current evaluation period. The prior period investment was made to a 501(c)3 non-profit certified CD financial institution that offers financial programs and services to help disadvantaged communities. ABT also received partial credit for two qualifying CD investments totaling \$349 thousand. These two investments were municipal bonds that partially served LMI individuals and geographies.

Management made 13 qualified donations totaling \$47 thousand during the evaluation period. The donations primarily supported a variety of organizations that provide community services and affordable housing to assist LMI individuals in the bank’s AA. Notable donations include \$16 thousand to a youth development organization, \$15 thousand to an affordable housing agency, and \$5 thousand to a children’s therapy center that primarily serves LMI families.

<i>Qualified Investments</i>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Quad Cities AA	1	30	15	396	16	100	426	100	--	--

* 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 Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

Extent to Which the Bank Provides Community Development Services

ABT's level of CD services within the MMSA reflects adequate responsiveness. Bank employees provided 713 service hours to six qualified CD organizations during the evaluation period. Examples of CD services provided by management include:

- One employee served as treasurer of a local housing development group that provides housing in LMI CTs at below market rental rates.
- One employee serves as a board member for a CD corporation that was established to assist the emerging economic needs of LMI communities and underserved areas.
- Numerous bank employees provided loan servicing for a local revolving loan fund that provides financing to LMI individuals.

State Rating

State of Illinois

CRA rating for the State of Illinois: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The major factors that support this rating include:

- The distribution of loans to businesses of different sizes and borrowers of different income levels is reasonable.
- The distribution of loans to CTs of different income levels is poor.
- ABT's CD activities demonstrated excellent responsiveness to the CD needs and opportunities in the AA.

Description of Institution's Operations in Illinois

ABT operates one AA in the State of Illinois, referred to as the Kane County AA.

The Kane County AA includes all of Kane County in Illinois. ABT operates two branches, and no ATMs in the Kane County AA. This AA represents a very small portion of ABT's market and banking activities. ABT reported \$51 million in deposits in the Kane County AA as of June 30, 2020, representing 14 percent of ABT's total deposits as of that date. According to the FDIC market share information as of June 30, 2020, ABT ranked 26th in deposit market share in the AA with a market share of 0.40 percent. Management originated \$152 million in loans out of the Kane County AA branches during the evaluation period. This represents 28 percent of ABT's loan originations by dollar during the evaluation period.

The Kane County AA includes 82 CTs. Four CTs are low-income, 29 are moderate-income, 27 are middle-income, and 22 are upper-income. The Kane County AA had a population of 525 thousand according to the 2015 ACS U.S. Census. The population included 129 thousand families and 172 thousand households. Twenty-two percent of families are low-income, 16 percent are moderate-income, 18 percent are middle-income, and 44 percent were upper-income. The median family income was \$80,899. Eight percent of households lived below the poverty level.

There were 183 thousand housing units in the Kane County AA in 2020. Sixty-nine percent of the total housing units are owner-occupied, and 25 percent are renter-occupied. The median age of housing units in the AA is 43 years, and the weighted-average of median housing costs is \$215 thousand. The weighted-average monthly gross rent is \$1,042.

Competition in the Kane County AA is moderate. As of June 30, 2020, there were 32 institutions operating 129 banking branches in the AA. Competition in the AA primarily includes a few large national institutions, along with a few larger regional and small community banks.

We relied on a community representative to gain additional insight of the AA to conduct the examination. The community contact indicated that the high cost of living has stifled growth in the area. The contact indicated that there is a significant need in the community for financial literacy education and financial management counseling, particularly surrounding student loan and credit card debt. The contact also mentioned the need for affordable housing and noted that the high housing costs, due to supply shortages of single-family homes, has led to an increase in renting.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Kane County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	82	4.9	35.4	32.9	26.8	0.0
Population by Geography	524,886	2.8	33.1	31.4	32.6	0.0
Housing Units by Geography	183,384	2.5	30.5	33.8	33.1	0.0
Owner-Occupied Units by Geography	126,903	1.5	23.4	35.1	40.0	0.0
Occupied Rental Units by Geography	45,576	5.0	47.1	30.8	17.1	0.0
Vacant Units by Geography	10,905	4.1	44.8	30.9	20.2	0.0
Businesses by Geography	32,661	2.6	18.9	35.7	42.8	0.0
Farms by Geography	956	1.5	19.6	46.5	32.4	0.0
Family Distribution by Income Level	128,926	20.8	17.1	20.2	41.9	0.0
Household Distribution by Income Level	172,479	21.7	15.7	18.3	44.3	0.0
Median Family Income MSA - 20994 Elgin, IL		\$80,899	Median Housing Value			\$214,648
			Median Gross Rent			\$1,042
			Families Below Poverty Level			8.4%
<i>Source: 2015 ACS and 2020 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.</i>						

Scope of Evaluation in Illinois

ABT operates one AA in the State of Illinois. The rating for the State of Illinois is based solely on a full-scope review of this area.

