

## DEPOSITORY AGREEMENT

We hereby offer to pay interest on the deposits of the City of Chicago and the Chicago Board of Education in Fiscal Year 2022 in accordance with the following schedules:

### INTEREST-BEARING DEPOSITS

We hereby offer to pay interest on deposit accounts of the City of Chicago and Chicago Board of Education at the following minimum rate(s):

<u>Type of Account</u>	<u>Rate</u>	<u>Minimum Deposit Requirement (if any)</u>
Checking Plus	Market	None

### TIME DEPOSITS OR CERTIFICATES OF DEPOSIT

We hereby offer to pay interest on single maturity time deposits or certificates of deposit of \$100,000 or more at the then current market rate being paid by our institution on similar principal amounts and for similar maturity terms; or at the following other rates:

*(Please describe in detail your proposed rate schedule if your institution is offering to pay other than the current market rate. Attach sheets if necessary.)*

NA

*The City shall reject the Proposal of any institution that does not offer rates on certificates of deposit or time deposits as prescribed above.*

We understand that:

\$ Interest on all certificates of deposit shall be computed on a 360-day basis rounded to 3 decimals.

\$ Interest shall be paid to the City on the date of maturity.

Furthermore, we understand that any costs incurred in administering the City's account, including any costs incurred in collateralizing and safekeeping the City's investments, will be borne by our institution.

We understand the City's objective to invest its monies with financial institutions that demonstrate a commitment to benefit Chicago's communities and, in accordance with Chapter 2-32-440 of the Municipal Code of Chicago, have provided supplemental information to demonstrate our commitment. It is further understood that all information included in, attached to, or required by this Depository Agreement and related documents responding to the City's Request for Proposal shall become public record upon delivery to the City.

We certify that we have read the terms and conditions of this Request for Proposal and fully understand its intent. We also certify that we have adequate personnel, equipment and facilities to fulfill all requirements and to qualify as a municipal depository. Upon execution by the City below, it is our understanding that the Depository Agreement, along with all the requirements, provisions and stipulations as contained in the Request for Proposal, which is incorporated herein by reference, constitute the agreement between our institution and the City.

Submitted by: Trina M Tyler

Title: Assistant Vice President, Government and Union Services

Date: October 15, 2021

Authorized Signature: 

Name of Institution: Amalgamated Bank of Chicago

Location of Principal Place of Business: 30 N. LaSalle Street, 38th Flr, Chicago, IL 60602

If known, please indicate which City Ward the Principal Place of Business is located 42nd

How many facilities are located within the City of Chicago? One

Is your bank a Regularly Organized State Bank, National Bank, or Federal Bank? (Please indicate State, National or Federal) State Bank

Is your bank Federally Insured? Yes Type of Insurance? FDIC

Is your bank Minority Owned? (as defined by the Federal Reserve Board) No

What is the Bank's Aggregate Amount of Capital Stock as of 12/31/2020? \$2,200,000

Surplus as of 12/31/2020? \$86,557,000 Total Assets as of 12/31/2020? \$1,082,442,000

Name of Person Preparing the Proposal: Trina M Tyler

Work Phone: 312-822-3134 Fax: 312-541-7392 Email: ttyler@aboc.com

**Executed for the City of Chicago:**

By: Trina M Tyler

Title: Assistant Vice President, Government and Union Services

Date: October 15, 2021

**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT  
AND AFFIDAVIT**

**SECTION I -- GENERAL INFORMATION**

A. Legal name of the Disclosing Party submitting this EDS. Include d/b/a/ if applicable:

AMALGAMATED BANK OF CHICAGO.

**Check ONE of the following three boxes:**

Indicate whether the Disclosing Party submitting this EDS is:

1.  the Applicant

OR

2.  a legal entity currently holding, or anticipated to hold within six months after City action on the contract, transaction or other undertaking to which this EDS pertains (referred to below as the "Matter"), a direct or indirect interest in excess of 7.5% in the Applicant. State the Applicant's legal name: AMALGAMATED BANK OF CHICAGO

OR

3.  a legal entity with a direct or indirect right of control of the Applicant (see Section II(B)(1))  
State the legal name of the entity in which the Disclosing Party holds a right of control:  
\_\_\_\_\_

B. Business address of the Disclosing Party: 30 N. LASALLE STREET  
CHICAGO, IL 60602

C. Telephone: 312-822-3188 Fax: 312-267-8770 Email: LRYAN@ABOC.COM

D. Name of contact person: LAURA D. RYAN

E. Federal Employer Identification No. (if you have one): 36-0721895

F. Brief description of the Matter to which this EDS pertains. (Include project number and location of property, if applicable):

Municipal Depository in fiscal year 2022

G. Which City agency or department is requesting this EDS? City of Chicago, Department of Finance

If the Matter is a contract being handled by the City's Department of Procurement Services, please complete the following:

Specification # \_\_\_\_\_ and Contract # \_\_\_\_\_

**SECTION II -- DISCLOSURE OF OWNERSHIP INTERESTS**

**A. NATURE OF THE DISCLOSING PARTY**

1. Indicate the nature of the Disclosing Party:

- |   |  |
|---|--|
| <input type="checkbox"/> Person   | <input type="checkbox"/> Limited liability company       |
| <input type="checkbox"/> Publicly registered business corporation       | <input type="checkbox"/> Limited liability partnership   |
| <input checked="" type="checkbox"/> Privately held business corporation | <input type="checkbox"/> Joint venture                   |
| <input type="checkbox"/> Sole proprietorship                            | <input type="checkbox"/> Not-for-profit corporation      |
| <input type="checkbox"/> General partnership                            | (Is the not-for-profit corporation also a 501(c)(3))?    |
| <input type="checkbox"/> Limited partnership                            | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Trust  | <input type="checkbox"/> Other (please specify)          |
- 

2. For legal entities, the state (or foreign country) of incorporation or organization, if applicable:

ILLINOIS

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3. For legal entities not organized in the State of Illinois: Has the organization registered to do business in the State of Illinois as a foreign entity?

- Yes                       No                       Organized in Illinois

**B. IF THE DISCLOSING PARTY IS A LEGAL ENTITY:**

1. List below the full names and titles, if applicable, of: (i) all executive officers and all directors of the entity; (ii) **for not-for-profit corporations**, all members, if any, which are legal entities (if there are no such members, write "no members which are legal entities"); (iii) **for trusts, estates or other similar entities**, the trustee, executor, administrator, or similarly situated party; (iv) **for general or limited partnerships, limited liability companies, limited liability partnerships or joint ventures**, each general partner, managing member, manager or any other person or legal entity that directly or indirectly controls the day-to-day management of the Applicant.

**NOTE:** Each legal entity listed below must submit an EDS on its own behalf.

Name	Title
SEE ATTACHED SHEET.	

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2. Please provide the following information concerning each person or legal entity having a direct or indirect, current or prospective (i.e. within 6 months after City action) beneficial interest (including ownership) in excess of 7.5% of the Applicant. Examples of such an interest include shares in a corporation, partnership interest in a partnership or joint venture, interest of a member or manager in a

limited liability company, or interest of a beneficiary of a trust, estate or other similar entity. If none, state "None."

**NOTE:** Each legal entity listed below may be required to submit an EDS on its own behalf.

Name	Business Address	Percentage Interest in the Applicant
Amalgamated Investments Company	30 N. LaSalle Street	100%
	Chicago, IL 60602	

**SECTION III -- INCOME OR COMPENSATION TO, OR OWNERSHIP BY, CITY ELECTED OFFICIALS**

Has the Disclosing Party provided any income or compensation to any City elected official during the 12-month period preceding the date of this EDS?  Yes  No

Does the Disclosing Party reasonably expect to provide any income or compensation to any City elected official during the 12-month period following the date of this EDS?  Yes  No

If "yes" to either of the above, please identify below the name(s) of such City elected official(s) and describe such income or compensation:

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Does any City elected official or, to the best of the Disclosing Party's knowledge after reasonable inquiry, any City elected official's spouse or domestic partner, have a financial interest (as defined in Chapter 2-156 of the Municipal Code of Chicago ("MCC")) in the Disclosing Party?

Yes  No

If "yes," please identify below the name(s) of such City elected official(s) and/or spouse(s)/domestic partner(s) and describe the financial interest(s).

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**SECTION IV -- DISCLOSURE OF SUBCONTRACTORS AND OTHER RETAINED PARTIES**

The Disclosing Party must disclose the name and business address of each subcontractor, attorney, lobbyist (as defined in MCC Chapter 2-156), accountant, consultant and any other person or entity whom the Disclosing Party has retained or expects to retain in connection with the Matter, as well as the nature of the relationship, and the total amount of the fees paid or estimated to be paid. The Disclosing Party is not required to disclose employees who are paid solely through the Disclosing Party's regular payroll. If the Disclosing Party is uncertain whether a disclosure is required under this Section, the Disclosing Party must either ask the City whether disclosure is required or make the disclosure.

Name (indicate whether retained or anticipated to be retained)	Business Address	Relationship to Disclosing Party (subcontractor, attorney, lobbyist, etc.)	Fees ( <u>indicate whether paid or estimated.</u> ) <b>NOTE:</b> "hourly rate" or "t.b.d." is not an acceptable response.
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(Add sheets if necessary)

Check here if the Disclosing Party has not retained, nor expects to retain, any such persons or entities.

**SECTION V -- CERTIFICATIONS**

**A. COURT-ORDERED CHILD SUPPORT COMPLIANCE**

Under MCC Section 2-92-415, substantial owners of business entities that contract with the City must remain in compliance with their child support obligations throughout the contract's term.

Has any person who directly or indirectly owns 10% or more of the Disclosing Party been declared in arrearage on any child support obligations by any Illinois court of competent jurisdiction?

Yes     No     No person directly or indirectly owns 10% or more of the Disclosing Party.

If "Yes," has the person entered into a court-approved agreement for payment of all support owed and is the person in compliance with that agreement?

Yes     No

**B. FURTHER CERTIFICATIONS**

1. [This paragraph 1 applies only if the Matter is a contract being handled by the City's Department of Procurement Services.] In the 5-year period preceding the date of this EDS, neither the Disclosing Party nor any Affiliated Entity [see definition in (5) below] has engaged, in connection with the performance of any public contract, the services of an integrity monitor, independent private sector inspector general, or integrity compliance consultant (i.e., an individual or entity with legal, auditing, investigative, or other similar skills, designated by a public agency to help the agency monitor the activity of specified agency vendors as well as help the vendors reform their business practices so they can be considered for agency contracts in the future, or continue with a contract in progress).

2. The Disclosing Party and its Affiliated Entities are not delinquent in the payment of any fine, fee, tax or other source of indebtedness owed to the City of Chicago, including, but not limited to, water and sewer charges, license fees, parking tickets, property taxes and sales taxes, nor is the Disclosing Party delinquent in the payment of any tax administered by the Illinois Department of Revenue.

3. The Disclosing Party and, if the Disclosing Party is a legal entity, all of those persons or entities identified in Section II(B)(1) of this EDS:

- a. are not presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from any transactions by any federal, state or local unit of government;
- b. have not, during the 5 years before the date of this EDS, been convicted of a criminal offense, adjudged guilty, or had a civil judgment rendered against them in connection with: obtaining, attempting to obtain, or performing a public (federal, state or local) transaction or contract under a public transaction; a violation of federal or state antitrust statutes; fraud; embezzlement; theft; forgery; bribery; falsification or destruction of records; making false statements; or receiving stolen property;
- c. are not presently indicted for, or criminally or civilly charged by, a governmental entity (federal, state or local) with committing any of the offenses set forth in subparagraph (b) above;
- d. have not, during the 5 years before the date of this EDS, had one or more public transactions (federal, state or local) terminated for cause or default; and
- e. have not, during the 5 years before the date of this EDS, been convicted, adjudged guilty, or found liable in a civil proceeding, or in any criminal or civil action, including actions concerning environmental violations, instituted by the City or by the federal government, any state, or any other unit of local government.

4. The Disclosing Party understands and shall comply with the applicable requirements of MCC Chapters 2-56 (Inspector General) and 2-156 (Governmental Ethics).

5. Certifications (5), (6) and (7) concern:

- the Disclosing Party;
- any "Contractor" (meaning any contractor or subcontractor used by the Disclosing Party in connection with the Matter, including but not limited to all persons or legal entities disclosed under Section IV, "Disclosure of Subcontractors and Other Retained Parties");
- any "Affiliated Entity" (meaning a person or entity that, directly or indirectly: controls the Disclosing Party, is controlled by the Disclosing Party, or is, with the Disclosing Party, under common control of another person or entity). Indicia of control include, without limitation: interlocking management or ownership; identity of interests among family members, shared facilities and equipment; common use of employees; or organization of a business entity following the ineligibility of a business entity to do business with federal or state or local government, including the City, using substantially the same management, ownership, or principals as the ineligible entity. With respect to Contractors, the term Affiliated Entity means a person or entity that directly or indirectly controls the Contractor, is controlled by it, or, with the Contractor, is under common control of another person or entity;
- any responsible official of the Disclosing Party, any Contractor or any Affiliated Entity or any other official, agent or employee of the Disclosing Party, any Contractor or any Affiliated Entity, acting pursuant to the direction or authorization of a responsible official of the Disclosing Party, any Contractor or any Affiliated Entity (collectively "Agents").

Neither the Disclosing Party, nor any Contractor, nor any Affiliated Entity of either the Disclosing Party or any Contractor, nor any Agents have, during the 5 years before the date of this EDS, or, with respect to a Contractor, an Affiliated Entity, or an Affiliated Entity of a Contractor during the 5 years before the date of such Contractor's or Affiliated Entity's contract or engagement in connection with the Matter:

- a. bribed or attempted to bribe, or been convicted or adjudged guilty of bribery or attempting to bribe, a public officer or employee of the City, the State of Illinois, or any agency of the federal government or of any state or local government in the United States of America, in that officer's or employee's official capacity;
  - b. agreed or colluded with other bidders or prospective bidders, or been a party to any such agreement, or been convicted or adjudged guilty of agreement or collusion among bidders or prospective bidders, in restraint of freedom of competition by agreement to bid a fixed price or otherwise; or
  - c. made an admission of such conduct described in subparagraph (a) or (b) above that is a matter of record, but have not been prosecuted for such conduct; or
  - d. violated the provisions referenced in MCC Subsection 2-92-320(a)(4)(Contracts Requiring a Base Wage); (a)(5)(Debarment Regulations); or (a)(6)(Minimum Wage Ordinance).
6. Neither the Disclosing Party, nor any Affiliated Entity or Contractor, or any of their employees, officials, agents or partners, is barred from contracting with any unit of state or local government as a result of engaging in or being convicted of (1) bid-rigging in violation of 720 ILCS 5/33E-3; (2) bid-rotating in violation of 720 ILCS 5/33E-4; or (3) any similar offense of any state or of the United States of America that contains the same elements as the offense of bid-rigging or bid-rotating.
7. Neither the Disclosing Party nor any Affiliated Entity is listed on a Sanctions List maintained by the United States Department of Commerce, State, or Treasury, or any successor federal agency.
8. [FOR APPLICANT ONLY] (i) Neither the Applicant nor any "controlling person" [see MCC Chapter 1-23, Article I for applicability and defined terms] of the Applicant is currently indicted or charged with, or has admitted guilt of, or has ever been convicted of, or placed under supervision for, any criminal offense involving actual, attempted, or conspiracy to commit bribery, theft, fraud, forgery, perjury, dishonesty or deceit against an officer or employee of the City or any "sister agency"; and (ii) the Applicant understands and acknowledges that compliance with Article I is a continuing requirement for doing business with the City. NOTE: If MCC Chapter 1-23, Article I applies to the Applicant, that Article's permanent compliance timeframe supersedes 5-year compliance timeframes in this Section V.
9. [FOR APPLICANT ONLY] The Applicant and its Affiliated Entities will not use, nor permit their subcontractors to use, any facility listed as having an active exclusion by the U.S. EPA on the federal System for Award Management ("SAM").
10. [FOR APPLICANT ONLY] The Applicant will obtain from any contractors/subcontractors hired or to be hired in connection with the Matter certifications equal in form and substance to those in Certifications (2) and (9) above and will not, without the prior written consent of the City, use any such

contractor/subcontractor that does not provide such certifications or that the Applicant has reason to believe has not provided or cannot provide truthful certifications.

11. If the Disclosing Party is unable to certify to any of the above statements in this Part B (Further Certifications), the Disclosing Party must explain below:

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N/A.

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If the letters "NA," the word "None," or no response appears on the lines above, it will be conclusively presumed that the Disclosing Party certified to the above statements.

12. To the best of the Disclosing Party's knowledge after reasonable inquiry, the following is a complete list of all current employees of the Disclosing Party who were, at any time during the 12-month period preceding the date of this EDS, an employee, or elected or appointed official, of the City of Chicago (if none, indicate with "N/A" or "none").

NONE.

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13. To the best of the Disclosing Party's knowledge after reasonable inquiry, the following is a complete list of all gifts that the Disclosing Party has given or caused to be given, at any time during the 12-month period preceding the execution date of this EDS, to an employee, or elected or appointed official, of the City of Chicago. For purposes of this statement, a "gift" does not include: (i) anything made generally available to City employees or to the general public, or (ii) food or drink provided in the course of official City business and having a retail value of less than \$25 per recipient, or (iii) a political contribution otherwise duly reported as required by law (if none, indicate with "N/A" or "none"). As to any gift listed below, please also list the name of the City recipient.

NONE.

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### C. CERTIFICATION OF STATUS AS FINANCIAL INSTITUTION

1. The Disclosing Party certifies that the Disclosing Party (check one)

is             is not

a "financial institution" as defined in MCC Section 2-32-455(b).

2. If the Disclosing Party IS a financial institution, then the Disclosing Party pledges:

"We are not and will not become a predatory lender as defined in MCC Chapter 2-32. We further pledge that none of our affiliates is, and none of them will become, a predatory lender as defined in MCC Chapter 2-32. We understand that becoming a predatory lender or becoming an affiliate of a predatory lender may result in the loss of the privilege of doing business with the City."

If the Disclosing Party is unable to make this pledge because it or any of its affiliates (as defined in MCC Section 2-32-455(b)) is a predatory lender within the meaning of MCC Chapter 2-32, explain here (attach additional pages if necessary):

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If the letters "NA," the word "None," or no response appears on the lines above, it will be conclusively presumed that the Disclosing Party certified to the above statements.

**D. CERTIFICATION REGARDING FINANCIAL INTEREST IN CITY BUSINESS**

Any words or terms defined in MCC Chapter 2-156 have the same meanings if used in this Part D.

1. In accordance with MCC Section 2-156-110: To the best of the Disclosing Party's knowledge after reasonable inquiry, does any official or employee of the City have a financial interest in his or her own name or in the name of any other person or entity in the Matter?

Yes                       No

NOTE: If you checked "Yes" to Item D(1), proceed to Items D(2) and D(3). If you checked "No" to Item D(1), skip Items D(2) and D(3) and proceed to Part E.

2. Unless sold pursuant to a process of competitive bidding, or otherwise permitted, no City elected official or employee shall have a financial interest in his or her own name or in the name of any other person or entity in the purchase of any property that (i) belongs to the City, or (ii) is sold for taxes or assessments, or (iii) is sold by virtue of legal process at the suit of the City (collectively, "City Property Sale"). Compensation for property taken pursuant to the City's eminent domain power does not constitute a financial interest within the meaning of this Part D.

Does the Matter involve a City Property Sale?

Yes                       No

3. If you checked "Yes" to Item D(1), provide the names and business addresses of the City officials or employees having such financial interest and identify the nature of the financial interest:

Name	Business Address	Nature of Financial Interest
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4. The Disclosing Party further certifies that no prohibited financial interest in the Matter will be acquired by any City official or employee.

E. CERTIFICATION REGARDING SLAVERY ERA BUSINESS

Please check either (1) or (2) below. If the Disclosing Party checks (2), the Disclosing Party must disclose below or in an attachment to this EDS all information required by (2). Failure to comply with these disclosure requirements may make any contract entered into with the City in connection with the Matter voidable by the City.

X  1. The Disclosing Party verifies that the Disclosing Party has searched any and all records of the Disclosing Party and any and all predecessor entities regarding records of investments or profits from slavery or slaveholder insurance policies during the slavery era (including insurance policies issued to slaveholders that provided coverage for damage to or injury or death of their slaves), and the Disclosing Party has found no such records.

2. The Disclosing Party verifies that, as a result of conducting the search in step (1) above, the Disclosing Party has found records of investments or profits from slavery or slaveholder insurance policies. The Disclosing Party verifies that the following constitutes full disclosure of all such records, including the names of any and all slaves or slaveholders described in those records:

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SECTION VI -- CERTIFICATIONS FOR FEDERALLY FUNDED MATTERS

**NOTE: If the Matter is federally funded**, complete this Section VI. **If the Matter is not federally funded**, proceed to Section VII. For purposes of this Section VI, tax credits allocated by the City and proceeds of debt obligations of the City are not federal funding.

A. CERTIFICATION REGARDING LOBBYING

1. List below the names of all persons or entities registered under the federal Lobbying Disclosure Act of 1995, as amended, who have made lobbying contacts on behalf of the Disclosing Party with respect to the Matter: (Add sheets if necessary):

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(If no explanation appears or begins on the lines above, or if the letters "NA" or if the word "None" appear, it will be conclusively presumed that the Disclosing Party means that NO persons or entities registered under the Lobbying Disclosure Act of 1995, as amended, have made lobbying contacts on behalf of the Disclosing Party with respect to the Matter.)

2. The Disclosing Party has not spent and will not expend any federally appropriated funds to pay any person or entity listed in paragraph A(1) above for his or her lobbying activities or to pay any person or entity to influence or attempt to influence an officer or employee of any agency, as defined by applicable federal law, a member of Congress, an officer or employee of Congress, or an employee

of a member of Congress, in connection with the award of any federally funded contract, making any federally funded grant or loan, entering into any cooperative agreement, or to extend, continue, renew, amend, or modify any federally funded contract, grant, loan, or cooperative agreement.

3. The Disclosing Party will submit an updated certification at the end of each calendar quarter in which there occurs any event that materially affects the accuracy of the statements and information set forth in paragraphs A(1) and A(2) above.

4. The Disclosing Party certifies that either: (i) it is not an organization described in section 501(c)(4) of the Internal Revenue Code of 1986; or (ii) it is an organization described in section 501(c)(4) of the Internal Revenue Code of 1986 but has not engaged and will not engage in "Lobbying Activities," as that term is defined in the Lobbying Disclosure Act of 1995, as amended.

5. If the Disclosing Party is the Applicant, the Disclosing Party must obtain certifications equal in form and substance to paragraphs A(1) through A(4) above from all subcontractors before it awards any subcontract and the Disclosing Party must maintain all such subcontractors' certifications for the duration of the Matter and must make such certifications promptly available to the City upon request.

#### B. CERTIFICATION REGARDING EQUAL EMPLOYMENT OPPORTUNITY

If the Matter is federally funded, federal regulations require the Applicant and all proposed subcontractors to submit the following information with their bids or in writing at the outset of negotiations.

Is the Disclosing Party the Applicant?

Yes

No

If "Yes," answer the three questions below:

1. Have you developed and do you have on file affirmative action programs pursuant to applicable federal regulations? (See 41 CFR Part 60-2.)

Yes

No

2. Have you filed with the Joint Reporting Committee, the Director of the Office of Federal Contract Compliance Programs, or the Equal Employment Opportunity Commission all reports due under the applicable filing requirements?

Yes

No

Reports not required

3. Have you participated in any previous contracts or subcontracts subject to the equal opportunity clause?

Yes

No

If you checked "No" to question (1) or (2) above, please provide an explanation:

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## SECTION VII -- FURTHER ACKNOWLEDGMENTS AND CERTIFICATION

The Disclosing Party understands and agrees that:

A. The certifications, disclosures, and acknowledgments contained in this EDS will become part of any contract or other agreement between the Applicant and the City in connection with the Matter, whether procurement, City assistance, or other City action, and are material inducements to the City's execution of any contract or taking other action with respect to the Matter. The Disclosing Party understands that it must comply with all statutes, ordinances, and regulations on which this EDS is based.

B. The City's Governmental Ethics Ordinance, MCC Chapter 2-156, imposes certain duties and obligations on persons or entities seeking City contracts, work, business, or transactions. The full text of this ordinance and a training program is available on line at [www.cityofchicago.org/Ethics](http://www.cityofchicago.org/Ethics), and may also be obtained from the City's Board of Ethics, 740 N. Sedgwick St., Suite 500, Chicago, IL 60610, (312) 744-9660. The Disclosing Party must comply fully with this ordinance.

C. If the City determines that any information provided in this EDS is false, incomplete or inaccurate, any contract or other agreement in connection with which it is submitted may be rescinded or be void or voidable, and the City may pursue any remedies under the contract or agreement (if not rescinded or void), at law, or in equity, including terminating the Disclosing Party's participation in the Matter and/or declining to allow the Disclosing Party to participate in other City transactions. Remedies at law for a false statement of material fact may include incarceration and an award to the City of treble damages.

D. It is the City's policy to make this document available to the public on its Internet site and/or upon request. Some or all of the information provided in, and appended to, this EDS may be made publicly available on the Internet, in response to a Freedom of Information Act request, or otherwise. By completing and signing this EDS, the Disclosing Party waives and releases any possible rights or claims which it may have against the City in connection with the public release of information contained in this EDS and also authorizes the City to verify the accuracy of any information submitted in this EDS.

E. The information provided in this EDS must be kept current. In the event of changes, the Disclosing Party must supplement this EDS up to the time the City takes action on the Matter. If the Matter is a contract being handled by the City's Department of Procurement Services, the Disclosing Party must update this EDS as the contract requires. **NOTE:** With respect to Matters subject to MCC Chapter 1-23, Article I (imposing **PERMANENT INELIGIBILITY** for certain specified offenses), the information provided herein regarding eligibility must be kept current for a longer period, as required by MCC Chapter 1-23 and Section 2-154-020.

**CERTIFICATION**

Under penalty of perjury, the person signing below: (1) warrants that he/she is authorized to execute this EDS, and all applicable Appendices, on behalf of the Disclosing Party, and (2) warrants that all certifications and statements contained in this EDS, and all applicable Appendices, are true, accurate and complete as of the date furnished to the City.

AMALGAMATED BANK OF CHICAGO

(Print or type exact legal name of Disclosing Party)

By: \_\_\_\_\_  
(Sign here) 

JAMES T. LANDENBERGER

(Print or type name of person signing)

PRESIDENT AND GENERAL COUNSEL

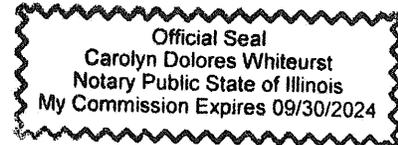
(Print or type title of person signing)

Signed and sworn to before me on (date) November 3, 2021,

at Cook County, ILLINOIS (state).

Carolyn Dolores Whiteurst  
Notary Public

Commission expires: 09/30/2024



**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX A**

**FAMILIAL RELATIONSHIPS WITH ELECTED CITY OFFICIALS  
AND DEPARTMENT HEADS**

**This Appendix is to be completed only by (a) the Applicant, and (b) any legal entity which has a direct ownership interest in the Applicant exceeding 7.5%. It is not to be completed by any legal entity which has only an indirect ownership interest in the Applicant.**

Under MCC Section 2-154-015, the Disclosing Party must disclose whether such Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof currently has a "familial relationship" with any elected city official or department head. A "familial relationship" exists if, as of the date this EDS is signed, the Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof is related to the mayor, any alderman, the city clerk, the city treasurer or any city department head as spouse or domestic partner or as any of the following, whether by blood or adoption: parent, child, brother or sister, aunt or uncle, niece or nephew, grandparent, grandchild, father-in-law, mother-in-law, son-in-law, daughter-in-law, stepfather or stepmother, stepson or stepdaughter, stepbrother or stepsister or half-brother or half-sister.

"Applicable Party" means (1) all executive officers of the Disclosing Party listed in Section II.B.1.a., if the Disclosing Party is a corporation; all partners of the Disclosing Party, if the Disclosing Party is a general partnership; all general partners and limited partners of the Disclosing Party, if the Disclosing Party is a limited partnership; all managers, managing members and members of the Disclosing Party, if the Disclosing Party is a limited liability company; (2) all principal officers of the Disclosing Party; and (3) any person having more than a 7.5% ownership interest in the Disclosing Party. "Principal officers" means the president, chief operating officer, executive director, chief financial officer, treasurer or secretary of a legal entity or any person exercising similar authority.

Does the Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof currently have a "familial relationship" with an elected city official or department head?

Yes

No

If yes, please identify below (1) the name and title of such person, (2) the name of the legal entity to which such person is connected; (3) the name and title of the elected city official or department head to whom such person has a familial relationship, and (4) the precise nature of such familial relationship.

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**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX B**

**BUILDING CODE SCOFFLAW/PROBLEM LANDLORD CERTIFICATION**

This Appendix is to be completed only by (a) the Applicant, and (b) any legal entity which has a direct ownership interest in the Applicant exceeding 7.5% (an "Owner"). It is not to be completed by any legal entity which has only an indirect ownership interest in the Applicant.

1. Pursuant to MCC Section 2-154-010, is the Applicant or any Owner identified as a building code scofflaw or problem landlord pursuant to MCC Section 2-92-416?

Yes                       No

2. If the Applicant is a legal entity publicly traded on any exchange, is any officer or director of the Applicant identified as a building code scofflaw or problem landlord pursuant to MCC Section 2-92-416?

Yes                       No                       The Applicant is not publicly traded on any exchange.

3. If yes to (1) or (2) above, please identify below the name of each person or legal entity identified as a building code scofflaw or problem landlord and the address of each building or buildings to which the pertinent code violations apply.

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**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX C**

**PROHIBITION ON WAGE & SALARY HISTORY SCREENING - CERTIFICATION**

This Appendix is to be completed only by an Applicant that is completing this EDS as a “contractor” as defined in MCC Section 2-92-385. That section, which should be consulted ([www.amlegal.com](http://www.amlegal.com)), generally covers a party to any agreement pursuant to which they: (i) receive City of Chicago funds in consideration for services, work or goods provided (including for legal or other professional services), or (ii) pay the City money for a license, grant or concession allowing them to conduct a business on City premises.

On behalf of an Applicant that is a contractor pursuant to MCC Section 2-92-385, I hereby certify that the Applicant is in compliance with MCC Section 2-92-385(b)(1) and (2), which prohibit: (i) screening job applicants based on their wage or salary history, or (ii) seeking job applicants’ wage or salary history from current or former employers. I also certify that the Applicant has adopted a policy that includes those prohibitions.

Yes

No

N/A – I am not an Applicant that is a “contractor” as defined in MCC Section 2-92-385.

This certification shall serve as the affidavit required by MCC Section 2-92-385(c)(1).

If you checked “no” to the above, please explain.

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**EXHIBIT SECTION II. B. 1**



**DIRECTORS**

Ken Bahk  
Ronald A. Damashek  
Donald Finn  
Miriam L. Fitzgerald  
Warren Katz  
James T. Landenberger  
Gary Perinar  
Robert G. Reiter, Jr.  
James Sweeney  
Darrell Williams  
Robert M. Wrobel

**OFFICERS**

Robert M. Wrobel, Chairman and CEO

James T. Landenberger, President and General Counsel

Richard Wojtecki, Senior Executive Vice President and Chief Credit Officer

Nicholas Weaver, Executive Vice President/Operations

Joseph Kehoe, Senior Vice President and Chief Financial Officer

**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT  
AND AFFIDAVIT**

**SECTION I -- GENERAL INFORMATION**

A. Legal name of the Disclosing Party submitting this EDS. Include d/b/a/ if applicable:

AMALGAMATED INVESTMENTS COMPANY

**Check ONE of the following three boxes:**

Indicate whether the Disclosing Party submitting this EDS is:

1.  the Applicant

OR

2.  a legal entity currently holding, or anticipated to hold within six months after City action on the contract, transaction or other undertaking to which this EDS pertains (referred to below as the "Matter"), a direct or indirect interest in excess of 7.5% in the Applicant. State the Applicant's legal name: AMALGAMATED BANK OF CHICAGO

OR

3.  a legal entity with a direct or indirect right of control of the Applicant (see Section II(B)(1))  
State the legal name of the entity in which the Disclosing Party holds a right of control:

B. Business address of the Disclosing Party: 30 N. LASALLE STREET

CHICAGO, IL 60602

C. Telephone: 312-822-3188

Fax: 312-267-8770

Email: LRYAN@ABOC.COM

D. Name of contact person: LAURA D. RYAN

E. Federal Employer Identification No. (if you have one): 36-2641426

F. Brief description of the Matter to which this EDS pertains. (Include project number and location of property, if applicable):

Municipal Depository in fiscal year 2022

G. Which City agency or department is requesting this EDS? City of Chicago, Department of Finance

If the Matter is a contract being handled by the City's Department of Procurement Services, please complete the following:

Specification # \_\_\_\_\_ and Contract # \_\_\_\_\_

**SECTION II -- DISCLOSURE OF OWNERSHIP INTERESTS**

**A. NATURE OF THE DISCLOSING PARTY**

1. Indicate the nature of the Disclosing Party:

- Person
- Publicly registered business corporation
- Privately held business corporation
- Sole proprietorship
- General partnership
- Limited partnership
- Trust
- Limited liability company
- Limited liability partnership
- Joint venture
- Not-for-profit corporation  
(Is the not-for-profit corporation also a 501(c)(3))?  
 Yes  No
- Other (please specify)

2. For legal entities, the state (or foreign country) of incorporation or organization, if applicable:

ILLINOIS

3. For legal entities not organized in the State of Illinois: Has the organization registered to do business in the State of Illinois as a foreign entity?

- Yes
- No
- Organized in Illinois

**B. IF THE DISCLOSING PARTY IS A LEGAL ENTITY:**

1. List below the full names and titles, if applicable, of: (i) all executive officers and all directors of the entity; (ii) **for not-for-profit corporations**, all members, if any, which are legal entities (if there are no such members, write "no members which are legal entities"); (iii) **for trusts, estates or other similar entities**, the trustee, executor, administrator, or similarly situated party; (iv) **for general or limited partnerships, limited liability companies, limited liability partnerships or joint ventures**, each general partner, managing member, manager or any other person or legal entity that directly or indirectly controls the day-to-day management of the Applicant.

**NOTE:** Each legal entity listed below must submit an EDS on its own behalf.

Name	Title
SEE ATTACHED SHEET.	

2. Please provide the following information concerning each person or legal entity having a direct or indirect, current or prospective (i.e. within 6 months after City action) beneficial interest (including ownership) in excess of 7.5% of the Applicant. Examples of such an interest include shares in a corporation, partnership interest in a partnership or joint venture, interest of a member or manager in a

limited liability company, or interest of a beneficiary of a trust, estate or other similar entity. If none, state "None."

**NOTE:** Each legal entity listed below may be required to submit an EDS on its own behalf.

Name	Business Address	Percentage Interest in the Applicant
SEE ATTACHED EXHIBIT.		

**SECTION III -- INCOME OR COMPENSATION TO, OR OWNERSHIP BY, CITY ELECTED OFFICIALS**

Has the Disclosing Party provided any income or compensation to any City elected official during the 12-month period preceding the date of this EDS?  Yes  No

Does the Disclosing Party reasonably expect to provide any income or compensation to any City elected official during the 12-month period following the date of this EDS?  Yes  No

If "yes" to either of the above, please identify below the name(s) of such City elected official(s) and describe such income or compensation:

---

Does any City elected official or, to the best of the Disclosing Party's knowledge after reasonable inquiry, any City elected official's spouse or domestic partner, have a financial interest (as defined in Chapter 2-156 of the Municipal Code of Chicago ("MCC")) in the Disclosing Party?

Yes  No

If "yes," please identify below the name(s) of such City elected official(s) and/or spouse(s)/domestic partner(s) and describe the financial interest(s).

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**SECTION IV -- DISCLOSURE OF SUBCONTRACTORS AND OTHER RETAINED PARTIES**

The Disclosing Party must disclose the name and business address of each subcontractor, attorney, lobbyist (as defined in MCC Chapter 2-156), accountant, consultant and any other person or entity whom the Disclosing Party has retained or expects to retain in connection with the Matter, as well as the nature of the relationship, and the total amount of the fees paid or estimated to be paid. The Disclosing Party is not required to disclose employees who are paid solely through the Disclosing Party's regular payroll. If the Disclosing Party is uncertain whether a disclosure is required under this Section, the Disclosing Party must either ask the City whether disclosure is required or make the disclosure.

Name (indicate whether retained or anticipated to be retained)	Business Address	Relationship to Disclosing Party (subcontractor, attorney, lobbyist, etc.)	Fees (indicate whether paid or estimated.) <b>NOTE:</b> "hourly rate" or "t.b.d." is not an acceptable response.
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(Add sheets if necessary)

Check here if the Disclosing Party has not retained, nor expects to retain, any such persons or entities.

**SECTION V -- CERTIFICATIONS**

**A. COURT-ORDERED CHILD SUPPORT COMPLIANCE**

Under MCC Section 2-92-415, substantial owners of business entities that contract with the City must remain in compliance with their child support obligations throughout the contract's term.

Has any person who directly or indirectly owns 10% or more of the Disclosing Party been declared in arrearage on any child support obligations by any Illinois court of competent jurisdiction?

Yes     No     No person directly or indirectly owns 10% or more of the Disclosing Party.

If "Yes," has the person entered into a court-approved agreement for payment of all support owed and is the person in compliance with that agreement?

