



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

January 25, 2016

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Bank and Trust Company, National Association  
Charter Number 24369

4301 East 53rd Street Davenport, Iowa 52807

Office of the Comptroller of the Currency

1089 Jordan Creek Parkway Suite 230 West Des Moines, Iowa 50266

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, nor should it 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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**INSTITUTION'S CRA RATING:** This institution is rated **Satisfactory**.

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

American Bank and Trust Company, National Association (ABT) satisfactorily meets the needs of its assessment areas (AAs). The conclusion is based on the following:

- The average loan-to-deposit (LTD) ratio is reasonable compared to similarly situated banks in the AAs;
- A majority of the bank's loans are originated within its AAs;
- The bank's distribution of loans reflects reasonable penetration among borrowers and businesses of different income levels;
- The geographic distribution of loans reflects reasonable dispersion among the low- and moderate-income census tracts (CTs) in the AA's; and
- There were no complaints regarding the bank's performance in meeting the credit needs of the AAs.

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

- ABT offers various products and services at no cost to the customer.
- ABT originated \$18.3 million in community development (CD) loans and donated \$36 thousand to qualified organizations this evaluation period.
- Bank employees provided 899 hours of financial expertise to qualified organizations and individuals during this evaluation period.

## **Scope of Examination**

We evaluated ABT using intermediate small bank examination procedures, which includes a lending test and a CD test. 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 CD lending, qualified investments, and CD services. The evaluation period for the lending test covers loans originated or purchased from January 7, 2013 through November 30, 2015, while the CD test covers the bank's performance from January 7, 2013 to December 31, 2015.

ABT has two AAs. These include the Quad Cities AA that is within the Davenport-Moline-Rock Island Metropolitan Statistical Area (MSA) and Kane County AA within the state of Illinois. We placed the most weight on the Quad Cities AA because loan

volume within the AA there was the greatest, and the majority of ABT’s deposits are also in this AA.

ABT’s primary products are residential real estate loans and business loans. The following table shows the percentage of loan originations by loan type from January 7, 2013 to November 30, 2015. We placed more weight on the bank’s residential real estate lending compared to the business lending.

<b>Table 1: Loan Originations</b>		
<b>Loan Type</b>	<b>% by Dollar</b>	<b>% by Number</b>
Residential	51%	70%
Business	46%	16%
Consumer	2%	14%
Agricultural	0%	0%

*Source: Bank-provided loan origination reports (2013- 2015)*

To evaluate ABT’s lending performance, we relied upon the bank’s Home Mortgage Disclosure Act (HMDA) data to evaluate the residential real estate loan portfolio, and selected a loan sample to evaluate the business loan portfolio.

## **Description of Institution**

ABT is a \$344 million national bank headquartered in Davenport, Iowa. Davenport, Iowa is located in Eastern Iowa along the Mississippi River and Interstates 74 and 80. ABT is a wholly owned subsidiary of Ambank Holdings, Inc., a one bank holding company headquartered in Davenport, Iowa. ABT is an interstate financial institution operating in Iowa and Illinois. The bank operates with eight bank branches, and two additional trust and investment services branches. The bank has seven automated teller machines (ATMs), of which three contain a deposit-taking feature.

The December 31, 2015 call report identifies \$220 million in loans, which consist of \$129 million in business loans, \$89 million in residential real estate loans, and \$2 million in consumer loans.

ABT received a satisfactory rating at its last CRA examination dated January 7, 2013.

## **Conclusions with Respect to Performance Criteria**

ABT’s performance in regards to the lending test is satisfactory. The bank’s LTD ratio is reasonable given the bank’s size, financial condition, and credit needs of the AAs. In addition, ABT originates a majority of its loans inside the AAs. The borrower distribution of residential real estate and business loans reflects reasonable penetration. The geographic distribution of residential and business loans reflects reasonable dispersion among low- and moderate-income CTs. ABT has not received any complaints regarding its CRA performance since the previous examination.

**Loan-to-Deposit Ratio**

ABT’s lending level is reasonable and meets the criteria for satisfactory performance. Over the past 12 quarters ending September 30, 2015, ABT’s quarterly average LTD ratio was 64.05 percent. This ratio is comparable to the quarterly average LTD ratio of three other comparable institutions of 67.30 percent.

**Lending in Assessment Area**

ABT originates a majority of residential and business loans within its AAs, which meets the standard for satisfactory performance. ABT originated 68.90 percent of its loans by number and 57.56 percent of its loans by dollar amount within the AAs.

