

LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

Albany Bank and Trust Company, N.A.
Charter Number: 14688

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Office of the Comptroller of the Currency

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NOTE: 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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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **Albany Bank and Trust Company, N.A.** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **March 1, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

Community Development (CD) - Affordable housing for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA) - The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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.

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

Geography - A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

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

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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, branch distribution).

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Metropolitan Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

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

The following table indicates the performance level of **Albany Bank and Trust Company, N.A.** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Albany Bank and Trust Company, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- < Lending levels that reflect good responsiveness by Albany to the credit needs of its assessment area.
- < Excellent distribution of Albany's loans among geographies and good distribution among borrowers of different income levels throughout its assessment area.
- < Community development lending which has an overall positive impact on the Lending Test conclusion.
- < Investments that reflect an adequate responsiveness by Albany to the needs of its assessment area.
- < Good accessibility of Albany's offices to geographies and individuals of different income levels and adequate responsiveness of Albany's services to the needs of its assessment area.
- < Excellent performance in providing community development services.

Description of Institution

Albany Bank and Trust, National Association (Albany), an intrastate bank, had total assets of \$352 million, at December 31, 1999. Headquartered in Chicago, Illinois, the bank was incorporated as Albany Bank and Trust, National Association in 1953. Albany is a 92% wholly-owned subsidiary of Albank Corporation, which was formed in 1983. It is a one-bank holding company with combined total assets that are virtually the same as the bank's. The holding company does not have any additional subsidiaries that would significantly influence the bank's capacity to lend or invest in the bank's assessment area. Albany is the largest locally owned financial institution when compared to others in the surrounding area.

Albany has four bank offices, three of which are all located in the Albany Park Community area. The most recent branch opening, in February 1998, expanded the bank's presence to Skokie, IL. There are seven ATMs, two of which are free standing. The bank's assessment area is contiguously located around all branch and ATM locations.

The bank offers traditional deposit services and a wide variety of lending products. However, the bank's lending efforts are largely commercial. All of the products are offered at all branch locations. Underwriting is performed primarily at the main office.

There are no current impediments that would hamper Albany's ability to meet the credit needs of its communities. The bank has historically been a strong financial performer. On December 31, 1999, Albany had net income of \$3.5 million and a loan-to-deposit ratio of 72%. The Tier 1 Capital ratio and Return on Average Assets were 11% and .98%, respectively. Loans represented 64% of total assets. The loan portfolio was comprised of commercial and commercial real estate loans (72%), residential real estate loans (26%), and consumer loans (2%).

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation considered the bank's performance since the last examination dated March 6, 1998, at which time the bank received a Satisfactory rating. The current evaluation reflects lending performance from January 1, 1998 through December 31, 1999. Community Development loans, the investment and service test performances are evaluated from March 7, 1998 through December 31, 1999. Our evaluation focused heavily on business lending performance given the bank's business strategy.

Data Integrity

The Community Reinvestment Act requires that banks collect and maintain certain data regarding originations and purchases of small business, small farm and HMDA loans. This information is maintained in the bank's Public File. As part of our evaluation, we tested the bank's publicly filed HMDA and CRA data for accuracy. We also evaluated Albany's processes to ensure that data are reliable.

The CRA data was determined to be accurate. However, errors were noted with regard to some of the loan amount fields of the HMDA data. These errors did not impact our ability to perform our analysis since the HMDA analysis is primarily based on the number of loans originated versus the loan amount.

Selection of Areas for Full-Scope Review

The bank has only one assessment area. This assessment area represents portions of Cook County that is a portion of the Chicago Metropolitan Statistical Area (MSA 1600). We performed a full scope review of this assessment area. (Refer to the table in Appendix A for more information.)

Ratings

The bank's overall rating is based primarily on the assessment area discussed above.

Other

Due to the size and location of the bank's assessment area, credit and community development needs are numerous and varied. Significant credit needs include affordable housing (low down payment loans, down payment assistance and rehabilitation), consumer, and small business loans (business planning assistance, working capital, and microloans to maintain economic viability).