Yes     No

**B. FURTHER CERTIFICATIONS**

1. [This paragraph 1 applies only if the Matter is a contract being handled by the City's Department of Procurement Services.] In the 5-year period preceding the date of this EDS, neither the Disclosing Party nor any Affiliated Entity [see definition in (5) below] has engaged, in connection with the performance of any public contract, the services of an integrity monitor, independent private sector inspector general, or integrity compliance consultant (i.e., an individual or entity with legal, auditing, investigative, or other similar skills, designated by a public agency to help the agency monitor the activity of specified agency vendors as well as help the vendors reform their business practices so they can be considered for agency contracts in the future, or continue with a contract in progress).

2. The Disclosing Party and its Affiliated Entities are not delinquent in the payment of any fine, fee, tax or other source of indebtedness owed to the City of Chicago, including, but not limited to, water and sewer charges, license fees, parking tickets, property taxes and sales taxes, nor is the Disclosing Party delinquent in the payment of any tax administered by the Illinois Department of Revenue.

3. The Disclosing Party and, if the Disclosing Party is a legal entity, all of those persons or entities identified in Section II(B)(1) of this EDS:
- a. are not presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from any transactions by any federal, state or local unit of government;
  - b. have not, during the 5 years before the date of this EDS, been convicted of a criminal offense, adjudged guilty, or had a civil judgment rendered against them in connection with: obtaining, attempting to obtain, or performing a public (federal, state or local) transaction or contract under a public transaction; a violation of federal or state antitrust statutes; fraud; embezzlement; theft; forgery; bribery; falsification or destruction of records; making false statements; or receiving stolen property;
  - c. are not presently indicted for, or criminally or civilly charged by, a governmental entity (federal, state or local) with committing any of the offenses set forth in subparagraph (b) above;
  - d. have not, during the 5 years before the date of this EDS, had one or more public transactions (federal, state or local) terminated for cause or default; and
  - e. have not, during the 5 years before the date of this EDS, been convicted, adjudged guilty, or found liable in a civil proceeding, or in any criminal or civil action, including actions concerning environmental violations, instituted by the City or by the federal government, any state, or any other unit of local government.
4. The Disclosing Party understands and shall comply with the applicable requirements of MCC Chapters 2-56 (Inspector General) and 2-156 (Governmental Ethics).
5. Certifications (5), (6) and (7) concern:
- the Disclosing Party;
  - any "Contractor" (meaning any contractor or subcontractor used by the Disclosing Party in connection with the Matter, including but not limited to all persons or legal entities disclosed under Section IV, "Disclosure of Subcontractors and Other Retained Parties");
  - any "Affiliated Entity" (meaning a person or entity that, directly or indirectly: controls the Disclosing Party, is controlled by the Disclosing Party, or is, with the Disclosing Party, under common control of another person or entity). Indicia of control include, without limitation: interlocking management or ownership; identity of interests among family members, shared facilities and equipment; common use of employees; or organization of a business entity following the ineligibility of a business entity to do business with federal or state or local government, including the City, using substantially the same management, ownership, or principals as the ineligible entity. With respect to Contractors, the term Affiliated Entity means a person or entity that directly or indirectly controls the Contractor, is controlled by it, or, with the Contractor, is under common control of another person or entity;
  - any responsible official of the Disclosing Party, any Contractor or any Affiliated Entity or any other official, agent or employee of the Disclosing Party, any Contractor or any Affiliated Entity, acting pursuant to the direction or authorization of a responsible official of the Disclosing Party, any Contractor or any Affiliated Entity (collectively "Agents").

Neither the Disclosing Party, nor any Contractor, nor any Affiliated Entity of either the Disclosing Party or any Contractor, nor any Agents have, during the 5 years before the date of this EDS, or, with respect to a Contractor, an Affiliated Entity, or an Affiliated Entity of a Contractor during the 5 years before the date of such Contractor's or Affiliated Entity's contract or engagement in connection with the Matter:

- a. bribed or attempted to bribe, or been convicted or adjudged guilty of bribery or attempting to bribe, a public officer or employee of the City, the State of Illinois, or any agency of the federal government or of any state or local government in the United States of America, in that officer's or employee's official capacity;
  - b. agreed or colluded with other bidders or prospective bidders, or been a party to any such agreement, or been convicted or adjudged guilty of agreement or collusion among bidders or prospective bidders, in restraint of freedom of competition by agreement to bid a fixed price or otherwise; or
  - c. made an admission of such conduct described in subparagraph (a) or (b) above that is a matter of record, but have not been prosecuted for such conduct; or
  - d. violated the provisions referenced in MCC Subsection 2-92-320(a)(4)(Contracts Requiring a Base Wage); (a)(5)(Debarment Regulations); or (a)(6)(Minimum Wage Ordinance).
6. Neither the Disclosing Party, nor any Affiliated Entity or Contractor, or any of their employees, officials, agents or partners, is barred from contracting with any unit of state or local government as a result of engaging in or being convicted of (1) bid-rigging in violation of 720 ILCS 5/33E-3; (2) bid-rotating in violation of 720 ILCS 5/33E-4; or (3) any similar offense of any state or of the United States of America that contains the same elements as the offense of bid-rigging or bid-rotating.
7. Neither the Disclosing Party nor any Affiliated Entity is listed on a Sanctions List maintained by the United States Department of Commerce, State, or Treasury, or any successor federal agency.
8. [FOR APPLICANT ONLY] (i) Neither the Applicant nor any "controlling person" [see MCC Chapter 1-23, Article I for applicability and defined terms] of the Applicant is currently indicted or charged with, or has admitted guilt of, or has ever been convicted of, or placed under supervision for, any criminal offense involving actual, attempted, or conspiracy to commit bribery, theft, fraud, forgery, perjury, dishonesty or deceit against an officer or employee of the City or any "sister agency"; and (ii) the Applicant understands and acknowledges that compliance with Article I is a continuing requirement for doing business with the City. NOTE: If MCC Chapter 1-23, Article I applies to the Applicant, that Article's permanent compliance timeframe supersedes 5-year compliance timeframes in this Section V.
9. [FOR APPLICANT ONLY] The Applicant and its Affiliated Entities will not use, nor permit their subcontractors to use, any facility listed as having an active exclusion by the U.S. EPA on the federal System for Award Management ("SAM").
10. [FOR APPLICANT ONLY] The Applicant will obtain from any contractors/subcontractors hired or to be hired in connection with the Matter certifications equal in form and substance to those in Certifications (2) and (9) above and will not, without the prior written consent of the City, use any such

contractor/subcontractor that does not provide such certifications or that the Applicant has reason to believe has not provided or cannot provide truthful certifications.

11. If the Disclosing Party is unable to certify to any of the above statements in this Part B (Further Certifications), the Disclosing Party must explain below:

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N/A.

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If the letters "NA," the word "None," or no response appears on the lines above, it will be conclusively presumed that the Disclosing Party certified to the above statements.

12. To the best of the Disclosing Party's knowledge after reasonable inquiry, the following is a complete list of all current employees of the Disclosing Party who were, at any time during the 12-month period preceding the date of this EDS, an employee, or elected or appointed official, of the City of Chicago (if none, indicate with "N/A" or "none").

NONE.

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13. To the best of the Disclosing Party's knowledge after reasonable inquiry, the following is a complete list of all gifts that the Disclosing Party has given or caused to be given, at any time during the 12-month period preceding the execution date of this EDS, to an employee, or elected or appointed official, of the City of Chicago. For purposes of this statement, a "gift" does not include: (i) anything made generally available to City employees or to the general public, or (ii) food or drink provided in the course of official City business and having a retail value of less than \$25 per recipient, or (iii) a political contribution otherwise duly reported as required by law (if none, indicate with "N/A" or "none"). As to any gift listed below, please also list the name of the City recipient.

NONE.

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### C. CERTIFICATION OF STATUS AS FINANCIAL INSTITUTION

1. The Disclosing Party certifies that the Disclosing Party (check one)

is             is not

a "financial institution" as defined in MCC Section 2-32-455(b).

2. If the Disclosing Party IS a financial institution, then the Disclosing Party pledges:

"We are not and will not become a predatory lender as defined in MCC Chapter 2-32. We further pledge that none of our affiliates is, and none of them will become, a predatory lender as defined in MCC Chapter 2-32. We understand that becoming a predatory lender or becoming an affiliate of a predatory lender may result in the loss of the privilege of doing business with the City."

If the Disclosing Party is unable to make this pledge because it or any of its affiliates (as defined in MCC Section 2-32-455(b)) is a predatory lender within the meaning of MCC Chapter 2-32, explain here (attach additional pages if necessary):

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If the letters "NA," the word "None," or no response appears on the lines above, it will be conclusively presumed that the Disclosing Party certified to the above statements.

#### D. CERTIFICATION REGARDING FINANCIAL INTEREST IN CITY BUSINESS

Any words or terms defined in MCC Chapter 2-156 have the same meanings if used in this Part D.

1. In accordance with MCC Section 2-156-110: To the best of the Disclosing Party's knowledge after reasonable inquiry, does any official or employee of the City have a financial interest in his or her own name or in the name of any other person or entity in the Matter?

Yes

No

NOTE: If you checked "Yes" to Item D(1), proceed to Items D(2) and D(3). If you checked "No" to Item D(1), skip Items D(2) and D(3) and proceed to Part E.

2. Unless sold pursuant to a process of competitive bidding, or otherwise permitted, no City elected official or employee shall have a financial interest in his or her own name or in the name of any other person or entity in the purchase of any property that (i) belongs to the City, or (ii) is sold for taxes or assessments, or (iii) is sold by virtue of legal process at the suit of the City (collectively, "City Property Sale"). Compensation for property taken pursuant to the City's eminent domain power does not constitute a financial interest within the meaning of this Part D.

Does the Matter involve a City Property Sale?

Yes

No

3. If you checked "Yes" to Item D(1), provide the names and business addresses of the City officials or employees having such financial interest and identify the nature of the financial interest:

Name

Business Address

Nature of Financial Interest

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4. The Disclosing Party further certifies that no prohibited financial interest in the Matter will be acquired by any City official or employee.

E. CERTIFICATION REGARDING SLAVERY ERA BUSINESS

Please check either (1) or (2) below. If the Disclosing Party checks (2), the Disclosing Party must disclose below or in an attachment to this EDS all information required by (2). Failure to comply with these disclosure requirements may make any contract entered into with the City in connection with the Matter voidable by the City.

X 1. The Disclosing Party verifies that the Disclosing Party has searched any and all records of the Disclosing Party and any and all predecessor entities regarding records of investments or profits from slavery or slaveholder insurance policies during the slavery era (including insurance policies issued to slaveholders that provided coverage for damage to or injury or death of their slaves), and the Disclosing Party has found no such records.

     2. The Disclosing Party verifies that, as a result of conducting the search in step (1) above, the Disclosing Party has found records of investments or profits from slavery or slaveholder insurance policies. The Disclosing Party verifies that the following constitutes full disclosure of all such records, including the names of any and all slaves or slaveholders described in those records:

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**SECTION VI -- CERTIFICATIONS FOR FEDERALLY FUNDED MATTERS**

**NOTE: If the Matter is federally funded**, complete this Section VI. **If the Matter is not federally funded**, proceed to Section VII. For purposes of this Section VI, tax credits allocated by the City and proceeds of debt obligations of the City are not federal funding.

A. CERTIFICATION REGARDING LOBBYING

1. List below the names of all persons or entities registered under the federal Lobbying Disclosure Act of 1995, as amended, who have made lobbying contacts on behalf of the Disclosing Party with respect to the Matter: (Add sheets if necessary):

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(If no explanation appears or begins on the lines above, or if the letters "NA" or if the word "None" appear, it will be conclusively presumed that the Disclosing Party means that NO persons or entities registered under the Lobbying Disclosure Act of 1995, as amended, have made lobbying contacts on behalf of the Disclosing Party with respect to the Matter.)

2. The Disclosing Party has not spent and will not expend any federally appropriated funds to pay any person or entity listed in paragraph A(1) above for his or her lobbying activities or to pay any person or entity to influence or attempt to influence an officer or employee of any agency, as defined by applicable federal law, a member of Congress, an officer or employee of Congress, or an employee

of a member of Congress, in connection with the award of any federally funded contract, making any federally funded grant or loan, entering into any cooperative agreement, or to extend, continue, renew, amend, or modify any federally funded contract, grant, loan, or cooperative agreement.

3. The Disclosing Party will submit an updated certification at the end of each calendar quarter in which there occurs any event that materially affects the accuracy of the statements and information set forth in paragraphs A(1) and A(2) above.

4. The Disclosing Party certifies that either: (i) it is not an organization described in section 501(c)(4) of the Internal Revenue Code of 1986; or (ii) it is an organization described in section 501(c)(4) of the Internal Revenue Code of 1986 but has not engaged and will not engage in "Lobbying Activities," as that term is defined in the Lobbying Disclosure Act of 1995, as amended.

5. If the Disclosing Party is the Applicant, the Disclosing Party must obtain certifications equal in form and substance to paragraphs A(1) through A(4) above from all subcontractors before it awards any subcontract and the Disclosing Party must maintain all such subcontractors' certifications for the duration of the Matter and must make such certifications promptly available to the City upon request.

#### B. CERTIFICATION REGARDING EQUAL EMPLOYMENT OPPORTUNITY

If the Matter is federally funded, federal regulations require the Applicant and all proposed subcontractors to submit the following information with their bids or in writing at the outset of negotiations.

Is the Disclosing Party the Applicant?

Yes

No

If "Yes," answer the three questions below:

1. Have you developed and do you have on file affirmative action programs pursuant to applicable federal regulations? (See 41 CFR Part 60-2.)

Yes

No

2. Have you filed with the Joint Reporting Committee, the Director of the Office of Federal Contract Compliance Programs, or the Equal Employment Opportunity Commission all reports due under the applicable filing requirements?

Yes

No

Reports not required

3. Have you participated in any previous contracts or subcontracts subject to the equal opportunity clause?

Yes

No

If you checked "No" to question (1) or (2) above, please provide an explanation:

---

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## SECTION VII -- FURTHER ACKNOWLEDGMENTS AND CERTIFICATION

The Disclosing Party understands and agrees that:

A. The certifications, disclosures, and acknowledgments contained in this EDS will become part of any contract or other agreement between the Applicant and the City in connection with the Matter, whether procurement, City assistance, or other City action, and are material inducements to the City's execution of any contract or taking other action with respect to the Matter. The Disclosing Party understands that it must comply with all statutes, ordinances, and regulations on which this EDS is based.

B. The City's Governmental Ethics Ordinance, MCC Chapter 2-156, imposes certain duties and obligations on persons or entities seeking City contracts, work, business, or transactions. The full text of this ordinance and a training program is available on line at [www.cityofchicago.org/Ethics](http://www.cityofchicago.org/Ethics), and may also be obtained from the City's Board of Ethics, 740 N. Sedgwick St., Suite 500, Chicago, IL 60610, (312) 744-9660. The Disclosing Party must comply fully with this ordinance.

C. If the City determines that any information provided in this EDS is false, incomplete or inaccurate, any contract or other agreement in connection with which it is submitted may be rescinded or be void or voidable, and the City may pursue any remedies under the contract or agreement (if not rescinded or void), at law, or in equity, including terminating the Disclosing Party's participation in the Matter and/or declining to allow the Disclosing Party to participate in other City transactions. Remedies at law for a false statement of material fact may include incarceration and an award to the City of treble damages.

D. It is the City's policy to make this document available to the public on its Internet site and/or upon request. Some or all of the information provided in, and appended to, this EDS may be made publicly available on the Internet, in response to a Freedom of Information Act request, or otherwise. By completing and signing this EDS, the Disclosing Party waives and releases any possible rights or claims which it may have against the City in connection with the public release of information contained in this EDS and also authorizes the City to verify the accuracy of any information submitted in this EDS.

E. The information provided in this EDS must be kept current. In the event of changes, the Disclosing Party must supplement this EDS up to the time the City takes action on the Matter. If the Matter is a contract being handled by the City's Department of Procurement Services, the Disclosing Party must update this EDS as the contract requires. **NOTE:** With respect to Matters subject to MCC Chapter 1-23, Article I (imposing **PERMANENT INELIGIBILITY** for certain specified offenses), the information provided herein regarding eligibility must be kept current for a longer period, as required by MCC Chapter 1-23 and Section 2-154-020.

**CERTIFICATION**

Under penalty of perjury, the person signing below: (1) warrants that he/she is authorized to execute this EDS, and all applicable Appendices, on behalf of the Disclosing Party, and (2) warrants that all certifications and statements contained in this EDS, and all applicable Appendices, are true, accurate and complete as of the date furnished to the City.

AMALGAMATED INVESTMENTS COMPANY

(Print or type exact legal name of Disclosing Party)

By: \_\_\_\_\_  
(Sign here) *[Handwritten Signature]*

JAMES T. LANDENBERGER

(Print or type name of person signing)

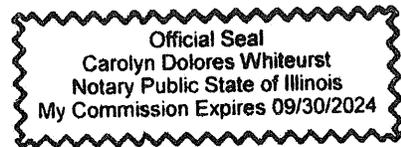
SECRETARY

(Print or type title of person signing)

Signed and sworn to before me on (date) November 3, 2021,

at Cook County, Illinois (state).

Carolyn Dolores Whiteurst  
Notary Public



Commission expires: 09/30/2024

**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX A**

**FAMILIAL RELATIONSHIPS WITH ELECTED CITY OFFICIALS  
AND DEPARTMENT HEADS**

**This Appendix is to be completed only by (a) the Applicant, and (b) any legal entity which has a direct ownership interest in the Applicant exceeding 7.5%. It is not to be completed by any legal entity which has only an indirect ownership interest in the Applicant.**

Under MCC Section 2-154-015, the Disclosing Party must disclose whether such Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof currently has a "familial relationship" with any elected city official or department head. A "familial relationship" exists if, as of the date this EDS is signed, the Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof is related to the mayor, any alderman, the city clerk, the city treasurer or any city department head as spouse or domestic partner or as any of the following, whether by blood or adoption: parent, child, brother or sister, aunt or uncle, niece or nephew, grandparent, grandchild, father-in-law, mother-in-law, son-in-law, daughter-in-law, stepfather or stepmother, stepson or stepdaughter, stepbrother or stepsister or half-brother or half-sister.

"Applicable Party" means (1) all executive officers of the Disclosing Party listed in Section II.B.1.a., if the Disclosing Party is a corporation; all partners of the Disclosing Party, if the Disclosing Party is a general partnership; all general partners and limited partners of the Disclosing Party, if the Disclosing Party is a limited partnership; all managers, managing members and members of the Disclosing Party, if the Disclosing Party is a limited liability company; (2) all principal officers of the Disclosing Party; and (3) any person having more than a 7.5% ownership interest in the Disclosing Party. "Principal officers" means the president, chief operating officer, executive director, chief financial officer, treasurer or secretary of a legal entity or any person exercising similar authority.

Does the Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof currently have a "familial relationship" with an elected city official or department head?

Yes

No

If yes, please identify below (1) the name and title of such person, (2) the name of the legal entity to which such person is connected; (3) the name and title of the elected city official or department head to whom such person has a familial relationship, and (4) the precise nature of such familial relationship.

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**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX B**

**BUILDING CODE SCOFFLAW/PROBLEM LANDLORD CERTIFICATION**

This Appendix is to be completed only by (a) the Applicant, and (b) any legal entity which has a direct ownership interest in the Applicant exceeding 7.5% (an "Owner"). It is not to be completed by any legal entity which has only an indirect ownership interest in the Applicant.

1. Pursuant to MCC Section 2-154-010, is the Applicant or any Owner identified as a building code scofflaw or problem landlord pursuant to MCC Section 2-92-416?

Yes                       No

2. If the Applicant is a legal entity publicly traded on any exchange, is any officer or director of the Applicant identified as a building code scofflaw or problem landlord pursuant to MCC Section 2-92-416?

Yes                       No                       The Applicant is not publicly traded on any exchange.

3. If yes to (1) or (2) above, please identify below the name of each person or legal entity identified as a building code scofflaw or problem landlord and the address of each building or buildings to which the pertinent code violations apply.

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**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX C**

**PROHIBITION ON WAGE & SALARY HISTORY SCREENING - CERTIFICATION**

This Appendix is to be completed only by an Applicant that is completing this EDS as a “contractor” as defined in MCC Section 2-92-385. That section, which should be consulted ([www.amlegal.com](http://www.amlegal.com)), generally covers a party to any agreement pursuant to which they: (i) receive City of Chicago funds in consideration for services, work or goods provided (including for legal or other professional services), or (ii) pay the City money for a license, grant or concession allowing them to conduct a business on City premises.

On behalf of an Applicant that is a contractor pursuant to MCC Section 2-92-385, I hereby certify that the Applicant is in compliance with MCC Section 2-92-385(b)(1) and (2), which prohibit: (i) screening job applicants based on their wage or salary history, or (ii) seeking job applicants’ wage or salary history from current or former employers. I also certify that the Applicant has adopted a policy that includes those prohibitions.

Yes

No

N/A – I am not an Applicant that is a “contractor” as defined in MCC Section 2-92-385.

This certification shall serve as the affidavit required by MCC Section 2-92-385(c)(1).

If you checked “no” to the above, please explain.

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**EXHIBIT SECTION II. B. 1**



**DIRECTORS**

Warren Katz

James Sweeney

Debra H. Wrobel

Robert M. Wrobel

**OFFICERS**

Robert M. Wrobel	Chairman of the Board and President
Joseph Kehoe	Vice President and Chief Financial Officer
James T. Landenberger	Vice President and Secretary
Laura Maher	Vice President/Audit
William J. Dunn	Assistant Secretary

**SECTION II. B. 2.**

<b><u>Name</u></b>	<b><u>Business Address</u></b>	<b><u>Percentage Indirect Interest in Amalgamated Bank of Chicago (the "Applicant")</u></b>
Robert M. Wrobel Trust dated November 13, 1997	Amalgamated Bank of Chicago 30 North LaSalle Street Chicago, Illinois 60602	27.43%
Debra H. Wrobel Trust dated November 13, 1997, as amended on March 16, 2006	Amalgamated Bank of Chicago 30 North LaSalle Street Chicago, Illinois 60602	8.85%

**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT  
AND AFFIDAVIT**

**SECTION I -- GENERAL INFORMATION**

A. Legal name of the Disclosing Party submitting this EDS. Include d/b/a/ if applicable:

ROBERT M. WROBEL TRUST DATED NOVEMBER 13, 1997.

**Check ONE of the following three boxes:**

Indicate whether the Disclosing Party submitting this EDS is:

1.  the Applicant

OR

2.  a legal entity currently holding, or anticipated to hold within six months after City action on the contract, transaction or other undertaking to which this EDS pertains (referred to below as the "Matter"), a direct or indirect interest in excess of 7.5% in the Applicant. State the Applicant's legal name: AMALGAMATED BANK OF CHICAGO

OR

3.  a legal entity with a direct or indirect right of control of the Applicant (see Section II(B)(1))  
State the legal name of the entity in which the Disclosing Party holds a right of control:

B. Business address of the Disclosing Party: 30 N. LASALLE STREET

CHICAGO, IL 60602

C. Telephone: 312-822-3188 Fax: 312-267-8770 Email: LRYAN@ABOC.COM

D. Name of contact person: LAURA D. RYAN

E. Federal Employer Identification No. (if you have one): N/A

F. Brief description of the Matter to which this EDS pertains. (Include project number and location of property, if applicable):

Municipal Depository in fiscal year 2022

G. Which City agency or department is requesting this EDS? City of Chicago, Department of Finance

If the Matter is a contract being handled by the City's Department of Procurement Services, please complete the following:

Specification # \_\_\_\_\_ and Contract # \_\_\_\_\_

**SECTION II -- DISCLOSURE OF OWNERSHIP INTERESTS**

**A. NATURE OF THE DISCLOSING PARTY**

1. Indicate the nature of the Disclosing Party:

- Person
  - Publicly registered business corporation
  - Privately held business corporation
  - Sole proprietorship
  - General partnership
  - Limited partnership
  - Trust
  - Limited liability company
  - Limited liability partnership
  - Joint venture
  - Not-for-profit corporation
- (Is the not-for-profit corporation also a 501(c)(3))?  
 Yes       No  
 Other (please specify)
- 

2. For legal entities, the state (or foreign country) of incorporation or organization, if applicable:

TRUSTS GOVERNED BY ILLINOIS LAW.

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3. For legal entities not organized in the State of Illinois: Has the organization registered to do business in the State of Illinois as a foreign entity?

- Yes
- No
- Organized in Illinois

**B. IF THE DISCLOSING PARTY IS A LEGAL ENTITY:**

1. List below the full names and titles, if applicable, of: (i) all executive officers and all directors of the entity; (ii) **for not-for-profit corporations**, all members, if any, which are legal entities (if there are no such members, write "no members which are legal entities"); (iii) **for trusts, estates or other similar entities**, the trustee, executor, administrator, or similarly situated party; (iv) **for general or limited partnerships, limited liability companies, limited liability partnerships or joint ventures**, each general partner, managing member, manager or any other person or legal entity that directly or indirectly controls the day-to-day management of the Applicant.

**NOTE:** Each legal entity listed below must submit an EDS on its own behalf.

Name	Title
ROBERT M. WROBEL	TRUSTEE

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2. Please provide the following information concerning each person or legal entity having a direct or indirect, current or prospective (i.e. within 6 months after City action) beneficial interest (including ownership) in excess of 7.5% of the Applicant. Examples of such an interest include shares in a corporation, partnership interest in a partnership or joint venture, interest of a member or manager in a



Name (indicate whether retained or anticipated to be retained)	Business Address	Relationship to Disclosing Party (subcontractor, attorney, lobbyist, etc.)	Fees ( <u>indicate whether paid or estimated.</u> ) <b>NOTE:</b> "hourly rate" or "t.b.d." is not an acceptable response.
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(Add sheets if necessary)

Check here if the Disclosing Party has not retained, nor expects to retain, any such persons or entities.

**SECTION V -- CERTIFICATIONS**

**A. COURT-ORDERED CHILD SUPPORT COMPLIANCE**

Under MCC Section 2-92-415, substantial owners of business entities that contract with the City must remain in compliance with their child support obligations throughout the contract's term.

Has any person who directly or indirectly owns 10% or more of the Disclosing Party been declared in arrearage on any child support obligations by any Illinois court of competent jurisdiction?

Yes     No     No person directly or indirectly owns 10% or more of the Disclosing Party.

If "Yes," has the person entered into a court-approved agreement for payment of all support owed and is the person in compliance with that agreement?

Yes     No

**B. FURTHER CERTIFICATIONS**

1. [This paragraph 1 applies only if the Matter is a contract being handled by the City's Department of Procurement Services.] In the 5-year period preceding the date of this EDS, neither the Disclosing Party nor any Affiliated Entity [see definition in (5) below] has engaged, in connection with the performance of any public contract, the services of an integrity monitor, independent private sector inspector general, or integrity compliance consultant (i.e., an individual or entity with legal, auditing, investigative, or other similar skills, designated by a public agency to help the agency monitor the activity of specified agency vendors as well as help the vendors reform their business practices so they can be considered for agency contracts in the future, or continue with a contract in progress).

2. The Disclosing Party and its Affiliated Entities are not delinquent in the payment of any fine, fee, tax or other source of indebtedness owed to the City of Chicago, including, but not limited to, water and sewer charges, license fees, parking tickets, property taxes and sales taxes, nor is the Disclosing Party delinquent in the payment of any tax administered by the Illinois Department of Revenue.

3. The Disclosing Party and, if the Disclosing Party is a legal entity, all of those persons or entities identified in Section II(B)(1) of this EDS:
- a. are not presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from any transactions by any federal, state or local unit of government;
  - b. have not, during the 5 years before the date of this EDS, been convicted of a criminal offense, adjudged guilty, or had a civil judgment rendered against them in connection with: obtaining, attempting to obtain, or performing a public (federal, state or local) transaction or contract under a public transaction; a violation of federal or state antitrust statutes; fraud; embezzlement; theft; forgery; bribery; falsification or destruction of records; making false statements; or receiving stolen property;
  - c. are not presently indicted for, or criminally or civilly charged by, a governmental entity (federal, state or local) with committing any of the offenses set forth in subparagraph (b) above;
  - d. have not, during the 5 years before the date of this EDS, had one or more public transactions (federal, state or local) terminated for cause or default; and
  - e. have not, during the 5 years before the date of this EDS, been convicted, adjudged guilty, or found liable in a civil proceeding, or in any criminal or civil action, including actions concerning environmental violations, instituted by the City or by the federal government, any state, or any other unit of local government.
4. The Disclosing Party understands and shall comply with the applicable requirements of MCC Chapters 2-56 (Inspector General) and 2-156 (Governmental Ethics).
5. Certifications (5), (6) and (7) concern:
- the Disclosing Party;
  - any "Contractor" (meaning any contractor or subcontractor used by the Disclosing Party in connection with the Matter, including but not limited to all persons or legal entities disclosed under Section IV, "Disclosure of Subcontractors and Other Retained Parties");
  - any "Affiliated Entity" (meaning a person or entity that, directly or indirectly: controls the Disclosing Party, is controlled by the Disclosing Party, or is, with the Disclosing Party, under common control of another person or entity). Indicia of control include, without limitation: interlocking management or ownership; identity of interests among family members, shared facilities and equipment; common use of employees; or organization of a business entity following the ineligibility of a business entity to do business with federal or state or local government, including the City, using substantially the same management, ownership, or principals as the ineligible entity. With respect to Contractors, the term Affiliated Entity means a person or entity that directly or indirectly controls the Contractor, is controlled by it, or, with the Contractor, is under common control of another person or entity;
  - any responsible official of the Disclosing Party, any Contractor or any Affiliated Entity or any other official, agent or employee of the Disclosing Party, any Contractor or any Affiliated Entity, acting pursuant to the direction or authorization of a responsible official of the Disclosing Party, any Contractor or any Affiliated Entity (collectively "Agents").

Neither the Disclosing Party, nor any Contractor, nor any Affiliated Entity of either the Disclosing Party or any Contractor, nor any Agents have, during the 5 years before the date of this EDS, or, with respect to a Contractor, an Affiliated Entity, or an Affiliated Entity of a Contractor during the 5 years before the date of such Contractor's or Affiliated Entity's contract or engagement in connection with the Matter:

- a. bribed or attempted to bribe, or been convicted or adjudged guilty of bribery or attempting to bribe, a public officer or employee of the City, the State of Illinois, or any agency of the federal government or of any state or local government in the United States of America, in that officer's or employee's official capacity;
  - b. agreed or colluded with other bidders or prospective bidders, or been a party to any such agreement, or been convicted or adjudged guilty of agreement or collusion among bidders or prospective bidders, in restraint of freedom of competition by agreement to bid a fixed price or otherwise; or
  - c. made an admission of such conduct described in subparagraph (a) or (b) above that is a matter of record, but have not been prosecuted for such conduct; or
  - d. violated the provisions referenced in MCC Subsection 2-92-320(a)(4)(Contracts Requiring a Base Wage); (a)(5)(Debarment Regulations); or (a)(6)(Minimum Wage Ordinance).
6. Neither the Disclosing Party, nor any Affiliated Entity or Contractor, or any of their employees, officials, agents or partners, is barred from contracting with any unit of state or local government as a result of engaging in or being convicted of (1) bid-rigging in violation of 720 ILCS 5/33E-3; (2) bid-rotating in violation of 720 ILCS 5/33E-4; or (3) any similar offense of any state or of the United States of America that contains the same elements as the offense of bid-rigging or bid-rotating.
7. Neither the Disclosing Party nor any Affiliated Entity is listed on a Sanctions List maintained by the United States Department of Commerce, State, or Treasury, or any successor federal agency.
8. [FOR APPLICANT ONLY] (i) Neither the Applicant nor any "controlling person" [see MCC Chapter 1-23, Article I for applicability and defined terms] of the Applicant is currently indicted or charged with, or has admitted guilt of, or has ever been convicted of, or placed under supervision for, any criminal offense involving actual, attempted, or conspiracy to commit bribery, theft, fraud, forgery, perjury, dishonesty or deceit against an officer or employee of the City or any "sister agency"; and (ii) the Applicant understands and acknowledges that compliance with Article I is a continuing requirement for doing business with the City. NOTE: If MCC Chapter 1-23, Article I applies to the Applicant, that Article's permanent compliance timeframe supersedes 5-year compliance timeframes in this Section V.
9. [FOR APPLICANT ONLY] The Applicant and its Affiliated Entities will not use, nor permit their subcontractors to use, any facility listed as having an active exclusion by the U.S. EPA on the federal System for Award Management ("SAM").
10. [FOR APPLICANT ONLY] The Applicant will obtain from any contractors/subcontractors hired or to be hired in connection with the Matter certifications equal in form and substance to those in Certifications (2) and (9) above and will not, without the prior written consent of the City, use any such

contractor/subcontractor that does not provide such certifications or that the Applicant has reason to believe has not provided or cannot provide truthful certifications.

11. If the Disclosing Party is unable to certify to any of the above statements in this Part B (Further Certifications), the Disclosing Party must explain below:

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N/A.

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If the letters "NA," the word "None," or no response appears on the lines above, it will be conclusively presumed that the Disclosing Party certified to the above statements.

12. To the best of the Disclosing Party's knowledge after reasonable inquiry, the following is a complete list of all current employees of the Disclosing Party who were, at any time during the 12-month period preceding the date of this EDS, an employee, or elected or appointed official, of the City of Chicago (if none, indicate with "N/A" or "none").

NONE.

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13. To the best of the Disclosing Party's knowledge after reasonable inquiry, the following is a complete list of all gifts that the Disclosing Party has given or caused to be given, at any time during the 12-month period preceding the execution date of this EDS, to an employee, or elected or appointed official, of the City of Chicago. For purposes of this statement, a "gift" does not include: (i) anything made generally available to City employees or to the general public, or (ii) food or drink provided in the course of official City business and having a retail value of less than \$25 per recipient, or (iii) a political contribution otherwise duly reported as required by law (if none, indicate with "N/A" or "none"). As to any gift listed below, please also list the name of the City recipient.

NONE.

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### C. CERTIFICATION OF STATUS AS FINANCIAL INSTITUTION

1. The Disclosing Party certifies that the Disclosing Party (check one)

is  is not

a "financial institution" as defined in MCC Section 2-32-455(b).

2. If the Disclosing Party IS a financial institution, then the Disclosing Party pledges:

"We are not and will not become a predatory lender as defined in MCC Chapter 2-32. We further pledge that none of our affiliates is, and none of them will become, a predatory lender as defined in MCC Chapter 2-32. We understand that becoming a predatory lender or becoming an affiliate of a predatory lender may result in the loss of the privilege of doing business with the City."

If the Disclosing Party is unable to make this pledge because it or any of its affiliates (as defined in MCC Section 2-32-455(b)) is a predatory lender within the meaning of MCC Chapter 2-32, explain here (attach additional pages if necessary):

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If the letters "NA," the word "None," or no response appears on the lines above, it will be conclusively presumed that the Disclosing Party certified to the above statements.

**D. CERTIFICATION REGARDING FINANCIAL INTEREST IN CITY BUSINESS**

Any words or terms defined in MCC Chapter 2-156 have the same meanings if used in this Part D.

1. In accordance with MCC Section 2-156-110: To the best of the Disclosing Party's knowledge after reasonable inquiry, does any official or employee of the City have a financial interest in his or her own name or in the name of any other person or entity in the Matter?

Yes                       No

NOTE: If you checked "Yes" to Item D(1), proceed to Items D(2) and D(3). If you checked "No" to Item D(1), skip Items D(2) and D(3) and proceed to Part E.

2. Unless sold pursuant to a process of competitive bidding, or otherwise permitted, no City elected official or employee shall have a financial interest in his or her own name or in the name of any other person or entity in the purchase of any property that (i) belongs to the City, or (ii) is sold for taxes or assessments, or (iii) is sold by virtue of legal process at the suit of the City (collectively, "City Property Sale"). Compensation for property taken pursuant to the City's eminent domain power does not constitute a financial interest within the meaning of this Part D.

Does the Matter involve a City Property Sale?

Yes                       No

3. If you checked "Yes" to Item D(1), provide the names and business addresses of the City officials or employees having such financial interest and identify the nature of the financial interest:

Name	Business Address	Nature of Financial Interest
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4. The Disclosing Party further certifies that no prohibited financial interest in the Matter will be acquired by any City official or employee.

E. CERTIFICATION REGARDING SLAVERY ERA BUSINESS

Please check either (1) or (2) below. If the Disclosing Party checks (2), the Disclosing Party must disclose below or in an attachment to this EDS all information required by (2). Failure to comply with these disclosure requirements may make any contract entered into with the City in connection with the Matter voidable by the City.

X  1. The Disclosing Party verifies that the Disclosing Party has searched any and all records of the Disclosing Party and any and all predecessor entities regarding records of investments or profits from slavery or slaveholder insurance policies during the slavery era (including insurance policies issued to slaveholders that provided coverage for damage to or injury or death of their slaves), and the Disclosing Party has found no such records.

2. The Disclosing Party verifies that, as a result of conducting the search in step (1) above, the Disclosing Party has found records of investments or profits from slavery or slaveholder insurance policies. The Disclosing Party verifies that the following constitutes full disclosure of all such records, including the names of any and all slaves or slaveholders described in those records:

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**SECTION VI -- CERTIFICATIONS FOR FEDERALLY FUNDED MATTERS**

**NOTE: If the Matter is federally funded**, complete this Section VI. **If the Matter is not federally funded**, proceed to Section VII. For purposes of this Section VI, tax credits allocated by the City and proceeds of debt obligations of the City are not federal funding.