Conclusions in 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 is satisfactory.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

Small Loans to Businesses

The distribution of loans to businesses of different sizes is satisfactory. Eighty-three percent of AA businesses reported gross annual revenues (GAR) of \$1 million or less, while 47 percent of aggregate market loans reported by other financial institutions in the area were made to small businesses with GAR of \$1 million or less. Sixty percent of ABT's business loans by number were made to businesses with GAR of \$1 million or less. Our loan sample of 20 business loans was comprised of three loans to the same large business, which reported GAR greater than \$1 million, which skews the results. If this large borrower was only counted once in the sample ABT's lending to small businesses would represent 71 percent. Furthermore, the lower aggregate market data in comparison to demographic data could be an indication of lower business loan demand in comparison to the level of businesses operating in the AA. Upon review of business demographic information for the AA, we determined that nine percent of AA businesses are branches and not headquartered in the AA or single business locations. This could equate to the lack of financing opportunity available in the AA. After consideration of these factors, we found ABT's level of lending to small businesses to be comparable to demographic information and reflective of satisfactory performance.

Refer to Table R in 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.

Home Mortgage Loans

The distribution of home mortgage loans to families of different income levels is satisfactory. Twenty-one percent of AA families are low-income; however, only six percent of aggregate market loans reported by other financial institutions in the area were made to low-income families. The lower aggregate information is indicative of an external factor that is preventing banks from lending at the demographic level. Through further review of demographic and economic information, we found that the 21 percent of low-income families includes eight percent of families that are considered to be living below the poverty level. Furthermore, we

identified there are barriers to home ownership for low-income borrowers due to the high cost of housing relative to the median family income in the AA. Our analysis determined that homeownership is not affordable for low-income families. Additionally, rent is a more affordable option for low-income families compared to the estimated mortgage payment on a \$215 thousand house, which is the median housing price in the AA. The cost of housing in the AA relative to income is why local financial institutions struggle to lend at the demographic level. Four percent of ABT's mortgage loans were originated to low-income families, which is comparable to aggregate market data.

Thirteen percent of ABT's mortgage loans were originated to moderate-income families, which is comparable to the demographic and aggregate data. Seventeen percent of AA families are moderate-income, and eighteen percent of aggregate market loans reported by other financial institutions in the area were made to moderate-income families.

Refer to Table P in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Distribution of Loans by Income Level of the Geography

ABT exhibits poor geographic distribution of loans in the Kane County AA. The AA has four low-income CTs and 29 moderate-income CTs.

Small Loans to Businesses

The geographic distribution of business loans originated or purchased in the AA is poor. Zero percent of ABT's business loans were made to businesses in low-income CTs, compared to three percent of businesses within the AA located in low-income CTs and three percent aggregate market data. Zero percent of ABT's business loans were made to businesses in moderate-income CTs, compared to 19 percent of businesses within the AA located in moderate-income CTs and 17 percent aggregate market data. The bank's performance is significantly below demographic and aggregate market data and reflects poor distribution to lending to LMI CTs.

Refer to Table Q in 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.

Home Mortgage Loans

The geographic distribution of home mortgage loans originated or purchased in the AA is reasonable. ABT originated zero percent of their home mortgage loans to borrowers in low-income CTs and seven percent were made in moderate-income CTs. The bank's level of lending to low-income CTs within the AA is comparable to demographic data, which shows that 1.5 percent of owner-occupied housing units are in low-income CTs and 0.5 percent of aggregate market loans are originated in low-income CTs. However, the bank's level of lending to moderate-income CTs within the AA is below demographic and aggregate data as well, which shows that 23 percent of owner-occupied housing units are in moderate-income CTs and fourteen percent of aggregate market loans are originated in moderate-income CTs. ABT's performance is below demographic and aggregate market data. ABT's lower level of lending to

moderate-income CTs is contributed to the bank’s branch locations not located in or near the moderate-income CTs. Furthermore, the cities in which the majority of the moderate-income CTs are located have significant banking competition and are already served by numerous banks and credit unions, restricting ABT’s ability to reach those borrowers.

Refer to Table O in appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases.

Responses to Complaints

There were no complaints related to ABT’s CRA performance in the Kane County AA 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 excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for CD in the bank’s AA.

CD activities demonstrated excellent responsiveness to CD needs and opportunities in the bank’s AA. CD loans, investments, and donations totaled \$4 million during the evaluation period. This represents 74 percent of the AA’s allocated tier 1 capital as of December 31, 2020.

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 \$
Kane County AA	9	100	4,000	100

The level of CD loans within the Kane County AA reflects excellent responsiveness. Management originated nine CD loans totaling \$4 million in the Kane County AA during the evaluation period. Eight of the CD loans provide support for economic development by retaining jobs for LMI individuals or LMI CTs in the AA, while one CD loan created jobs for LMI individuals.