These needs were identified through several community contacts with housing, economic and government representatives contacted by this banking regulatory agency in the past 18 months.

Opportunities for qualified investments, community development loans, and community development services exist within the bank's assessment area. These opportunities include investment in Community Development Corporations (CDCs), Small Business Administration loan programs (Microlending Demonstration Program and 504 Program), credit counseling agencies, small business development centers and non-profit organizations that provide social services to low- and moderate-income individuals.

Fair Lending Review

An analysis of 1998 and 1999 HMDA and Small Business lending data, public comments, and consumer complaint information was performed according to the OCC's risk based analysis approach. The analysis of the lending data revealed no significant differences for applicants by collected prohibited basis. In addition, an analysis of the 1998 and 1999 consumer complaint data and public comments revealed no substantive fair lending issues that warranted more detailed review.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions

The bank's performance under the Lending Test is rated High Satisfactory. Based on the full-scope review, the bank's performance is good.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

Albany's lending activity reflects good responsiveness to assessment area credit needs. The bank ranks fifty-third in terms of deposit market share (.25%) out of 312 financial institutions within Cook County. Financial institutions that dominate deposit market share (greater than 10%) are multinational banks headquartered in Chicago.

As of December 31, 1999, the loan-to-deposit ratio was 72%. This ratio is in line with other peer banks, which average the same percentage. Peer banks include all banks within Cook County with total assets between \$200 million to \$400 million, and have a commercial real estate loan base of at least 30%. Fourteen banks fit into this custom peer group.

Albany originates a wide variety of loans. However, it has historically been a commercial lender. As discussed earlier, 72% of the loan portfolio is commercial. The bank originated 184 small loans to businesses in 1998 and 1999. Based on the 1998 Small Business Aggregate data published by the FFIEC, Albany ranked 50th out of 270 lenders. The ranking places Albany within the top quartile when compared to peer banks within Cook County. This market rank indicates strong performance in the volume of small loans to businesses in relation to the bank's deposit market rank. The statistics are skewed toward reporters, such as American Express, who issue a large number of business credit cards, which are considered small loans to businesses for reporting purposes.

The bank is not a significant home mortgage lender. However, the bank has found a niche in multifamily lending. Of the 71 loans reported within the assessment area, 64% are multi-family. The bank ranks 10th in multi-family lending within its assessment area, with a 1.89% market share. This ranking demonstrates strong performance in the volume of multi-family loans in relation to the bank's deposit market rank and deposit market share.

The remaining 18% of the loans reported are home purchase, 14% are home

improvement, and 4% are refinance. Management does not emphasize this type of lending due to steep competition from many larger regional banks and mortgage companies who have the resources and expertise to offer these types of loans. The significant rental market also contributes to low home loan originations.

Aggregate market data for 1998 HMDA activity revealed that 63,600 HMDA loans were originated within the bank's assessment area, with Albany originating only 35 of the HMDA reportable loans. The bank ranked 193 out of 645 reporters within the assessment area in 1998, the most current year for which HMDA market share data is available. The market share data further substantiated that leaders are several multinational and regional bank financial institutions.

Distribution of Loans by Income Level of the Geography

The geographic distribution of Albany's home mortgage loans and small loans to businesses reflect excellent penetration throughout the assessment area. The bank did not originate any farm loans, therefore, we did not perform an analysis of these loan types.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans is excellent within the assessment area.

The analysis included a comparison of the bank's level of home purchase, home improvement, and home mortgage refinance loans to the corresponding percentage of owner-occupied housing units by type of geography. The bank did not originate any home purchase, home improvement, or refinance loans within its low-income census tracts. Only 2% of the owner occupied units within the assessment area are located in these low-income census tracts. However, Albany originated one multi-family loan within a low-income census tract, therefore, reflecting some housing related lending in low-income areas.

Although lending volumes are low, Albany originated 54% of home purchase, 40% home improvement, and 67% of refinance loans within moderate-income census tracts. This percentage of lending is excellent and significantly exceeds the 27% of the owner occupied units that are located within moderate-income census tracts.