A. CERTIFICATION REGARDING LOBBYING

1. List below the names of all persons or entities registered under the federal Lobbying Disclosure Act of 1995, as amended, who have made lobbying contacts on behalf of the Disclosing Party with respect to the Matter: (Add sheets if necessary):

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(If no explanation appears or begins on the lines above, or if the letters "NA" or if the word "None" appear, it will be conclusively presumed that the Disclosing Party means that NO persons or entities registered under the Lobbying Disclosure Act of 1995, as amended, have made lobbying contacts on behalf of the Disclosing Party with respect to the Matter.)

2. The Disclosing Party has not spent and will not expend any federally appropriated funds to pay any person or entity listed in paragraph A(1) above for his or her lobbying activities or to pay any person or entity to influence or attempt to influence an officer or employee of any agency, as defined by applicable federal law, a member of Congress, an officer or employee of Congress, or an employee

of a member of Congress, in connection with the award of any federally funded contract, making any federally funded grant or loan, entering into any cooperative agreement, or to extend, continue, renew, amend, or modify any federally funded contract, grant, loan, or cooperative agreement.

3. The Disclosing Party will submit an updated certification at the end of each calendar quarter in which there occurs any event that materially affects the accuracy of the statements and information set forth in paragraphs A(1) and A(2) above.

4. The Disclosing Party certifies that either: (i) it is not an organization described in section 501(c)(4) of the Internal Revenue Code of 1986; or (ii) it is an organization described in section 501(c)(4) of the Internal Revenue Code of 1986 but has not engaged and will not engage in "Lobbying Activities," as that term is defined in the Lobbying Disclosure Act of 1995, as amended.

5. If the Disclosing Party is the Applicant, the Disclosing Party must obtain certifications equal in form and substance to paragraphs A(1) through A(4) above from all subcontractors before it awards any subcontract and the Disclosing Party must maintain all such subcontractors' certifications for the duration of the Matter and must make such certifications promptly available to the City upon request.

#### B. CERTIFICATION REGARDING EQUAL EMPLOYMENT OPPORTUNITY

If the Matter is federally funded, federal regulations require the Applicant and all proposed subcontractors to submit the following information with their bids or in writing at the outset of negotiations.

Is the Disclosing Party the Applicant?

Yes

No

If "Yes," answer the three questions below:

1. Have you developed and do you have on file affirmative action programs pursuant to applicable federal regulations? (See 41 CFR Part 60-2.)

Yes

No

2. Have you filed with the Joint Reporting Committee, the Director of the Office of Federal Contract Compliance Programs, or the Equal Employment Opportunity Commission all reports due under the applicable filing requirements?

Yes

No

Reports not required

3. Have you participated in any previous contracts or subcontracts subject to the equal opportunity clause?

Yes

No

If you checked "No" to question (1) or (2) above, please provide an explanation:

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## SECTION VII -- FURTHER ACKNOWLEDGMENTS AND CERTIFICATION

The Disclosing Party understands and agrees that:

A. The certifications, disclosures, and acknowledgments contained in this EDS will become part of any contract or other agreement between the Applicant and the City in connection with the Matter, whether procurement, City assistance, or other City action, and are material inducements to the City's execution of any contract or taking other action with respect to the Matter. The Disclosing Party understands that it must comply with all statutes, ordinances, and regulations on which this EDS is based.

B. The City's Governmental Ethics Ordinance, MCC Chapter 2-156, imposes certain duties and obligations on persons or entities seeking City contracts, work, business, or transactions. The full text of this ordinance and a training program is available on line at [www.cityofchicago.org/Ethics](http://www.cityofchicago.org/Ethics), and may also be obtained from the City's Board of Ethics, 740 N. Sedgwick St., Suite 500, Chicago, IL 60610, (312) 744-9660. The Disclosing Party must comply fully with this ordinance.

C. If the City determines that any information provided in this EDS is false, incomplete or inaccurate, any contract or other agreement in connection with which it is submitted may be rescinded or be void or voidable, and the City may pursue any remedies under the contract or agreement (if not rescinded or void), at law, or in equity, including terminating the Disclosing Party's participation in the Matter and/or declining to allow the Disclosing Party to participate in other City transactions. Remedies at law for a false statement of material fact may include incarceration and an award to the City of treble damages.

D. It is the City's policy to make this document available to the public on its Internet site and/or upon request. Some or all of the information provided in, and appended to, this EDS may be made publicly available on the Internet, in response to a Freedom of Information Act request, or otherwise. By completing and signing this EDS, the Disclosing Party waives and releases any possible rights or claims which it may have against the City in connection with the public release of information contained in this EDS and also authorizes the City to verify the accuracy of any information submitted in this EDS.

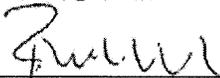
E. The information provided in this EDS must be kept current. In the event of changes, the Disclosing Party must supplement this EDS up to the time the City takes action on the Matter. If the Matter is a contract being handled by the City's Department of Procurement Services, the Disclosing Party must update this EDS as the contract requires. **NOTE:** With respect to Matters subject to MCC Chapter 1-23, Article I (imposing **PERMANENT INELIGIBILITY** for certain specified offenses), the information provided herein regarding eligibility must be kept current for a longer period, as required by MCC Chapter 1-23 and Section 2-154-020.

**CERTIFICATION**

Under penalty of perjury, the person signing below: (1) warrants that he/she is authorized to execute this EDS, and all applicable Appendices, on behalf of the Disclosing Party, and (2) warrants that all certifications and statements contained in this EDS, and all applicable Appendices, are true, accurate and complete as of the date furnished to the City.

ROBERT M. WROBEL TRUST DATED NOVEMBER 13, 1997.

(Print or type exact legal name of Disclosing Party)

By:   
(Sign here)

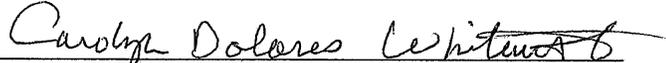
ROBERT M. WROBEL, as Trustee

(Print or type name of person signing)

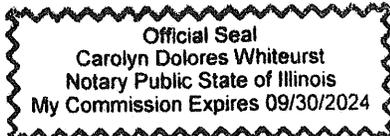
(Print or type title of person signing)

Signed and sworn to before me on (date) November 3, 2021,

at Cook County, ILLINOIS (state).

  
Notary Public

Commission expires: 09/30/2024



**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX A**

**FAMILIAL RELATIONSHIPS WITH ELECTED CITY OFFICIALS  
AND DEPARTMENT HEADS**

**This Appendix is to be completed only by (a) the Applicant, and (b) any legal entity which has a direct ownership interest in the Applicant exceeding 7.5%. It is not to be completed by any legal entity which has only an indirect ownership interest in the Applicant.**

Under MCC Section 2-154-015, the Disclosing Party must disclose whether such Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof currently has a "familial relationship" with any elected city official or department head. A "familial relationship" exists if, as of the date this EDS is signed, the Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof is related to the mayor, any alderman, the city clerk, the city treasurer or any city department head as spouse or domestic partner or as any of the following, whether by blood or adoption: parent, child, brother or sister, aunt or uncle, niece or nephew, grandparent, grandchild, father-in-law, mother-in-law, son-in-law, daughter-in-law, stepfather or stepmother, stepson or stepdaughter, stepbrother or stepsister or half-brother or half-sister.

"Applicable Party" means (1) all executive officers of the Disclosing Party listed in Section II.B.1.a., if the Disclosing Party is a corporation; all partners of the Disclosing Party, if the Disclosing Party is a general partnership; all general partners and limited partners of the Disclosing Party, if the Disclosing Party is a limited partnership; all managers, managing members and members of the Disclosing Party, if the Disclosing Party is a limited liability company; (2) all principal officers of the Disclosing Party; and (3) any person having more than a 7.5% ownership interest in the Disclosing Party. "Principal officers" means the president, chief operating officer, executive director, chief financial officer, treasurer or secretary of a legal entity or any person exercising similar authority.

Does the Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof currently have a "familial relationship" with an elected city official or department head?

Yes

No

If yes, please identify below (1) the name and title of such person, (2) the name of the legal entity to which such person is connected; (3) the name and title of the elected city official or department head to whom such person has a familial relationship, and (4) the precise nature of such familial relationship.

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Disclosing Party only has an indirect ownership interest in the Applicant.

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**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX B**

**BUILDING CODE SCOFFLAW/PROBLEM LANDLORD CERTIFICATION**

This Appendix is to be completed only by (a) the Applicant, and (b) any legal entity which has a direct ownership interest in the Applicant exceeding 7.5% (an "Owner"). It is not to be completed by any legal entity which has only an indirect ownership interest in the Applicant.

1. Pursuant to MCC Section 2-154-010, is the Applicant or any Owner identified as a building code scofflaw or problem landlord pursuant to MCC Section 2-92-416?

Yes                       No

2. If the Applicant is a legal entity publicly traded on any exchange, is any officer or director of the Applicant identified as a building code scofflaw or problem landlord pursuant to MCC Section 2-92-416?

Yes                       No                       The Applicant is not publicly traded on any exchange.

3. If yes to (1) or (2) above, please identify below the name of each person or legal entity identified as a building code scofflaw or problem landlord and the address of each building or buildings to which the pertinent code violations apply.

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Disclosing Party only has an indirect ownership interest in the Applicant.

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**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX C**

**PROHIBITION ON WAGE & SALARY HISTORY SCREENING - CERTIFICATION**

This Appendix is to be completed only by an Applicant that is completing this EDS as a “contractor” as defined in MCC Section 2-92-385. That section, which should be consulted ([www.amlegal.com](http://www.amlegal.com)), generally covers a party to any agreement pursuant to which they: (i) receive City of Chicago funds in consideration for services, work or goods provided (including for legal or other professional services), or (ii) pay the City money for a license, grant or concession allowing them to conduct a business on City premises.

On behalf of an Applicant that is a contractor pursuant to MCC Section 2-92-385, I hereby certify that the Applicant is in compliance with MCC Section 2-92-385(b)(1) and (2), which prohibit: (i) screening job applicants based on their wage or salary history, or (ii) seeking job applicants’ wage or salary history from current or former employers. I also certify that the Applicant has adopted a policy that includes those prohibitions.

Yes

No

N/A – I am not an Applicant that is a “contractor” as defined in MCC Section 2-92-385.

This certification shall serve as the affidavit required by MCC Section 2-92-385(c)(1).

If you checked “no” to the above, please explain.

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**EXHIBIT SECTION II. B. 2.**

<u>Name</u>	<u>Business Address</u>	<u>Percentage Indirect Interest in Amalgamated Bank of Chicago (the "Applicant")</u>
Robert M. Wrobel Trust dated November 13, 1997	Amalgamated Bank of Chicago 30 North LaSalle Street Chicago, Illinois 60602	27.43%
<b>Beneficiary</b>		
Robert M. Wrobel	Amalgamated Bank of Chicago 30 North LaSalle Street Chicago, Illinois 60602	



**SECTION II -- DISCLOSURE OF OWNERSHIP INTERESTS**

**A. NATURE OF THE DISCLOSING PARTY**

1. Indicate the nature of the Disclosing Party:

- Person
- Publicly registered business corporation
- Privately held business corporation
- Sole proprietorship
- General partnership
- Limited partnership
- Trust
- Limited liability company
- Limited liability partnership
- Joint venture
- Not-for-profit corporation  
(Is the not-for-profit corporation also a 501(c)(3))?  
 Yes       No
- Other (please specify)

2. For legal entities, the state (or foreign country) of incorporation or organization, if applicable:

TRUSTS GOVERNED BY ILLINOIS LAW.

3. For legal entities not organized in the State of Illinois: Has the organization registered to do business in the State of Illinois as a foreign entity?

- Yes
- No
- Organized in Illinois

**B. IF THE DISCLOSING PARTY IS A LEGAL ENTITY:**

1. List below the full names and titles, if applicable, of: (i) all executive officers and all directors of the entity; (ii) **for not-for-profit corporations**, all members, if any, which are legal entities (if there are no such members, write "no members which are legal entities"); (iii) **for trusts, estates or other similar entities**, the trustee, executor, administrator, or similarly situated party; (iv) **for general or limited partnerships, limited liability companies, limited liability partnerships or joint ventures**, each general partner, managing member, manager or any other person or legal entity that directly or indirectly controls the day-to-day management of the Applicant.

**NOTE:** Each legal entity listed below must submit an EDS on its own behalf.

Name	Title
DEBRA H. WROBEL	TRUSTEE

2. Please provide the following information concerning each person or legal entity having a direct or indirect, current or prospective (i.e. within 6 months after City action) beneficial interest (including ownership) in excess of 7.5% of the Applicant. Examples of such an interest include shares in a corporation, partnership interest in a partnership or joint venture, interest of a member or manager in a



Name (indicate whether retained or anticipated to be retained)	Business Address	Relationship to Disclosing Party (subcontractor, attorney, lobbyist, etc.)	Fees ( <u>indicate whether paid or estimated.</u> ) <b>NOTE:</b> "hourly rate" or "t.b.d." is not an acceptable response.
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(Add sheets if necessary)

Check here if the Disclosing Party has not retained, nor expects to retain, any such persons or entities.

**SECTION V -- CERTIFICATIONS**

**A. COURT-ORDERED CHILD SUPPORT COMPLIANCE**

Under MCC Section 2-92-415, substantial owners of business entities that contract with the City must remain in compliance with their child support obligations throughout the contract's term.

Has any person who directly or indirectly owns 10% or more of the Disclosing Party been declared in arrearage on any child support obligations by any Illinois court of competent jurisdiction?

Yes     No     No person directly or indirectly owns 10% or more of the Disclosing Party.

If "Yes," has the person entered into a court-approved agreement for payment of all support owed and is the person in compliance with that agreement?

Yes     No

**B. FURTHER CERTIFICATIONS**

1. [This paragraph 1 applies only if the Matter is a contract being handled by the City's Department of Procurement Services.] In the 5-year period preceding the date of this EDS, neither the Disclosing Party nor any Affiliated Entity [see definition in (5) below] has engaged, in connection with the performance of any public contract, the services of an integrity monitor, independent private sector inspector general, or integrity compliance consultant (i.e., an individual or entity with legal, auditing, investigative, or other similar skills, designated by a public agency to help the agency monitor the activity of specified agency vendors as well as help the vendors reform their business practices so they can be considered for agency contracts in the future, or continue with a contract in progress).

2. The Disclosing Party and its Affiliated Entities are not delinquent in the payment of any fine, fee, tax or other source of indebtedness owed to the City of Chicago, including, but not limited to, water and sewer charges, license fees, parking tickets, property taxes and sales taxes, nor is the Disclosing Party delinquent in the payment of any tax administered by the Illinois Department of Revenue.

3. The Disclosing Party and, if the Disclosing Party is a legal entity, all of those persons or entities identified in Section II(B)(1) of this EDS:

- a. are not presently debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded from any transactions by any federal, state or local unit of government;
- b. have not, during the 5 years before the date of this EDS, been convicted of a criminal offense, adjudged guilty, or had a civil judgment rendered against them in connection with: obtaining, attempting to obtain, or performing a public (federal, state or local) transaction or contract under a public transaction; a violation of federal or state antitrust statutes; fraud; embezzlement; theft; forgery; bribery; falsification or destruction of records; making false statements; or receiving stolen property;
- c. are not presently indicted for, or criminally or civilly charged by, a governmental entity (federal, state or local) with committing any of the offenses set forth in subparagraph (b) above;
- d. have not, during the 5 years before the date of this EDS, had one or more public transactions (federal, state or local) terminated for cause or default; and
- e. have not, during the 5 years before the date of this EDS, been convicted, adjudged guilty, or found liable in a civil proceeding, or in any criminal or civil action, including actions concerning environmental violations, instituted by the City or by the federal government, any state, or any other unit of local government.

4. The Disclosing Party understands and shall comply with the applicable requirements of MCC Chapters 2-56 (Inspector General) and 2-156 (Governmental Ethics).

5. Certifications (5), (6) and (7) concern:

- the Disclosing Party;
- any "Contractor" (meaning any contractor or subcontractor used by the Disclosing Party in connection with the Matter, including but not limited to all persons or legal entities disclosed under Section IV, "Disclosure of Subcontractors and Other Retained Parties");
- any "Affiliated Entity" (meaning a person or entity that, directly or indirectly: controls the Disclosing Party, is controlled by the Disclosing Party, or is, with the Disclosing Party, under common control of another person or entity). Indicia of control include, without limitation: interlocking management or ownership; identity of interests among family members, shared facilities and equipment; common use of employees; or organization of a business entity following the ineligibility of a business entity to do business with federal or state or local government, including the City, using substantially the same management, ownership, or principals as the ineligible entity. With respect to Contractors, the term Affiliated Entity means a person or entity that directly or indirectly controls the Contractor, is controlled by it, or, with the Contractor, is under common control of another person or entity;
- any responsible official of the Disclosing Party, any Contractor or any Affiliated Entity or any other official, agent or employee of the Disclosing Party, any Contractor or any Affiliated Entity, acting pursuant to the direction or authorization of a responsible official of the Disclosing Party, any Contractor or any Affiliated Entity (collectively "Agents").

Neither the Disclosing Party, nor any Contractor, nor any Affiliated Entity of either the Disclosing Party or any Contractor, nor any Agents have, during the 5 years before the date of this EDS, or, with respect to a Contractor, an Affiliated Entity, or an Affiliated Entity of a Contractor during the 5 years before the date of such Contractor's or Affiliated Entity's contract or engagement in connection with the Matter:

- a. bribed or attempted to bribe, or been convicted or adjudged guilty of bribery or attempting to bribe, a public officer or employee of the City, the State of Illinois, or any agency of the federal government or of any state or local government in the United States of America, in that officer's or employee's official capacity;
  - b. agreed or colluded with other bidders or prospective bidders, or been a party to any such agreement, or been convicted or adjudged guilty of agreement or collusion among bidders or prospective bidders, in restraint of freedom of competition by agreement to bid a fixed price or otherwise; or
  - c. made an admission of such conduct described in subparagraph (a) or (b) above that is a matter of record, but have not been prosecuted for such conduct; or
  - d. violated the provisions referenced in MCC Subsection 2-92-320(a)(4)(Contracts Requiring a Base Wage); (a)(5)(Debarment Regulations); or (a)(6)(Minimum Wage Ordinance).
6. Neither the Disclosing Party, nor any Affiliated Entity or Contractor, or any of their employees, officials, agents or partners, is barred from contracting with any unit of state or local government as a result of engaging in or being convicted of (1) bid-rigging in violation of 720 ILCS 5/33E-3; (2) bid-rotating in violation of 720 ILCS 5/33E-4; or (3) any similar offense of any state or of the United States of America that contains the same elements as the offense of bid-rigging or bid-rotating.
7. Neither the Disclosing Party nor any Affiliated Entity is listed on a Sanctions List maintained by the United States Department of Commerce, State, or Treasury, or any successor federal agency.
8. [FOR APPLICANT ONLY] (i) Neither the Applicant nor any "controlling person" [see MCC Chapter 1-23, Article I for applicability and defined terms] of the Applicant is currently indicted or charged with, or has admitted guilt of, or has ever been convicted of, or placed under supervision for, any criminal offense involving actual, attempted, or conspiracy to commit bribery, theft, fraud, forgery, perjury, dishonesty or deceit against an officer or employee of the City or any "sister agency"; and (ii) the Applicant understands and acknowledges that compliance with Article I is a continuing requirement for doing business with the City. NOTE: If MCC Chapter 1-23, Article I applies to the Applicant, that Article's permanent compliance timeframe supersedes 5-year compliance timeframes in this Section V.
9. [FOR APPLICANT ONLY] The Applicant and its Affiliated Entities will not use, nor permit their subcontractors to use, any facility listed as having an active exclusion by the U.S. EPA on the federal System for Award Management ("SAM").
10. [FOR APPLICANT ONLY] The Applicant will obtain from any contractors/subcontractors hired or to be hired in connection with the Matter certifications equal in form and substance to those in Certifications (2) and (9) above and will not, without the prior written consent of the City, use any such

contractor/subcontractor that does not provide such certifications or that the Applicant has reason to believe has not provided or cannot provide truthful certifications.

11. If the Disclosing Party is unable to certify to any of the above statements in this Part B (Further Certifications), the Disclosing Party must explain below:

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N/A.

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If the letters "NA," the word "None," or no response appears on the lines above, it will be conclusively presumed that the Disclosing Party certified to the above statements.

12. To the best of the Disclosing Party's knowledge after reasonable inquiry, the following is a complete list of all current employees of the Disclosing Party who were, at any time during the 12-month period preceding the date of this EDS, an employee, or elected or appointed official, of the City of Chicago (if none, indicate with "N/A" or "none").

NONE.

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13. To the best of the Disclosing Party's knowledge after reasonable inquiry, the following is a complete list of all gifts that the Disclosing Party has given or caused to be given, at any time during the 12-month period preceding the execution date of this EDS, to an employee, or elected or appointed official, of the City of Chicago. For purposes of this statement, a "gift" does not include: (i) anything made generally available to City employees or to the general public, or (ii) food or drink provided in the course of official City business and having a retail value of less than \$25 per recipient, or (iii) a political contribution otherwise duly reported as required by law (if none, indicate with "N/A" or "none"). As to any gift listed below, please also list the name of the City recipient.

NONE.

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### C. CERTIFICATION OF STATUS AS FINANCIAL INSTITUTION

1. The Disclosing Party certifies that the Disclosing Party (check one)

is  is not

a "financial institution" as defined in MCC Section 2-32-455(b).

2. If the Disclosing Party IS a financial institution, then the Disclosing Party pledges:

"We are not and will not become a predatory lender as defined in MCC Chapter 2-32. We further pledge that none of our affiliates is, and none of them will become, a predatory lender as defined in MCC Chapter 2-32. We understand that becoming a predatory lender or becoming an affiliate of a predatory lender may result in the loss of the privilege of doing business with the City."

If the Disclosing Party is unable to make this pledge because it or any of its affiliates (as defined in MCC Section 2-32-455(b)) is a predatory lender within the meaning of MCC Chapter 2-32, explain here (attach additional pages if necessary):

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If the letters "NA," the word "None," or no response appears on the lines above, it will be conclusively presumed that the Disclosing Party certified to the above statements.

**D. CERTIFICATION REGARDING FINANCIAL INTEREST IN CITY BUSINESS**

Any words or terms defined in MCC Chapter 2-156 have the same meanings if used in this Part D.

1. In accordance with MCC Section 2-156-110: To the best of the Disclosing Party's knowledge after reasonable inquiry, does any official or employee of the City have a financial interest in his or her own name or in the name of any other person or entity in the Matter?

Yes                       No

NOTE: If you checked "Yes" to Item D(1), proceed to Items D(2) and D(3). If you checked "No" to Item D(1), skip Items D(2) and D(3) and proceed to Part E.

2. Unless sold pursuant to a process of competitive bidding, or otherwise permitted, no City elected official or employee shall have a financial interest in his or her own name or in the name of any other person or entity in the purchase of any property that (i) belongs to the City, or (ii) is sold for taxes or assessments, or (iii) is sold by virtue of legal process at the suit of the City (collectively, "City Property Sale"). Compensation for property taken pursuant to the City's eminent domain power does not constitute a financial interest within the meaning of this Part D.

Does the Matter involve a City Property Sale?

Yes                       No

3. If you checked "Yes" to Item D(1), provide the names and business addresses of the City officials or employees having such financial interest and identify the nature of the financial interest:

Name	Business Address	Nature of Financial Interest
_____	_____	_____
_____	_____	_____
_____	_____	_____

4. The Disclosing Party further certifies that no prohibited financial interest in the Matter will be acquired by any City official or employee.

E. CERTIFICATION REGARDING SLAVERY ERA BUSINESS

Please check either (1) or (2) below. If the Disclosing Party checks (2), the Disclosing Party must disclose below or in an attachment to this EDS all information required by (2). Failure to comply with these disclosure requirements may make any contract entered into with the City in connection with the Matter voidable by the City.

X 1. The Disclosing Party verifies that the Disclosing Party has searched any and all records of the Disclosing Party and any and all predecessor entities regarding records of investments or profits from slavery or slaveholder insurance policies during the slavery era (including insurance policies issued to slaveholders that provided coverage for damage to or injury or death of their slaves), and the Disclosing Party has found no such records.

       2. The Disclosing Party verifies that, as a result of conducting the search in step (1) above, the Disclosing Party has found records of investments or profits from slavery or slaveholder insurance policies. The Disclosing Party verifies that the following constitutes full disclosure of all such records, including the names of any and all slaves or slaveholders described in those records:

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**SECTION VI -- CERTIFICATIONS FOR FEDERALLY FUNDED MATTERS**

**NOTE: If the Matter is federally funded, complete this Section VI. If the Matter is not federally funded, proceed to Section VII. For purposes of this Section VI, tax credits allocated by the City and proceeds of debt obligations of the City are not federal funding.**

A. CERTIFICATION REGARDING LOBBYING

1. List below the names of all persons or entities registered under the federal Lobbying Disclosure Act of 1995, as amended, who have made lobbying contacts on behalf of the Disclosing Party with respect to the Matter: (Add sheets if necessary):

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(If no explanation appears or begins on the lines above, or if the letters "NA" or if the word "None" appear, it will be conclusively presumed that the Disclosing Party means that NO persons or entities registered under the Lobbying Disclosure Act of 1995, as amended, have made lobbying contacts on behalf of the Disclosing Party with respect to the Matter.)

2. The Disclosing Party has not spent and will not expend any federally appropriated funds to pay any person or entity listed in paragraph A(1) above for his or her lobbying activities or to pay any person or entity to influence or attempt to influence an officer or employee of any agency, as defined by applicable federal law, a member of Congress, an officer or employee of Congress, or an employee

of a member of Congress, in connection with the award of any federally funded contract, making any federally funded grant or loan, entering into any cooperative agreement, or to extend, continue, renew, amend, or modify any federally funded contract, grant, loan, or cooperative agreement.

3. The Disclosing Party will submit an updated certification at the end of each calendar quarter in which there occurs any event that materially affects the accuracy of the statements and information set forth in paragraphs A(1) and A(2) above.

4. The Disclosing Party certifies that either: (i) it is not an organization described in section 501(c)(4) of the Internal Revenue Code of 1986; or (ii) it is an organization described in section 501(c)(4) of the Internal Revenue Code of 1986 but has not engaged and will not engage in "Lobbying Activities," as that term is defined in the Lobbying Disclosure Act of 1995, as amended.

5. If the Disclosing Party is the Applicant, the Disclosing Party must obtain certifications equal in form and substance to paragraphs A(1) through A(4) above from all subcontractors before it awards any subcontract and the Disclosing Party must maintain all such subcontractors' certifications for the duration of the Matter and must make such certifications promptly available to the City upon request.

#### B. CERTIFICATION REGARDING EQUAL EMPLOYMENT OPPORTUNITY

If the Matter is federally funded, federal regulations require the Applicant and all proposed subcontractors to submit the following information with their bids or in writing at the outset of negotiations.

Is the Disclosing Party the Applicant?

Yes

No

If "Yes," answer the three questions below:

1. Have you developed and do you have on file affirmative action programs pursuant to applicable federal regulations? (See 41 CFR Part 60-2.)

Yes

No

2. Have you filed with the Joint Reporting Committee, the Director of the Office of Federal Contract Compliance Programs, or the Equal Employment Opportunity Commission all reports due under the applicable filing requirements?

Yes

No

Reports not required

3. Have you participated in any previous contracts or subcontracts subject to the equal opportunity clause?

Yes

No

If you checked "No" to question (1) or (2) above, please provide an explanation:

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## SECTION VII -- FURTHER ACKNOWLEDGMENTS AND CERTIFICATION

The Disclosing Party understands and agrees that:

A. The certifications, disclosures, and acknowledgments contained in this EDS will become part of any contract or other agreement between the Applicant and the City in connection with the Matter, whether procurement, City assistance, or other City action, and are material inducements to the City's execution of any contract or taking other action with respect to the Matter. The Disclosing Party understands that it must comply with all statutes, ordinances, and regulations on which this EDS is based.

B. The City's Governmental Ethics Ordinance, MCC Chapter 2-156, imposes certain duties and obligations on persons or entities seeking City contracts, work, business, or transactions. The full text of this ordinance and a training program is available on line at [www.cityofchicago.org/Ethics](http://www.cityofchicago.org/Ethics), and may also be obtained from the City's Board of Ethics, 740 N. Sedgwick St., Suite 500, Chicago, IL 60610, (312) 744-9660. The Disclosing Party must comply fully with this ordinance.

C. If the City determines that any information provided in this EDS is false, incomplete or inaccurate, any contract or other agreement in connection with which it is submitted may be rescinded or be void or voidable, and the City may pursue any remedies under the contract or agreement (if not rescinded or void), at law, or in equity, including terminating the Disclosing Party's participation in the Matter and/or declining to allow the Disclosing Party to participate in other City transactions. Remedies at law for a false statement of material fact may include incarceration and an award to the City of treble damages.

D. It is the City's policy to make this document available to the public on its Internet site and/or upon request. Some or all of the information provided in, and appended to, this EDS may be made publicly available on the Internet, in response to a Freedom of Information Act request, or otherwise. By completing and signing this EDS, the Disclosing Party waives and releases any possible rights or claims which it may have against the City in connection with the public release of information contained in this EDS and also authorizes the City to verify the accuracy of any information submitted in this EDS.

E. The information provided in this EDS must be kept current. In the event of changes, the Disclosing Party must supplement this EDS up to the time the City takes action on the Matter. If the Matter is a contract being handled by the City's Department of Procurement Services, the Disclosing Party must update this EDS as the contract requires. **NOTE:** With respect to Matters subject to MCC Chapter 1-23, Article I (imposing **PERMANENT INELIGIBILITY** for certain specified offenses), the information provided herein regarding eligibility must be kept current for a longer period, as required by MCC Chapter 1-23 and Section 2-154-020.

**CERTIFICATION**

Under penalty of perjury, the person signing below: (1) warrants that he/she is authorized to execute this EDS, and all applicable Appendices, on behalf of the Disclosing Party, and (2) warrants that all certifications and statements contained in this EDS, and all applicable Appendices, are true, accurate and complete as of the date furnished to the City.

DEBRA H. WROBEL TRUST DATED NOVEMBER 13, 1997.

(Print or type exact legal name of Disclosing Party)

By: *[Signature]*  
(Sign here)

DEBRA H. WROBEL, as Trustee

(Print or type name of person signing)

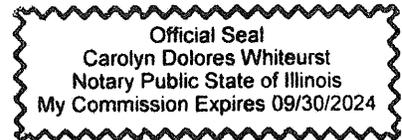
\_\_\_\_\_  
(Print or type title of person signing)

Signed and sworn to before me on (date) November 3, 2021,

at Cook County, Illinois (state).

*Carolyn Dolores Whiteurst*  
Notary Public

Commission expires: 09/30/2024



**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX A**

**FAMILIAL RELATIONSHIPS WITH ELECTED CITY OFFICIALS  
AND DEPARTMENT HEADS**

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Under MCC Section 2-154-015, the Disclosing Party must disclose whether such Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof currently has a "familial relationship" with any elected city official or department head. A "familial relationship" exists if, as of the date this EDS is signed, the Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof is related to the mayor, any alderman, the city clerk, the city treasurer or any city department head as spouse or domestic partner or as any of the following, whether by blood or adoption: parent, child, brother or sister, aunt or uncle, niece or nephew, grandparent, grandchild, father-in-law, mother-in-law, son-in-law, daughter-in-law, stepfather or stepmother, stepson or stepdaughter, stepbrother or stepsister or half-brother or half-sister.

"Applicable Party" means (1) all executive officers of the Disclosing Party listed in Section II.B.1.a., if the Disclosing Party is a corporation; all partners of the Disclosing Party, if the Disclosing Party is a general partnership; all general partners and limited partners of the Disclosing Party, if the Disclosing Party is a limited partnership; all managers, managing members and members of the Disclosing Party, if the Disclosing Party is a limited liability company; (2) all principal officers of the Disclosing Party; and (3) any person having more than a 7.5% ownership interest in the Disclosing Party. "Principal officers" means the president, chief operating officer, executive director, chief financial officer, treasurer or secretary of a legal entity or any person exercising similar authority.

Does the Disclosing Party or any "Applicable Party" or any Spouse or Domestic Partner thereof currently have a "familial relationship" with an elected city official or department head?

Yes

No

If yes, please identify below (1) the name and title of such person, (2) the name of the legal entity to which such person is connected; (3) the name and title of the elected city official or department head to whom such person has a familial relationship, and (4) the precise nature of such familial relationship.

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Disclosing Party only has an indirect ownership interest in the Applicant.

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**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX B**

**BUILDING CODE SCOFFLAW/PROBLEM LANDLORD CERTIFICATION**

This Appendix is to be completed only by (a) the Applicant, and (b) any legal entity which has a direct ownership interest in the Applicant exceeding 7.5% (an "Owner"). It is not to be completed by any legal entity which has only an indirect ownership interest in the Applicant.

1. Pursuant to MCC Section 2-154-010, is the Applicant or any Owner identified as a building code scofflaw or problem landlord pursuant to MCC Section 2-92-416?

Yes                       No

2. If the Applicant is a legal entity publicly traded on any exchange, is any officer or director of the Applicant identified as a building code scofflaw or problem landlord pursuant to MCC Section 2-92-416?

Yes                       No                       The Applicant is not publicly traded on any exchange.

3. If yes to (1) or (2) above, please identify below the name of each person or legal entity identified as a building code scofflaw or problem landlord and the address of each building or buildings to which the pertinent code violations apply.

---

Disclosing Party only has an indirect ownership interest in the Applicant.

---

**CITY OF CHICAGO  
ECONOMIC DISCLOSURE STATEMENT AND AFFIDAVIT  
APPENDIX C**

**PROHIBITION ON WAGE & SALARY HISTORY SCREENING - CERTIFICATION**

This Appendix is to be completed only by an Applicant that is completing this EDS as a “contractor” as defined in MCC Section 2-92-385. That section, which should be consulted ([www.amlegal.com](http://www.amlegal.com)), generally covers a party to any agreement pursuant to which they: (i) receive City of Chicago funds in consideration for services, work or goods provided (including for legal or other professional services), or (ii) pay the City money for a license, grant or concession allowing them to conduct a business on City premises.

On behalf of an Applicant that is a contractor pursuant to MCC Section 2-92-385, I hereby certify that the Applicant is in compliance with MCC Section 2-92-385(b)(1) and (2), which prohibit: (i) screening job applicants based on their wage or salary history, or (ii) seeking job applicants’ wage or salary history from current or former employers. I also certify that the Applicant has adopted a policy that includes those prohibitions.

Yes

No

N/A – I am not an Applicant that is a “contractor” as defined in MCC Section 2-92-385.

This certification shall serve as the affidavit required by MCC Section 2-92-385(c)(1).

If you checked “no” to the above, please explain.

---

---

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**EXHIBIT SECTION II. B. 2.**

<b><u>Name</u></b>	<b><u>Business Address</u></b>	<b>Percentage Indirect Interest in Amalgamated Bank of Chicago (the "Applicant")</b>
Debra H. Wrobel Trust dated November 13, 1997, as amended on March 16, 2006	Amalgamated Bank of Chicago 30 North LaSalle Street Chicago, Illinois 60602	8.85%

**Beneficiary**

Debra H. Wrobel	Amalgamated Bank of Chicago 30 North LaSalle Street Chicago, Illinois 60602
-----------------	---

**Anti-Predatory Lending Pledge\*  
for Municipal Depositories**

We pledge that we are not and will not become a predatory lender as defined in Chapter 2-32 of the Municipal Code of Chicago. We further pledge that none of our affiliates is, and none of them will become, a predatory lender as defined in Chapter 2-32 of the Municipal Code of Chicago. We understand that becoming a predatory lender or becoming an affiliate of a predatory lender may result in the loss of our designation as a municipal depository.

Amalgamated Bank of Chicago

Name of Financial Institution

Richard Wojtecki

Signature of Authorized Officer

Sr Exec Vice President/Chief Credit Officer

Title

Richard J. Wojtecki

Name of Authorized Officer (Print or Type)

312-822-3207

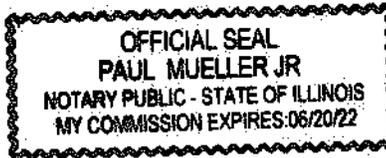
Business Telephone Number

Subscribed and sworn to before me this

14<sup>th</sup> day of OCTOBER, 2021

Paul Mueller Jr.

Notary Public



Date: 10/14/21

Name of transaction for which this certificate is submitted: RFP for the City of Chicago

Contact Person: Trina M. Tyler

Address: 30 N. LaSalle Street, 38th Floor

Chicago, IL 60602

Telephone: 312-822-3134

\*The definitions of certain terms set forth in Chapter 2-32 of the Municipal Code of Chicago and used in the Anti-Predatory Lending Pledge are reproduced on the attached pages.

**Loan Policy Pledge for Municipal Depositories**

We pledge not to arbitrarily reject mortgage loans for residential properties within a specific geographic area in Chicago because of the location and/or age of the property, or in the case of proposed borrower to arbitrarily vary the terms of those loans or the application procedures for those loans on the basis of race, color, religion, national origin, age, sex, marital status, ancestry, sexual orientation, parental status, source of income, disability or military discharge status. In addition, we pledge to make loans available to low- and moderate-income residential property in the neighborhoods of the City of Chicago within the limits of our legal restriction and prudent financial practices.

We understand that arbitrarily rejecting or varying the terms and/or application procedures of mortgage loans on the basis of the factors listed above may result in the lost of our designation as a municipal depository.