<b>Table 2 - Lending in Quad Cities AA and Kane County AA</b>										
Loan Type	Number of Loans					Dollars of Loans (\$000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	975	78.95	260	21.05	1235	151,874	70.62	63,187	29.38	215,061
Home Refinance	684	57.53	505	42.47	1189	118,825	45.08	144,733	54.92	263,558
Home Improvement	83	78.30	23	21.70	106	9,717	71.95	3,789	28.05	13,506
Total Home	1,742	68.85	788	31.15	2,530	280,416	56.98	211,709	43.02	492,125
Business	15	75.00	5	25.00	20	8,985	84.18	1,688	15.82	10,673
Total	1,757	68.90	793	31.10	2,550	289,401	57.56	213,397	42.44	502,798

*Source: 2010 U.S. Census data; 2013-2015 HMDA data, business loan sample*

**Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. § 25.28(c), or 12 C.F.R. § 195.28(c), in determining a bank’s (bank) or Federal savings association’s (FSA) CRA rating, respectively, 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 or FSA’s lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

## **Multistate Metropolitan Area Rating**

### **Davenport-Moline-Rock Island MSA**

**CRA Rating for the Davenport-Moline-Rock Island MSA<sup>1</sup>: Satisfactory**

**The Lending test is rated: Satisfactory**

**The Community Development test is rated: Satisfactory**

The major factors supporting this rating include:

- The borrower distribution of loans reflects reasonable penetration throughout the AA;
- The geographic distribution of loans reflects reasonable dispersion throughout the AA; and
- CD activity reflects an adequate responsiveness to CD needs throughout the AA.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE QUAD CITIES ASSESSMENT AREA**

The bank operates with the Quad Cities AA that is located within the Davenport-Moline-Rock Island MSA. The Quad Cities AA includes Rock Island and Scott Counties, along with five census tracts in Henry County and one census tract in Mercer County. This is a multi-state MSA because it includes counties and tracts in both Iowa and Illinois. The bank has six full-service branch locations and seven ATMs located within the AA. The AA consists of 93 census tracts consisting of eight low income, 19 moderate-income, 46 middle income, and 20 upper income tracts. The AA consists of whole census tracts and does not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income areas.

Competition in the AA is significant. Forty deposit-taking FDIC-insured financial institutions serve the Quad Cities AA per the June 30, 2015 FDIC Deposit Market Share Report. ABT ranks seventh for deposit market share with \$240 million in deposits, which represented 3.65 percent of the Quad Cities market. Demographic data for 2015 shows a population of 343 thousand, with a median family income of \$65,310. The economy of the Quad Cities AA is concentrated in manufacturing, healthcare, and agricultural industries. Some major employers include John Deere Inc., ALCOA, Rock Island Arsenal, Genesis Medical Center, and Trinity Medical Center.

We interviewed a community contact who provided information regarding the local economy. The contact noted that the local economy is more stable compared to the

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

states in which they are located. The contact noted additional pressure on availability of rental properties due to a declined median income and competitive job market with low wages. Some pressing community development needs identified by the contact included affordable housing, multi-family housing, small business loans, small dollar consumer loans, and access to low-cost banking services.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE QUAD CITIES ASSESSMENT AREA.**

ABT’s CRA performance in the Quad Cities AA is satisfactory. The bank’s performance is satisfactory under both the lending test and the CD test.

**LENDING TEST**

The bank’s performance under the lending test in the Quad Cities AA is satisfactory. ABT exhibits reasonable penetration among borrowers and businesses of different income levels. The bank has reasonable dispersion of residential real estate and business loans among low- and moderate-income CTs.

**Lending to Borrowers of Different Incomes and Businesses of Different Sizes**

The bank’s borrower distribution of loans in the Quad Cities AA reflects reasonable penetration. The distribution of residential real estate loans and business loans are both reasonable.

Residential Real Estate Loans

The distribution of residential real estate loans to borrowers of different income levels in the Quad Cities AA reflects reasonable penetration. Our review of the bank’s HMDA data indicated that ABT originated 1,666 loans in the Quad Cities AA; 952 purchase, eight home improvement, and 633 refinance loans. ABT originated 139 loans or 8.34 percent to low-income borrowers, compared to 19.57 percent of AA families. However, we noted that 8.42 percent of families in the AA are below the poverty level (2010 U.S. Census), and realize that the bank’s ability to lend to these individuals is limited due to the income and down payment requirements to qualify for a mortgage loan. Therefore, the bank’s lending to low-income borrowers reflects reasonable penetration. In addition, lending to moderate-income borrowers was outstanding. ABT originated 307 loans or 18.43 percent to moderate-income borrowers, compared to 18.26 percent of AA families.