The market share for loans made in moderate-income geographies exceed Albany's overall market shares in the assessment area for home purchase loans and home improvement loans. The bank's overall market share for refinance loans is very low since the bank only originated three loans of this type. Therefore, the market share within moderate-income geographies was not meaningful.

Small Loans to Businesses

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The analysis compares the bank's level of small loans to businesses with the proportionate number of businesses operating in the type of geography. Albany's distribution of small loans (less than \$1 million) is excellent when compared to the percentage distribution of businesses throughout the geographies. Albany originated 8% its small loans in low-income census tracts and 34% of its small loans within moderate-income census tracts. Only 3% of the businesses are located within the low-income census tracts and 30% of the businesses are located in moderate-income geographies. The bank's overall market share for small loans to businesses is strong when considering the bank's size and resources, at .30%. Albany's market share within low- and moderate-income geographies exceeds the overall market share for small loans to business.

Lending Gap Analysis

The lending gap analysis determines the dispersion of lending of all product types throughout the assessment area. To effectively make this assessment, we determined the lending dispersion within Community Areas designated by the City of Chicago, with a significant percentage of low-or moderate-income census tracts. These communities include: Rogers Park, Uptown, Albany Park, Irving Park, Hermosa, Avondale, Logan Square, Humboldt Square, West Town and Austin. The analysis revealed that the lending dispersion is reasonable. Not every census tract had lending activity. However, there is lending activity within all of these communities. Further, we did not observe any significant clusters of census tracts within these communities with low-penetration of lending.

Inside/Outside Ratio

An adequate portion of Albany's overall originations is within the assessment area. Fifty-three percent of HMDA and 47% of the small loans to businesses were originated within the assessment area. Contributing to the small percentage of small loans to businesses is that many of the bank's established customers have moved to suburban neighborhoods but continue to maintain banking relationships with the bank.

See **Table 1** for the number and dollar amount of loans extended within the assessment area.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of Albany's home mortgage loans and small loans to businesses reflects good dispersion among borrowers of different income levels throughout the assessment area. Performance is good within this assessment area.

As reflected in the *Market Profile* section, the percentage of owner-occupied units is low. Coupled with the significant housing cost within the assessment area in relation to the income level of low-income individuals, the low-income individual's ability to afford a home is impaired.

Home Mortgage Loans

Refer to Tables 7, 8, and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home mortgage loans to low-income borrowers are adequate when compared to the percentage of low-income families in the assessment area. Albany's performance for home purchase loans and home improvement loans is lower than the percentage of low-income families in the assessment area. Albany did not extend any refinance loans to low-income borrowers, within its assessment area. Albany's market share for home improvement loans to low-income borrowers exceeds its overall market share.

Albany's performance in lending to moderate-income borrowers is good when compared to the percentage of moderate-income families in the assessment area. When granting home purchase loans, Albany's performance is near the percentage of moderate-income borrowers. However, the bank's performance exceeds the percentage of moderate-income borrowers, for home improvement and refinance loans to moderate-income families. Albany's market share for moderate-income borrowers is excellent for home improvement loans when compared to the overall market share. Home purchase and refinancing originations for Albany are so low in 1998 that its market share is insignificant.

Small Loans to Businesses

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good in the assessment area. Our analyses revealed that 66% of Albany's small loans to businesses were to businesses with gross revenues of \$1 million or less. This performance is near the portion of businesses with gross revenues of \$1 million or less and exceeds the aggregate market's percentage of 52%. The portion of loans of \$100,000 or less is near to the portion of businesses that are defined as small. Albany's market share

exceeds the overall market share.

Community Development Lending

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of CD lending.

Albany extended a significant number of community development loans during the evaluation period. Therefore, the CD lending has had a positive impact on the Lending Test conclusions for the assessment area.

During the evaluation period, Albany originated 27 multi-family loans within low- and moderate-income census tracts, totaling \$15,203,000. All of the loans are within the bank's assessment area and either provide affordable housing for low-and moderate-income persons or revitalize or stabilize the low-or moderate-income geographies.

Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test conclusions. Albany makes good use of flexible loan programs that benefit low- and moderate-income borrowers or geographies. These programs have been instrumental in providing affordable lending for consumer purposes and small business development.