Amalgamated Bank of Chicago

Name of Financial Institution

*Richard Wojtecki*

Signature of Authorized Officer

Sr. Exec Vice President/Chief Credit Officer

Title

Richard Wojtecki

Name of Authorized Officer (Print or Type)

312-822-3207

Business Telephone Number

Subscribed and sworn to before me this

14<sup>th</sup> day of OCTOBER, 2021

*Paul Mueller Jr*

Notary Public



Date: 10/14/21

Name of transaction for which this certificate is submitted: RFP for the City of Chicago

Contact Person: Trina M. Tyler, AVP

Address: 30 N. LaSalle Street, 38th Flr  
Chicago, IL 60602

Telephone: 312-822-3134

**Compliance with Vacant Buildings Code Pledge  
For Municipal Depositories**

We are in compliance with the reporting requirements in regard to vacant property as defined in Section 13-12-125 of the Municipal Code of Chicago. We further pledge we will maintain vacant properties in compliance with the Chicago Building Code as defined in Section 13-12-135 of the Municipal Code of Chicago. We understand that failing to adhere to these requirements or becoming an affiliate of an offender of these requirements may result in the loss of our designation as a municipal depository.

Amalgamated Bank of Chicago

Name of Financial Institution

*Richard J. Wojtecki*

Signature of Authorized Official

Richard J. Wojtecki

Name of Authorized Officer  
(Print or Type)

Sr. Exec Vice President/Chief Credit Officer

Title

312-822-3207

Business Telephone Number

Subscribed and sworn to before me this

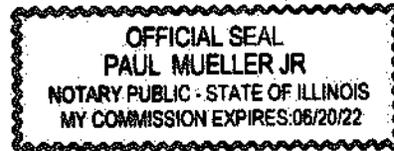
14<sup>TH</sup> day of OCTOBER, 20 21

*Paul Mueller Jr*

Notary Public

10/14/21

Date



Contact Person: Trina M. Tyler, AVP

Address: 30 N. LaSalle Street, 38th Flr  
Chicago, IL 60602

Telephone: 312-822-3134

# QUESTIONNAIRE

To facilitate the City's analysis of the data that you have provided on Disclosure Forms A (1) - G, please provide the information requested below:

1. List all credit instruments or types of credit that you have included within or under the following lending categories:

Consumer Lending:

**Car Loans**  
**Home Equity Lines of Credit**  
**Secured Installment Loans**  
**Home Mortgage Loans – Purchases & Refinancing's**

Commercial Lending:

**Lines of Credit Secured by Business Assets**  
**Equipment Loans**  
**Real Estate Loans of Investment and Owner Occupied Property**

2. List all types of accounts that you have included as:

Savings Accounts:

**Regular Savings**  
**Premium Savings**  
**Advantage Savings**  
**Exclusive Savings**  
**Money Market**  
**Certificates of Deposit**

Checking Accounts:

**Economy Checking**  
**Regular Checking**  
**Checking Plus**

**AFFIDAVIT OF COMMITMENT TO COMMUNITY REINVESTMENT,  
RESPONSIBILITY AND TRANSPARENCY  
CITY OF CHICAGO OFFICE OF THE COMPTROLLER**

I, Richard Wojtecki a duly authorized representative of Amalgamated Bank of Chicago represent and say as follows:

That for the purpose of becoming an eligible depository for active deposits of the City of Chicago, the undersigned Affiant states that it will use reasonable efforts to provide lending, financing, and banking opportunities as a commitment of community reinvestment to Chicago's low and moderate income (LMI) communities; Affiant states that such reasonable efforts shall include, but are not limited to:

- A. Assignment of identifiable personnel to answer and respond to questions, concerns and inquiries by the citizens of Chicago, City Treasurer, City Comptroller, and the City Council regarding financial services, investment and lending products, services and related issues, including the Community Reinvestment Act (CRA) of 1977;
- B. Cooperate with and support non-profit neighborhood development/redevelopment organizations in the implementation of "neighborhood economic development" strategies that focus on revitalization of communities that are more locally focused where an institution has a branch or market presence;
- C. Commit to affirmatively market and make available banking services throughout Chicago's low and moderate income communities, by not meeting this commitment only through the installation of ATM distribution centers, but also by opening and/or maintaining branch locations within those communities;
- D. Prepare an annual report of CRA activities, presented to the Comptroller, the Treasurer, and the City Council, that is made publicly available, demonstrating investment in all Chicago Communities, as well as reinvestment in LMI communities of Chicago, by community area that includes the number of loans and amount of loans in the following (6) categories:
  1. Home Purchase within LMI communities;
  2. Refinancing within LMI communities;
  3. Home Improvement;
  4. Small Business Loans (to companies with revenues under \$1 Million);
  5. Community Development Loans including multi-family lending; and
  6. Community Development Investments to eligible Community Development Financial Institutions (CDFI) and other community intermediaries to further the goals of an institution to meet its obligations to the Community Reinvestment Act of 1977 and this Affidavit.

Such a Municipal Depository annual CRA report will include, by community area, the number of mortgage loans originated and other strategies to minimize the impact of foreclosure and neighborhood instability.

- E. An institution acknowledges that failure to comply with this Affidavit may result in discontinued status as a municipal depository.

Signed: \_\_\_\_\_

*Richard J. Wojtecki*

Dated: \_\_\_\_\_

*10/14/21*

Print Name: \_\_\_\_\_

*Richard J. Wojtecki*

Title: \_\_\_\_\_

*Sr. EVP*

**DEMOGRAPHICS AFFIDAVIT**

Name of Applicant firm: Amalgamated Bank of Chicago

Description of Matter: **Designation as a 2022 Municipal Depository for City of Chicago and Chicago Board of Education Funds**

Role of Applicant: **Municipal Depository**

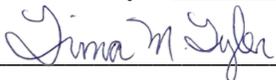
**Fill out below (and attach additional sheets using the same format, if necessary), the following information for each person in the Applicant’s firm who will directly provide professional services to the City in connection with the Matter described above: the individual’s position in the Applicant’s firm and their role in the Matter, gender, and race or ethnicity. Individuals’ names need not be disclosed.**

Count	Position and Role	Gender	Race/Ethnicity
1	AVP/Relationship Manager	F	Black/African American
2	Exec Senior VP/Operations	M	Caucasian
3	Senior VP/Department Manager	M	Caucasian
4	VP Operations	F	Caucasian
5	Administrative Assistant	F	Caucasian

*(If needed, please use additional sheets to identify additional personnel.)*

By signing below, I represent under penalty of perjury that: (1) I am authorized to act on behalf of the Applicant; (2) the information in this Affidavit (and associated attachment, if applicable) are true, complete, and correct; and (3) failure to accurately and completely provide the information requested herein may result in a declaration of ineligibility to participate in future Matters for the City of Chicago.

Printed Name: Trina M. Tyler

Signature: 

Title: AVP Union and Government Services

Date: November 4, 2021

**FIRMWIDE**

**PLEASE POPULATE THE HIGHLIGHTED PORTIONS ONLY**

Firm Name:	Amalgamated Bank of Chicago
Primary Representative:	
Primary Representative Email and Telephone:	
Headquarters Address:	30 N. LaSalle Street
Chicago Public Finance Office Address:	
Total Number of Employees:	
Number of Employees in Illinois:	153
Number of Employees in Chicago:	148
Capital Position:	
Minority Designation:	

Job Categories	58 Male							95 Female						
	Overall Totals	White (Not Hispanic)	Black (Not Hispanic)	Hispanic	Asian	Native American	Two or More Races	White (Not Hispanic)	Black (Not Hispanic)	Hispanic	Asian	Native American	Two or More Races	
Officials and Managers	76	27	4	5	3	0	0	15	15	6	1	0	0	
Professionals	42	4	2	4	0	0	0	9	19	4	0	0	0	
Technicians	0	0	0	0	0	0	0	0	0	0	0	0	0	
Sales Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	
Office and Clerical	35	3	4	2	0	0	0	6	14	6	0	0	0	
Craft Workers (Skilled)	0	0	0	0	0	0	0	0	0	0	0	0	0	
Operatives (Semi-Skilled)	0	0	0	0	0	0	0	0	0	0	0	0	0	
Laborers	0	0	0	0	0	0	0	0	0	0	0	0	0	
Service Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	
<b>Total</b>	<b>153</b>	<b>34</b>	<b>10</b>	<b>11</b>	<b>3</b>	<b>0</b>	<b>0</b>	<b>30</b>	<b>48</b>	<b>16</b>	<b>1</b>	<b>0</b>	<b>0</b>	

Job Categories	Overall Totals	White (Not Hispanic)	Black (Not Hispanic)	Hispanic	Asian	Native American	Two or More Races
Officials and Managers	50%	27%	12%	7%	3%	0%	0%
Professionals	27%	8%	14%	5%	0%	0%	0%
Technicians	0%	0%	0%	0%	0%	0%	0%
Sales Workers	0%	0%	0%	0%	0%	0%	0%
Office and Clerical	23%	6%	12%	5%	0%	0%	0%
Craft Workers (Skilled)	0%	0%	0%	0%	0%	0%	0%
Operatives (Semi-Skilled)	0%	0%	0%	0%	0%	0%	0%
Laborers	0%	0%	0%	0%	0%	0%	0%
Service Workers	0%	0%	0%	0%	0%	0%	0%
<b>Total</b>	<b>100%</b>	<b>42%</b>	<b>38%</b>	<b>18%</b>	<b>3%</b>	<b>0%</b>	<b>0%</b>

Male	Female	Total
38%	62%	100%



November 12, 2021

Mr. Steve Sakai  
City Comptroller  
City of Chicago  
Department of Finance  
121 North LaSalle Street, 7<sup>th</sup> Flr.  
Chicago, IL 60602-1246

Re: Request for Proposal for Payment of Interest on the Monies of the City of Chicago and Chicago Board of Education– Fiscal Year 2022

Dear Mr. Sakai:

The Amalgamated Bank of Chicago is pleased to respond to the noted RFP. We have served as a Depository Bank for the City of Chicago and Board of Education Funds for over forty years and look forward to continuing to serve in this capacity. Addendums #1 & #3 were received and reviewed along with the filing instructions, Guide for HMDA data collected in 2020.

We thank you for the opportunity to submit this RFP response and look forward to continuing to support the banking needs of the City of Chicago and the Chicago Board of Education Funds in the future.

Sincerely,

A handwritten signature in blue ink that reads "Trina M. Tyler". The signature is fluid and cursive.

Trina M. Tyler  
AVP, Government & Union Services  
[ttyler@aboc.com](mailto:ttyler@aboc.com)  
312-822-3134

CC: City Treasurer, City of Chicago  
Attn: Mauricio Banuelos  
City Hall, Treasurer's Office, Room 106  
121 N. LaSalle Street  
Chicago, IL 60602-1242



### **FDIC COVERAGE**

The FDIC coverage rate for deposited balances is \$250,000.

### **LIQUIDITY MANAGEMENT OPTION**

The Amalgamated Bank offers an enhanced cash investment product that allows for higher returns but also provides liquidity.

### **ONLINE BANKING**

Amalgamated Bank's Internet Balance Reporting Service, ABOC Link, provides our commercial and municipal customers with the ability to view and manage their accounts 24 hours a day, seven days a week. Account activity can be formatted and downloaded from this site. Customers can designate two administrators who would have the authority to designate other users. The administrator(s) can establish restrictions (by user) as to specific accounts that can be viewed, functions that can be accessed and daily transaction dollar limits if users are granted funds movement access.

The system also allows for multiple levels of authority for transactions involving funds movement. Current day data includes all electronic transactions which are shown as memo activity. Data is available for viewing 24 hours a day, seven days a week and updated real time throughout each day. Balance and detailed information is stored for online viewing for a maximum of 60 days. This includes the previous statement cycle and the current cycle to month to date. We use a multi-factor authentication process as well as SSL encryption for communication purposes.

## **STATEMENT OF COMMUNITY INVOLVEMENT**

The Amalgamated Bank of Chicago has a long history of engagement and support of Civic, Cultural, Educational and Social Service Organizations in the City of Chicago. A sampling of such organizations includes, but is not limited to the following:

- **Chicago Community Loan Fund**
- **Accion Chicago**
- **BBF Family Services**
- **Midwest Community Council**
- **Chicago Urban League**
- **Chicago Chapter NAACP**
- **Chicago Public Schools**
- **City Colleges of Chicago**
- **Chicago Summer Business Institute (CSBI)**
- **Anti-Defamation League**
- **After School Matters**
- **Arise Chicago**
- **The Menta Group**
- **Illinois Department of Corrections, Financial Literacy Program**

## 2021 CRA Public File

A list of Amalgamated Bank of Chicago's branches, their street addresses and geographies:

1.  
30 N. LaSalle Street  
Chicago, Illinois 60602  
Geography:  
City Name: Chicago  
State Abbr: IL  
Zip Code: 60602  
MSA/MD Code: 16974  
State Code: 17  
County Code: 031  
Tract Code: 8391.00
  
2.  
Warrenville Branch  
28600 Bella Vista Parkway  
Warrenville, Illinois 60555  
Geography:  
City: Warrenville  
State Abbr: IL  
Zip Code: 60555  
MSA/MD Code: 16974  
State Code: 17  
County Code: 043  
Tract Code: 8464.13

**AMALGAMATED BANK OF CHICAGO  
HELOC LOANS BY CENSUS TRACT**

<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>Census Tract #</u></b>	<b><u>Loan Amount</u></b>
January 2021	Chicago	0308.00	\$380,000.00
February 2021	Chicago	0715.00	\$207,000.00
February 2021	Park Ridge	8057.02	\$ 41,000.00
February 2021	Chicago	3901.00	\$130,000.00
February 2021	Winnetka	8003.00	\$195,000.00
March 2021	Burbank	8391.00	\$ 54,000.00
March 2021	Chicago	8211.02	\$150,000.00
April 2021	Woodridge	8463.02	\$160,000.00
May 2021	Chicago	7404.00	\$ 60,000.00
May 2021	Chicago	5610.00	\$ 40,000.00
May 2021	Northbrook	8018.00	\$200,000.00
May 2021	Chicago	7504.00	\$ 46,000.00
May 2021	Glen Ellyn	8423.00	\$ 75,000.00
June 2021	Streamwood	8043.10	\$280,000.00
June 2021	Lake Zurich	8644.07	\$150,000.00
June 2021	South Elgin	8521.01	\$100,000.00
July 2021	Oak Park	8626.00	\$100,000.00
July 2021	Glen Ellyn	8420.00	\$225,000.00
July 2021	Chicago	3801.00	\$ 40,000.00
August 2021	Chicago	1003.00	\$ 75,000.00
September 2021	Winfield	8418.02	\$ 40,000.00
September 2021	LaGrange Highlands	8201.01	\$ 36,756.43

(Form of Safekeeping Agreement)  
**Pledgee Agreement Form**

To: Federal Reserve Bank of Boston  
600 Atlantic Avenue  
Boston, MA 02210  
Attn: Wholesale Operations/Joint Custody

Tel: 800-327-0147, Option #4  
Fax: 877-973-8972

Date: \_\_\_\_\_

We, the \_\_\_\_\_ agree to the terms of Appendix C of your *Operating Circular 7*, dated August 19, 2005, as it may be amended from time to time with respect to the account on your books designated \_\_\_\_\_ (4 digit alpha-numeric account number)

We further agree that you may accept par for par substitutions: securities from the Pledgor as a replacement of, or in substitution for, those securities presently held (please check one):

NO (Instructions required for each withdrawal)

YES (Standing approval)

Provided that the replacement or substitution does not reduce the aggregate par amount of securities held in custody for us. (See *Operating Circular 7, Appendix C, Section 4.3.*)

We authorize you to use the following call-back procedure for securities transactions pertaining to this account (please check one):

Three-party call-back

Four-party call-back

We certify that the individuals listed below may take authoritative action on our behalf with respect to the account, including a direction to release collateral from the account. You may rely on the authority of these individuals with respect to the account until we otherwise notify you.

Telephone: \_\_\_\_\_

Print Name: \_\_\_\_\_ Title: \_\_\_\_\_

Fax: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Telephone: \_\_\_\_\_

Print Name: \_\_\_\_\_ Title: \_\_\_\_\_

Fax: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Telephone: \_\_\_\_\_

Print Name: \_\_\_\_\_ Title: \_\_\_\_\_

Fax: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Pledgee Agreement  
(page 2 of 2)

Telephone: \_\_\_\_\_

Print Name: \_\_\_\_\_ Title: \_\_\_\_\_

Fax: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

The Undersigned hereby certifies that he/she is the present lawful incumbent of the designated public office.

**Pledgee**

\_\_\_\_\_  
Name of governmental unit

\_\_\_\_\_  
Street Address or P.O. Box Number

\_\_\_\_\_  
City, State, Zip Code

\_\_\_\_\_  
Official Signature/ Date

\_\_\_\_\_  
Printed Name and Title

**Notary**

State of \_\_\_\_\_

County of \_\_\_\_\_

On this \_\_\_\_ day of \_\_\_\_\_, 20\_\_ before me personally appeared \_\_\_\_\_, to me personally known or satisfactorily proven, who by me duly sworn, did depose and say that he/she resides at \_\_\_\_\_, in the City of \_\_\_\_\_, in the State of \_\_\_\_\_, that he/she is the \_\_\_\_\_ [Title] of \_\_\_\_\_ and that he/she executed this document on behalf of \_\_\_\_\_ before me.

\_\_\_\_\_  
(Signature of Notary)

\_\_\_\_\_  
(Print name of Notary)

My commission expires on \_\_\_\_\_ [Date]

## Instructions for Completing a Pledgee Agreement & Authorization List

Please retain a blank copy of the Pledgee Agreement for future use and a copy of the completed form for your records.

Please type or print in ink the following information in the appropriate sections of the form

- Please list the name of your entity, as it appears on your statements, on the blank line in the first sentence. (e.g. We, the "Town of Plainville")
- Pledgee number is the four-character identifier that begins with an alpha character, is assigned by the Federal Reserve Bank, and can be found on your statement as the Institution ID. If this is a request to open a new account, please write "NEW".
- To allow substitution of collateral, check the box YES to permit financial institutions that pledge collateral to you to replace or substitute collateral at the same or greater current value (par for par) without your having to approve each transaction:
  - Replacement collateral must be deposited the same day that the request to release the collateral is made. At no time are you at risk of being under-collateralized. No collateral will be released without a qualifying substitution or your approval.
  - FRB staff will calculate the current book value of the replacement collateral and ensure that it is of equal or greater value to the collateral it is replacing.
  - A Pledgee Activity statement will be sent to you as notification that a substitution has been completed.
- Select NO to approve each and every individual transaction.
- Call-back procedure refers to the number of Authorized Individuals who must approve a release of collateral. By checking the box for three-party call-back, you are indicating that one individual from your organization can initiate a collateral transaction and that same person can also verify the transaction. By checking the box for four-party call-back, you are indicating that two individuals from your organization are required for every approval: one individual can initiate the transaction but a second must verify it. (In both cases, the other two parties are Federal Reserve individuals.)
- Name, title, signature, fax and telephone numbers of each individual authorized to release securities pledged to this public entity and held in a joint custody account at the Federal Reserve Bank. This list will be used to verify the authenticity of instructions to release pledged securities. Please provide at least three names and as many additional people as you need to accommodate vacations, illness, turnover, etc. Please list them in the order you prefer they be contacted.

## Instructions for Completing a Pledgee Agreement (page 2 of 2)

- **Signature, name, and title of the officer who is authorized to designate the listed individuals.** We recommend that the officer not be included on this list as one of the persons authorized to release securities. By signing this form, the officer authorizes the individuals listed to release pledged securities. This signature must be notarized.
- **Notary Information with seal** must be obtained to validate the authenticity of the signature of the approving officer.
- **Please Return the completed Pledge Agreement to:**

**Federal Reserve Bank of Boston  
600 Atlantic Avenue  
Boston, MA 02210  
Attn: Wholesale Operations/Joint Custody**

**Or fax toll-free to: 877-973-8972**

**If you have questions or require assistance, please call a customer support representative: 800-327-0147, option 4.**

**You can view Operating Circular 7 at the following web address:  
[www.frbsecurities.org/OperatingCirculars/pdf/Oc7.pdf](http://www.frbsecurities.org/OperatingCirculars/pdf/Oc7.pdf)**

# **PUBLIC DISCLOSURE**

May 26, 2020

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Amalgamated Bank of Chicago  
Certificate Number: 903

30 North LaSalle Street  
Chicago, Illinois 60602

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Chicago Regional Office

300 South Riverside Plaza, Suite 1700  
Chicago, Illinois 60606

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 RATING

**INSTITUTION'S CRA RATING:** This institution is rated Satisfactory.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area (AA), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Amalgamated Bank of Chicago's performance under the Community Reinvestment Act (CRA) was evaluated under the Interagency Large Bank Examination Procedures, which includes the Lending, Investment, and Service Tests and resulted in the overall rating. The conclusions drawn in support of the rating are noted below.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	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 Lending Test is rated Low Satisfactory.

- Lending levels reflect adequate responsiveness to AA credit needs.
- A high percentage of loans were originated in the institution's AA.
- The distribution of loans to borrowers reflects, given the product lines offered by the institution, adequate penetration among businesses of different sizes and retail customers of different income levels.
- The geographic distribution of loans reflects adequate penetration of small business and home mortgage loans throughout the AA.
- The institution makes use of innovative and flexible lending practices in order to serve AA credit needs.
- The institution is a leader in making community development loans.
- The institution exhibits an adequate record of servicing the credit needs of the most economically disadvantaged areas of its AA, low-income individuals, and very small businesses, consistent with safe and sound banking practices.

The Investment Test is rated Low Satisfactory.

- The institution has an adequate level of qualified community development investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.
- The institution exhibits adequate responsiveness to credit and community economic development needs.
- The institution occasionally uses innovative and/or complex investments to support community development initiatives.

The Service Test is rated Low Satisfactory.

- Delivery systems are accessible to essentially all portions of the institution's AA.
- To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals.
- Services including business hours do not vary in a way that inconveniences portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals.
- The institution provides an adequate level of community development services.

#### **Discriminatory or Other Illegal Credit Practices**

No violations of anti-discrimination laws or regulations or other illegal credit practices were identified during the evaluation.

### **DESCRIPTION OF INSTITUTION**

#### **Background**

Amalgamated Bank of Chicago (ABOC) is a full service commercial bank, wholly-owned by Amalgamated Investments, a one-bank holding company in Chicago, Illinois. The bank was established in 1922 by the garment workers' union in Chicago and continues to have strong union ties. No branches have opened or closed since the previous CRA evaluation and the bank has no affiliates that offer lending products. The institution received a Satisfactory rating at its previous FDIC evaluation dated May 22, 2017, based on Interagency Large Bank CRA Examination Procedures.

#### **Operations**

ABOC's main office is located in downtown Chicago, Illinois in an upper-income census tract. In addition, the bank operates one branch located in Warrenville, a western suburb of Chicago, Illinois, in an upper-income census tract. ABOC continues to serve the needs of labor unions, union members,

and various public entities within Cook County and the city of Chicago, offering a variety of traditional deposit, credit, and other financial products to meet the needs of its AA.

ABOC's primary lending focus is commercial and residential real estate lending, which includes financing of commercial and residential properties, construction loans, and home equity lines of credit. The majority of residential lending consists of multi-family residential buildings and 1-4 family non-owner occupied housing units. The bank also offers its own proprietary credit card products through MasterCard.

Deposit products consist of a conventional mix of savings, checking, certificate of deposit, and money market deposit accounts. ABOC participates in the STAR, Cirrus, and Money Pass automated teller machine (ATM) networks, which provides customer access to more than 500 ATMs in the Chicago metropolitan area. Additional services include online and mobile banking through which customers are able to check balances, view transaction details and images, transfer funds between accounts, pay bills, make check deposits, as well as pull their account statements. Remote deposit capture and electronic cash management are offered to business customers.

Additionally, the bank began originating loans under the Paycheck Protection Program (PPP) guaranteed by the Small Business Administration (SBA). Additional details regarding the benefits of these loan programs are discussed later in this evaluation.

#### Ability and Capacity

According to the March 31, 2020, Consolidated Reports of Condition and Income, ABOC reported total assets of \$823.3 million, net loans of \$488.7 million and total deposits of \$716.0 million, yielding a net loan-to-deposit ratio of 68.3 percent and a net loan-to-asset ratio of 59.4 percent. Additionally, ABOC's investment portfolio totaled \$156.4 million, which represents 19.0 percent of total assets.

ABOC experienced growth in both assets and loans since the previous CRA evaluation. Total assets increased by \$88.4 million, or 12.0 percent, and total loans increased by \$115.4 million, or 30.4 percent. Loan growth by dollar volume has been primarily in multifamily lending (81.9 percent), construction (43.4 percent), and nonfarm nonresidential commercial lending (35.4 percent).

The bank's loan portfolio as of March 31, 2020, is diversified between commercial and residential lending. Commercial lending, including commercial real estate loans, represents 48.8 percent of the loan portfolio, followed by residential lending at 33.0 percent. The loan portfolio also includes small percentages of construction and consumer loans.

The distribution of the loan portfolio is shown in the following table.

Loan Portfolio Distribution as of March 31, 2020		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	48,120	9.7
Secured by Farmland	522	>1.0
Secured by 1-4 Family Residential Properties	49,197	9.9
Secured by Multifamily (5 or more) Residential Properties	115,356	23.1
Secured by Nonfarm Nonresidential Properties	208,612	41.9
<b>Total Real Estate Loans</b>	<b>421,807</b>	<b>84.6</b>
Commercial and Industrial Loans	34,748	7.0
Consumer Loans	40,655	8.2
Other Loans	2,080	>1.0
Less: Unearned Income	892	>1.0
<b>Total Loans</b>	<b>500,182</b>	<b>100.0</b>

*Source: Reports of Condition and Income*

Examiners did not identify any financial or other legal impediments that hinder the bank's ability to provide credit within its AA.

## DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more AAs within which its CRA performance will be evaluated. ABOC's designated AA includes all of Cook County and DuPage County, Illinois, which are located within the Chicago-Naperville-Arlington Heights, Illinois Metropolitan Division (Chicago MD). The AA is consistent with the requirements of the CRA.

### Economic and Demographic Data

The AA includes all 1,535 census tracts in Cook and DuPage Counties. These tracts reflect the following income designations according to the 2015 American Community Survey (ACS) data:

- 253 (16.5 percent) low-income tracts,
- 391 (25.5 percent) moderate-income tracts,
- 397 (25.9 percent) middle-income tracts,
- 481 (31.3 percent) upper-income tracts, and
- 13 (0.8 percent) census tracts with no income designation.

Economic and demographic data determined by the 2015 American Community Survey (ACS) data and 2019 D&B data provides relevant comparable factors for which examiners base conclusions. The following table outlines select demographic information about the designated AA. The table reflects lower levels of owner-occupied housing units in low- and moderate-income geographies (26.0 percent) within the AA and higher concentrations of rental units (48.5 percent). This data highlights opportunities for financial institutions to originate non-owner occupied

investment loans; however, some financial institutions might face obstacles in originating home mortgage loans in these geographies.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,535	16.5	25.5	25.9	31.3	0.8
Population by Geography	6,166,805	12.3	26.1	28.7	32.6	0.3
Housing Units by Geography	2,533,565	12.4	24.6	28.2	34.4	0.4
Owner-Occupied Units by Geography	1,355,993	5.6	20.4	32.4	41.4	0.2
Occupied Rental Units by Geography	925,049	18.8	29.7	23.9	26.9	0.8
Vacant Units by Geography	252,523	25.4	28.6	21.2	24.2	0.6
Businesses by Geography	437,738	5.6	16.9	27.2	49.7	0.6
Farms by Geography	4,853	4.5	17.5	32.1	45.8	0.1
Family Distribution by Income Level	1,424,403	25.6	16.5	17.9	40.0	0.0
Household Distribution by Income Level	2,281,042	27.3	15.5	16.7	40.5	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL		\$75,024	Median Housing Value			\$252,409
			Median Gross Rent			\$1,048
			Families Below Poverty Level			11.9%

Sources: 2015 ACS Census and 2019 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.

The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by gross annual revenues (GARs). The GARs of businesses operating in the AA in 2019 are as follows:

- 83.6 percent report \$1.0 million or less,
- 7.0 percent report greater than \$1 million, and
- 9.4 percent did not report revenues to D&B.

Service industries represent the largest portion of businesses in the AA at 41.1 percent; followed by retail trade (11.8 percent); finance, insurance, and real estate (10.3 percent); construction (5.6 percent); and transportation and communication (5.1 percent). In addition, 60.2 percent of businesses have four or fewer employees, and 89.0 percent operate from a single location.

The 2018 and 2019 FFIEC-updated median family income (MFI) level is used to analyze home mortgage loans under the Borrower Profile criterion. The table below contains information on the median family incomes by category.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Chicago-Naperville-Arlington Heights, IL MD Median Family Income (16974)				
2018 (\$82,400)	<\$41,200	\$41,200 to <\$65,920	\$65,920 to <\$98,880	≥\$98,880
Chicago-Naperville-Evanston, IL Median Family Income (16984)				
2019 (\$82,000)	<\$41,000	\$41,000 to <\$65,600	\$65,600 to <\$98,400	≥\$98,400
Source: FFIEC				

Data obtained from the U.S. Bureau of Labor Statistics reflect that the 2019 year-end unemployment rate was 4.0 percent for the State of Illinois. The unemployment rates for Cook and DuPage Counties were 3.8 percent and 2.9 percent, respectively. These unemployment rates reflect improvement since the previous evaluation when the 2016 year-end unemployment rates were 5.7 percent for Illinois, 5.7 percent for Cook County and 4.4 percent for DuPage County. The decreases in the unemployment rates indicate an improving economy.

In recent weeks leading up to the examination, the coronavirus (COVID-19) has spread globally and local and global environments are feeling its immediate impact. The global COVID-19 pandemic has affected local economies creating considerable hardships for small businesses and individuals. As of the examination date, the State of Illinois is operating under a “shelter-in-place” order. As a result, statewide unemployment has spiked and non-essential businesses have been closed since March 21, 2020. This evaluation focuses on 2018 and 2019 lending activity that occurred prior to the pandemic. However, examiners acknowledge the recent events and the rapid impact on the local economy when assessing the bank’s responsiveness to area credit and community development needs.

### Competition

ABOC’s AA is highly competitive in the market for financial services. Data from the FDIC Deposit Market Share Report as of June 30, 2019, indicates 1,665 offices of 118 financial institutions operating within the AA. ABOC maintains a 0.22 percent deposit market share in the AA, ranking 35<sup>th</sup> among all institutions. The majority of the market share is held by large national and regional financial institutions operating offices within the AA.

Aggregate small business lending data provides insight into the level of demand for small business loans within the AA. Aggregate lending data for 2018 indicates 200 lenders reported originating 162,807 small business loans, indicating a high degree of competition for this loan product. ABOC ranked 75<sup>th</sup> capturing 0.03 percent of the market share.

Additionally, a high level of competition in the AA exists for home mortgage loans among banks, credit unions, and non-depositor mortgage lenders. According to the 2018 aggregate data, 864 lenders reported 246,563 home mortgage loan originations and purchases. ABOC ranked 314<sup>th</sup> capturing 0.05 percent of the market share.

### Community Contacts

Recent community contact interviews with non-profit community services agencies were conducted to assist examiners in identifying and understanding the credit and community development needs of the AA. The information helps examiners determine area needs and whether local financial institutions are responsive to the needs. The contacts stated needs include financing for start-up businesses, specifically small dollar loans and increased access to affordable home mortgage loans throughout all areas of the AA.

### Credit and Community Development Needs and Opportunities

Considering the information from the community contacts and demographic data, examiners determined that community development needs in the AA include small business lending and affordable housing lending. The relatively high level of low- and moderate-income families along with the percentage of businesses with revenues of \$1.0 million or less is reflective of these credit and service needs.

The AA provides numerous opportunities for involvement in community development activities. The Chicago metropolitan area contains empowerment zones and tax increment financing districts that are designated by local or state government entities for revitalization, stabilization, or economic development. These areas were established to stimulate economic activities that include job preservation and creation, and business and residential development. Additionally, the State of Illinois and local community organizations sponsor various programs to support affordable housing and economic development.

Further, the current COVID-19 pandemic has impacted many area businesses resulting in closures and negatively affecting the operations and increasing credit needs.

## SCOPE OF EVALUATION

### General Information

This evaluation covers the period from the previous evaluation dated May 22, 2017, to the current evaluation dated May 26, 2020. Examiners used the Interagency Large Bank CRA Examination Procedures to evaluate ABOC's CRA performance. These procedures include three tests: the Lending Test, Investment Test, and Service Test. The criteria for these procedures are listed in the Appendix.

The bank's overall rating is determined using a points system as defined in the Community Reinvestment Act regulation. Banks must achieve at least a Low Satisfactory rating under the Lending Test to obtain an overall Satisfactory rating.

### Activities Reviewed

ABOC's major product lines are small business and home mortgage loans; this conclusion considered the bank's business strategy and the number and dollar volume of loans originated during the evaluation period. ABOC's CRA performance is based on an analysis of the universe of small business and home mortgage loans from January 1, 2018, through December 31, 2019. Farm

and consumer lending was not evaluated, as it represents a nominal portion of ABOC's loan portfolio.

ABOC has optionally collected and reported small business data pursuant to the CRA data collection requirements. The universe of small business loans reported under the CRA data reporting requirements for the review period consisted of 59 small business loans totaling \$20.9 million in 2018 and 52 small business loans totaling \$16.7 million in 2019.

In addition, this evaluation considered all home mortgage loans reported on the bank's 2018 and 2019 Home Mortgage Disclosure Act (HMDA) Loan Application Registers (LAR). ABOC reported 33 home mortgage loans totaling approximately \$32.5 million in 2018 and 32 home mortgage loans totaling \$33.1 million in 2019.

Given the volume of loans for each product type reviewed and the bank's business focus, more weight was placed on small business lending when drawing conclusions. While both number and dollar volume of loans were considered, discussion of the bank's performance is limited to loans by number, as performance by dollar volume did not lead to different conclusions or noticeable trends.

Community development loans, qualified investments, and services, initiated or maintained since the previous CRA evaluation were also reviewed.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

ABOC's lending performance evidences adequate responsiveness to the credit needs in the AA. This rating is derived after considering the following factors: high percentage of loans in the AA; adequate geographic distribution of loans; adequate loan distribution by borrower profile; adequate record of serving the credit needs of the most economically disadvantaged areas of its AA, including low-income individuals, and very small businesses, consistent with safe and sound banking practices; limited use of innovative or flexible lending practices, and leader in originating community development loans.

#### Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs. The number and dollar volume of loans originated during the review period were reviewed. Examiners also considered market share reports, aggregate lending data, and demographic data for primary loan products to determine the bank's level of lending. Market share reports provide greater context regarding competitive factors and the interest rate environment, especially for mortgage lending activity. Deposit market share data is reviewed to gain perspective on a bank's presence in a community.

Within the bank's AA, during the review period, ABOC originated 99 small business loans totaling approximately \$32.4 million; 63 home mortgage loans totaling approximately \$65.1 million. ABOC originated 58 community development loans totaling approximately \$115.1 million during the evaluation period in the assessment area.

ABOC has maintained an average net loan-to-deposit (NLTD) ratio of 57.8 percent for the previous 12 quarters since the previous evaluation. ABOC's NLTD was compared to five similarly-situated institutions (SSIs) located in the FDIC Chicago Region, which were selected based on similar asset size, loan concentrations, and complexity of operations. The average NLTD ratios of these institutions during the same 12-quarter period ranged from 75.2 percent to 96.0 percent.

ABOC is a leading provider of corporate trust and agency services to corporations and tax-exempt entities, resulting in a unique deposit base for a community financial institution. A significant portion of the institution's deposits consist of public fund deposits, which require greater than 100 percent collateralization by securities. Although the bank's NLTD is low and fluctuated during the evaluation period, the bank's NLTD ratio as of March 31, 2020 was 68.3 percent, which was shown to be on the higher end throughout the evaluation period. In reviewing the quarterly trends of bank deposits, fluctuations were also noted due to the business practices of the bank's large number of municipals depositors. After taking into account ABOC's unique deposit base and competition within the assessment area, the bank's NLTD ratio as a measure of overall lending capacity is reasonable.

### Assessment Area Concentration

A high percentage of loans are made in the institution's AA. ABOC originated a substantial majority of small business and home mortgage loans, by number and dollar volume, within its AA. The following table reflects the distribution of the loans inside and outside the AA by year and loan type.

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										
2018	33	100.0	0	0.0	33	32,463	100.0	0	0.0	32,463
2019	30	93.8	2	6.3	32	32,639	98.6	474	1.4	33,113
Subtotal	63	96.9	2	3.1	65	65,102	99.3	474	0.7	65,575
Small Business										
2018	53	89.8	6	10.2	59	20,075	95.6	918	4.4	20,993
2019	46	88.5	6	11.5	52	12,293	74.0	4,322	26.0	16,615
Subtotal	99	89.2	12	10.8	111	32,368	86.1	5,240	13.9	37,608
Total	162	92.0	14	8.0	176	97,469	94.5	5,714	5.5	103,183

Source: Evaluation Period: 1/1/2018 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0

### Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the AA. The bank's small business and home mortgage lending performance supports this conclusion. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts, and only loans originated in ABOC's AA were considered in this analysis.

**Small Business Loans**

The geographic distribution of small business loans reflects adequate penetration throughout the AA. Performance is compared against the location of businesses by census tract income level (demographic) and aggregate data. Examiners weighed the comparison to aggregate data more heavily as it provides a better assessment of lending opportunities and activities in the AA. The table below details the distribution of small business loans by census tract income level.