Table 3 - Borrower Distribution of Residential Real Estate Loans in Quad Cities AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	19.57	9.35	18.26	23.00	21.56	23.11	40.61	43.38
Home Improvement	19.57	3.70	18.26	11.11	21.56	22.22	40.61	61.73
Home Refinance	19.57	7.42	18.26	12.48	21.56	18.96	40.61	45.50

Business Loans

The distribution of business loans to companies of different sizes in the Quad Cities AA reflects reasonable penetration. Our review of 20 business loans in the Quad Cities AA indicated that ABT originated 14 loans, or 70 percent to small businesses, compared to 75.26 percent of AA businesses that are classified as small. Small businesses are defined as those that generated gross annual revenues of \$1 million or less. The percentage of bank loans in the Quad Cities AA by dollar volume was lower at 53.43 percent, due to an exceptionally large credit (\$5.3 million) that was selected in the sample. Excluding this outlier from the data increases the percentage of bank loans to small businesses to 90 percent.

<b>Table 3A - Borrower Distribution of Loans to Businesses in Quad Cities AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Business	75.26	5.76	18.97	100.00
% of Bank Loans in AA by #	70.00	30.00	0.00	100.00
% of Bank Loans in AA by \$	53.43	46.57	0.00	100.00

**Geographic Distribution of Loans**

The bank’s geographic distribution of loans in the Quad Cities AA reflects a reasonable dispersion throughout the CTs of different income levels. The distribution of residential real estate loans is reasonable, while the distribution of business loans is excellent.

Residential Real Estate Loans

ABT’s geographic distribution of residential real estate loans in the Quad Cities AA reflects reasonable dispersion. ABT originated eight residential real estate loans out of 1,666 residential loans in the Quad Cities AA in low-income CTs, reflecting 0.48 percent of total loans. ABT’s lending to low-income CTs is considerably below the percentage of owner-occupied housing in low-income CTs of 2.58 percent. According to the 2010 U.S. Census data, of the total housing units in low-income geographies, rental and vacant units account for 52.17 percent and 18.68 percent, respectively. Based on these statistics, the bank had limited opportunities for home mortgage lending in low-income CTs. We considered these factors when determining the conclusion for the geographic distribution of home mortgage loans.

Additionally, ABT originated 151 residential real estate loans, or 9.06 percent, to moderate-income CTs. ABT’s lending to moderate-income CTs is below the demographic comparator of 14.08 percent. Again, the bank had limited opportunities for home mortgage lending in moderate-income CTs, as 36.22 percent of total housing units in moderate-income geographies are rental, and an additional 8.89 percent are vacant.



Table 4 - Geographic Distribution of Residential Real Estate Loans in Quad Cities AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	2.58	0.63	14.08	9.14	56.32	50.42	27.03	39.81
Home Improvement	2.58	0.00	14.08	8.64	56.32	39.51	27.03	51.85
Refinancing	2.58	0.32	14.08	9.00	56.32	48.66	27.03	42.02

**Business Loans**

ABT’s geographic distribution of business loans in the Quad Cities AA reflects excellent dispersion. Our review of 20 business loans in the Quad Cities AA indicated that ABT originated two loans, or 10 percent to low-income CTs, and four loans, or 20 percent to moderate-income CTs. Both figures compare favorably to demographic data that indicate 9.34 percent of AA businesses are located in low-income CTs, and 13.56 percent of AA businesses are located in moderate-income CTs.

Table 4A - Geographic Distribution of Loans to Businesses in Quad Cities AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	9.34	10.00	13.56	20.00	46.95	35.00	30.06	35.00

**Responses to Complaints**

ABT has not received any CRA-related complaints since the last CRA examination.

**COMMUNITY DEVELOPMENT TEST**

The bank’s performance under the community development test in the Quad Cities AA represented adequate responsiveness and is satisfactory. The bank operates with six branch locations in the Quad Cities AA, of which one is located in a low income CT, and one is located in a moderate-income CT.

**Banking Access**

ABT offers various products and services for no fee. In addition, access to the bank’s products and services are offered through various channels.

Free services include an automated telephone banking system, internet banking, electronic bank statements, mobile banking, and remote deposit capture. Providing banking services free of charge and through various channels allows greater access to financial services and products to low- and moderate-income individuals.