- ! **Albank A-B-C Creditability Loan Program:** This program is designed to establish, or re-establish credit. The terms require that the borrower put the money in an Albany Certificate of Deposit (CD). The minimum loan amount of \$2,500 is required for a maximum term of 30 months. Pricing of the loan is three percent over the current CD rate at the time of financing. The program originated in March of 1996. In 1998 and 1999, 9 loans were originated, totaling \$116,500.
- ! **Automobile Loan Programs:** The following two programs were designed in response to the growing demand to finance older model automobiles for persons with no credit history. These programs are considered a risky form of lending. As such, the loan products are adequately priced for the level of risk involved. The bank will finance automobiles up to seven model years old under both programs. The pricing varies based on the length of employment. The first program requires customers to have at least two years employment. Loan amounts are limited to \$10,000 for 36 months, with an interest rate of 13%. Implemented in 1996, the bank has extended 634 loans under this program.

The second loan program is tailored to customers with less than two years employment. Terms require at least 50% down and an interest rate of 18.50%. Under this program, no loans were originated during this evaluation period

According to Crain's Chicago Business magazine, dated March 31, 2000, and based on September 30, 1999 performance, Albany is ranked as one of the top 25 Small Business Administration lenders in Chicago. Below is a description of the bank's qualified performance relating to this type lending.

- ! **Small Business Administration Low DOC Program:** This government guaranteed program allows for shorter application and approval time. During this evaluation period the bank has originated one loan, totaling \$100,000 within a moderate-income geography, within the assessment area.

- ! **Small Business Administration 7(a) Program:** As a preferred lender under this government guaranteed program, fast and efficient service is provided to small businesses who might otherwise have difficulty in obtaining favorable financing. During this evaluation period the bank originated one loan, totaling \$275,000 within a moderate-income geography, within the assessment area.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated Low Satisfactory. Based on this full-scope review, the bank's performance in its assessment area is adequate.

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

In its investing activities, Albany exhibits adequate responsiveness to credit and community development needs. This conclusion is based on the needs and opportunities within the area identified through community contacts and the bank's size and financial capacity. The bank's assessment area represents a small portion of a large metropolitan area where many investment opportunities are available to assist with needs within the communities in which the bank serves. However, the bank has devoted its efforts in contributing to those investments that provide the most direct benefit to its assessment area. The Specific needs and opportunities are discussed within the *Scope of Evaluation* section of this report.

The bank provided investments within its primary service area through cash, in-kind contributions and grants to organizations serving the low- and moderate-income individuals of the assessment area. Total qualifying investments during this evaluation period total \$73,500. Specific noteworthy investments include:

- ! The bank has been continuously involved with the North River Commission, a 38 year old, not-for-profit community development organization which consist of more than one hundred civic associations, businesses, and institutions who unite to revitalize and stabilize the low-and moderate-income communities of Albany Park, North Park, and Irving Park. There are three organizations that assist in carrying out the objectives of the North River Commission. They include The Lawrence Avenue Development Corporation, which is responsible for business lending and development; The North River Housing Corporation that is responsible for building, renovating, and packaging affordable housing; and the Albany Park Chamber of Commerce, which is responsible for business services. Albany was a founding member of these organizations and continues to be committed in achieving the corporations' goals. During this evaluation period, the bank supported these organizations through cash grants and in-kind contributions, for a total of \$14,000.

As in-kind contributions, Albany provides mailing services and meeting space for the Commission and affiliates. Total in-kind contributions for the organizations are valued at \$33,500.

- ! As a founding member of the Albany Park Community Center, which is the leading assessment area, the bank has recently demonstrated continued support through cash grants totaling \$16,000 for 1998 and 1999.

Additional donations and grants were provided to organizations with a community development focus. Albany contributed to 14 different community development organizations, totaling \$10,000 during the evaluation period.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated High Satisfactory. Based on this full-scope review, the bank's performance in the assessment area is good.