Geographic Distribution of Small Business Loans						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<b>Low</b>						
2018	5.6	4.4	2	3.8	482	2.4
2019	5.6	--	1	2.2	265	2.2
<b>Moderate</b>						
2018	17.0	18.1	5	9.4	1,067	5.3
2019	16.9	--	6	13.0	992	8.1
<b>Middle</b>						
2018	28.1	30.1	15	28.3	8,359	41.6
2019	27.2	--	9	19.6	3,003	24.4
<b>Upper</b>						
2018	48.6	47.0	31	58.5	10,167	50.6
2019	49.7	--	30	65.2	8,033	65.3
<b>Not Available</b>						
2018	0.7	0.4	0	0.0	0	0.0
2019	0.6	--	0	0.0	0	0.0
<b>Total</b>						
2018	100.0	100.0	53	100.0	20,075	100.0
2019	100.0	--	46	100.0	12,293	100.0

*Sources: 2018 & 2019 D&B Data; 1/1/2018 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0*

ABOC performance in low- and moderate-income census tracts trailed aggregate data in 2018 and trailed the demographic in 2018 and 2019. Although the bank's performance fell short of the aggregate market lending, the results are reasonable in light of the bank's locations, which make penetration of low- and moderate-income geographies challenging. More specifically, the main office is in Chicago's downtown business district that consists largely of a cluster of upper-income tracts that are not particularly convenient to locales outside the immediate area, while the branch is located in a western suburb in a county that has no low-income tracts and limited moderate-income tracts (the closest cluster is approximately four miles from the branch). As a result, the loan distribution reflects adequate performance and a willingness to make loans in low- and moderate-income geographies.

### Home Mortgage Lending

The geographic distribution of home mortgage loans reflects adequate penetration throughout the AA. As mentioned previously, a significant majority of the bank's home mortgage loans are secured by multi-family residential housing and non-owner occupied 1-4 family residential housing. More weight is placed on multi-family residential housing given the volume and business focus of the bank. A good distribution of multi-family residential housing and adequate distribution of non-owner occupied 1-4 family residential housing supports this conclusion.

### Multi-Family Residential Lending

The geographic distribution of 1-4 family non-owner occupied home mortgage loans reflects good penetration throughout the AA. Performance is measured against the percentage of multi-family housing units in the AA (demographic), as well as applicable aggregate data. Examiners focused on the comparison to aggregate data as it better reflects the demand and opportunities for originating home mortgage loans in the AA. The table below details the distribution of home mortgage loans secured by multi-family properties by census tract income level.

Geographic Distribution of Multi-Family Residential Loans						
Tract Income Level	% of Multi-Family Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2018	11.8	18.5	5	23.8	6,227	24.0
2019		--	4	21.1	5,480	19.9
Moderate						
2018	23.1	31.9	6	28.6	5,306	20.5
2019		--	8	42.1	11,985	43.5
Middle						
2018	26.3	22.2	5	23.8	5,596	21.6
2019		--	2	10.5	3,118	11.3
Upper						
2018	37.8	24.4	5	23.8	8,775	33.9
2019		--	5	26.3	6,940	25.2
Not Available						
2018	1.0	3.0	0	0.0	0	0.0
2019		--	0	0.0	0	0.0
Total						
2018	100.0	100.0	21	100.0	25,904	100.0
2019		--	19	100.0	27,523	100.0

Sources: 2015 ACS Census; 1/1/2018 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

ABOC's multi-family lending in low-income census tracts exceeded both the demographic and the aggregate in 2018 and exceeded the demographic in 2019. The bank's lending in moderate-income census tracts was slightly below aggregate in 2018; however, it exceeded the demographic in both years. Additionally, the bank increased its lending in moderate-income census tracts in 2019. Overall, tank originated over 50 percent of its multi-family residential real estate loans in low- and moderate- census tracts during the review period.

*Non-Owner Occupied 1-4 Family Residential Lending*

The geographic distribution of non-owner occupied 1-4 family residential loans reflects adequate penetration throughout the AA. Performance is measured against the percentage of rental housing units in the AA (demographic), as well as applicable aggregate data. Examiners focused on the comparison to aggregate data as it better reflects the demand and opportunities for originating home mortgage loans in the AA. The following table details the distribution of home mortgage loans secured by rental housing units by census tract income level.

Geographic Distribution of Non-Owner Occupied 1-4 Family Residential Loans						
Tract Income Level	% of Rental Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2018	18.1	11.4	0	0.0	0	0.0
2019		--	1	9.1	475	9.3
Moderate						
2018	29.7	26.2	3	25.0	1,218	18.6
2019		--	3	27.3	1,790	35.0
Middle						
2018	23.9	27.1	2	16.7	935	14.3
2019		--	2	18.2	567	11.1
Upper						
2018	26.9	35.0	6	50.0	3,527	53.8
2019		--	5	45.5	2,285	44.7
Not Available						
2018	0.8	0.3	1	8.3	880	13.4
2019		--	0	0.0	0	0.0
Total						
2018	100.0	100.0	12	100.0	6,560	100.0
2019		--	11	100.0	5,117	100.0

Sources: 2015 ACS Census; 1/1/2018 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Overall, the bank did not originate any non-owner occupied 1-4 family loans in 2018 and originated one loan in 2019, in low-income tracts, trailing the demographic. The bank's level of lending in

moderate-income census tracts increased in 2018 and was only slightly below the demographic and aggregate; performance in 2019 also slightly below the demographic but is comparable. In addition, the bank's performance is reasonable in light of the bank's locations, as previously mentioned, which make access to low- and moderate-income geographies challenging. Additionally, the bank was able to make 30 percent of their non-owner occupied 1-4 family loans in low- and moderate-income census tracts throughout the review period. Given the aforementioned facts, overall performance is adequate.

### Borrower Profile

The distribution of loans to borrowers reflects, given the product lines offered by the institution, adequate penetration among business customers of different sizes and retail customers of varying income levels. This conclusion is supported by adequate performance in the small business lending category. No conclusions were drawn regarding the home mortgage lending given that a significant majority of the loans originated were to those with an income designation of not applicable "NA." These loans are typically originated for investment purposes, and the income designation is reported as such on the bank's HMDA LAR. Only loans located inside the AA are included in the analyses.

### *Small Business Lending*

The distribution of loans to borrowers reflects adequate penetration among businesses of different sizes. Performance is measured against the percentage of businesses with GAR of \$1 million or less (demographic) and aggregate data. Examiners applied more weight to the comparison of lending to aggregate data, as it is a better indicator of lending opportunities and demand in the AA. The following table details the distribution of small business loans by GAR of the business in the AA.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
<b>&lt;=\$1,000,000</b>						
2018	80.5	42.7	24	45.3	8,554	42.6
2019	83.7	--	24	52.2	6,437	52.4
<b>&gt;\$1,000,000</b>						
2018	8.4	--	26	49.1	11,215	55.9
2019	6.8	--	20	43.5	5,828	47.4
<b>Revenue Not Available</b>						
2018	11.1	--	3	5.7	306	1.5
2019	9.5	--	2	4.3	28	0.2
<b>Total</b>						
2018	100.0	100.0	53	100.0	20,075	100.0
2019	100.0	--	46	100.0	12,293	100.0

*Sources: 2018 & 2019 D&B Data; 1/1/2018 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data; "--" data not available. Due to rounding, totals may not equal 100.0*

While the bank trailed the demographic in both years, aggregate performance is a stronger comparison because it reflects actual lending activity of other lenders throughout the AA. As such, the bank exceeded the aggregate figure in 2018 and is considered adequate.

In addition, given the very recent effects of the COVID-19 pandemic, the SBA rapidly created the PPP. The program is intended to support small businesses and allow them to maintain employees and continue paying them during the shelter-in-place orders. This program is directly responsive to AA needs and supports job retention. Loan originations under this program are considered particularly responsive to AA credit needs given the current economic environment, as well as needs stated by a community contact. The bank's participation in the program is also considered innovative and flexible. Because of the very recent implementation of the program, these lending efforts are not reflected in the lending test analysis above. During the review period, the bank originated 22 PPP loans totaling approximately \$3.0 million within its designated AA. All of the loans originated had loan amounts of \$1 million or less.

Overall performance is adequate and examiners acknowledge the efforts and flexibility exercised by the bank and its responsiveness and benefit to small businesses given the recent economic impact of COVID-19. These actions to meet an immediate and significant credit need because of COVID-19 further supports the bank's adequate performance in its AA.

#### *Home Mortgage Loans*

Given the limited number of home mortgage loans originated with income information, no meaningful conclusions could be drawn regarding the borrower profile distribution for this loan product. During the review period, 58 of the 63 home mortgage loans originated within the AA had incomes reported as "NA." Of the loans with incomes reported, none were to low- or moderate-income borrowers.

#### Innovative or Flexible Lending Practices

ABOC makes limited use of innovative and flexible lending practices to serve AA credit needs. As previously stated, the bank originated 22 SBA loans in order to assist small businesses with immediate credit assistance. All the PPP loans were originated in amounts of \$1 million less, indicating the bank's commitment to serving small businesses. Additionally, the bank provides low interest loans to an organization that provides microfinance small business lending in the AA.

#### Community Development Loans

The institution is a leader in making community development loans. ABOC's community development lending initiatives include affordable housing, economic development, community services, and revitalization and stabilization of low- or moderate-income geographies.

ABOC originated 58 community development loans totaling approximately \$115.1 million during the evaluation period. This volume represents approximately 23.5 percent of net loans outstanding as of March 31, 2020. This level of community development lending exceeds that of SSIs in the AA, which averaged 8.6 percent of net loans outstanding. These loans were originated since the previous evaluation, have a community development purpose and are not considered in the analysis

of small business and home mortgage loans. The following table details ABOC's community development loans.

Activity Year	Community Development Lending									
	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2017	13	21,870	1	450	0	0	7	23,471	21	45,790
2018	12	6,151	1	450	0	0	7	20,065	20	26,667
2019	12	14,745	1	450	1	9,798	3	17,688	17	42,680
Total	37	42,766	3	1,350	1	9,798	17	61,224	58	115,137

*Source: Bank Records.*

Notable examples of the institution's community development loans in the AA are described below.

- The bank originated a significant number of affordable housing loans that secure properties, which include units with rental rates consistent with the capacity of low- and moderate-income individuals. Community contacts identified affordable housing as a primary credit need in the AA.
- Annually, the bank continues to provide financing to a human services organization that provides various resources to underprivileged youth and their families.
- Several loans were originated in order to revitalize and stabilize by retaining jobs for low- and moderate-income individuals including those loans located in Tax Increment Financing (TIF) districts and supported by a TIF bond issue.

## INVESTMENT TEST

ABOC has an adequate level of qualified investments, particularly those that are not routinely provided by private investors, although rarely in a leadership position. The institution exhibits adequate responsiveness to credit and community economic development needs of the AA. ABOC occasionally uses innovative or complex investments to support community development initiatives.

### Investment and Grant Activity

The institution has an adequate level of qualified community development investments and grants, although rarely in a leadership position. ABOC made 12 qualified community development investments totaling \$9.4 million and 37 donations totaling \$31,000, representing 6.1 percent of the bank's total securities and 10.5 percent of equity capital, as of March 31, 2020. Primarily, the bank was able to maintain prior period investments for the purpose of affordable housing. Affordable housing needs in the AA were identified by a community contact.

ABOC's community development investments are comparable to the performance of the aforementioned SSIs. The SSIs community development investments averaged 4.5 percent of total securities. The following table provides additional details regarding the bank's community development investment and donation activity by year and purpose.

Community Development Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	11	6,911	0	0	0	0	0	0	11	6,911
2017	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	0	0	0	0
2020	1	2,531	0	0	0	0	0	0	1	2,531
Subtotal	12	9,442	0	0	0	0	0	0	12	9,442
Grants & Donations	4	6	32	24	1	1	0	0	37	31
<b>Total</b>	<b>16</b>	<b>9,448</b>	<b>32</b>	<b>24</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>49</b>	<b>9,473</b>

Source: Bank Records.

### Responsiveness to Credit and Community Development Needs

ABOC exhibits adequate responsiveness to the credit and community development needs of the AA. As stated previously, community contacts identified that the AA is in need of affordable housing for low- and moderate-income individuals. ABOC participated in several investment funds supporting affordable housing. ABOC also made several donations to organizations that serve low- and moderate individuals.

### Community Development Initiatives

ABOC made occasional use of innovative or complex investments to support community development initiatives. The most complex of the bank's investment initiatives is related to its targeted affordable housing investments to low- and moderate-income areas in the form of mortgage-backed securities.

### **SERVICE TEST**

The bank's retail delivery systems are reasonably accessible to essentially all portions of the AA. No branches have been opened or closed since the previous examination. Services (including business hours) do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income geographies and/or individuals. The institution provides an adequate level community development services.

### Accessibility of Delivery Systems

The bank's retail delivery systems are reasonably accessible to essentially all portions of the AA. ABOC operates two offices; both are located in upper-income census tracts and are reasonably accessible to essentially all portions of the AA. However, the demographics of the area immediately surrounding the offices impact the accessibility of the offices to geographies of different income levels, including low- and moderate-income. ABOC also provides banking services through online banking and bill pay, telephone and mobile banking, and a 24-hour ATM at its Warrenville branch location.

### Changes in Branch Locations

No branches have opened or closed since the previous evaluation; therefore, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems.

### Reasonableness of Business Hours and Services

Services, including business hours, do not vary in a way that inconveniences portions of the AA or any group of individuals. Outside of the current COVID-19 pandemic, both offices are open from 8:30 AM to 5:00 PM Monday through Friday. In the recent months, the bank had closed its offices to the public due to the pandemic; however, the bank welcomed customers via appointment to its main office, additionally the Warrenville branch continued to provide drive-up services and has a 24-hour ATM. Additional services include online and mobile banking through which customers are able to check balances, transfer funds, and pay bills. Remote deposit capture and electronic cash management are offered to business customers. The lack of Saturday hours is mitigated to some extent by the bank's participation in the STAR, Cirrus, and Money Pass ATM networks, which allow customer access to more than 500 ATMs in the Chicago metropolitan area.

### Community Development Services

Bank personnel participated in 12 services since the previous evaluation. The bank's services are predominately ongoing throughout the years. The services qualify for consideration as they use the individuals' financial expertise in serving on Boards of Directors, finance committees, fundraising committees, and planning committees for numerous organizations, including entities that serve low- and moderate-income individuals or support affordable housing in the assessment area. Below is a summary, which highlights the bank's significant services.

- Bank officer sits on the Board of Directors for the West Cook County Youth Club, which services underprivileged youth. The Bank officer also provides ongoing financial literacy instruction to the organization.
- The bank hosted three student interns since the previous evaluation from the Chicago Summer Business Institute, which is a needs-based summer internship program for high school students of low-income families.
- Since the previous examination, ABOC team has been providing basic financial tools to union apprentices throughout the Chicago area. To date, ABOC trainers have spoken to more than 2,000 students from four different labor unions about personal finance.
- Starting in 2019, the ABOC initiated a life skills re-entry program and Financial Literacy Program. As part of the Illinois Department of Corrections' Parole Program, ABOC and the Illinois Department of Corrections have partnered to provide offenders with personal finance tools and education to assist with reentry to society. Offenders participating in the program gain skills, such as household budgeting that will help them reintegrate into their communities and the workforce.
- Since before the previous examination, the bank has been working with the Roosevelt University Life Skills Reentry Program, which provides financial education to ex-offenders and other disadvantaged adults in the Chicago area. As part of this program, the Bank offers the Fresh Start Checking account along with a step-by-step program where these adults can open a checking account, then add a savings account, progress to a credit card, and improve their credit so they are able to purchase a home.

- In March 2020, the bank partnered with EverFi and funded a program to provide financial literacy to inmates prior to being released from the Illinois Department of Corrections.

### **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

No violations of anti-discrimination laws or regulations or other illegal credit practices were noted during the evaluation.

## APPENDICES

### LARGE BANK PERFORMANCE CRITERIA

#### Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
  - i. The proportion of the bank's lending in the bank's assessment area(s);
  - ii. The dispersion of lending in the bank's assessment areas(s); and
  - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
  - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
  - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
  - iii. Small business and small farm loans by loan amount at origination; and
  - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

#### Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

### Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (e.g., RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

## GLOSSARY

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions.

Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
  - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

**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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or

- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 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 (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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 metropolitan area/assessment area.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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.

**Micropolitan Statistical Area:** CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

**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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area (also known as non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.



## OFFICIAL EXAMINATION FINDINGS

August 5, 2020

Board of Directors  
Amalgamated Bank of Chicago  
30 North LaSalle Street  
Chicago, Illinois 60602

Re: Consumer Compliance Examination and Community Reinvestment Act Performance Evaluation

Members of the Board:

This letter and its enclosures serve as the official communication of the consumer compliance examination and Community Reinvestment Act (CRA) evaluation results for Amalgamated Bank of Chicago (Cert: #903). Examiner-in-Charge (EIC) Danielle S. Larkin conducted the consumer compliance examination as of May 26, 2020. Please be advised that the findings from the consumer compliance examination are subject to the confidentiality restrictions pursuant to Part 309 of the FDIC's Rules and Regulations.

### Examination Scope and Conclusions

Examiners performed a risk-focused review of the compliance management system (CMS), with an emphasis on areas exhibiting potential risk of consumer harm, since the prior consumer compliance examination. As part of the consumer compliance examination, examiners conducted a fair lending review using the Federal Financial Institutions Examination Council's Fair Lending Examination Procedures. The following table summarizes the consumer compliance examination findings.

<b>Consumer Compliance Rating</b>	<i>1   Prior Rating: 2 (5/22/17)</i>
<i>An institution in this category maintains a strong CMS and takes action to prevent violations of law and consumer harm.</i>	
<b>Board and Management Oversight</b>	<b>Strong</b>
<b>Compliance Program</b>	<b>Strong</b>
Policies and Procedures	Strong
Training	Strong
Monitoring and Audit	Adequate
Consumer Complaint Response	Strong

The compliance posture and rating improved since the prior examination as reflected in the assigned "1" rating. The Board and management implemented all recommendations made at the prior examination, as well as corrective measures to prevent recurrence of previously identified and new violations of law. In addition, there were no violations identified during this examination. As such, the efforts taken reflect your strong commitment to maintain an effective CMS and ensure ongoing compliance with applicable consumer protection laws and regulations.

### **Community Reinvestment Act**

A CRA Rating of Satisfactory is assigned. Examiners evaluated the bank's CRA performance using Large Bank Examination Procedures, focusing on activities since the previous evaluation dated May 26, 2017. Please refer to the enclosed Performance Evaluation for more details. The Performance Evaluation must be placed in the institution's CRA public file within thirty (30) business days of receipt. The format and content of this evaluation may not be altered or abridged in any manner. Upon request, a copy of your current evaluation must be provided to the public. You are authorized to charge a fee not to exceed the cost of reproduction and mailing (if applicable).

### **Meeting with Management**

On July 8, 2020, Supervisory Examiner Ruben Baez and EIC Larkin met with bank management to discuss the results of the consumer compliance examination and CRA evaluation. Executive Vice President and General Counsel James T. Landenberger, and Compliance Officer Bruce McCrindle represented the bank. EIC Larkin discussed the scope of the examination, CMS assessment, and the fair lending review. The CRA Performance Evaluation was also discussed. EIC Larkin disclosed the proposed consumer compliance and CRA ratings and informed management that the ratings are subject to additional review by the Chicago Regional Office. Management was receptive to findings and concurred with the proposed ratings.

### **Post-Examination Survey**

Management is encouraged to complete the Post-Examination Survey using the website and access code provided. The survey is part of our continuing effort to improve the quality and efficiency of our examination process. We are specifically interested in your thoughts regarding this new streamlined format for communicating compliance examination findings.

### **No Response Required**

We request that consider this examination letter and CRA Performance Evaluation at an official Board meeting and record the action in the minutes. No response is required; however, we trust that you will continue to ensure the operations of the bank are in compliance with all applicable consumer protection laws and regulations.

While no response is requested, as a reminder, written correspondence can be sent to this office as a PDF document through the FDIC's Secure Email portal ([securemail.fdic.gov](mailto:securemail.fdic.gov)) using the following e-mail address: [CHIMailRoom@FDIC.gov](mailto:CHIMailRoom@FDIC.gov). Information about how to use secure email and FAQs about the service can be found at [fdic.gov/secureemail](http://fdic.gov/secureemail). If there are any questions about the Secure Email process or the examination findings, please contact Review Examiner D. Simone Stovall at (312) 382-6935.

Sincerely,  
LaTicia T. Nichols  
Review Examiner

Enclosures

cc: State, Federal Reserve

Federal Financial Institutions Examination Council



Consolidated Reports of Condition and Income for  
a Bank with Domestic Offices Only and Total Assets  
Less than \$5 Billion - FFIEC 051

Report at the close of business June 30, 2021

This report is required by law: 12 U.S.C. §324 (State member banks); 12 U.S.C. §1817 (State nonmember banks); 12 U.S.C. §161 (National banks); and 12 U.S.C §1464 (Savings associations). Unless the context indicates otherwise, the term "bank" in this report form refers to both banks and savings associations. This report form is to be filed by banks with domestic offices only and total assets

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less than \$5 billion, except such banks that (1) are advanced approaches institutions or are subject to Category III capital standards for regulatory capital purposes, (2) are large or highly complex institutions for deposit insurance assessment purposes, or (3) have elected, or have been required by their primary federal regulator, to file the FFIEC 041.

NOTE: Each bank's board of directors and senior management are responsible for establishing and maintaining an effective system of internal control, including controls over the Reports of Condition and Income. The Reports of Condition and Income are to be prepared in accordance with federal regulatory authority instructions. The Reports of Condition and Income must be signed by the Chief Financial Officer (CFO) of the reporting bank (or by the individual performing an equivalent function) and attested to by not less than two directors (trustees) for state nonmember banks and three directors for state member banks, national banks, and savings associations.

We, the undersigned directors (trustees), attest to the correctness of the Reports of Condition and Income (including the supporting schedules) for this report date and declare that the Reports of Condition and Income have been examined by us and to the best of our knowledge and belief have been prepared in conformance with the instructions issued by the appropriate Federal regulatory authority and are true and correct.

I, the undersigned CFO (or equivalent) of the named bank, attest that the Reports of Condition and Income (including the supporting schedules) for this report date have been prepared in conformance with the instructions issued by the appropriate Federal regulatory authority and are true and correct to the best of my knowledge and belief.

Director (Trustee)

Director (Trustee)

Director (Trustee)

*Joseph M. F. Kahan*  
Signature of Chief Financial Officer (or Equivalent)

7/29/21  
Date of Signature

Submission of Reports

Each bank must file its Reports of Condition and Income (Call Report) data by either:

- (a) Using computer software to prepare its Call Report and then submitting the report data directly to the FFIEC's Central Data Repository (CDR), an Internet-based system for data collection (<https://cdr.ffiec.gov/cdr/>), or
- (b) Completing its Call Report in paper form and arranging with a software vendor or another party to convert the data into the electronic format that can be processed by the CDR. The software vendor or other party then must electronically submit the bank's data file to the CDR.

To fulfill the signature and attestation requirement for the Reports of Condition and Income for this report date, attach your bank's completed signature page (or a photocopy or a computer generated version of this page) to the hard-copy record of the data file submitted to the CDR that your bank must place in its files.

The appearance of your bank's hard-copy record of the submitted data file need not match exactly the appearance of the FFIEC's sample report forms, but should show at least the caption of each Call Report item and the reported amount.

For technical assistance with submissions to the CDR, please contact the CDR Help Desk by telephone at (888) CDR-3111, by fax at (703) 774-3946, or by e-mail at [cdr.help@cdr.ffiec.gov](mailto:cdr.help@cdr.ffiec.gov).

AMALGAMATED BANK OF CHICAGO

Legal Title of Bank (RSSD 9017)

CHICAGO

City (RSSD 9130)

IL

60602

State Abbrev. (RSSD 9200)

ZIP Code (RSSD 9220)

Legal Entity Identifier (LEI)

~~254900531V3C2AAN2000~~

(Report only if your institution already has an LEI.) (RCON 9224)

FDIC Certificate Number

01019019  
(RSSD 9050)

The estimated average burden associated with this information collection is 35-27 hours per respondent and is expected to vary by institution, depending on individual circumstances. Burden estimates include the time for reviewing instructions, gathering and maintaining data in the required form, and completing the information collection, but exclude the time for compiling and maintaining business records in the normal course of a respondent's activities. A Federal agency may not conduct or sponsor, and an organization (or a person) is not required to respond to a collection of information, unless it displays a currently valid OMB control number. Comments concerning the accuracy of this burden estimate and suggestions for reducing this burden should be directed to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, and to one of the following: Secretary, Board of Governors of the Federal Reserve System, 20th and C Streets, NW, Washington, DC 20551; Legislative and Regulatory Analysis Division, Office of the Comptroller of the Currency, Washington, DC 20219; Assistant Executive Secretary, Federal Deposit Insurance Corporation, Washington, DC 20429.

# Consolidated Reports of Condition and Income for a Bank with Domestic Offices Only and Total Assets Less than \$5 Billion

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For information or assistance, national banks, state nonmember banks, and savings associations should contact the FDIC's Data Collection and Analysis Section, 550 17th Street, NW, Washington, DC 20429, toll free on (800) 688-FDIC(3342), Monday through Friday between 8:00 a.m. and 5:00 p.m., Eastern Time. State member banks should contact their Federal Reserve District Bank.

## Contact Information for the Reports of Condition and Income

To facilitate communication between the Agencies and the bank concerning the Reports of Condition and Income, please provide contact information for (1) the Chief Financial Officer (or equivalent) of the bank signing the reports for this quarter, and (2) the person at the bank—other than the Chief Financial Officer (or equivalent)— to whom questions about the reports should be directed. If the Chief Financial Officer (or equivalent) is the primary contact for questions about the reports, please provide contact information for another person at the bank who will serve as a secondary contact for communications between the Agencies and the bank concerning the Reports of Condition and Income. Enter "none" for the contact's e-mail address or fax number if not available. Contact information for the Reports of Condition and Income is for the confidential use of the Agencies and will not be released to the public.

### Chief Financial Officer (or Equivalent) Signing the Reports

JOSEPH F. KEHOE

Name (TEXT C490)

SENIOR VICE PRESIDENT / CFO

Title (TEXT C491)

JKEHOE@ABOC.COM

E-mail Address (TEXT C492)

(312) 822-3117

Telephone: Area code/phone number/extension (TEXT C493)

(312) 541-7395

FAX: Area code/phone number (TEXT C494)

### Other Person to Whom Questions about the Reports Should be Directed

ROBERT LESAK

Name (TEXT C495)

VICE PRESIDENT

Title (TEXT C496)

RLESAK@ABOC.COM

E-mail Address (TEXT 4086)

(312) 822-8349

Telephone: Area code/phone number/extension (TEXT 8902)

(312) 541-7395

FAX: Area code/phone number (TEXT 9116)

## Chief Executive Officer Contact Information

This information is being requested so the Agencies can distribute notifications about policy initiatives, deposit insurance assessments, and other matters directly to the Chief Executive Officers of reporting institutions. Notifications about other matters may include emergency notifications that may or may not also be sent to the institution's emergency contacts listed below. Please provide contact information for the Chief Executive Officer of the reporting institution. Enter "none" for the Chief Executive Officer's e-mail address or fax number if not available. Chief Executive Officer contact information is for the confidential use of the Agencies and will not be released to the public.

### Chief Executive Officer

ROBERT M. WROBEL

Name (TEXT FT42)

RWROBEL@ABOC.COM

E-mail Address (TEXT FT44)

(312) 822-3050

Telephone: Area code/phone number/extension (TEXT FT43)

(312) 267-8765

Fax: Area code/phone number (TEXT FT45)

## Emergency Contact Information

This information is being requested so the Agencies can distribute critical, time sensitive information to emergency contacts at banks. Please provide primary contact information for a senior official of the bank who has decision-making authority. Also provide information for a secondary contact if available. Enter "none" for the contact's e-mail address or fax number if not available. Emergency contact information is for the confidential use of the Agencies and will not be released to the public.

### Primary Contact

ROBERT M. WROBEL

Name (TEXT C366)

CHAIRMAN OF BOARD/CEO

Title (TEXT C367)

RWROBEL@ABOC.COM

E-mail Address (TEXT C368)

(312) 822-3050

Telephone: Area code/phone number/extension (TEXT C369)

(312) 267-8765

FAX: Area code/phone number (TEXT C370)

### Secondary Contact

JAMES LANDENBERGER

Name (TEXT C371)

PRESIDENT

Title (TEXT C372)

JLANDENBERGER@ABOC.COM

E-mail Address (TEXT C373)

(312) 822-3159

Telephone: Area code/phone number/extension (TEXT C374)

(312) 541-7394

FAX: Area code/phone number (TEXT C375)

**USA PATRIOT Act Section 314(a) Anti-Money Laundering Contact Information**

This information is being requested to identify points-of-contact who are in charge of your bank's USA PATRIOT Act Section 314(a) information requests. Bank personnel listed could be contacted by law enforcement officers or the Financial Crimes Enforcement Network (FinCEN) for additional information related to specific Section 314(a) search requests or other anti-terrorist financing and anti-money laundering matters. Communications sent by FinCEN to the bank for purposes other than Section 314(a) notifications will state the intended purpose and should be directed to the appropriate bank personnel for review. Any disclosure of customer records to law enforcement officers or FinCEN must be done in compliance with applicable law, including the Right to Financial Privacy Act (12 U.S.C. 3401 et seq.).

Please provide information for a primary and secondary contact. Information for a third and fourth contact may be provided at the bank's option. Enter "none" for the contact's e-mail address if not available. This contact information is for the confidential use of the Agencies, FinCEN, and law enforcement officers and will not be released to the public.

**Primary Contact**DAVID DIERLAM

Name (TEXT C437)

VICE PRESIDENT / COMPLIANCE OFFICER

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Telephone: Area code/phone number/extension (TEXT C440)

**Secondary Contact**JAMES LANDENBERGER

Name (TEXT C442)

PRESIDENT

Title (TEXT C443)

JLANDENBERGER@ABOC.COM

E-mail Address (TEXT C444)

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**Third Contact**WILLIAM DUNN

Name (TEXT C870)

SENIOR VICE PRESIDENT

Title (TEXT C871)

WDUNN@ABOC.COM

E-mail Address (TEXT C872)

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Telephone: Area code/phone number/extension (TEXT C873)

**Fourth Contact**  
Name (TEXT C875)  
Title (TEXT C876)  
E-mail Address (TEXT C877)  
Telephone: Area code/phone number/extension (TEXT C878)

# Consolidated Report of Income

## For the period January 1, 2021 — June 30, 2021

### Schedule RI—Income Statement

		Dollar Amounts in Thousands	RIAD	Amount	
<b>1. Interest income:</b>					
<b>a. Interest and fee income on loans:</b>					
<b>(1) Loans secured by real estate:</b>					
(a) Loans secured by 1-4 family residential properties.....					
	4435	1,088			1.a.1.a.
(b) All other loans secured by real estate.....					
	4436	9,016			1.a.1.b.
<b>(2) Commercial and industrial loans.....</b>					
	4012	898			1.a.2.
<b>(3) Loans to individuals for household, family, and other personal expenditures:</b>					
(a) Credit cards.....					
	8485	1,050			1.a.3.a.
(b) Other (includes revolving credit plans other than credit cards, automobile loans, and other consumer loans).....					
	8486	2			1.a.3.b.
<b>(4) Not applicable</b>					
<b>(5) All other loans (1).....</b>					
	4058	15			1.a.5.
<b>(6) Total interest and fee income on loans (sum of items 1.a.(1)(a) through 1.a.(5)).....</b>					
	4010	12,069			1.a.6.
<b>b. Income from lease financing receivables.....</b>					
	4065	0			1.b.
<b>c. Interest income on balances due from depository institutions (2).....</b>					
	4115	124			1.c.
<b>d. Interest and dividend income on securities:</b>					
(1) U.S. Treasury securities and U.S. Government agency obligations (excluding mortgage-backed securities).....					
	8488	682			1.d.1.
(2) Mortgage-backed securities.....					
	8489	133			1.d.2.
(3) All other securities (includes securities issued by states and political subdivisions in the U.S.).....					
	4060	4			1.d.3.
<b>e. Not applicable</b>					
<b>f. Interest income on federal funds sold and securities purchased under agreements to resell.....</b>					
	4020	0			1.f.
<b>g. Other interest income.....</b>					
	4518	25			1.g.
<b>h. Total interest income (sum of items 1.a.(6) through 1.g.).....</b>					
	4107	13,037			1.h.
<b>2. Interest expense:</b>					
<b>a. Interest on deposits:</b>					
(1) Transaction accounts (interest-bearing demand deposits, NOW accounts, ATS accounts, and telephone and preauthorized transfer accounts).....					
	4508	75			2.a.1.
(2) Nontransaction accounts:					
(a) Savings deposits (includes MMDAs).....					
	0093	182			2.a.2.a.
(b) Time deposits of \$250,000 or less.....					
	HK03	114			2.a.2.b.
(c) Time deposits of more than \$250,000.....					
	HK04	15			2.a.2.c.
<b>b. Expense of federal funds purchased and securities sold under agreements to repurchase.....</b>					
	4180	0			2.b.
<b>c. Other interest expense.....</b>					
	GW44	0			2.c.
<b>d. Not applicable</b>					
<b>e. Total interest expense (sum of items 2.a through 2.d.).....</b>					
	4073	386			2.e.
<b>3. Net interest income (item 1.h minus 2.e.).....</b>					
	4074	12,651			3.
<b>4. Provision for loan and lease losses (3).....</b>					
	JJ33	800			4.

1 Includes interest and fee income on "Loans to depository institutions and acceptances of other banks," "Loans to finance agricultural production and other loans to farmers," "Obligations (other than securities and leases) of states and political subdivisions in the U.S.," and "Loans to nondepository financial institutions and other loans."

2 Includes interest income on time certificates of deposit not held for trading.

3 Institutions that have adopted ASU 2016-13 should report in item 4 the provisions for credit losses on all financial assets and off-balance-sheet exposures that fall within the scope of the standard.

Schedule RI—Continued

	Dollar Amounts in Thousands		Year-to-date		
			RIAD	Amount	
5. Noninterest income:					
a. Income from fiduciary activities (1).....	4070	6,306			5.a.
b. Service charges on deposit accounts.....	4080	965			5.b.
c. Not applicable					
d. <b>Income from securities-related and insurance activities:</b>					
(1) Fees and commissions from securities brokerage, investment banking, advisory, and underwriting activities.....	HT73	0			5.d.1.
(2) Income from insurance activities (2).....	HT74	0			5.d.2.
e. Not applicable					
f. Net servicing fees.....	B492	0			5.f.
g. and h. Not applicable					
i. Net gains (losses) on sales of loans and leases.....	5416	0			5.i.
j. Net gains (losses) on sales of other real estate owned.....	5415	0			5.j.
k. Net gains (losses) on sales of other assets (3).....	B496	0			5.k.
l. Other noninterest income*.....	B497	1,351			5.l.
m. Total noninterest income (sum of items 5.a through 5.l).....	4079	8,622			5.m.
6. a. Realized gains (losses) on held-to-maturity securities.....	3521	0			6.a.
b. Realized gains (losses) on available-for-sale debt securities.....	3196	31			6.b.
7. Noninterest expense:					
a. Salaries and employee benefits.....	4135	9,732			7.a.
b. Expenses of premises and fixed assets (net of rental income (excluding salaries and employee benefits and mortgage interest).....	4217	1,667			7.b.
c. (1) Goodwill impairment losses.....	C216	0			7.c.1.
(2) Amortization expense and impairment losses for other intangible assets.....	C232	3			7.c.2.
d. Other noninterest expense*.....	4092	6,863			7.d.
e. Total noninterest expense (sum of items 7.a through 7.d).....	4093	18,265			7.e.
8. a. Income (loss) before change in net unrealized holding gains (losses) on equity securities not held for trading, applicable income taxes, and discontinued operations (item 3 plus or minus items 4, 5.m, 6.a, 6.b, and 7.e).....	HT69	2,239			8.a.
b. Change in net unrealized holding gains (losses) on equity securities not held for trading (4).....	HT70	0			8.b.
c. Income (loss) before applicable income taxes and discontinued operations (sum of items 8.a and 8.b).....	4301	2,239			8.c.
9. Applicable income taxes (on item 8.c).....	4302	534			9.
10. Income (loss) before discontinued operations (item 8.c minus item 9).....	4300	1,705			10.
11. Discontinued operations, net of applicable income taxes*.....	FT28	0			11.
12. Net income (loss) attributable to bank and noncontrolling (minority) interests (sum of items 10 and 11).....	G104	1,705			12.
13. LESS: Net income (loss) attributable to noncontrolling (minority) interests (if net income, report as a positive value; if net loss, report as a negative value).....	G103	0			13.
14. Net income (loss) attributable to bank (item 12 minus item 13).....	4340	1,705			14.

\* Describe on Schedule RI-E - Explanations

1 For banks required to complete Schedule RC-T, items 14 through 22, income from fiduciary activities reported in Schedule RI, item 5.a, must equal the amount reported in Schedule RC-T, item 22.