Number and Amount of Qualified Investments

The level of qualified CD investments within the Kane County AA reflects poor responsiveness. Management had no qualifying investments but made 16 qualified donations totaling \$30 thousand during the evaluation period. Donations were made to organizations that provide social services to assist LMI individuals. Twelve donations totaling \$19 thousand were to various food pantries in the AA. Another notable donation includes \$8 thousand to a children’s organization to fund a scholarship program that allows free membership for low-income individuals to participate.

<i>Qualified Investments</i>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kane County AA	0	0	16	30	16	100	30	100	--	--

* *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.

Extent to Which the Bank Provides Community Development Services

ABT’s level of CD services within the Kane County AA reflects adequate responsiveness. One bank employee provided 32 service hours to a CD organization in the Kane County AA during the evaluation period. The employee served as a board member of a local food pantry.

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

Appendix A: Scope of Examination

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 metropolitan and nonmetropolitan areas 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”).

Time Period Reviewed:	01/01/2018 to 12/31/2020	
Bank Products Reviewed:	Home mortgage Business loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA		
Davenport-Moline-Rock Island IA-IL	Full-scope	Includes all of Scott County in Iowa, all of Rock Island County in Illinois, and part of Mercer and Henry Counties in Illinois.
State: Illinois		
Kane County AA	Full-scope	Includes all of Kane County in Illinois.

Appendix B: Summary of MMSA and State Ratings

RATINGS American Bank & Trust			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
American Bank & Trust	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Davenport-Moline-Rock Island IA-IL MMSA	Satisfactory	Satisfactory	Satisfactory
State of Illinois	Satisfactory	Outstanding	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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 30th 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.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2018-20**

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Quad Cities AA	1,554	238,434	100.0	19.4	14.4	7.3	17.8	22.8	16.7	21.6	21.0	19.1	41.2	37.3	36.0	0.0	4.6	21.0
Total	1,554	238,434	100.0	19.4	14.4	7.3	17.8	22.8	16.7	21.6	21.0	19.1	41.2	37.3	36.0	0.0	4.6	21.0

Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%

American Bank and Trust Company excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2018-20**

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Owner-Occupied Housing Units	% Bank Loans	Aggregate	% Owner-Occupied Housing Units	% Bank Loans	Aggregate
Quad Cities AA	1,554	238,434	100.0	0.7	0.6	0.4	16.5	13.6	11.1	59.1	55.2	56.0	23.6	30.6	32.4	0.0	0.0	0.0
Total	1,554	238,434	100.0	0.7	0.6	0.4	16.5	13.6	11.1	59.1	55.2	56.0	23.6	30.6	32.4	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0%

American Bank and Trust Company excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2018-20

Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues ≤ IMM			Businesses with Revenues > IMM			Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Bank Loans
Kane County AA	20	6,059	100	11,885	83.3	60.0	47.1	6.5	40.0	10.2	0.0	
Total	20	6,059	100	11,885	83.3	60.0	47.1	6.5	40.0	10.2	0.0	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

American Bank and Trust Company excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2018-20

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	% Families	% Bank Loans
Kane County AA	83	22,395	100.0	31,894	20.8	3.7	6.4	17.1	13.3	18.0	20.2	10.8	22.1	41.9	60.2	37.0	0.0	14.5	16.5		
Total	83	22,395	100.0	31,894	20.8	3.7	6.4	17.1	13.3	18.0	20.2	10.8	22.1	41.9	60.2	37.0	0.0	14.5	16.5		

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

American Bank and Trust Company excluded from Aggregate

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018-20

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	% of Total	Aggregate	% of Total	% of Total	Aggregate	% of Total	% of Total	Aggregate	% of Total	% of Total	Aggregate	% of Total	% of Total	Aggregate	
Kane County AA	20	6,059	100	2.6	2.5	18.9	0.0	16.6	35.7	50.0	39.0	42.8	50.0	40.7	0.0	0.0	1.3	
Total	20	6,059	100	2.6	2.5	18.9	0.0	16.6	35.7	50.0	39.0	42.8	50.0	40.7	0.0	0.0	1.3	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

American Bank and Trust Company excluded from Aggregate

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018-20

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Total	Aggregate	% of Total	% of Total	Aggregate	% of Total	% of Total	Aggregate	% of Total	% of Total	Aggregate	% of Total	% of Total	Aggregate	
Kane County AA	83	22,395	100.0	1.5	0.5	23.4	7.2	13.7	35.1	33.7	36.3	40.0	59.0	49.5	0.0	0.0	0.0	
Total	83	22,395	100.0	1.5	0.5	23.4	7.2	13.7	35.1	33.7	36.3	40.0	59.0	49.5	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

American Bank and Trust Company excluded from Aggregate