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Albany has four offices (including the main office). Two offices are located within a three mile radius of the head office, the portion of the assessment area in which the bank considers as its primary service area. This area is also a high traffic area. A fourth branch was opened in Skokie, Illinois in February 1998.

Albany's head office is located in a moderate-income census tract and the remaining three offices are located in middle-income census tracts. Moderate- and middle-income census tracts are somewhat intertwined in the areas around the branches within the city. Therefore, offices located in middle-income tracts also serve moderate-income tracts. The bank does not have offices in low-income census tracts as all of the low-income tracts are around the outer edge of the assessment area.

Products and services are primarily offered in a manner consistent throughout the community. The staffing of lending officers at the branches vary somewhat. The majority of loan officers are at the head office. And most branch loan officers have very limited lending authority. Lenders will readily make appointments to meet with customers at any bank office. A senior lender was placed at the new Skokie location because of its distance from the head office.

Albany's hours are generally tailored to the needs of the surrounding area. All of the branch offices maintain Saturday hours. Three of the branches have drive-up facilities which offer extended hours. These three branches are located in the moderate- and middle-income tracts.

Alternative Delivery Systems

Albany's alternative delivery systems make services more accessible. The bank maintains seven ATMs within the assessment area. Each location is equipped with a 24 hour ATM. The head office is equipped with two ATMs, one of which is free-standing. The bank subscribes to the Cash Station network that enables customers to transact banking through a large number of ATM machines throughout the assessment area and nationwide.

The bank also offers a 24 hour telephone banking service at no charge. The banking service is accessible in English, Spanish and Korean. Also, a toll free number is available to access the service from outside of the Chicago area. Customers can obtain account information on their checking and savings account and can also obtain rate information on certificates of deposits. We could not place significant weight on the alternative delivery systems when drawing our CRA performance conclusions because no data was available to provide specifics on the availability and effectiveness of the bank's alternative delivery systems for low and moderate income individuals and geographies.

Community Development Services

Albany's performance in providing community development services is excellent.

Several bank employees offer community development services to organizations that have as their primary purpose economic development or revitalization and serve low-and moderate- income individuals. Their involvement is providing technical assistance, developing programs to provide lending and inform the community about credit and deposit products, sponsoring seminars and counseling programs on home ownership and starting small businesses. Detailed below are some of the programs and organizations.

- In 1999, Albany received the "Private Sector Linkage Award" from the Chicago Association of Neighborhood Development Organizations (CANDO) for their role in economic development of Albany Park. The award is given to organizations that best demonstrate the link between public, private and non-profit sectors necessary for community economic development. The bank played a major role in the redevelopment of properties previous occupied by an insurance company (The May Fair Project). Bank officials, in cooperation with area businesses and residents, contributed time, talent, funding and financing to fill the void created when the insurance company relocated. The bank's participation in this project helped to revitalize and stabilize Albany Park, a low-and moderate- income community.
- The bank's president serves as Vice-Chairman and a director of the bank serves as Chairman of the board of a local community center that leads in providing social services for low-and moderate-income individuals in Albany Park. Both provide technical expertise and financial counseling on various ventures with the community center. Specifically, these executive officers have provided financial expertise to the community center on budgeting, staffing matters, as well as locating funding sources for affordable housing projects.
- An officer of the bank serves on the Board of Directors of an Albany Park-based Community Development Corporation within the assessment area. This organization represents many organizations, businesses and residents who unite

to revitalize and stabilize the low-and moderate-income communities of Albany Park, North Park, and Irving Park.

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 **AFull-Scope@**) and those that received a less comprehensive review (designated by the term **ALimited-Scope@**).