2 Includes underwriting income from insurance and reinsurance activities.

3 Exclude net gains (losses) on sales of trading assets and held-to-maturity and available-for-sale debt securities.

4 Item 8.b is to be completed by all institutions. See the instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.

### Schedule RI—Continued

#### Memoranda

	Year-to-date		
	RIAD	Amount	
Dollar Amounts in Thousands			
1. and 2. Not applicable			
3. Income on tax-exempt loans and leases to states and political subdivisions in the U.S. (included in Schedule RI, items 1.a and 1.b).....	4313	15	M.3.
4. Income on tax-exempt securities issued by states and political subdivisions in the U.S. (included in Schedule RI, item 1.d.(3)).....	4507	0	M.4.
5. Number of full-time equivalent employees at end of current period (round to the nearest whole number).....	4150	167	M.5.
<i>Memorandum item 6 is to be completed by:<sup>1</sup></i>			
<ul style="list-style-type: none"> <li>banks with \$300 million or more in total assets, and</li> <li>banks with less than \$300 million in total assets that have loans to finance agricultural production and other loans to farmers (Schedule RC-C, Part I, item 3) exceeding 5 percent of total loans.</li> </ul>			
6. Interest and fee income on loans to finance agricultural production and other loans to farmers (included in Schedule RI, item 1.a.(5)).....	RIAD	Amount	
	4024	0	M.6.
7. If the reporting institution has applied push down accounting this calendar year, report the date of the institution's acquisition (see instructions) (2).....	RIAD	Date	
	9106	0	M.7.
8. through 10. Not applicable			
11. Does the reporting bank have a Subchapter S election in effect for federal income tax purposes for the current tax year?.....	RIAD	YES / NO	
	A530	NO	M.11.
<i>Memorandum item 12 is to be completed by banks that are required to complete Schedule RC-C, Part I, Memorandum items 8.b and 8.c. and is to be completed annually in the December report only.</i>			
12. Noncash income from negative amortization on closed-end loans secured by 1-4 family residential properties (included in Schedule RI, item 1.a.(1)(a)).....	RIAD	Amount	
	F228	NR	M.12.
13. Not applicable			
<i>Memorandum item 14 is to be completed semiannually in the June and December reports only.</i>			
14. Other-than-temporary impairment losses on held-to-maturity and available-for-sale debt securities recognized in earnings (included in Schedule RI, items 6.a and 6.b) (3).....	J321	0	M.14.
<i>Memorandum item 15 is to be completed annually in the December report only by institutions with \$1 billion or more in total assets<sup>1</sup> that answered "Yes" to Schedule RC-E, Memorandum item 5.</i>			
15. Components of service charges on deposit accounts (sum of Memorandum items 15.a through 15.d must equal Schedule RI, item 5.b):			
a. Consumer overdraft-related service charges levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use.....	RIAD	Amount	
	H032	NR	M.15.a.
b. Consumer account periodic maintenance charges levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use.....	H033	NR	M.15.b.
c. Consumer customer automated teller machine (ATM) fees levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use.....	H034	NR	M.15.c.
d. All other service charges on deposit accounts.....	H035	NR	M.15.d.

<sup>1</sup> For the \$300 million and \$1 billion asset-size tests for report dates through December 31, 2021, an institution may use the lesser of the total assets reported in its Report of Condition as of December 31, 2019, or June 30, 2020. If the total assets reported as of one of these two report dates are less than \$300 million, the same report date should be used for the 5 percent of total loans test. If the total assets reported for both of these two report dates are less than \$300 million, the 5 percent of total loans test should be based on the total loans reported in the Report of Condition as of June 30, 2020.

<sup>2</sup> Report the date in YYYYMMDD format. For example, a bank acquired on March 1, 2021 would report 20210301.

<sup>3</sup> Memorandum item 14 is to be completed only by institutions that have not adopted ASU 2016-13.

**Schedule RI-A—Changes in Bank Equity Capital**

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RI-4

	Dollar Amounts in Thousands		
	RIAD	Amount	
1. Total bank equity capital most recently reported for the December 31, 2020, Reports of Condition and Income (i.e., after adjustments from amended Reports of Income).....	3217	88,757	1.
2. Cumulative effect of changes in accounting principles and corrections of material accounting errors*.....	8507	0	2.
3. Balance end of previous calendar year as restated (sum of items 1 and 2).....	8508	88,757	3.
4. Net income (loss) attributable to bank (must equal Schedule RI, item 14).....	4340	1,705	4.
5. Sale, conversion, acquisition, or retirement of capital stock, net (excluding treasury stock transactions).....	8509	0	5.
6. Treasury stock transactions, net.....	8510	0	6.
7. Changes incident to business combinations, net.....	4356	0	7.
8. LESS: Cash dividends declared on preferred stock.....	4470	0	8.
9. LESS: Cash dividends declared on common stock.....	4460	400	9.
10. Other comprehensive income (1).....	8511	(1,197)	10.
11. Other transactions with stockholders (including a parent holding company)* (not included in items 5, 6, 8, or 9 above).....	4415	0	11.
12. Total bank equity capital end of current period (sum of items 3 through 11) (must equal Schedule RC, item 27.a).....	3210	88,865	12.

\* Describe on Schedule RI-E—Explanations.

1 Includes, but is not limited to, changes in net unrealized holding gains (losses) on available-for-sale debt securities, changes in accumulated net gains (losses) on cash flow hedges, and pension and other postretirement plan-related changes other than net periodic benefit cost.

# Schedule RI-B—Charge-offs and Recoveries on Loans and Leases and Changes in Allowances for Credit Losses

## Part I. Charge-offs and Recoveries on Loans and Leases

Part I includes charge-offs and recoveries through the allocated transfer risk reserve.

Dollar Amounts in Thousands

	(Column A) Charge-offs <sup>1</sup>		(Column B) Recoveries		
	RIAD	Amount	RIAD	Amount	
Calendar year-to-date					
1. Loans secured by real estate:					
a. Construction, land development, and other land loans:					
(1) 1-4 family residential construction loans.....	C891	0	C892	0	1.a.1.
(2) Other construction loans and all land development and other land loans.....	C893	0	C894	0	1.a.2.
b. Secured by farmland.....	3584	0	3585	0	1.b.
c. Secured by 1-4 family residential properties:					
(1) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	5411	0	5412	0	1.c.1.
(2) Closed-end loans secured by 1-4 family residential properties:					
(a) Secured by first liens.....	C234	0	C217	0	1.c.2.a.
(b) Secured by junior liens.....	C235	0	C218	0	1.c.2.b.
d. Secured by multifamily (5 or more) residential properties.....	3588	0	3589	0	1.d.
e. Secured by nonfarm nonresidential properties:					
(1) Loans secured by owner-occupied nonfarm nonresidential properties.....	C895	0	C896	0	1.e.1.
(2) Loans secured by other nonfarm nonresidential properties.....	C897	0	C898	0	1.e.2.
2. and 3. Not applicable					
4. Commercial and industrial loans.....	4638	0	4608	0	4.
5. Loans to individuals for household, family, and other personal expenditures:					
a. Credit cards.....	B514	541	B515	106	5.a.
b. Automobile loans.....	K129	0	K133	0	5.b.
c. Other (includes revolving credit plans other than credit cards and other consumer loans).....	K205	0	K206	0	5.c.
6. Not applicable					
7. All other loans (2).....	4644	0	4628	0	7.
8. Lease financing receivables.....	4266	0	4267	0	8.
9. Total (sum of items 1 through 8).....	4635	541	4605	106	9.

<sup>1</sup> Include write-downs arising from transfers of loans to a held-for-sale account.

<sup>2</sup> Includes charge-offs and recoveries on "Loans to depository institutions and acceptances of other banks," "Loans to finance agricultural production and other loans to farmers," "Obligations (other than securities and leases) of states and political subdivisions in the U.S.," and "Loans to non-depository financial institutions and other loans."

### Memoranda

Dollar Amounts in Thousands

	(Column A) Charge-offs <sup>1</sup>		(Column B) Recoveries		
	RIAD	Amount	RIAD	Amount	
Calendar year-to-date					
1. Loans to finance commercial real estate, construction, and land development activities (not secured by real estate) included in Schedule RI-B, Part I, items 4 and 7, above.....	5409	0	5410	0	M.1.
2. Not applicable					

<sup>1</sup> Include write-downs arising from transfers of loans to a held-for-sale account.

**Schedule RI-B—Continued**

**Part I - Continued**

**Memoranda - Continued**

Dollar Amounts in Thousands	(Column A) Charge-offs <sup>1</sup>		(Column B) Recoveries		
	Calendar year-to-date				
	RIAD	Amount	RIAD	Amount	
<i>Memorandum item 3 is to be completed by:</i> <sup>2</sup>					
• banks with \$300 million or more in total assets, and					
• banks with less than \$300 million in total assets that have loans to finance agricultural production and other loans to farmers (Schedule RC-C, Part I, item 3) exceeding 5 percent of total loans.					
3. Loans to finance agricultural production and other loans to farmers (included in Schedule RI-B, Part I, item 7, above).....	4655	0	4665	0	M.3.

1 Include write-downs arising from transfers of loans to a held-for-sale account.  
2 For the \$300 million asset-size test for report dates through December 31, 2021, an institution may use the lesser of the total assets reported in its Report of Condition as of December 31, 2019, or June 30, 2020. If the total assets reported as of one of these two report dates are less than \$300 million, the same report date should be used for the 5 percent of total loans test. If the total assets reported for both of these two report dates are less than \$300 million, the 5 percent of total loans test should be based on the total loans reported in the Report of Condition as of June 30, 2020.

**Part II. Changes in Allowances for Credit Losses<sup>1</sup>**

Dollar Amounts in Thousands	(Column A) Loans and Leases Held for Investment		(Column B) Held-to-Maturity Debt Securities <sup>2</sup>		(Column C) Available-for-Sale Debt Securities <sup>2</sup>		
	RIAD	Amount	RIAD	Amount	RIAD	Amount	
	1. Balance most recently reported for the December 31, 2020, Reports of Condition and Income (i.e., after adjustments from amended Reports of Income).....	B522	7,685	JH88	NR	JH94	
2. Recoveries (column A must equal Part I, item 9, column B, above).....	4605	106	JH89	NR	JH95	NR	2.
3. LESS: Charge-offs (column A must equal Part I, item 9, column A, above less Schedule RI-B, Part II, item 4, column A).....	C079	541	JH92	NR	JH98	NR	3.
4. LESS: Write-downs arising from transfers of financial assets (3).....	5523	0	JJ00	NR	JJ01	NR	4.
5. Provisions for credit losses (4,5).....	4230	800	JH90	NR	JH96	NR	5.
6. Adjustments* (see instructions for this schedule).....	C233	0	JH91	NR	JH97	NR	6.
7. Balance end of current period (sum of items 1, 2, 5, and 6, less items 3 and 4) (column A must equal Schedule RC, item 4.c).....	3123	8,050	JH93	NR	JH99	NR	7.

\* Describe on Schedule RI-E - Explanations.  
1 Institutions that have not yet adopted ASU 2016-13 should report changes in the allowance for loan and lease losses in column A.  
2 Columns B and C are to be completed only by institutions that have adopted ASU 2016-13.  
3 Institutions that have not yet adopted ASU 2016-13 should report write-downs arising from transfers of loans to a held-for-sale account in item 4, column A.  
4 Institutions that have not yet adopted ASU 2016-13 should report the provision for loan and lease losses in item 5, column A, and the amount reported must equal Schedule RI, item 4.  
5 For institutions that have adopted ASU 2016-13, the sum of item 5, columns A through C, plus Schedule RI-B, Part II, Memorandum items 5 and 7, below, must equal Schedule RI, item 4.

**Memoranda**

Dollar Amounts in Thousands	RIAD	Amount	
1. to 4. Not applicable			
5. Provisions for credit losses on other financial assets measured at amortized cost (not included in item 5, above) (1).....	JJ02	NR	M.5.
6. Allowance for credit losses on other financial assets measured at amortized cost (not included in item 7, above) (1).....	RCON		
	JJ03	NR	M.6.
	RIAD		
7. Provisions for credit losses on off-balance-sheet credit exposures (1).....	MG93	NR	M.7.

1 Memorandum items 5, 6, and 7 are to be completed only by institutions that have adopted ASU 2016-13.

### Schedule RI-C—Disaggregated Data on the Allowance for Loan and Lease Losses

Items 1 through 6 are to be completed semiannually in the June and December reports only by institutions with \$1 billion or more in total assets.<sup>1</sup>

	Dollar Amounts in Thousands				
	(Column A) Recorded Investment <sup>2</sup>		(Column B) Allowance Balance <sup>2</sup>		
	RCON	Amount	RCON	Amount	
<b>Loans and Leases Held for Investment:</b>					
1. Real estate loans:					
a. Construction loans.....	JJ04	NR	JJ12	NR	1.a.
b. Commercial real estate loans.....	JJ05	NR	JJ13	NR	1.b.
c. Residential real estate loans.....	JJ06	NR	JJ14	NR	1.c.
2. Commercial loans (3).....	JJ07	NR	JJ15	NR	2.
3. Credit cards.....	JJ08	NR	JJ16	NR	3.
4. Other consumer loans.....	JJ09	NR	JJ17	NR	4.
5. Unallocated, if any.....			JJ18	NR	5.
6. Total (sum of items 1.a through 5) (4).....	JJ11	NR	JJ19	NR	6.

Items 7 through 11 are to be completed semiannually in the June and December reports only by institutions with \$1 billion or more in total assets. (1,5)

	Dollar Amounts in Thousands		Allowance Balance		
	RCON	Amount	RCON	Amount	
<b>Held-to-Maturity Securities:</b>					
7. Securities issued by states and political subdivisions in the U.S.....	JJ20	NR			7.
8. Mortgage-backed securities (MBS) (including CMOs, REMICs, and stripped MBS).....	JJ21	NR			8.
9. Asset-backed securities and structured financial products.....	JJ23	NR			9.
10. Other debt securities.....	JJ24	NR			10.
11. Total (sum of items 7 through 10) (6).....	JJ25	NR			11.

1 For the \$1 billion asset-size test for report dates through December 31, 2021, an institution may use the lesser of the total assets reported in its Report of Condition as of December 31, 2019, or June 30, 2020.

2 Institutions that have adopted ASU 2016-13 should report the amortized cost and the related allowance for credit losses by loan category in columns A and B, respectively.

3 Include all loans and leases not reported as real estate loans, credit cards, or other consumer loans in items 1, 3, or 4 of Schedule RI-C.

4 Item 6, column B, must equal Schedule RC, item 4.c.

5 Only institutions that have adopted ASU 2016-13 are to complete items 7 through 11.

6 Item 11 must equal Schedule RI-B, Part II, item 7, column B.

### Schedule RI-E—Explanations

Schedule RI-E is to be completed each quarter on a calendar year-to-date basis, unless otherwise noted.

Detail all adjustments in Schedule RI-A and RI-B, all discontinued operations in Schedule RI, and all significant items of other noninterest income and other noninterest expense in Schedule RI (See instructions for details.)

		Dollar Amounts in Thousands		Year-to-date		
				RIAD	Amount	
<i>Items 1.a through 1.j and 2.a through 2.p are to be completed annually on a calendar year-to-date basis in the December report only.</i>						
<b>1. Other noninterest income (from Schedule RI, item 5.l)</b>						
Itemize and describe amounts greater than \$100,000 that exceed 7% of Schedule RI, item 5.l:						
a.	Income and fees from the printing and sale of checks.....	C013		NR		1.a.
b.	Earnings on/increase in value of cash surrender value of life insurance.....	C014		NR		1.b.
c.	Income and fees from automated teller machines (ATMs).....	C016		NR		1.c.
d.	Rent and other income from other real estate owned.....	4042		NR		1.d.
e.	Safe deposit box rent.....	C015		NR		1.e.
f.	Bank card and credit card interchange fees.....	F555		NR		1.f.
g.	Income and fees from wire transfers not reportable as service charges on deposit accounts.....	T047		NR		1.g.
h.	TEXT 4461	4461		NR		1.h.
i.	TEXT 4462	4462		NR		1.i.
j.	TEXT 4463	4463		NR		1.j.
<b>2. Other noninterest expense (from Schedule RI, item 7.d)</b>						
Itemize and describe amounts greater than \$100,000 that exceed 7% of Schedule RI, item 7.d:						
a.	Data processing expenses.....	C017		NR		2.a.
b.	Advertising and marketing expenses.....	0497		NR		2.b.
c.	Directors' fees.....	4136		NR		2.c.
d.	Printing, stationery, and supplies.....	C018		NR		2.d.
e.	Postage.....	8403		NR		2.e.
f.	Legal fees and expenses.....	4141		NR		2.f.
g.	FDIC deposit insurance assessments.....	4146		NR		2.g.
h.	Accounting and auditing expenses.....	F556		NR		2.h.
i.	Consulting and advisory expenses.....	F557		NR		2.i.
j.	Automated teller machine (ATM) and interchange expenses.....	F558		NR		2.j.
k.	Telecommunications expenses.....	F559		NR		2.k.
l.	Other real estate owned expenses.....	Y923		NR		2.l.
m.	Insurance expenses (not included in employee expenses, premises and fixed asset expenses, and other real estate owned expenses).....	Y924		NR		2.m.
n.	TEXT 4464	4464		NR		2.n.
o.	TEXT 4467	4467		NR		2.o.
p.	TEXT 4468	4468		NR		2.p.
<b>3. Discontinued operations and applicable income tax effect (from Schedule RI, item 11)</b>						
(itemize and describe each discontinued operation):						
a. (1)	TEXT FT29	FT29		0		3.a.1.
	(2) Applicable income tax effect.....	FT30		0		3.a.2.
b. (1)	TEXT FT31	FT31		0		3.b.1.
	(2) Applicable income tax effect.....	FT32		0		3.b.2.

**Schedule RI-E—Continued**

		Dollar Amounts in Thousands		Year-to-date		
				RIAD	Amount	
4. Cumulative effect of changes in accounting principles and corrections of material accounting errors (from Schedule RI-A, item 2) (itemize and describe all such effects):						
a.	Effect of adoption of current expected credit losses methodology – ASU 2016-13 (1,2).....	JJ26		NR		4.a.
b.	Effect of adoption of lease accounting standard – ASC Topic 842.....	KW17				4.b.
c.	TEXT BS26	B526		0		4.c.
d.	TEXT BS27	B527		0		4.d.
5. Other transactions with stockholders (including a parent holding company) (from Schedule RI-A, item 11) (itemize and describe all such transactions):						
a.	TEXT 4498	4498		0		5.a.
b.	TEXT 4499	4499		0		5.b.
6. Adjustments to allowances for credit losses (3) (from Schedule RI-B, Part II, item 6) (itemize and describe all adjustments):						
a.	Initial allowances for credit losses recognized upon the acquisition of purchased credit-deteriorated assets on or after the effective date of ASU 2016-13 (1).....	JJ27		NR		6.a.
b.	Effect of adoption of current expected credit losses methodology on allowances for credit losses (1,2).....	JJ28		NR		6.b.
c.	TEXT 4521	4521		0		6.c.
d.	TEXT 4522	4522		0		6.d.
7. Other explanations (the space below is provided for the bank to briefly describe, at its option, any other significant items affecting the Report of Income):						
Comments?.....		4769		NO		7.

Other explanations (please type or print clearly):  
(TEXT 4769)

1 Only institutions that have adopted ASU 2016-13 should report amounts in items 4.a, 6.a, and 6.b, if applicable.  
2 An institution should complete item 4.a and item 6.b in the quarter that it adopts ASU 2016-13 and in the quarter-end Call Reports for the remainder of that calendar year only.  
3 Institutions that have not adopted ASU 2016-13 should report adjustments to the allowance for loan and lease losses in items 6.c and 6.d, if applicable.

# Consolidated Report of Condition for Insured Banks and Savings Associations for June 30, 2021

All schedules are to be reported in thousands of dollars. Unless otherwise indicated, report the amount outstanding as of the last business day of the quarter.

## Schedule RC—Balance Sheet

		Dollar Amounts in Thousands	RCON	Amount	
<b>Assets</b>					
1. Cash and balances due from depository institutions:					
a. Noninterest-bearing balances and currency and coin (1).....					
			0081	15,678	1.a.
b. Interest-bearing balances (2).....					
			0071	212,477	1.b.
2. Securities:					
a. Held-to-maturity securities (from Schedule RC-B, column A) (3).....					
			JJ34	9,649	2.a.
b. Available-for-sale debt securities (from Schedule RC-B, column D).....					
			L773	164,207	2.b.
c. Equity securities with readily determinable fair values not held for trading (4).....					
			JA22	0	2.c.
3. Federal funds sold and securities purchased under agreements to resell:					
a. Federal funds sold.....					
			B987	0	3.a.
b. Securities purchased under agreements to resell (5,6).....					
			B989	0	3.b.
4. Loans and lease financing receivables (from Schedule RC-C):					
a. Loans and leases held for sale.....					
			5369	0	4.a.
b. Loans and leases held for investment.....					
	B528	519,020			4.b.
c. LESS: Allowance for loan and lease losses (7).....					
	3123	8,050			4.c.
d. Loans and leases held for investment, net of allowance (item 4.b minus 4.c).....					
			B529	510,970	4.d.
5. Trading assets.....					
			3545	0	5.
6. Premises and fixed assets (including capitalized leases).....					
			2145	4,583	6.
7. Other real estate owned (from Schedule RC-M).....					
			2150	225	7.
8. Investments in unconsolidated subsidiaries and associated companies.....					
			2130	0	8.
9. Direct and indirect investments in real estate ventures.....					
			3656	1,799	9.
10. Intangible assets (from Schedule RC-M).....					
			2143	26	10.
11. Other assets (from Schedule RC-F) (6).....					
			2160	30,526	11.
12. Total assets (sum of items 1 through 11).....					
			2170	950,140	12.
<b>Liabilities</b>					
13. Deposits:					
a. In domestic offices (sum of totals of columns A and C from Schedule RC-E).....					
			2200	836,202	13.a.
(1) Noninterest-bearing (8).....					
	6631	514,680			13.a.1.
(2) Interest-bearing.....					
	6636	321,522			13.a.2.
b. Not applicable					
14. Federal funds purchased and securities sold under agreements to repurchase:					
a. Federal funds purchased (9).....					
			B993	0	14.a.
b. Securities sold under agreements to repurchase (10).....					
			B995	0	14.b.
15. Trading liabilities.....					
			3548	0	15.
16. Other borrowed money (includes mortgage indebtedness) (from Schedule RC-M) .....					
			3190	5,000	16.
17. and 18. Not applicable					
19. Subordinated notes and debentures (11).....					
			3200	0	19.

1 Includes cash items in process of collection and unposted debits.  
 2 Includes time certificates of deposit not held for trading.  
 3 Institutions that have adopted ASU 2016-13 should report in item 2.a amounts net of any applicable allowance for credit losses, and item 2.a should equal Schedule RC-B, item 8, column A, less Schedule RI-B, Part II, item 7, column B.  
 4 Item 2.c is to be completed by all institutions. See the instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.  
 5 Includes all securities resale agreements, regardless of maturity.  
 6 Institutions that have adopted ASU 2016-13 should report in items 3.b and 11 amounts net of any applicable allowance for credit losses.  
 7 Institutions that have adopted ASU 2016-13 should report in item 4.c the allowance for credit losses on loans and leases.  
 8 Includes noninterest-bearing, demand, time, and savings deposits.  
 9 Report overnight Federal Home Loan Bank advances in Schedule RC, item 16, "Other borrowed money."  
 10 Includes all securities repurchase agreements, regardless of maturity.  
 11 Includes limited-life preferred stock and related surplus.

**Schedule RC—Continued**

	Dollar Amounts in Thousands		
	RCON	Amount	
<b>Liabilities—continued</b>			
20. Other liabilities (from Schedule RC-G).....	2930	20,073	20.
21. Total liabilities (sum of items 13 through 20).....	2948	861,275	21.
22. Not applicable			
<b>Equity Capital</b>			
<b>Bank Equity Capital</b>			
23. Perpetual preferred stock and related surplus.....	3838	0	23.
24. Common stock.....	3230	2,200	24.
25. Surplus (excludes all surplus related to preferred stock).....	3839	17,800	25.
26. a. Retained earnings.....	3632	74,457	26.a.
b. Accumulated other comprehensive income (1).....	8530	(5,592)	26.b.
c. Other equity capital components (2).....	A130	0	26.c.
27. a. Total bank equity capital (sum of items 23 through 26.c).....	3210	88,865	27.a.
b. Noncontrolling (minority) interests in consolidated subsidiaries.....	3000	0	27.b.
28. Total equity capital (sum of items 27.a and 27.b).....	G105	88,865	28.
29. Total liabilities and equity capital (sum of items 21 and 28).....	3300	950,140	29.

**Memoranda**

**To be reported with the March Report of Condition.**

1. Indicate in the box at the right the number of the statement below that best describes the most comprehensive level of auditing work performed for the bank by independent external auditors as of any date during 2020.....

RCON	Number
6724	NR

M.1.

- 1a = An integrated audit of the reporting institution's financial statements and its internal control over financial reporting conducted in accordance with the standards of the American Institute of Certified Public Accountants (AICPA) or the Public Company Accounting Oversight Board (PCAOB) by an independent public accountant that submits a report on the institution
- 1b = An audit of the reporting institution's financial statements only conducted in accordance with the auditing standards of the AICPA or the PCAOB by an independent public accountant that submits a report on the institution
- 2a = An integrated audit of the reporting institution's parent holding company's consolidated financial statements and its internal control over financial reporting conducted in accordance with the standards of the AICPA or the PCAOB by an independent public accountant that submits a report on the consolidated holding company (but not on the institution separately)
- 2b = An audit of the reporting institution's parent holding company's consolidated financial statements only conducted in accordance with the auditing standards of the AICPA or the PCAOB by an independent public accountant that submits a report on the consolidated holding company (but not on the institution separately)

- 3 = This number is not to be used
- 4 = Directors' examination of the bank conducted in accordance with generally accepted auditing standards by a certified public accounting firm (may be required by state-chartering authority)
- 5 = Directors' examination of the bank performed by other external auditors (may be required by state-chartering authority)
- 6 = Review of the bank's financial statements by external auditors
- 7 = Compilation of the bank's financial statements by external auditors
- 8 = Other audit procedures (excluding tax preparation work)
- 9 = No external audit work

**To be reported with the March Report of Condition.**

2. Bank's fiscal year-end date (report the date in MMDD format).....

RCON	Date
8678	NR

M.2.

1 Includes, but is not limited to, net unrealized holding gains (losses) on available-for-sale securities, accumulated net gains (losses) on cash flow hedges, and accumulated defined benefit pension and other postretirement plan adjustments.  
2 Includes treasury stock and unearned Employee Stock Ownership Plan shares.

### Schedule RC-B—Securities

Exclude assets held for trading.

Dollar Amounts in Thousands	Held-to-maturity				Available-for-sale				
	(Column A) Amortized Cost		(Column B) Fair Value		(Column C) Amortized Cost		(Column D) Fair Value		
	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	
1. U.S. Treasury securities.....	0211	0	0213	0	1286	27,948	1287	27,977	1.
2. U.S. Government agency and sponsored agency obligations (exclude mortgage-backed securities) (1).....	HT50	0	HT51	0	HT52	136,688	HT53	135,953	2.
3. Securities issued by states and political subdivisions in the U.S.....	8496	0	8497	0	8498	0	8499	0	3.
4. Mortgage-backed securities (MBS):									
a. Residential mortgage pass-through securities:									
(1) Issued or guaranteed by FNMA, FHLMC, or GNMA.....	HT54	7,649	HT55	8,087	HT56	252	HT57	277	4.a.1.
(2) Other pass-through securities.....	G308	0	G309	0	G310	0	G311	0	4.a.2.
b. Other residential mortgage-backed securities (include CMOs, REMICs, and stripped MBS):									
(1) Issued or guaranteed by U.S. Government agencies or sponsored agencies (2).....	G312	0	G313	0	G314	0	G315	0	4.b.1.
(2) Collateralized by MBS issued or guaranteed by U.S. Government agencies or sponsored agencies (2).....	G316	0	G317	0	G318	0	G319	0	4.b.2.
(3) All other residential MBS.....	G320	0	G321	0	G322	0	G323	0	4.b.3.

1 Includes Small Business Administration "Guaranteed Loan Pool Certificates," U.S. Maritime Administration obligations, Export-Import Bank participation certificates, and obligations (other than mortgage-backed securities) issued by the Farm Credit System, the Federal Home Loan Bank System, the Federal Home Loan Mortgage Corporation, the Federal National Mortgage Association, the Resolution Funding Corporation, the Student Loan Marketing Association, and the Tennessee Valley Authority.

2 U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).

**Schedule RC-B—Continued**

Dollar Amounts in Thousands	Held-to-maturity				Available-for-sale				
	(Column A) Amortized Cost		(Column B) Fair Value		(Column C) Amortized Cost		(Column D) Fair Value		
	RCON	Amount	RCON	Amount	RCON	Amount	RCON	Amount	
4. c. Commercial MBS:									
(1) Commercial mortgage pass-through securities:									
(a) Issued or guaranteed by FNMA, FHLMC, or GNMA.....	K142	0	K143	0	K144	0	K145	0	4.c.1.a.
(b) Other pass-through securities.....	K146	0	K147	0	K148	0	K149	0	4.c.1.b.
4. c.(2) Other commercial MBS:									
(a) Issued or guaranteed by U.S. Government agencies or sponsored agencies (1).....	K150	0	K151	0	K152	0	K153	0	4.c.2.a.
(b) All other commercial MBS.....	K154	0	K155	0	K156	0	K157	0	4.c.2.b.
5. Asset-backed securities and structured financial products:									
a. Asset-backed securities (ABS).....	C026	0	C988	0	C989	0	C027	0	5.a.
b. Structured financial products.....	HT58	0	HT59	0	HT60	0	HT61	0	5.b.
6. Other debt securities:									
a. Other domestic debt securities.....	1737	0	1738	0	1739	0	1741	0	6.a.
b. Other foreign debt securities.....	1742	2,000	1743	2,000	1744	0	1746	0	6.b.
7. Not applicable									
8. Total (sum of items 1 through 6.b) (2).....	1754	9,649	1771	10,087	1772	164,888	1773	164,207	8.

<sup>1</sup> U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).

<sup>2</sup> For institutions that have adopted ASU 2016-13, the total reported in column A must equal Schedule RC, item 2.a, plus Schedule RI-B, Part II, item 7, column B. For institutions that have not adopted ASU 2016-13, the total reported in column A must equal Schedule RC, item 2.a. For all institutions, the total reported in column D must equal Schedule RC, item 2.b.

Schedule RC-B—Continued

Memoranda

	Dollar Amounts in Thousands	RCON	Amount	
1. Pledged securities (1).....		0416	165,915	M.1.
2. Maturity and repricing data for debt securities (excluding those in nonaccrual status):				
a. Securities issued by the U.S. Treasury, U.S. Government agencies, and states and political subdivisions in the U.S.; other non-mortgage debt securities; and mortgage pass-through securities other than those backed by closed-end first lien 1-4 family residential mortgages with a remaining maturity or next repricing date of: (2,3)				
(1) Three months or less.....		A549	0	M.2.a.1.
(2) Over three months through 12 months.....		A550	26,268	M.2.a.2.
(3) Over one year through three years.....		A551	35,733	M.2.a.3.
(4) Over three years through five years.....		A552	52,773	M.2.a.4.
(5) Over five years through 15 years.....		A553	51,156	M.2.a.5.
(6) Over 15 years.....		A554	0	M.2.a.6.
b. Mortgage pass-through securities backed by closed-end first lien 1-4 family residential mortgages with a remaining maturity or next repricing date of: (2,4)				
(1) Three months or less.....		A555	0	M.2.b.1.
(2) Over three months through 12 months.....		A556	0	M.2.b.2.
(3) Over one year through three years.....		A557	0	M.2.b.3.
(4) Over three years through five years.....		A558	4,058	M.2.b.4.
(5) Over five years through 15 years.....		A559	313	M.2.b.5.
(6) Over 15 years.....		A560	3,555	M.2.b.6.
c. Other mortgage-backed securities (include CMOs, REMICs, and stripped MBS; exclude mortgage pass-through securities) with an expected average life of: (5)				
(1) Three years or less.....		A561	0	M.2.c.1.
(2) Over three years.....		A562	0	M.2.c.2.
d. Debt securities with a REMAINING MATURITY of one year or less (included in Memorandum items 2.a through 2.c above).....		A248	26,268	M.2.d.
<i>Memorandum item 3 is to be completed semiannually in the June and December reports only.</i>				
3. Amortized cost of held-to-maturity securities sold or transferred to available-for-sale or trading securities during the calendar year-to-date (report the amortized cost at date of sale or transfer).....		1778	0	M.3.
4. Structured notes (included in the held-to-maturity and available-for-sale accounts in Schedule RC-B, items 2, 3, 5, and 6):				
a. Amortized cost.....		8782	0	M.4.a.
b. Fair value.....		8783	0	M.4.b.

1 Includes held-to-maturity securities at amortized cost, available-for-sale debt securities at fair value, and equity securities with readily determinable fair values not held for trading (reported in Schedule RC, item 2.c) at fair value.

2 Report fixed rate debt securities by remaining maturity and floating rate debt securities by next repricing date.

3 Sum of Memorandum items 2.a.(1) through 2.a.(6) plus any nonaccrual debt securities in the categories of debt securities reported in Memorandum item 2.a that are included in Schedule RC-N, item 10, column C, must equal Schedule RC-B, sum of items 1, 2, 3, 4.c.(1), 5, and 6, columns A and D, plus residential mortgage pass-through securities other than those backed by closed-end first lien 1-4 family residential mortgages included in Schedule RC-B, item 4.a, columns A and D.

4 Sum of Memorandum items 2.b.(1) through 2.b.(6) plus any nonaccrual mortgage pass-through securities backed by closed-end first lien 1-4 family residential mortgages included in Schedule RC-N, item 10, column C, must equal Schedule RC-B, item 4.a, sum of columns A and D, less the amount of residential mortgage pass-through securities other than those backed by closed-end first lien 1-4 family residential mortgages included in Schedule RC-B, item 4.a, columns A and D.

5 Sum of Memorandum items 2.c.(1) and 2.c.(2) plus any nonaccrual "Other mortgage-backed securities" included in Schedule RC-N, item 10, column C, must equal Schedule RC-B, sum of items 4.b and 4.c.(2), columns A and D.

# Schedule RC-C—Loans and Lease Financing Receivables

## Part I. Loans and Leases

Do not deduct the allowance for loan and lease losses or the allocated transfer risk reserve from amounts reported in this schedule.<sup>1</sup> Report (1) loans and leases held for sale at the lower of cost or fair value, (2) loans and leases held for investment, net of unearned income, and (3) loans and leases accounted for at fair value under a fair value option. Exclude assets held for trading and commercial paper.

	Dollar Amounts in Thousands		
	RCON	Amount	
1. Loans secured by real estate:			
a. Construction, land development, and other land loans:			
(1) 1-4 family residential construction loans.....	F158	0	1.a.1.
(2) Other construction loans and all land development and other land loans.....	F159	61,378	1.a.2.
b. Secured by farmland (including farm residential and other improvements).....	1420	498	1.b.
c. Secured by 1-4 family residential properties:			
(1) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	1797	13,463	1.c.1.
(2) Closed-end loans secured by 1-4 family residential properties:			
(a) Secured by first liens.....	5367	31,852	1.c.2.a.
(b) Secured by junior liens.....	5368	6	1.c.2.b.
d. Secured by multifamily (5 or more) residential properties.....	1460	143,086	1.d.
e. Secured by nonfarm nonresidential properties:			
(1) Loans secured by owner-occupied nonfarm nonresidential properties.....	F160	78,760	1.e.1.
(2) Loans secured by other nonfarm nonresidential properties.....	F161	136,022	1.e.2.
2. Loans to depository institutions and acceptances of other banks.....	1288	0	2.
3. Loans to finance agricultural production and other loans to farmers.....	1590	0	3.
4. Commercial and industrial loans.....	1766	23,971	4.
5. Not applicable			
6. Loans to individuals for household, family, and other personal expenditures (i.e., consumer loans) (includes purchased paper):			
a. Credit Cards.....	8538	29,661	6.a.
b. Other revolving credit plans.....	B539	22	6.b.
c. Automobile loans.....	K137	0	6.c.
d. Other consumer loans (includes single payment and installment loans other than automobile loans and all student loans).....	K207	23	6.d.
7. Not applicable			
8. Obligations (other than securities and leases) of states and political subdivisions in the U.S.....	2107	0	8.
9. Loans to nondepository financial institutions and other loans:			
a. Loans to nondepository financial institutions.....	J454	0	9.a.
b. Other loans.....	J464	1,458	9.b.
10. Lease financing receivables (net of unearned income).....	2165	0	10.
11. LESS: Any unearned income on loans reflected in items 1-9 above.....	2123	1,180	11.
12. Total loans and leases held for investment and held for sale (sum of items 1 through 10 minus item 11) (must equal Schedule RC, sum of items 4.a and 4.b).....	2122	519,020	12.

<sup>1</sup> Institutions that have adopted ASU 2016-13 should not deduct the allowance for credit losses on loans and leases or the allocated transfer risk reserve from amounts reported on this schedule.