**Number and Amount of Community Development Loans**

ABT's CD lending activities demonstrated adequate responsiveness to the needs of its AA. ABT originated 11 qualifying CD loans totaling \$18.3 million during the evaluation period, which represented 48.12 percent of the bank's tier 1 capital. All CD loans were originated in the Quad Cities AA. The purpose of the loans ranged from projects to revitalize low- or moderate-income geographies to economic development projects to create or retain jobs for low- or moderate-income individuals.

**Number and Amount of Qualified Investments**

ABT's responsiveness to provide qualified investments in the AA is adequate. Community development investments for the bank totaled \$36 thousand with a total of 18 donations and investments. ABT's cash contributions and donations were to several organizations assisting low- and moderate-income individuals and families in the bank's AA. The largest investment was to a community development corporation that provides community-based lending services to finance business, real estate, and predevelopment activities that provide economic development, revitalization, and stabilization to the local community.

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

Associates in the Quad Cities AA demonstrated adequate responsiveness to CD needs by providing a significant number of hours to organizations that primarily provide services to low- and moderate-income individuals and small businesses. Sixteen associates provided services to 14 organizations by serving as board directors, fundraising, and providing financial education. Associates provided 874 hours of service time to community organizations to help serve low- and moderate-income individuals.

**Responsiveness to Community Development Needs**

The bank displays adequate responsiveness to community development needs in the Quad Cities AA.

## State Rating

### State of Illinois

#### CRA Rating for Illinois: Needs Improvement

**The Lending test is rated: Needs Improvement**

**The Community development test is rated: Needs Improvement**

The major factors supporting this rating include:

- The borrower distribution of loans reflects poor penetration throughout the AA;
- The geographic distribution of loans reflects poor dispersion throughout the AA; and
- CD activity reflects a poor responsiveness to CD needs throughout the AA.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN ILLINOIS

The bank operates with the Kane County AA that is located within the state of Illinois. The Kane County AA consists of the entire county and is comprised of 82 census tracts; two low-income, 32 moderate-income, 27 middle income, and 21 upper income. The bank's operations in this AA are minimal, with only two of their eight full service branch locations and zero of their seven ATMs located in the AA. The AA consists of whole, census tracts and does not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income areas.

Competition in the AA is significant. Thirty-seven deposit-taking FDIC-insured financial institutions serve the Kane County AA, per the June 30, 2015 FDIC Deposit Market Share Report. ABT ranks twenty-sixth for deposit market share with \$61 million in deposits, or 0.64 percent of the Kane County market. The \$61 million in deposits located in the Kane County AA represent only 20 percent of the bank's overall deposits. Demographic data for 2015 shows a population of 515 thousand with a median family income of \$82,251. Major employers in the AA include Universities Research Association Inc., Illinois Department of Human Services, Bank One National Association, Hollywood Casino, Grand Victoria Casino, Dryer Cancer Center, Provena Health, and Delnor-Community Hospital.

We interviewed a community contact who provided information regarding the local economy. The contact noted that the economic downturn in 2013/2014 had both a negative and positive effect in Kane County, as some businesses had to close their doors, but some new start-up businesses emerged. The contact believed the biggest credit need continues to be small business loans less than \$100 thousand. The contact believes local financial institutions are meeting the credit needs of the community, but primarily through assistance work with community organizations, and not always by directly originating loans to small businesses.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANE COUNTY ASSESSMENT AREA

ABT’s CRA performance in the Kane County AA needs improvement. The bank’s performance under the lending test and the CD test both need improvement.

### LENDING TEST

The bank’s performance under the lending test in Illinois is rated needs improvement. ABT exhibits poor penetration among borrowers and businesses of different income levels. The bank has poor dispersion of residential real estate and business loans among low- and moderate-income CTs. However, the bank’s level of lending within the Kane County AA was low compared to the overall lending at the institution. Because of this, we placed minimal weight on the Kane County AA.

#### Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The bank’s borrower distribution of loans in the Kane County AA reflects poor penetration. The distribution of residential real estate loans and business loans are both poor.

##### Residential Real Estate Loans

The distribution of residential real estate loans to borrowers of different income levels in the Kane County AA reflects poor penetration. Our review of the bank’s HMDA data indicated that ABT originated only 76 loans in the Kane County AA; 23 purchase loans, two home improvement loans, and 51 refinance loans. ABT originated one loan, or 1.32 percent to low-income borrowers, and four loans, or 5.26 percent to moderate-income borrowers. Both figures compare negatively to demographic data.

Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	19.51	0.00	18.20	4.35	21.03	26.09	41.27	60.87
Home Improvement	19.51	0.00	18.20	0.00	21.03	0.00	41.27	100.00
Home Refinance	19.51	1.96	18.20	5.88	21.03	25.49	41.27	25.49

##### Business Loans

The distribution of business loans to companies of different sizes in the Kane County AA reflects poor penetration. Our review of 26 business loans in Kane County indicated that ABT originated 12 loans, or 46.15 percent, to small businesses, compared to 75.48 percent of AA businesses that are categorized as small.

The percentage of bank loans in the Kane County AA by dollar volume was low at 27.31 percent. The low volume of business loans by dollar to small businesses is partially due to an exceptionally large credit (\$8 million) that was selected in the sample. Excluding this outlier from the data increases the percentage of bank loans by dollar to small businesses to 48.50 percent.

Table 5A - Borrower Distribution of Loans to Businesses in Kane County AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Business	75.48	7.43	17.09	100.00
% of Bank Loans in AA by #	46.15	53.85	0.00	100.00
% of Bank Loans in AA by \$	27.31	72.69	0.00	100.00

**Geographic Distribution of Loans**

The bank’s geographic distribution of loans in the Kane County AA reflects poor dispersion throughout the CTs of different income levels. The distribution of residential real estate loans and business loans are both poor.

Residential Real Estate Loans

ABT’s geographic distribution of residential real estate loans in the Kane County AA reflects poor dispersion. ABT did not originate any residential real estate loans to borrowers in low-income CTs, which is considered reasonable given that only 0.36 percent of AA owner occupied housing is located in low-income CTs. ABT originated six loans, or 7.89 percent to borrowers in moderate-income CTs, compared to 28.69 percent of AA owner occupied housing that is located in moderate-income CTs. ABT’s lending to borrowers in moderate-income CTs is poor.

Table 6 - Geographic Distribution of Residential Real Estate Loans in Kane County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	0.36	0.00	28.69	8.70	34.53	47.83	36.41	43.48
Home Improvement	0.36	0.00	28.69	0.00	34.53	0.00	36.41	100.00
Refinancing	0.36	0.00	28.69	7.84	34.53	37.25	36.41	54.90

Business Loans

ABT’s geographic distribution of business loans in the Kane County AA reflects poor dispersion. Our review of 26 business loans in the Kane County AA indicated that ABT did not originate any loans to low- or moderate-income CTs. Both figures compare unfavorably to demographic data that indicates 2.07 percent of AA businesses are located in low-income CTs, and 22.32 percent of AA businesses are located in moderate-income CTs.

Table 6A - Geographic Distribution of Loans to Businesses in Kane County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	2.07	0.00	22.32	0.00	40.23	50.00	35.38	50.00

**Responses to Complaints**

ABT has not received any CRA-related complaints since the last CRA examination.

**COMMUNITY DEVELOPMENT TEST**

The bank’s performance under the community development test in the Kane County AA represented poor responsiveness and needs improvement. The bank operates with two branch locations in the Kane County AA, with zero branches located in either a low or moderate-income CT.

**Number and Amount of Community Development Loans**

ABT’s performance in extending loans to the Kane County AA demonstrated poor responsiveness. During the assessment period, the bank did not originate any qualifying CD loans within the Kane County AA.

**Number and Amount of Qualified Investments**

ABT’s performance in investments to the Kane County AA demonstrated poor responsiveness. During the assessment period, the bank did not originate any qualifying CD investments within the Kane County AA.

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

ABT’s service performance in the Kane County AA demonstrated poor responsiveness. One associate provided 25 hours of service for an organization that provides community services to low- to moderate-income individuals.

**Responsiveness to Community Development Needs**

The bank displays a poor responsiveness to CD needs in the Kane County AA.

## 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”).

<b>Time Period Reviewed</b>	Lending Test: (01/07/2013 to 11/30/2015) Community Development Test: (01/07/2013 to 12/31/2015)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
American Bank & Trust (ABT) Davenport, Iowa	Residential Real Estate and Business Loans	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Quad Cities AA Kane County AA	Full-scope Full-scope	

## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

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Overall Bank:	Lending Test Rating	Community Development Test Rating	Overall Bank/State/Multistate Rating
American Bank & Trust	Satisfactory	Satisfactory	Satisfactory
MSA:			
Davenport-Moline-Rock Island MSA	Satisfactory	Satisfactory	Satisfactory
State:			
Illinois	Needs Improvement	Needs Improvement	Needs Improvement