Time Period Reviewed	Lending Test: (January 1, 1998 to December 31, 1999) Investment Test: (March 7, 1998 to December 31, 1999) Service Test: (March 7, 1998 to December 31, 1999)	
Financial Institution	Products Reviewed	
Albany Bank and Trust Company, N.A. Chicago, IL	HMDA, Small Business, and Community Development Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Chicago, IL MSA #1600	Full-Scope	

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Market Profiles for Areas Receiving Full-Scope Reviews

Albany Bank Assessment Area	B-2
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Chicago, Illinois MSA

Demographic Information for Full-Scope Area: Portions of Chicago, Illinois MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	279	9%	37%	39%	15%	0%
Population by Geography	1,090,310	8%	39%	39%	14%	0%
Owner-Occupied Housing by Geography	184,097	2%	27%	52%	19%	0%
Businesses by Geography	31,285	6%	30%	45%	19%	0%
Farms by Geography	221	5%	22%	56%	17%	0%
Family Distribution by Income Level	253,149	26%	20%	23%	30%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	253,149	7%	38%	43%	12%	0%
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$42,758 = \$63,800 = 54,558	Median Housing Value Unemployment Rate				= \$146,619 = 5.4%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 199X HUD updated MFI.

The assessment area is comprised of a portion of the Chicago Metropolitan Statistical Area (MSA 1600). This assessment area represents 279 geographies with 92% of the geographies located within the City of Chicago. The remaining geographies are located just north of the city in Cook County. The Community Areas designated by the City of Chicago include all of the Rogers Park, West Ridge, Uptown, Lincoln Square, North Center, LakeView, Jefferson Park, Forest Glen, North Park, Albany Park, Portage Park, Irving Park, Belmont Cragin, Norwood Park, Hermosa, Avondale, and Logan Square communities. The assessment area includes portions of the, Lincoln Park, West Town, Humbolt Park, Austin and Dunning communities. The suburban communities include portions of Skokie, Lincolnwood, Niles, Morton Grove, and Evanston. This assessment area includes geographies where the bank has a branch and where a substantial portion of the bank's loans have been originated. A general description of the bank's assessment area would include all census tracts within four to five miles of the branch locations. This assessment area was drawn in accordance with the regulation since the bank did not include the entire MSA as its AA.)

The economy for most of the assessment area is mature and stable. The employment base is largely service and retail oriented and extremely ethnically diverse. Most of the businesses within the assessment area are sole proprietorships and very small. Over 65% percent of the businesses have less than four employees. The unemployment rate for the City of Chicago in January 2000, is higher at 5.4%, than the national average of 4.5% and the State of Illinois, at 4.3%.

The assessment area consists of 475,604 housing units. Thirty-nine percent of these units are owner occupied, 54% are rental and 7% are vacant housing units. The median housing value is \$146,619. The median year built of housing in the assessment area is 1945. This year is in line with median year built for all housing units in Chicago.

Housing costs within the assessment area impairs the low- and moderate-income borrower's ability to afford a house. The National Low Income Housing Coalition (LIHIS) report, Out of Reach, dated September 1999, indicates that the maximum affordable monthly housing cost, for low-income families, in Chicago, is \$798. Based on aforementioned housing cost and current interest rates, the approximate maximum home value that low-income families could afford is \$104,000.

There are 253,149 families within the bank's assessment area. The number of families located in Albany's assessment area represent 20% of Cook County's total family base.

Competitive Factors Within the Assessment Area

Albany's principal business activities are highly competitive. The bank competes actively with other financial service providers offering a wide array of financial products and services. According to the 1998 Home Mortgage Disclosure Act (HMDA) information, 645 financial institutions originated home mortgage loans in the bank's assessment area. Albany ranked 193 amongst these lenders. In contrast, 1998 information from the aggregate CRA reports on small business lending reflect 270 lenders in Cook County. Albany ranked 50th. Competitors include other national and state banks, savings banks, savings and loan associations, finance companies, insurance companies, and various nonfinancial intermediaries.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the **Abank** 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: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Farms** - 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 market rank and market share information based on the most recent aggregate market data available.