# Schedule RC-C—Continued

## Part I—Continued

### Memoranda

		Dollar Amounts in Thousands	RCON	Amount	
<i>Memorandum items 1.a.(1) through 1.f.(5) are to be completed semiannually in the June and December reports only. Memorandum item 1.g is to be completed quarterly.</i>					
<b>1. Loans restructured in troubled debt restructurings that are in compliance with their modified terms (included in Schedule RC-C, Part I, and not reported as past due or nonaccrual in Schedule RC-N, Memorandum item 1):</b>					
<b>a. Construction, land development, and other land loans:</b>					
(1) 1-4 family residential construction loans.....					
	K158	0			M.1.a.1.
(2) Other construction loans and all land development and other land loans.....					
	K159	0			M.1.a.2.
<b>b. Loans secured by 1-4 family residential properties.....</b>					
	F576	0			M.1.b.
<b>c. Secured by multifamily (5 or more) residential properties.....</b>					
	K160	0			M.1.c.
<b>d. Secured by nonfarm nonresidential properties:</b>					
(1) Loans secured by owner-occupied nonfarm nonresidential properties.....					
	K161	0			M.1.d.1.
(2) Loans secured by other nonfarm nonresidential properties.....					
	K162	0			M.1.d.2.
<b>e. Commercial and industrial loans.....</b>					
	K256	0			M.1.e.
<b>f. All other loans (include loans to individuals for household, family, and other personal expenditures).....</b>					
	K165	186			M.1.f.
<i>Itemize loan categories included in Memorandum item 1.f, above that exceed 10% of total loans restructured in troubled debt restructurings that are in compliance with their modified terms (sum of Memorandum items 1.a through 1.e plus 1.f):</i>					
(1) Loans secured by farmland.....					
	K166	0			M.1.f.1.
(2) and (3) Not applicable					
(4) Loans to individuals for household, family, and other personal expenditures:					
(a) Credit cards.....					
	K098	186			M.1.f.4.a.
(b) Automobile loans.....					
	K203	0			M.1.f.4.b.
(c) Other (includes revolving credit plans other than credit cards and other consumer loans).....					
	K204	0			M.1.f.4.c.
<i>Memorandum item 1.f.(5) is to be completed by:<sup>1</sup></i>					
<ul style="list-style-type: none"> <li>• Banks with \$300 million or more in total assets</li> <li>• Banks with less than \$300 million in total assets that have loans to finance agricultural production and other loans to farmers (Schedule RC-C, Part I, item 3) exceeding 5 percent of total loans</li> </ul>					
(5) Loans to finance agricultural production and other loans to farmers.....					
	K168	0			M.1.f.5.
<b>g. Total loans restructured in troubled debt restructurings that are in compliance with their modified terms (sum of Memorandum items 1.a.(1) through 1.f).....</b>					
	HK25	186			M.1.g.

<sup>1</sup> For the \$300 million asset-size test for report dates through December 31, 2021, an institution may use the lesser of the total assets reported in its Report of Condition as of December 31, 2019, or June 30, 2020. If the total assets reported as of one of these two report dates are less than \$300 million, the same report date should be used for the 5 percent of total loans test. If the total assets reported for both of these two report dates are less than \$300 million, the 5 percent of total loans test should be based on the total loans reported in the Report of Condition as of June 30, 2020.

**Schedule RC-C—Continued**

**Part I—Continued**

**Memoranda—Continued**

	Dollar Amounts in Thousands	RCON	Amount	
<b>2. Maturity and repricing data for loans and leases (excluding those in nonaccrual status):</b>				
<b>a. Closed-end loans secured by first liens on 1-4 family residential properties</b> (reported in Schedule RC-C, Part I, item 1.c.(2)(a), above) with a remaining maturity or next repricing date of: (1,2)				
(1) Three months or less.....		A564	267	M.2.a.1.
(2) Over three months through 12 months.....		A565	2,640	M.2.a.2.
(3) Over one year through three years.....		A566	9,437	M.2.a.3.
(4) Over three years through five years.....		A567	16,775	M.2.a.4.
(5) Over five years through 15 years.....		A568	2,733	M.2.a.5.
(6) Over 15 years.....		A569	0	M.2.a.6.
<b>b. All loans and leases (reported in Schedule RC-C, Part I, items 1 through 10, above) EXCLUDING closed-end loans secured by first liens on 1-4 family residential properties (reported in Schedule RC-C, Part I, item 1.c.(2)(a), above) with a remaining maturity or next repricing date of: (1,3)</b>				
(1) Three months or less.....		A570	113,791	M.2.b.1.
(2) Over three months through 12 months.....		A571	62,633	M.2.b.2.
(3) Over one year through three years.....		A572	153,669	M.2.b.3.
(4) Over three years through five years.....		A573	120,744	M.2.b.4.
(5) Over five years through 15 years.....		A574	36,659	M.2.b.5.
(6) Over 15 years.....		A575	30	M.2.b.6.
<b>c. Loans and leases (reported in Schedule RC-C, Part I, items 1 through 10, above) with a REMAINING MATURITY of one year or less (excluding those in nonaccrual status).....</b>				
		A247	179,331	M.2.c.
<b>3. Loans to finance commercial real estate, construction, and land development activities (not secured by real estate) included in Schedule RC-C, Part I, items 4 and 9 (4).....</b>				
		2746	0	M.3.
<i>Memorandum item 4 is to be completed semiannually in the June and December reports only.</i>				
<b>4. Adjustable rate closed-end loans secured by first liens on 1-4 family residential properties (included in Schedule RC-C, Part I, item 1.c.(2)(a)).....</b>				
		5370	839	M.4.
<b>5. and 6. Not applicable</b>				

1 Report fixed-rate loans and leases by remaining maturity and floating rate loans by next repricing date.

2 Sum of Memorandum items 2.a.(1) through 2.a.(6) plus total nonaccrual closed-end loans secured by first liens on 1-4 family residential properties included in Schedule RC-N, item 1.c.(2)(a), column C, must equal total closed-end loans secured by first liens on 1-4 family residential properties from Schedule RC-C, Part I, item 1.c.(2)(a).

3 Sum of Memorandum items 2.b.(1) through 2.b.(6), plus total nonaccrual loans and leases from Schedule RC-N, item 9, column C, minus nonaccrual closed-end loans secured by first liens on 1-4 family residential properties included in Schedule RC-N, item 1.c.(2)(a), column C, must equal total loans and leases from Schedule RC-C, Part I, sum of items 1 through 10, minus total closed-end loans secured by first liens on 1-4 family residential properties from Schedule RC-C, Part I, item 1.c.(2)(a).

4 Exclude loans secured by real estate that are included in Schedule RC-C, Part I, items 1.a through 1.e.

**Schedule RC-C—Continued**

**Part I—Continued**

**Memoranda—Continued**

		Dollar Amounts in Thousands		RCON	Amount	
<i>Memorandum items 7.a, 7.b, and 8.a are to be completed by all banks semiannually in the June and December reports only.</i>						
7. Purchased credit-impaired loans held for investment accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3) (exclude loans held for sale): <sup>1</sup>						
a. Outstanding balance .....		C779	0			M.7.a.
b. Amount included in Schedule RC-C, Part I, items 1 through 9 .....		C780	0			M.7.b.
8. Closed-end loans with negative amortization features secured by 1-4 family residential properties:						
a. Total amount of closed-end loans with negative amortization features secured by 1-4 family residential properties (included in Schedule RC-C, Part I, items 1.c.(2)(a) and (b)) .....		F230	0			M.8.a.
<i>Memorandum items 8.b and 8.c are to be completed annually in the December report only by banks that had closed-end loans with negative amortization features secured by 1-4 family residential properties (as reported in Schedule RC-C, Part I, Memorandum item 8.a.) as of December 31, 2020, that exceeded the lesser of \$100 million or 5 percent of total loans and leases held for investment and held for sale (as reported in Schedule RC-C, Part I, item 12).</i>						
b. Total maximum remaining amount of negative amortization contractually permitted on closed-end loans secured by 1-4 family residential properties .....		F231	NR			M.8.b.
c. Total amount of negative amortization on closed-end loans secured by 1-4 family residential properties included in the amount reported in Memorandum item 8.a above .....		F232	NR			M.8.c.
9. Loans secured by 1-4 family residential properties in process of foreclosure (included in Schedule RC-C, Part I, items 1.c.(1), 1.c.(2)(a), and 1.c.(2)(b)) .....		F577	459			M.9.
10. and 11. Not applicable						

	(Column A) Fair Value of Acquired Loans and Leases at Acquisition Date		(Column B) Gross Contractual Amounts Receivable at Acquisition Date		(Column C) Best Estimate at Acquisition Date of Contractual Cash Flows Not Expected to be Collected	
	RCON	Amount	RCON	Amount	RCON	Amount
<i>Memorandum item 12 is to be completed semiannually in the June and December reports only.</i>						
12. Loans (not subject to the requirements of FASB ASC 310-30 (former AICPA Statement of Position 03-3)) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year (2).....						
	GW45	0	GW46	0	GW47	0

<sup>1</sup> Memorandum item 7 is to be completed only by institutions that have not yet adopted ASU 2016-13.  
<sup>2</sup> Institutions that have adopted ASU 2016-13 should report only loans held for investment not considered purchased credit-deteriorated in Memorandum item 12.

**Schedule RC-C—Continued**

**Part I—Continued**

**Memoranda—Continued**

		Dollar Amounts in Thousands	RCON	Amount	
<i>Memoranda item 13 is to be completed by banks that had construction, land development, and other land loans (as reported in Schedule RC-C, Part I, item 1.a) that exceeded the sum of tier 1 capital (as reported in Schedule RC-R, Part I, item 26) plus the allowance for loan and lease losses or the allowance for credit losses on loans and leases, as applicable (as reported in Schedule RC, item 4.c) as of December 31, 2020.</i>					
13. Construction, land development, and other land loans with interest reserves:					
a. Amount of loans that provide for the use of interest reserves (included in Schedule RC-C, Part I, item 1.a) .....					
	G376	0			M.13.a.
b. Amount of interest capitalized from interest reserves on construction, land development, and other land loans that is included in interest and fee income on loans during the quarter (included in Schedule RI, item 1.a.(1)(b)) .....					
	RIAD				
	G377	0			M.13.b.
<i>Memorandum item 14 is to be completed by all banks.</i>					
14. Pledged loans and leases.....					
	RCON				
	G378	118,752			M.14.
<i>Memorandum item 15 is to be completed for the December report only.</i>					
15. Reverse mortgages:					
a. Reverse mortgages outstanding that are held for investment (included in Schedule RC-C, Part I, item 1.c, above):					
(1) Home Equity Conversion Mortgage (HECM) reverse mortgages.....					
	J466		NR		M.15.a.1.
(2) Proprietary reverse mortgages.....					
	J467		NR		M.15.a.2.
b. Estimated number of reverse mortgage loan referrals to other lenders during the year from whom compensation has been received for services performed in connection with the origination of the reverse mortgages:					
(1) Home Equity Conversion Mortgage (HECM) reverse mortgages.....					
	J468		NR		M.15.b.1.
(2) Proprietary reverse mortgages.....					
	J469		NR		M.15.b.2.
c. Principal amount of reverse mortgage originations that have been sold during the year:					
(1) Home Equity Conversion Mortgage (HECM) reverse mortgages.....					
	J470		NR		M.15.c.1.
(2) Proprietary reverse mortgages.....					
	J471		NR		M.15.c.2.
<i>Memorandum item 16 is to be completed by all banks in the June and December reports only.</i>					
16. Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit that have converted to non-revolving closed-end status (included in item 1.c.(1) above).....					
	LE75	0			M.16.
<i>Amounts reported in Memorandum items 17.a and 17.b will not be made available to the public on an individual institution basis.</i>					
17. Eligible loan modifications under Section 4013, Temporary Relief from Troubled Debt Restructurings, of the 2020 Coronavirus Aid, Relief, and Economic Security Act:					
a. Number of Section 4013 loans outstanding.....					
	LG24	4			M.17.a.
b. Outstanding balance of Section 4013 loans.....					
	LG25	15,847			M.17.b.

# Schedule RC-C—Continued

## Part II. Loans to Small Businesses and Small Farms

Schedule RC-C, Part II, Loans to Small Businesses and Small Farms, is to be completed semiannually in the June and December reports only.

Report the number and amount currently outstanding as of the report date of business loans with "original amounts" of \$1,000,000 or less and farm loans with "original amounts" of \$500,000 or less. The following guidelines should be used to determine the "original amount" of a loan:

- (1) For loans drawn down under lines of credit or loan commitments, the "original amount" of the loan is the size of the line of credit or loan commitment when the line of credit or loan commitment was most recently approved, extended, or renewed prior to the report date. However, if the amount currently outstanding as of the report date exceeds this size, the "original amount" is the amount currently outstanding on the report date.
- (2) For loan participations and syndications, the "original amount" of the loan participation or syndication is the entire amount of the credit originated by the lead lender.
- (3) For all other loans, the "original amount" is the total amount of the loan at origination or the amount currently outstanding as of the report date, whichever is larger.

### Loans to Small Businesses

1. Indicate in the appropriate box at the right whether all or substantially all of the dollar volume of your bank's "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2), and all or substantially all of the dollar volume of your bank's "Commercial and industrial loans" reported in Schedule RC-C, Part I, item 4, have original amounts of \$100,000 or less (If your bank has no loans outstanding in both of these two loan categories, place an "X" in the box marked "NO.").....

RCON	YES / NO
6999	NO

- If YES, complete items 2.a and 2.b below, skip items 3 and 4, and go to item 5.
- If NO and your bank has loans outstanding in either loan category, skip items 2.a and 2.b, complete items 3 and 4 below, and go to item 5.
- If NO and your bank has no loans outstanding in both loan categories, skip items 2 through 4, and go to item 5.

2. Report the total number of loans currently outstanding for each of the following Schedule RC-C, Part I, loan categories:

- a. "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2) (Note: Sum of items 1.e.(1) and 1.e.(2) divided by the number of loans should NOT exceed \$100,000.).....
- b. "Commercial and industrial loans" reported in Schedule RC-C, Part I, item 4 (Note: Item 4 divided by the number of loans should NOT exceed \$100,000.).....

Number of Loans	
RCON	Number
5562	NR
5563	NR

	(Column A) Number of Loans		(Column B) Amount Currently Outstanding		
	RCON	Number	RCON	Amount	
Dollar Amounts in Thousands					
3. Number and amount currently outstanding of "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2) (sum of items 3.a through 3.c must be less than or equal to Schedule RC-C, Part I, sum of items 1.e.(1) and 1.e.(2)):					
a. With original amounts of \$100,000 or less.....	5564	10	5565	510	3.a.
b. With original amounts of more than \$100,000 through \$250,000.....	5566	17	5567	2,459	3.b.
c. With original amounts of more than \$250,000 through \$1,000,000.....	5568	59	5569	27,447	3.c.
4. Number and amount currently outstanding of "Commercial and industrial loans" reported in Schedule RC-C, part I, item 4 (sum of items 4.a through 4.c must be less than or equal to Schedule RC-C, Part I, item 4):					
a. With original amounts of \$100,000 or less.....	5570	23	5571	876	4.a.
b. With original amounts of more than \$100,000 through \$250,000.....	5572	19	5573	2,752	4.b.
c. With original amounts of more than \$250,000 through \$1,000,000.....	5574	23	5575	9,478	4.c.

**Schedule RC-C—Continued**

**Part II—Continued**

**Agricultural Loans to Small Farms**

5. Indicate in the appropriate box at the right whether all or substantially all of the dollar volume of your bank's "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, Part I, item 1.b, and all or substantially all of the dollar volume of your bank's "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, Part I, item 3, have original amounts of \$100,000 or less (If your bank has no loans outstanding in both of these two loan categories, place an "X" in the box marked "NO.").....

RCO	YES / NO
6860	NO

If YES, complete items 6.a and 6.b below, and do not complete items 7 and 8.  
 If NO and your bank has loans outstanding in either loan category, skip items 6.a and 6.b and complete items 7 and 8 below.  
 If NO and your bank has no loans outstanding in both loan categories, do not complete items 6 through 8.

6. Report the total number of loans currently outstanding for each of the following Schedule RC-C, Part I, loan categories:  
 a. "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, Part I, item 1.b, (Note: Item 1.b divided by the number of loans should NOT exceed \$100,000.).....  
 b. "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, Part I, item 3 (Note: Item 3 divided by the number of loans should NOT exceed \$100,000.).....

Number of Loans	
RCO	Number
5576	NR
5577	NR

	(Column A) Number of Loans		(Column B) Amount Currently Outstanding	
	RCO	Number	RCO	Amount
Dollar Amounts in Thousands				
7. Number and amount currently outstanding of "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, Part I, item 1.b (sum of items 7.a through 7.c must be less than or equal to Schedule RC-C, Part I, item 1.b):				
a. With original amounts of \$100,000 or less.....	5578	0	5579	0
b. With original amounts of more than \$100,000 through \$250,000.....	5580	0	5581	0
c. With original amounts of more than \$250,000 through \$500,000.....	5582	0	5583	0
8. Number and amount currently outstanding of "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, Part I, item 3 (sum of items 8.a through 8.c must be less than or equal to Schedule RC-C, Part I, item 3):				
a. With original amounts of \$100,000 or less.....	5584	0	5585	0
b. With original amounts of more than \$100,000 through \$250,000.....	5586	0	5587	0
c. With original amounts of more than \$250,000 through \$500,000.....	5588	0	5589	0

### Schedule RC-E—Deposit Liabilities

	Transaction Accounts				Nontransaction Accounts	
	(Column A) Total Transaction Accounts (Including Total Demand Deposits)		(Column B) Memo: Total Demand Deposits <sup>1</sup> (Included in Column A)		(Column C) Total Nontransaction Accounts (Including MMDAs)	
	RCON	Amount	RCON	Amount	RCON	Amount
Dollar Amounts in Thousands						
<b>Deposits of:</b>						
1. Individuals, partnerships, and corporations.....	8549	528,421			8550	187,539
2. U.S. Government.....	2202	0			2520	0
3. States and political subdivisions in the U.S.....	2203	117,931			2530	1,956
4. Commercial banks and other depository institutions in the U.S.....	8551	355			8552	0
5. Banks in foreign countries.....	2213	0			2236	0
6. Foreign governments and official institutions (including foreign central banks).....	2216	0			2377	0
7. Total (sum of items 1 through 6) (sum of columns A and C must equal Schedule RC, item 13.a).....	2215	646,707	2210	514,680	2385	189,495

### Memoranda

	Dollar Amounts in Thousands	
	RCON	Amount
1. Selected components of total deposits (i.e., sum of item 7, columns A and C):		
<i>Memorandum item 1.a is to be completed semiannually in the June and December reports only.</i>		
a. Total Individual Retirement Accounts (IRAs) and Keogh Plan accounts.....	6835	1,634
b. Total brokered deposits.....	2365	5,069
c. Brokered deposits of \$250,000 or less (fully insured brokered deposits) (2).....	HK05	5,069
d. Maturity data for brokered deposits:		
(1) Brokered deposits of \$250,000 or less with a remaining maturity of one year or less (included in Memorandum item 1.c above).....	HK06	5,069
(2) Not applicable		
(3) Brokered deposits of more than \$250,000 with a remaining maturity of one year or less (included in Memorandum item 1.b. above).....	K220	0
e. Preferred deposits (uninsured deposits of states and political subdivisions in the U.S. reported in item 3 above which are secured or collateralized as required under state law) (to be completed for the December report only).....	5590	NR
f. Estimated amount of deposits obtained through the use of deposit listing services that are not brokered deposits.....	K223	0
g. Total reciprocal deposits.....	JH83	0
2. Components of total nontransaction accounts (sum of Memorandum items 2.a through 2.d must equal item 7, column C above):		
a. Savings deposits:		
(1) Money market deposit accounts (MMDAs).....	6810	68,994
(2) Other savings deposits (excludes MMDAs).....	0352	88,484
b. Total time deposits of less than \$100,000.....	6648	9,739
c. Total time deposits of \$100,000 through \$250,000.....	J473	5,041
d. Total time deposits of more than \$250,000 (sum of Memoranda items 4.a.(1) through 4.a.(4) below).....	J474	17,237
e. Individual Retirement Accounts (IRAs) and Keogh Plan accounts of \$100,000 or more included in Memorandum items 2.c and 2.d above.....	F233	531

<sup>1</sup> Includes interest-bearing and noninterest-bearing demand deposits.

<sup>2</sup> The dollar amount used as the basis for reporting in Memorandum item 1.c reflects the deposit insurance limit in effect on the report date.

**Schedule RC-E—Continued**

**Memoranda—Continued**

		Dollar Amounts in Thousands	RCON	Amount	
<b>3. Maturity and repricing data for time deposits of \$250,000 or less:</b>					
a. Time deposits of \$250,000 or less with a remaining maturity or next repricing date of: (1,2)					
(1) Three months or less.....					
	HK07			2,531	M.3.a.1.
(2) Over three months through 12 months.....					
	HK08			11,723	M.3.a.2.
(3) Over one year through three years.....					
	HK09			526	M.3.a.3.
(4) Over three years.....					
	HK10			0	M.3.a.4.
b. Time deposits of \$250,000 or less with a REMAINING MATURITY of one year or less (included in Memorandum items 3.a.(1) and 3.a.(2) above) (3).....					
	HK11			14,254	M.3.b.
<b>4. Maturity and repricing data for time deposits of more than \$250,000:</b>					
a. Time deposits of more than \$250,000 with a remaining maturity or next repricing date of: (1,4)					
(1) Three months or less.....					
	HK12			7,730	M.4.a.1.
(2) Over three months through 12 months.....					
	HK13			9,152	M.4.a.2.
(3) Over one year through three years.....					
	HK14			0	M.4.a.3.
(4) Over three years.....					
	HK15			355	M.4.a.4.
b. Time deposits of more than \$250,000 with a REMAINING MATURITY of one year or less (included in Memorandum items 4.a.1 and 4.a.2 above) (3).....					
	K222			16,882	M.4.b.

Memorandum item 5 is to be completed semiannually in the June and December reports only.

<b>5. Does your institution offer one or more consumer deposit account products, i.e., transaction account or nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use?.....</b>		RCON	YES / NO	
		P752	YES	M.5.

Memorandum items 6 and 7 are to be completed annually in the December report only by institutions with \$1 billion or more in total assets (5) that answered "Yes" to Memorandum item 5 above.

		Dollar Amounts in Thousands	RCON	Amount	
<b>6. Components of total transaction account deposits of individuals, partnerships, and corporations (sum of Memorandum items 6.a and 6.b must be less than or equal to Schedule RC-E, item 1, column A):</b>					
a. Total deposits in those noninterest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use.....					
	P753			NR	M.6.a.
b. Total deposits in those interest-bearing transaction account deposit products intended primarily for individuals for personal, household, or family use.....					
	P754			NR	M.6.b.
<b>7. Components of total nontransaction account deposits of individuals, partnerships, and corporations (sum of Memorandum items 7.a.(1), 7.a.(2), 7.b.(1), and 7.b.(2) plus all time deposits of individuals, partnerships, and corporations must equal Schedule RC-E, item 1, column C):</b>					
a. Money market deposit accounts (MMDAs) of individuals, partnerships, and corporations (sum of Memorandum items 7.a.(1) and 7.a.(2) must be less than or equal to Schedule RC-E, Memorandum item 2.a.(1) above):					
(1) Total deposits in those MMDA deposit products intended primarily for individuals for personal, household, or family use.....					
	P756			NR	M.7.a.1.
(2) Deposits in all other MMDAs of individuals, partnerships, and corporations.....					
	P757			NR	M.7.a.2.
b. Other savings deposit accounts of individuals, partnerships, and corporations (sum of Memorandum items 7.b.(1) and 7.b.(2) must be less than or equal to Schedule RC-E, Memorandum item 2.a.(2) above):					
(1) Total deposits in those other savings deposit account deposit products intended primarily for individuals for personal, household, or family use.....					
	P758			NR	M.7.b.1.
(2) Deposits in all other savings deposit accounts of individuals, partnerships, and corporations.....					
	P759			NR	M.7.b.2.

- 1 Report fixed rate time deposits by remaining maturity and floating rate time deposits by next repricing date.
- 2 Sum of Memorandum items 3.a.(1) through 3.a.(4) must equal Schedule RC-E, sum of Memorandum items 2.b and 2.c.
- 3 Report both fixed-and floating-rate time deposits by remaining maturity. Exclude floating-rate time deposits with a next repricing date of one year or less that have a remaining maturity of over one year.
- 4 Sum of Memorandum items 4.a.(1) through 4.a.(4) must equal Schedule RC-E, Memorandum item 2.d.
- 5 For the \$1 billion asset-size test for report dates through December 31, 2021, an institution may use the lesser of the total assets reported in its Report of Condition as of December 31, 2019, or June 30, 2020.

### Schedule RC-F—Other Assets<sup>1</sup>

		Dollar Amounts in Thousands		RCON	Amount	
1.	Accrued interest receivable (2).....			B556	1,496	1.
2.	Net deferred tax assets (3).....			2148	3,917	2.
3.	Interest-only strips receivable (not in the form of a security) (4).....			HT80	0	3.
4.	Equity investments without readily determinable fair values (5).....			1752	2,505	4.
5.	Life insurance assets:					
a.	General account life insurance assets.....			K201	9,986	5.a.
b.	Separate account life insurance assets.....			K202	0	5.b.
c.	Hybrid account life insurance assets.....			K270	0	5.c.
<i>Items 6.a through 6.j are to be completed semiannually in the June and December reports only.</i>						
6.	All other assets (itemize and describe amounts greater than \$100,000 that exceed 25% of this item).....			2168	12,622	6.
a.	Prepaid expenses.....	2166	0			6.a.
b.	Repossessed personal property (including vehicles).....	1578	0			6.b.
c.	Derivatives with a positive fair value held for purposes other than trading.....	C010	0			6.c.
d.	FDIC loss-sharing indemnification assets.....	J448	0			6.d.
e.	Computer software.....	FT33	0			6.e.
f.	Accounts receivable.....	FT34	3,659			6.f.
g.	Receivables from foreclosed government-guaranteed mortgage loans.....	FT35	0			6.g.
h.	TEXT 3549 DIRECTORS AND OFFICERS DEFERRED	3549	6,594			6.h.
i.	TEXT 3550	3550	0			6.i.
j.	TEXT 3551	3551	0			6.j.
7.	Total (sum of items 1 through 6) ( must equal Schedule RC, item 11).....			2160	30,526	7.

1 Institutions that have adopted ASU 2016-13 should report asset amounts in Schedule RC-F net of any applicable allowance for credit losses.

2 Includes accrued interest receivable on loans, leases, debt securities, and other interest-bearing assets. Exclude accrued interest receivable on interest-bearing assets that is reported elsewhere on the balance sheet.

3 See discussion of deferred income taxes in Glossary entry on "income taxes."

4 Report interest-only strips receivable in the form of a security as available-for-sale securities in Schedule RC, item 2.b, or as trading assets in Schedule RC, item 5, as appropriate.

5 Includes Federal Reserve stock, Federal Home Loan Bank stock, and bankers' bank stock.

### Schedule RC-G—Other Liabilities

		Dollar Amounts in Thousands		RCON	Amount	
1.	a. Interest accrued and unpaid on deposits (1).....			3645	37	1.a.
	b. Other expenses accrued and unpaid (includes accrued income taxes payable).....			3646	4,114	1.b.
2.	Net deferred tax liabilities (2).....			3049	0	2.
3.	Allowance for credit losses on off-balance sheet credit exposures (3).....			B557	0	3.
<i>Items 4.a through 4.h are to be completed semiannually in the June and December reports only.</i>						
4.	All other liabilities (itemize and describe amounts greater than \$100,000 that exceed 25% of this item).....			2938	15,922	4.
a.	Accounts payable.....	3066	0			4.a.
b.	Deferred compensation liabilities.....	C011	6,594			4.b.
c.	Dividends declared but not yet payable.....	2932	0			4.c.
d.	Derivatives with a negative fair value held for purposes other than trading.....	C012	0			4.d.
e.	Operating lease liabilities.....	LB56	0			4.e.
f.	TEXT 3552	3552	0			4.f.
g.	TEXT 3553	3553	0			4.g.
h.	TEXT 3554	3554	0			4.h.
5.	Total (sum of items 1 through 4) (must equal Schedule RC, item 20).....			2930	20,073	5.

1 For savings banks, include "dividends" accrued and unpaid on deposits.

2 See discussion of deferred income taxes in Glossary entry on "income taxes."

3 Institutions that have adopted ASU 2016-13 should report in item 3 the allowance for credit losses on those off-balance sheet credit exposures that fall within the scope of the standard.

# Schedule RC-K—Quarterly Averages<sup>1</sup>

		Dollar Amounts in Thousands		
		RCON	Amount	
<b>Assets</b>				
1.	Interest-bearing balances due from depository institutions.....	3381	187,091	1.
2.	U.S. Treasury securities and U.S. Government agency obligations (2) (excluding mortgage-backed securities).....	B558	157,309	2.
3.	Mortgage-backed securities (2).....	B559	8,063	3.
4.	All other debt securities (2) and equity securities with readily determinable fair values not held for trading purposes (3).....	B560	2,000	4.
5.	Federal funds sold and securities purchased under agreements to resell.....	3365	0	5.
6.	Loans:			
a.	Total loans.....	3360	515,390	6.a.
b.	Loans secured by real estate:			
(1)	Loans secured by 1-4 family residential properties.....	3465	44,536	6.b.1.
(2)	All other loans secured by real estate.....	3466	384,614	6.b.2.
c.	Commercial and industrial loans.....	3387	23,667	6.c.
d.	Loans to individuals for household, family, and other personal expenditures:			
(1)	Credit cards.....	B561	29,532	6.d.1.
(2)	Other (includes revolving credit plans other than credit cards, automobile loans, and other consumer loans).....	B562	45	6.d.2.
7.	Not applicable			
8.	Lease financing receivables (net of unearned income).....	3484	0	8.
9.	Total assets (4).....	3368	947,659	9.
<b>Liabilities</b>				
10.	Interest-bearing transaction accounts (interest-bearing demand deposits, NOW accounts, ATS accounts, and telephone and preauthorized transfer accounts).....	3485	129,267	10.
11.	Nontransaction accounts:			
a.	Savings deposits (includes MMDAs).....	B563	159,921	11.a.
b.	Time deposits of \$250,000 or less.....	HK16	16,123	11.b.
c.	Time deposits of more than \$250,000.....	HK17	16,912	11.c.
12.	Federal funds purchased and securities sold under agreements to repurchase.....	3353	0	12.
13.	To be completed by banks with \$100 million or more in total assets: (5) Other borrowed money (includes mortgage indebtedness).....	3355	4,429	13.

## Memorandum

		Dollar Amounts in Thousands		
		RCON	Amount	
<i>Memorandum item 1 is to be completed by: (5)</i>				
<ul style="list-style-type: none"> <li>banks with \$300 million or more in total assets, and</li> <li>banks with less than \$300 million in total assets that have loans to finance agricultural production and other loans to farmers (Schedule RC-C, Part I, item 3) exceeding 5 percent of total loans.</li> </ul>				
1.	Loans to finance agricultural production and other loans to farmers.....	3386	0	M.1.

1 For all items, banks have the option of reporting either (1) an average of DAILY figures for the quarter, or (2) an average of WEEKLY figures (i.e., the Wednesday of each week of the quarter).

2 Quarterly averages for all debt securities should be based on amortized cost.

3 Quarterly averages for equity securities with readily determinable fair values should be based on fair value.

4 The quarterly average for total assets should reflect securities not held for trading as follows:

- Debt securities at amortized cost.
- Equity securities with readily determinable fair values at fair value.
- Equity investments without readily determinable fair values at their balance sheet carrying values (i.e., fair value or, if elected, cost minus impairment, if any, plus or minus changes resulting from observable price changes).

5 For the \$100 million and \$300 million asset-size tests for report dates through December 31, 2021, an institution may use the lesser of the total assets reported in its Report of Condition as of December 31, 2019, or June 30, 2020. If the total assets reported as of one of these two report dates are less than \$300 million, the same report date should be used for the 5 percent of total loans test. If the total assets reported for both of these two report dates are less than \$300 million, the 5 percent of total loans test should be based on the total loans reported in the Report of Condition as of June 30, 2020.

### Schedule RC-L—Derivatives and Off-Balance Sheet Items

Please read carefully the instructions for the preparation of Schedule RC-L. Some of the amounts reported in Schedule RC-L are regarded as volume indicators and not necessarily as measures of risk.

		Dollar Amounts in Thousands		RCON	Amount	
<b>1. Unused commitments:</b>						
a.	Revolving, open-end lines secured by 1-4 family residential properties, e.g., home equity lines.....	3814	12,088			1.a.
b.	Credit card lines.....	3815	232,708			1.b.
<b>c. Commitments to fund commercial real estate, construction, and land development loans:</b>						
<b>(1) Secured by real estate:</b>						
(a)	1-4 family residential construction loan commitments.....	F164	0			1.c.1.a.
(b)	Commercial real estate, other construction loan, and land development loan commitments.....	F165	21,282			1.c.1.b.
(2)	NOT secured by real estate .....	6550	0			1.c.2.
<b>d. Not applicable</b>						
<b>e. Other unused commitments:</b>						
(1)	Commercial and industrial loans.....	J457	27,769			1.e.1.
(2)	Loans to financial institutions.....	J458	0			1.e.2.
(3)	All other unused commitments.....	J459	48			1.e.3.
<b>2. Financial standby letters of credit.....</b>						
<b>3. Performance standby letters of credit.....</b>						
<b>4. Commercial and similar letters of credit.....</b>						
<b>5. Not applicable</b>						
<b>6. Securities lent and borrowed:</b>						
a.	Securities lent (including customers' securities lent where the customer is indemnified against loss by the reporting bank).....	3433	0			6.a.
b.	Securities borrowed.....	3432	0			6.b.
<b>7. and 8. Not applicable</b>						
<i>Items 9.c through 9.f and 10.b through 10.e are to be completed semiannually in the June and December reports only.</i>						
<b>9. All other off-balance sheet liabilities (exclude derivatives) (itemize and describe each component of this item over 25% of Schedule RC, item 27.a, "Total bank equity capital") .....</b>						
<b>a. and b. Not applicable</b>						
<b>c. Standby letters of credit issued by another party (e.g., a Federal Home Loan Bank) on the bank's behalf .....</b>						
		C978	0			9.c.
d.	TEXT					
	3555	3555	0			9.d.
e.	TEXT					
	3556	3556	0			9.e.
f.	TEXT					
	3557	3557	0			9.f.
<b>10. All other off-balance sheet assets (exclude derivatives) (itemize and describe each component of this item over 25% of Schedule RC, item 27.a, "Total bank equity capital") .....</b>						
<b>a. Not applicable</b>						
b.	TEXT					
	5592	5592	0			10.b.
c.	TEXT					
	5593	5593	0			10.c.
d.	TEXT					
	5594	5594	0			10.d.
e.	TEXT					
	5595	5595	0			10.e.
<i>Items 11.a and 11.b are to be completed semiannually in the June and December reports only.</i>						
<b>11. Year-to-date merchant credit card sales volume:</b>						
a.	Sales for which the reporting bank is the acquiring bank .....	C223	0			11.a.
b.	Sales for which the reporting bank is the agent bank with risk .....	C224	0			11.b.

**Schedule RC-M—Memoranda**

		Dollar Amounts in Thousands	RCON	Amount	
<b>1. Extensions of credit by the reporting bank to its executive officers, directors, principal shareholders, and their related interests as of the report date:</b>					
<b>a. Aggregate amount of all extensions of credit to all executive officers, directors, principal shareholders, and their related interests.....</b>					
			6164	120	1.a.
<b>b. Number of executive officers, directors, and principal shareholders to whom the amount of all extensions of credit by the reporting bank (including extensions of credit to related interests) equals or exceeds the lesser of \$500,000 or 5 percent of total capital as defined for this purpose in agency regulations.....</b>					
	Number		6165	0	1.b.
<b>2. Intangible assets:</b>					
<b>a. Mortgage servicing assets.....</b>					
			3164	0	2.a.
<b>(1) Estimated fair value of mortgage servicing assets.....</b>					
			A590	0	2.a.1.
<b>b. Goodwill.....</b>					
			3163	0	2.b.
<b>c. All other intangible assets.....</b>					
			JF76	26	2.c.
<b>d. Total (sum of items 2.a, 2.b, and 2.c) (must equal Schedule RC, item 10).....</b>					
			2143	26	2.d.
<b>3. Other real estate owned:</b>					
<b>a. Construction, land development, and other land.....</b>					
			5508	0	3.a.
<b>b. Farmland.....</b>					
			5509	0	3.b.
<b>c. 1-4 family residential properties.....</b>					
			5510	0	3.c.
<b>d. Multifamily (5 or more) residential properties.....</b>					
			5511	0	3.d.
<b>e. Nonfarm nonresidential properties.....</b>					
			5512	225	3.e.
<b>f. Total (sum of items 3.a through 3.e) (must equal Schedule RC, item 7).....</b>					
			2150	225	3.f.
<b>4. Cost of equity securities with readily determinable fair values not held for trading (the fair value of which is reported in Schedule RC, item 2.c) (1).....</b>					
			JA29	0	4.
<b>5. Other borrowed money:</b>					
<b>a. Federal Home Loan Bank advances:</b>					
<b>(1) Advances with a remaining maturity or next repricing date of: (2)</b>					
<b>(a) One year or less.....</b>					
			F055	5,000	5.a.1.a.
<b>(b) Over one year through three years.....</b>					
			F056	0	5.a.1.b.
<b>(c) Over three years through five years.....</b>					
			F057	0	5.a.1.c.
<b>(d) Over five years.....</b>					
			F058	0	5.a.1.d.
<b>(2) Advances with a REMAINING MATURITY of one year or less (included in item 5.a.(1)(a) above) (3).....</b>					
			2651	5,000	5.a.2.
<b>(3) Structured advances (included in items 5.a.(1)(a) - (d) above).....</b>					
			F059	0	5.a.3.
<b>b. Other borrowings:</b>					
<b>(1) Other borrowings with a remaining maturity or next repricing date of: (4)</b>					
<b>(a) One year or less.....</b>					
			F060	0	5.b.1.a.
<b>(b) Over one year through three years.....</b>					
			F061	0	5.b.1.b.
<b>(c) Over three years through five years.....</b>					
			F062	0	5.b.1.c.
<b>(d) Over five years.....</b>					
			F063	0	5.b.1.d.
<b>(2) Other borrowings with a REMAINING MATURITY of one year or less (included in item 5.b.(1)(a) above) (5).....</b>					
			8571	0	5.b.2.
<b>c. Total (sum of items 5.a.(1)(a)-(d) and items 5.b.(1)(a)-(d)) (must equal Schedule RC, item 16).....</b>					
			3190	5,000	5.c.