- Table 7. Borrower Distribution of Home Purchase Loans** - 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 MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's assessment area to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's assessment area to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.
- Table 13. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.
- Table 14. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 the population within each geography. For borrower distribution, the table 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 of households by income level in each MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME												State: Illinois	Evaluation Period: 01/01/1998 TO 12/31/1999
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans(#) in MSA/AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full-Scope:													
Albany Assessment Area	100.00	26	2,637	101	12,775	0	0	27	15,203	154	30,615	100.00	

* Deposit data as of June 30, 1999.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE																State: Illinois		Evaluation Period: 01/01/1998 TO 12/31/1999			
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans						
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**					
Full-Scope:																					
Albany Assessment Area	2.00	0.00	27.00	54.00	52.00	23.00	19.00	23.00	242	0.00	0.00	0.10	0.00	0.00	13	100.00					

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(**) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT																State: Illinois		Evaluation Period: 01/01/1998 TO 12/31/1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans				
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**			
Full-Scope:																			
Albany Assessment Area	2.00	0.00	27.00	40.00	52.00	50.00	19.00	10.00	70	0.10	0.00	0.20	0.10	0.00	10	100.00			

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(**) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE																State: Illinois		Evaluation Period: 01/01/1998 TO 12/31/1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans				
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**			
Full-Scope:																			
Albany Assessment Area	2.00	0.00	27.00	67.00	52.00	33.00	19.00	0.00	544	0.00	0.00	0.00	0.00	0.00	3	100.00			

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(**) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES																State: Illinois		Evaluation Period: 01/01/1998 to 12/31/1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans				
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**			
Full-Scope:																			
Albany Assessment Area	6.00	8.00	30.00	34.00	45.00	28.00	19.00	31.00	50	0.30	0.40	0.40	0.20	0.30	101	100.00			

(*) Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

(**) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS																State: Illinois		Evaluation Period: 01/01/1998 TO 12/31/1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans				
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**			
Full-Scope:																			
Not applicable																			

(*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.

(**) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE State: Illinois Evaluation Period: 01/01/1998 TO 12/31/1999																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full-Scope:																
Albany Assessment Area	26.00	15.00	21.00	15.00	23.00	0.00	30.00	46.00	242	0.00	0.00	0.00	0.00	0.10	13	100.00

(*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(***) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT																State: Illinois		Evaluation Period: 01/01/1998 TO 12/31/1999				
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans							
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total**						
Full-Scope:																						
Albany Assessment Area	26.00	20.00	21.00	40.00	23.00	20.00	30.00	0.00	70	0.10	0.30	0.30	0.10	0.00	10	100.00						

(*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(***) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				State: Illinois		Evaluation Period: 01/01/1998 TO 12/31/1999							Total Home Mortgage Refinance Loans			
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					#	% of Total***
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp		
Full-Scope:																
Albany Assessment Area	26.00	0.00	21.00	33.00	23.00	33.00	30.00	0.00	544	0.00	0.00	0.00	0.00	0.00	3	100.00

(*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

(***) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES										
State: Illinois			Evaluation Period: 01/01/1998 TO 12/31/1999							
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Loans to Businesses	
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total*****
Full-Scope:										
Albany Assessment Area	78.78	66.00	52.48	66	20	15	0.29	0.36	97	100.00

(*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(**) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0% of small loans to businesses originated and purchased by the bank.

(***) The market consists of all other Small Business reporters in the MSA/AA and is based on 1998 Aggregate Small Business Data only.

(****) Based on 1998 Aggregate Small Business Data only.

(*****) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS										
			State: Illinois			Evaluation Period: 01/01/1998 TO 12/31/1999				
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans	
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total*****
Full-Scope:										
Not Applicable										

(*) Farms with revenues of \$1 million or less as a percentage of all farms.
 (**) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0% of small loans to farms originated and purchased by the bank.
 (***) The market consists of all other Small Farm reporters in the MSA/AA and is based on 1998 Aggregate Small Farm Data only.
 (****) Based on 199X Aggregate Small Farm Data only.
 (*****) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS State: Illinois Evaluation Period: 01/01/1998 TO 12/31/1999									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$=s	#	\$ (000's)
Full-Scope:									
Albany Assessment Area	0	0	17	74	17	74	100	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 reported on the Report of Condition Schedule-L Off Balance Sheet Items.

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
State: Illinois Evaluation Period: 01/01/1998 TO 12/31/1999																	
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Albany Assessment Area	100.00	4	100.00	0.00	25.00	75.00	0.00	0	1	0	0	1	0	08.00	39.00	39.00	14.00