1 Item 4 is to be completed only by insured state banks that have been approved by the FDIC to hold grandfathered equity investments. See instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.  
 2 Report fixed rate advances by remaining maturity and floating-rate advances by next repricing date.  
 3 Report both fixed and floating-rate advances by remaining maturity. Exclude floating-rate advances with a next repricing date of one year or less that have a remaining maturity of over one year.  
 4 Report fixed rate other borrowings by remaining maturity and floating-rate other borrowings by next repricing date.  
 5 Report both fixed and floating-rate other borrowings by remaining maturity. Exclude floating-rate other borrowings with a next repricing date of one year or less that have a remaining maturity of over one year.

Schedule RC-M—Continued

Items 6 and 7 are to be completed annually in the December report only.

	Dollar Amounts in Thousands	RCON	YES / NO	
6. Does the reporting bank sell private label or third-party mutual funds and annuities?.....		B569	NR	6.
7. Assets under the reporting bank's management in proprietary mutual funds and annuities.....		RCON	Amount	
		B570	NR	7.

Items 8.a, 8.b, and 8.c are to be completed semiannually in the June and December reports only.

8. Internet Website addresses and physical office trade names:

- a. Uniform Resource Locator (URL) of the reporting institution's primary Internet Web site (home page), if any  
(Example: www.examplebank.com):

TEXT				
4087	http:// www.aboc.com			8.a.

- b. URLs of all other public-facing Internet websites that the reporting institution uses to accept or solicit deposits from the public, if any (Example: www.examplebank.biz):<sup>1</sup>

(1)	TE01 N528	http:// www.itms-online.com		8.b.1.
(2)	TE02 N528	http:// web6.secureinternetbank.com		8.b.2.
(3)	TE03 N528	http://		8.b.3.
(4)	TE04 N528	http://		8.b.4.
(5)	TE05 N528	http://		8.b.5.
(6)	TE06 N528	http://		8.b.6.
(7)	TE07 N528	http://		8.b.7.
(8)	TE08 N528	http://		8.b.8.
(9)	TE09 N528	http://		8.b.9.
(10)	TE10 N528	http://		8.b.10.

- c. Trade names other than the reporting institution's legal title used to identify one or more of the institution's physical offices at which deposits are accepted or solicited from the public, if any:

(1)	TE01 N529			8.c.1.
(2)	TE02 N529			8.c.2.
(3)	TE03 N529			8.c.3.
(4)	TE04 N529			8.c.4.
(5)	TE05 N529			8.c.5.
(6)	TE06 N529			8.c.6.

Items 9, 11, 12, 14.a, and 14.b are to be completed annually in the December report only.

9. Do any of the bank's Internet websites have transactional capability, i.e., allow the bank's customers to execute transactions on their accounts through the website?.....

RCON	YES / NO	
4088	NR	9.

10. Secured liabilities:

- a. Amount of "Federal funds purchased" that are secured (included in Schedule RC, item 14.a).....
- b. Amount of "Other borrowings" that are secured (included in Schedule RC-M, items 5.b.(1)(a) - (d)).....

RCON	Amount	
F064	0	10.a.
F065	0	10.b.

11. Does the bank act as trustee or custodian for Individual Retirement Accounts, Health Savings Accounts, and other similar accounts?.....

RCON	YES / NO	
G463	NR	11.

12. Does the bank provide custody, safekeeping, or other services involving the acceptance of orders for the sale or purchase of securities?.....

RCON	YES / NO	
G464	NR	12.

13. Not applicable

14. Captive insurance and reinsurance subsidiaries:

- a. Total assets of captive insurance subsidiaries (2).....
- b. Total assets of captive reinsurance subsidiaries (2).....

RCON	Amount	
K193	NR	14.a.
K194	NR	14.b.

<sup>1</sup> Report only highest level URLs (for example, report www.examplebank.biz, but do not also report www.examplebank.biz/checking). Report each top level domain name used (for example, report both www.examplebank.biz and www.examplebank.net).

<sup>2</sup> Report total assets before eliminating intercompany transactions between the consolidated insurance or reinsurance subsidiary and other offices or consolidated subsidiaries of the reporting bank.

Schedule RC-M—Continued

		Dollar Amounts in Thousands	RCON	Number	
<i>Item 15 is to be completed by institutions that are required or have elected to be treated as a Qualified Thrift Lender.</i>					
15. Qualified Thrift Lender (QTL) test:					
a. Does the institution use the Home Owners' Loan Act (HOLA) QTL test or the Internal Revenue Service Domestic Building and Loan Association (IRS DBLA) test to determine its QTL compliance? (for the HOLA QTL test, enter 1; for the IRS DBLA test, enter 2).....					
	L133			NR	15.a.
b. Has the institution been in compliance with the HOLA QTL test as of each month end during the quarter or the IRS DBLA test for its most recent taxable year, as applicable?.....					
	L135			NR	15.b.
<i>Item 16.a and, if appropriate, items 16.b.(1) through 16.b.(3) are to be completed annually in the December report only.</i>					
16. International remittance transfers offered to consumers: <sup>1</sup>					
a. Estimated number of international remittance transfers provided by your institution during the calendar year ending on the report date.....					
	N523			NR	16.a.
<i>Items 16.b.(1) through 16.b.(3) are to be completed by institutions that reported 501 or more international remittance transfers in item 16.a in either or both of the current report or the most recent prior report in which item 16.a was required to be completed.<sup>2</sup></i>					
b. Estimated dollar value of remittance transfers provided by your institution and usage of regulatory exceptions during the calendar year ending on the report date:					
(1) Estimated dollar value of international remittance transfers.....					
	N524			NR	16.b.1.
(2) Estimated number of international remittance transfers for which your institution applied the permanent exchange rate exception.....					
	MM07			NR	16.b.2.
(3) Estimated number of international remittance transfers for which your institution applied the permanent covered third-party fee exception.....					
	MQ52			NR	16.b.3.
17. U.S. Small Business Administration Paycheck Protection Program (PPP) loans <sup>3</sup> and the Federal Reserve PPP Liquidity Facility (PPPLF):					
a. Number of PPP loans outstanding.....					
	LG26		44		17.a.
b. Outstanding balance of PPP loans.....					
	LG27		13,881		17.b.
c. Outstanding balance of PPP loans pledged to the PPPLF.....					
	LG28		0		17.c.
d. Outstanding balance of borrowings from Federal Reserve Banks under the PPPLF with a remaining maturity of:					
(1) One year or less.....					
	LL59		0		17.d.1.
(2) More than one year.....					
	LL60		0		17.d.2.
e. Quarterly average amount of PPP loans pledged to the PPPLF and excluded from "Total assets for the leverage ratio" reported in Schedule RC-R, Part I, item 30.....					
	LL57		0		17.e.
18. Money Market Mutual Fund Liquidity Facility (MMLF):					
a. Outstanding balance of assets purchased under the MMLF.....					
	LL61		0		18.a.
b. Quarterly average amount of assets purchased under the MMLF and excluded from "Total assets for the leverage ratio" reported in Schedule RC-R, Part I, item 30.....					
	LL58		0		18.b.

1 Report information about international electronic transfers of funds offered to consumers in the United States that: (a) are "remittance transfers" as defined by subpart B of Regulation E (12 CFR § 1005.30(e)), or (b) would qualify as "remittance transfers" under subpart B of Regulation E (12 CFR § 1005.30(e)) but are excluded from that definition only because the provider is not providing those transfers in the normal course of its business. See 12 CFR § 1005.30(f). For purposes of this item 16, such transfers are referred to as international remittance transfers.

Exclude transfers sent by your institution as a correspondent bank for other providers. Report information only about transfers for which the reporting institution is the provider.

2 For the December 31, 2021, report date, your institution should complete Schedule RC-M, items 16.b.(1) through 16.b.(3), only if it reports 501 or more international remittance transfers in Schedule RC-M, item 16.a, in the December 31, 2021, Call Report or if it reported a combined total of 501 or more international remittance transfers in Schedule RC-M, item 16.d.(1), in the June 30 and December 31, 2020, Call Reports.

3 Paycheck Protection Program (PPP) covered loans as defined in sections 7(a)(36) and 7(a)(37) of the Small Business Act (15 U.S.C. 636(a)(36) and (37)).

### Schedule RC-N—Past Due and Nonaccrual Loans, Leases, and Other Assets

	(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual		
	RCON	Amount	RCON	Amount	RCON	Amount	
Dollar Amounts in Thousands							
1. Loans secured by real estate:							
a. Construction, land development, and other land loans:							
(1) 1-4 family residential construction loans.....	F172	0	F174	0	F176	0	1.a.1.
(2) Other construction loans and all land development and other land loans.....	F173	0	F175	0	F177	0	1.a.2.
b. Secured by farmland.....	3493	0	3494	0	3495	0	1.b.
c. Secured by 1-4 family residential properties:							
(1) Revolving, open-end loans secured by 1-4 family residential properties and extended under lines of credit.....	5398	0	5399	0	5400	459	1.c.1.
(2) Closed-end loans secured by 1-4 family residential properties:							
(a) Secured by first liens.....	C236	0	C237	0	C229	0	1.c.2.a.
(b) Secured by junior liens.....	C238	0	C239	0	C230	0	1.c.2.b.
d. Secured by multifamily (5 or more) residential properties.....	3499	0	3500	0	3501	363	1.d.
e. Secured by nonfarm nonresidential properties:							
(1) Loans secured by owner-occupied nonfarm nonresidential properties.....	F178	0	F180	0	F182	0	1.e.1.
(2) Loans secured by other nonfarm nonresidential properties.....	F179	0	F181	0	F183	0	1.e.2.
2. Loans to depository institutions and acceptances of other banks.....	B834	0	B835	0	B836	0	2.
3. Not applicable							
4. Commercial and industrial loans.....	1606	0	1607	0	1608	0	4.
5. Loans to individuals for household, family, and other personal expenditures:							
a. Credit cards.....	B575	344	B576	101	B577	0	5.a.
b. Automobile loans.....	K213	0	K214	0	K215	0	5.b.
c. Other (includes revolving credit plans other than credit cards and other consumer loans).....	K216	0	K217	0	K218	0	5.c.
6. Not applicable							
7. All other loans (1).....	5459	0	5460	0	5461	0	7.
8. Lease financing receivables.....	1226	0	1227	0	1228	0	8.
9. Total loans and leases (sum of items 1 through 8).....	1406	344	1407	101	1403	822	9.
10. Debt securities and other assets (exclude other real estate owned and other repossessed assets).....	3505	0	3506	0	3507	0	10.

<sup>1</sup> Includes past due and nonaccrual "Loans to finance agricultural production and other loans to farmers," "Obligations (other than securities and leases) of states and political subdivisions in the U.S.," and "Loans to nondepository financial institutions and other loans."

**Schedule RC-N—Continued**

Amounts reported by loan and lease category in Schedule RC-N, items 1 through 8, include guaranteed and unguaranteed portions of past due and nonaccrual loans and leases. Report in item 11 below certain guaranteed loans and leases that have already been included in the amounts reported in items 1 through 8.

	(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual	
	RCON	Amount	RCON	Amount	RCON	Amount
Dollar Amounts in Thousands						
11. Loans and leases reported in items 1 through 8 above that are wholly or partially guaranteed by the U.S. Government, excluding loans and leases covered by loss-sharing agreements with the FDIC.....	K036	0	K037	0	K038	0
a. Guaranteed portion of loans and leases included in item 11 above, excluding rebooked "GNMA loans".....	K039	0	K040	0	K041	0
b. Rebooked "GNMA loans" that have been repurchased or are eligible for repurchase included in item 11 above.....	K042	0	K043	0	K044	0

**Memoranda**

	(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual	
	RCON	Amount	RCON	Amount	RCON	Amount
Dollar Amounts in Thousands						
<i>Memorandum items 1.a.(1) through 1.f.(5) are to be completed semiannually in the June and December reports only. Memorandum item 1.g is to be completed quarterly.</i>						
1. Loans restructured in troubled debt restructurings included in Schedule RC-N, items 1 through 7, above (and not reported in Schedule RC-C, Part I, Memorandum item 1):						
a. Construction, land development, and other land loans:						
(1) 1-4 family residential construction loans.....	K105	0	K106	0	K107	0
(2) Other construction loans and all land development and other land loans.....	K108	0	K109	0	K110	0
b. Loans secured by 1-4 family residential properties.....	F661	0	F662	0	F663	0
c. Secured by multifamily (5 or more) residential properties.....	K111	0	K112	0	K113	302
d. Secured by nonfarm nonresidential properties:						
(1) Loans secured by owner-occupied nonfarm nonresidential properties.....	K114	0	K115	0	K116	0
(2) Loans secured by other nonfarm nonresidential properties.....	K117	0	K118	0	K119	0
e. Commercial and industrial loans.....	K257	0	K258	0	K259	0

Schedule RC-N—Continued

Memoranda—Continued

	(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual		
	RCON	Amount	RCON	Amount	RCON	Amount	
Dollar Amounts in Thousands							
1.f. All other loans (include loans to individuals for household, family, and other personal expenditures).....	K126	0	K127	0	K128	0	M.1.f.
<i>Itemize loan categories included in Memorandum item 1.f, above that exceed 10% of total loans restructured in troubled debt restructurings that are past due 30 days or more or in nonaccrual status (sum of Memorandum items 1.a through 1.e plus 1.f, columns A through C):</i>							
(1) Loans secured by farmland.....	K130	0	K131	0	K132	0	M.1.f.1.
(2) and (3) Not applicable							
(4) Loans to individuals for household, family, and other personal expenditures:							
(a) Credit cards.....	K274	0	K275	0	K276	0	M.1.f.4.a.
(b) Automobile loans.....	K277	0	K278	0	K279	0	M.1.f.4.b.
(c) Other (includes revolving credit plans other than credit cards and other consumer loans).....	K280	0	K281	0	K282	0	M.1.f.4.c.
<i>Memorandum item 1.f.5. is to be completed by:</i>							
• Banks with \$300 million or more in total assets							
• Banks with less than \$300 million in total assets that have loans to finance agricultural production and other loans to farmers (Schedule RC-C, Part I, item 3) exceeding 5 percent of total loans							
(5) Loans to finance agricultural production and other loans to farmers.....	K138	0	K139	0	K140	0	M.1.f.5.
1.g. Total loans restructured in troubled debt restructurings included in Schedule RC-N items 1 through 7, above (sum of Memorandum items 1.a.(1) through 1.f) (2).....	HK26	0	HK27	0	HK28	302	M.1.g.
2. Loans to finance commercial real estate, construction, and land development activities (not secured by real estate) included in Schedule RC-N, items 4 and 7, above.....	6558	0	6559	0	6560	0	M.2.
3. Not applicable							

1 For the \$300 million asset-size test for report dates through December 31, 2021, an institution may use the lesser of the total assets reported in its Report of Condition as of December 31, 2019, or June 30, 2020. If the total assets reported as of one of these two report dates are less than \$300 million, the same report date should be used for the 5 percent of total loans test. If the total assets reported for both of these two report dates are less than \$300 million, the 5 percent of total loans test should be based on the total loans reported in the Report of Condition as of June 30, 2020.

2 Exclude amounts reported in Memorandum items 1.f.(1) through 1.f.(5) when calculating the total in Memorandum item 1.g.

Schedule RC-N—Continued

Memoranda—Continued

	(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual	
	RCON	Amount	RCON	Amount	RCON	Amount
Dollar Amounts in Thousands						
<i>Memorandum item 4 is to be completed by:</i> <sup>1</sup>						
• banks with \$300 million or more in total assets						
• banks with less than \$300 million in total assets that have loans to finance agricultural production and other loans to farmers (Schedule RC-C, Part I, item 3) exceeding 5 percent of total loans:						
4. Loans to finance agricultural production and other loans to farmers (included in Schedule RC-N, item 7, above).....	1594	0	1597	0	1583	0 M.4.
<i>Memorandum item 5 is to be completed semiannually in the June and December reports only.</i>						
5. Loans and leases held for sale (included in Schedule RC-N, items 1 through 8, above).....	C240	0	C241	0	C226	0 M.5.
6. Not applicable						
<i>Memorandum items 7, 8, 9.a, and 9.b are to be completed semiannually in the June and December reports only.</i>						
7. Additions to nonaccrual assets during the previous six months.....	RCON	Amount				
	C410	7				M.7.
8. Nonaccrual assets sold during the previous six months.....	C411	0				M.8.

	(Column A) Past due 30 through 89 days and still accruing		(Column B) Past due 90 days or more and still accruing		(Column C) Nonaccrual	
	RCON	Amount	RCON	Amount	RCON	Amount
Dollar Amounts in Thousands						
9. Purchased credit-impaired loans accounted for in accordance with FASB ASC 310-30 (former AICPA Statement of Position 03-3): <sup>2</sup>						
a. Outstanding balance.....	L183	0	L184	0	L185	0 M.9.a
b. Amount included in Schedule RC-N, items 1 through 7, above.....	L186	0	L187	0	L188	0 M.9.b

<sup>1</sup> For the \$300 million asset-size test for report dates through December 31, 2021, an institution may use the lesser of the total assets reported in its Report of Condition as of December 31, 2019, or June 30, 2020. If the total assets reported as of one of these two report dates are less than \$300 million, the same report date should be used for the 5 percent of total loans test. If the total assets reported for both of these two report dates are less than \$300 million, the 5 percent of total loans test should be based on the total loans reported in the Report of Condition as of June 30, 2020.

<sup>2</sup> Memorandum items 9.a and 9.b should be completed only by institutions that have not yet adopted ASU 2016-13.

### Schedule RC-O—Other Data for Deposit Insurance Assessments

All FDIC-insured depository institutions must complete Schedule RC-O each quarter on an "unconsolidated single FDIC certificate number basis," unless otherwise indicated (see instructions).

		Dollar Amounts in Thousands	RCON	Amount	
1.	Total deposit liabilities before exclusions (gross) as defined in Section 3(l) of the Federal Deposit Insurance Act and FDIC regulations.....		F236	836,239	1.
2.	Total allowable exclusions, including interest accrued and unpaid on allowable exclusions.....		F237	0	2.
3.	Not applicable				
4.	Average consolidated total assets for the calendar quarter.....		K652	947,659	4.
	a. Averaging method used				
	(for daily averaging, enter 1, for weekly averaging, enter 2).....	K653	Number	1	4.a
			Amount		
5.	Average tangible equity for the calendar quarter (1).....		K654	94,225	5.
6.	Holdings of long-term unsecured debt issued by other FDIC-insured depository institutions.....		K655	0	6.
7.	Unsecured "Other borrowings" with a remaining maturity of (sum of items 7.a through 7.d must be less than or equal to Schedule RC-M, items 5.b.(1)(a)-(d) minus item 10.b):				
	a. One year or less.....		G465	0	7.a.
	b. Over one year through three years.....		G466	0	7.b.
	c. Over three years through five years.....		G467	0	7.c.
	d. Over five years.....		G468	0	7.d.
8.	Subordinated notes and debentures with a remaining maturity of (sum of items 8.a. through 8.d. must equal Schedule RC, item 19):				
	a. One year or less.....		G469	0	8.a.
	b. Over one year through three years.....		G470	0	8.b.
	c. Over three years through five years.....		G471	0	8.c.
	d. Over five years.....		G472	0	8.d.
9.	Brokered reciprocal deposits (included in Schedule RC-E, Memorandum item 1.b).....		G803	0	9.
	<i>Item 9.a is to be completed on a fully consolidated basis by all institutions that own another insured depository institution.</i>				
	a. Fully consolidated brokered reciprocal deposits.....		L190	NR	9.a
10.	Banker's bank certification:				
	Does the reporting institution meet both the statutory definition of a banker's bank and the business conduct test set forth in FDIC regulations?.....		K656	NO	10.
	<i>If the answer to item 10 is "YES", complete items 10.a and 10.b.</i>				
	a. Banker's bank deduction.....		K657	NR	10.a
	b. Banker's bank deduction limit.....		K658	NR	10.b
11.	Custodial bank certification:				
	Does the reporting institution meet the definition of a custodial bank set forth in FDIC regulations?.....		K659	NO	11.
	<i>If the answer to item 11 is "YES", complete items 11.a and 11.b.<sup>2</sup></i>				
	a. Custodial bank deduction.....		K660	NR	11.a
	b. Custodial bank deduction limit.....		K661	NR	11.b

<sup>1</sup> See instructions for averaging methods. For deposit insurance assessment purposes, tangible equity is defined as Tier 1 capital as set forth in the banking agencies' regulatory capital standards and reported in Schedule RC-R, Part I, item 26, except as described in the instructions.

<sup>2</sup> If the amount reported in item 11.b is zero, item 11.a may be left blank.

**Schedule RC-O—Continued**

**Memoranda**

		Dollar Amounts in Thousands	RCON	Amount	
1. Total deposit liabilities of the bank, including related interest accrued and unpaid, less allowable exclusions, including related interest accrued and unpaid (sum of Memorandum items 1.a.(1), 1.b.(1), 1.c.(1), and 1.d.(1) must equal Schedule RC-O, item 1 less item 2):					
a. Deposit accounts (excluding retirement accounts) of \$250,000 or less: <sup>1</sup>					
(1) Amount of deposit accounts (excluding retirement accounts) of \$250,000 or less.....			F049	122,875	M.1.a.1.
(2) Number of deposit accounts (excluding retirement accounts) of \$250,000 or less.....		Number			
		F050	7,908		M.1.a.2.
b. Deposit accounts (excluding retirement accounts) of more than \$250,000: <sup>1</sup>					
(1) Amount of deposit accounts (excluding retirement accounts) of more than \$250,000.....			F051	711,730	M.1.b.1.
(2) Number of deposit accounts (excluding retirement accounts) of more than \$250,000.....		Number			
		F052	403		M.1.b.2.
c. Retirement deposit accounts of \$250,000 or less: <sup>1</sup>					
(1) Amount of retirement deposit accounts of \$250,000 or less.....			F045	1,634	M.1.c.1.
(2) Number of retirement deposit accounts of \$250,000 or less.....		Number			
		F046	146		M.1.c.2.
d. Retirement deposit accounts of more than \$250,000: <sup>1</sup>					
(1) Amount of retirement deposit accounts of more than \$250,000.....			F047	0	M.1.d.1.
(2) Number of retirement deposit accounts of more than \$250,000.....		Number			
		F048	0		M.1.d.2.
<i>Memorandum item 2 is to be completed by banks with \$1 billion or more in total assets.<sup>2</sup></i>					
2. Estimated amount of uninsured deposits including related interest accrued and unpaid (see instructions) <sup>3</sup> .....			S597	NR	M.2.
3. Has the reporting institution been consolidated with a parent bank or savings association in that parent bank's or parent savings association's Call Report?					
If so, report the legal title and FDIC Certificate Number of the parent bank or parent savings association:					
TEXT			RCON	FDIC Cert. No.	
A545			A545	00000	M.3.

1 The dollar amounts used as the basis for reporting in Memorandum items 1.a through 1.d reflect the deposit insurance limits in effect on the report date.  
 2 For the \$1 billion asset-size test for report dates through December 31, 2021, an institution may use the lesser of the total assets reported in its Report of Condition as of December 31, 2019, or June 30, 2020.  
 3 Uninsured deposits should be estimated based on the deposit insurance limits set forth in Memorandum items 1.a through 1.d.

# Schedule RC-R—Regulatory Capital

## Part I. Regulatory Capital Components and Ratios

Part I is to be completed on a consolidated basis.

	Dollar Amounts in Thousands		
	RCOA	Amount	
<b>Common Equity Tier 1 Capital</b>			
1. Common stock plus related surplus, net of treasury stock and unearned employee stock ownership plan (ESOP) shares.....	P742	20,000	1.
2. Retained earnings (1).....	KW00	74,457	2.
a. To be completed only by institutions that have adopted ASU 2016-13: Does your institution have a CECL transition election in effect as of the quarter-end report date? (enter "0" for No; enter "1" for Yes with a 3-year CECL transition election; enter "2" for Yes with a 5-year 2020 CECL transition election.) .....	RCOA JJ29	Number NR	2.a.
3. Accumulated other comprehensive income (AOCI).....	RCOA 8530	Amount (5,592)	3.
a. AOCI opt-out election (enter "1" for Yes; enter "0" for No.).....	0=No 1=Yes	RCOA P838	Amount 1
4. Common equity tier 1 minority interest includable in common equity tier 1 capital.....	RCOA P839	Amount 0	4.
5. Common equity tier 1 capital before adjustments and deductions (sum of items 1 through 4).....	P840	88,865	5.
<b>Common Equity Tier 1 Capital: Adjustments and Deductions</b>			
6. LESS: Goodwill net of associated deferred tax liabilities (DTLs).....	P841	0	6.
7. LESS: Intangible assets (other than goodwill and mortgage servicing assets (MSAs)), net of associated DTLs.....	P842	26	7.
8. LESS: Deferred tax assets (DTAs) that arise from net operating loss and tax credit carryforwards, net of any related valuation allowances and net of DTLs.....	P843	0	8.
9. AOCI-related adjustments (if entered "1" for Yes in item 3.a, complete only items 9.a through 9.e; if entered "0" for No in item 3.a, complete only item 9.f):			
a. LESS: Net unrealized gains (losses) on available-for-sale debt securities (if a gain, report as a positive value; if a loss, report as a negative value).....	P844	(488)	9.a.
b. Not applicable			
c. LESS: Accumulated net gains (losses) on cash flow hedges (if a gain, report as a positive value; if a loss, report as a negative value).....	P846	0	9.c.
d. LESS: Amounts recorded in AOCI attributed to defined benefit postretirement plans resulting from the initial and subsequent application of the relevant GAAP standards that pertain to such plans (if a gain, report as a positive value; if a loss, report as a negative value).....	P847	(5,104)	9.d.
e. LESS: Net unrealized gains (losses) on held-to-maturity securities that are included in AOCI (if a gain, report as a positive value; if a loss, report as a negative value).....	P848	0	9.e.
f. To be completed only by institutions that entered "0" for No in item 3.a: LESS: Accumulated net gain (loss) on cash flow hedges included in AOCI, net of applicable income taxes, that relates to the hedging of items that are not recognized at fair value on the balance sheet (if a gain, report as a positive value; if a loss, report as a negative value).....	P849	NR	9.f.

1 Institutions that have adopted ASU 2016-13 and have elected to apply the 3-year or the 5-year 2020 CECL transition provision should include the applicable portion of the CECL transitional amount or the modified CECL transitional amount, respectively, in this item.

Schedule RC-R—Continued

Part I - Continued

	Dollar Amounts in Thousands	RCOA	Amount	
10. Other deductions from (additions to) common equity tier 1 capital before threshold-based deductions:				
a. LESS: Unrealized net gain (loss) related to changes in the fair value of liabilities that are due to changes in own credit risk (if a gain, report as a positive value; if a loss, report as a negative value).....		Q258	0	10.a.
b. LESS: All other deductions from (additions to) common equity tier 1 capital before threshold-based deductions.....		P850	0	10.b.
11. Not applicable				
12. Subtotal (item 5 minus items 6 through 10.b).....		P852	94,431	12.
13. LESS: Investments in the capital of unconsolidated financial institutions, net of associated DTLs, that exceed 25 percent of item 12.....		L858	0	13.
14. LESS: MSAs, net of associated DTLs, that exceed 25 percent of item 12.....		L859	0	14.
15. LESS: DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs, that exceed 25 percent of item 12.....		L860	0	15.
16. Not applicable				
17. LESS: Deductions applied to common equity tier 1 capital due to insufficient amounts of additional tier 1 capital and tier 2 capital (1) to cover deductions.....		P857	0	17.
18. Total adjustments and deductions for common equity tier 1 capital (sum of items 13 through 17).....		P858	0	18.
19. Common equity tier 1 capital (item 12 minus item 18).....		P859	94,431	19.
<b>Additional Tier 1 Capital</b>				
20. Additional tier 1 capital instruments plus related surplus.....		P860	0	20.
21. Non-qualifying capital instruments subject to phase-out from additional tier 1 capital.....		P861	0	21.
22. Tier 1 minority interest not included in common equity tier 1 capital.....		P862	0	22.
23. Additional tier 1 capital before deductions (sum of items 20, 21, and 22).....		P863	0	23.
24. LESS: Additional tier 1 capital deductions.....		P864	0	24.
25. Additional tier 1 capital (greater of item 23 minus item 24, or zero).....		P865	0	25.
<b>Tier 1 Capital</b>				
26. Tier 1 capital (sum of items 19 and 25).....		8274	94,431	26.
<b>Total Assets for the Leverage Ratio</b>				
27. Average total consolidated assets (2).....		KW03	947,659	27.
28. LESS: Deductions from common equity tier 1 capital and additional tier 1 capital (sum of items 6, 7, 8, 10.b, 13 through 15, 17, and certain elements of item 24 - see instructions).....		P875	26	28.
29. LESS: Other deductions from (additions to) assets for leverage ratio purposes.....		B596	0	29.
30. Total assets for the leverage ratio (item 27 minus items 28 and 29).....		A224	947,633	30.

1 An institution that has a CBLR framework election in effect as of the quarter-end report date is neither required to calculate tier 2 capital nor make any deductions that would have been taken from tier 2 capital as of the report date.

2 Institutions that have adopted ASU 2016-13 and have elected to apply the 3-year or the 5-year 2020 CECL transition provision should include the applicable portion of the CECL transitional amount or the modified CECL transitional amount, respectively, in item 27.

Schedule RC-R—Continued

Part I - Continued

Leverage Ratio\*

31. Leverage ratio (item 26 divided by item 30) .....

RCOA	Percentage
7204	9.9649%

a. Does your institution have a community bank leverage ratio (CBLR) framework election in effect as of the quarter-end report date? (enter "1" for Yes; enter "0" for No) .....

0=No	RCOA
1=Yes	LE74
	0

If your institution entered "1" for Yes in item 31.a:

- Complete items 32 through 37 and, if applicable, items 38.a through 38.c,
- Do not complete items 39 through 54, and
- Do not complete Part II of Schedule RC-R.

If your institution entered "0" for No in item 31.a:

- Skip (do not complete) items 32 through 38.c,
- Complete items 39 through 54, as applicable, and
- Complete Part II of Schedule RC-R.

Qualifying Criteria and Other Information for CBLR Institutions\*

	Dollar Amounts in Thousands		(Column A)		(Column B)		
	RCOA	Amount	RCOA	Percentage	RCOA	Percentage	
32. Total assets (1).....	2170	NR					32.
33. Trading assets and trading liabilities (Schedule RC, sum of items 5 and 15). Report as a dollar amount in column A and as a percentage of total assets (5% limit) in column B .....	KX77	NR	KX78	NR			33.
34. Off-balance sheet exposures:							
a. Unused portion of conditionally cancellable commitments.....	KX79	NR					34.a.
b. Securities lent and borrowed (Schedule RC-L, sum of items 6.a and 6.b).....	KX80	NR					34.b.
c. Other off-balance sheet exposures.....	KX81	NR					34.c.
d. Total off-balance sheet exposures (sum of items 34.a through 34.c). Report as a dollar amount in column A and as a percentage of total assets (25% limit) in column B.....	KX82	NR	KX83	NR			34.d.

	Dollar Amounts in Thousands		RCOA	Amount	
35. Unconditionally cancellable commitments.....	S540	NR			35.
36. Investments in the tier 2 capital of unconsolidated financial institutions.....	LB61	NR			36.
37. Allocated transfer risk reserve.....	3128	NR			37.
38. Amount of allowances for credit losses on purchased credit-deteriorated assets: (2)					
a. Loans and leases held for investment.....	JJ30	NR			38.a.
b. Held-to-maturity debt securities.....	JJ31	NR			38.b.
c. Other financial assets measured at amortized cost.....	JJ32	NR			38.c.

If your institution entered "0" for No in item 31.a, complete items 39 through 54, as applicable, and Part II of Schedule RC-R. If your institution entered "1" for Yes in item 31.a, do not complete items 39 through 54 or Part II of Schedule RC-R.

	Dollar Amounts in Thousands		RCOA	Amount	
<b>Tier 2 Capital<sup>3</sup></b>					
39. Tier 2 capital instruments plus related surplus.....	P866	0			39.
40. Non-qualifying capital instruments subject to phase-out from tier 2 capital.....	P867	0			40.

\* Report each ratio as a percentage, rounded to four decimal places, e.g., 12.3456.

1 For report dates through December 31, 2021, report the lesser of total assets reported in Schedule RC, item 12, as of December 31, 2019, or the current report date, which must be less than \$10 billion.

2 Items 38.a through 38.c should be completed only by institutions that have adopted ASU 2016-13.

3 An institution that has a CBLR framework election in effect as of the quarter-end report date is neither required to calculate tier 2 capital nor make any deductions that would have been taken from tier 2 capital as of the report date.

**Schedule RC-R—Continued**

**Part I - Continued**

	Dollar Amounts in Thousands	RCOA	Amount	
41. Total capital minority interest that is not included in tier 1 capital.....		P868	0	41.
42. Allowance for loan and lease losses includable in tier 2 capital (1,2).....		5310	7,047	42.
43. Not applicable				
44. Tier 2 capital before deductions (sum of items 39 through 42).....		P870	7,047	44.
45. LESS: Tier 2 capital deductions.....		P872	0	45.
46. Tier 2 capital (greater of item 44 minus item 45, or zero).....		5311	7,047	46.
<b>Total Capital</b>				
47. Total capital (sum of items 26 and 46).....		3792	101,478	47.
<b>Total Risk-Weighted Assets</b>				
48. Total risk-weighted assets (from Schedule RC-R, Part II, item 31).....		A223	562,781	48.
<b>Risk-Based Capital Ratios*</b>				
49. Common equity tier 1 capital ratio (item 19 divided by item 48).....		P793	16.7794%	49.
50. Tier 1 capital ratio (item 26 divided by item 48).....		7206	16.7794%	50.
51. Total capital ratio (item 47 divided by item 48).....		7205	18.0315%	51.
<b>Capital Buffer*</b>				
52. Institution-specific capital conservation buffer necessary to avoid limitations on distributions and discretionary bonus payments.....		H311	10.0315%	52.
	Dollar Amounts in Thousands	RCOA	Amount	
53. Eligible retained income (3).....		H313	0	53.
54. Distributions and discretionary bonus payments during the quarter (4).....		H314	NR	54.

\* Report each ratio and buffer as a percentage, rounded to four decimal places, e.g., 12.3456.

1 Institutions that have adopted ASU 2016-13 should report the amount of adjusted allowances for credit losses (AACL), as defined in the regulatory capital rule, includable in tier 2 capital in item 42.

2 Institutions that have adopted ASU 2016-13 and have elected to apply the 3-year or the 5-year 2020 CECL transition provision should subtract the applicable portion of the AACL transitional amount or the modified AACL transitional amount, respectively, from the AACL, as defined in the regulatory capital rule, before determining the amount of AACL includable in tier 2 capital. See instructions for further detail on the CECL transition provisions.

3 Institutions must complete item 53 only if the amount reported in item 52 above is less than or equal to 2.5000 percent.

4 Institutions must complete item 54 only if the amount reported in Schedule RC-R, Part I, item 52, in the Call Report for the previous calendar quarter-end report date was less than or equal to 2.5000 percent.

# Schedule RC-R—Continued

## Part II. Risk-Weighted Assets

Institutions that entered "1" for Yes in Schedule RC-R, Part I, item 31.a, do not have to complete Schedule RC-R, Part II. Institutions are required to assign a 100 percent risk weight to all assets not specifically assigned a risk weight under Subpart D of the federal banking agencies' regulatory capital rules<sup>1</sup> and not deducted from tier 1 or tier 2 capital. *Items 1 through 25 (column A through column U, as applicable) are to be completed semiannually in the June and December reports only.*

(Column A) Totals From Schedule RC	(Column B) Adjustments to Totals Reported in Column A	Allocation by Risk-Weight Category						(Column J) 150% Amount						
		(Column C) 0% Amount	(Column D) 2% Amount	(Column E) 4% Amount	(Column F) 10% Amount	(Column G) 20% Amount	(Column H) 50% Amount		(Column I) 100% Amount					
<b>Dollar Amounts in Thousands</b>														
<b>Balance Sheet Asset Categories<sup>2</sup></b>														
1. Cash and balances due from depository institutions.....	RCON D957 228,155	RCON D958 184,522					RCON D959 43,633	RCON D960 0	RCON S397 0	RCON D964 0	RCON D965 0	RCON S398 0	RCON S400 0	1.
2. Securities:														2.a.
a. Held-to-maturity securities (3).....	RCON D961 9,649	RCON D962 3,103	RCON H174 0	RCON H175 0										
b. Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading.....	RCON JA21 164,207	RCON D967 27,948	RCON H176 0	RCON H177 0			RCON D968 136,940	RCON D969 0	RCON D970 0			RCON S403 0		2.b.
3. Federal funds sold and securities purchased under agreements to resell:														
a. Federal funds sold.....	RCON D971 0	RCON D972 0					RCON D973 0	RCON S410 0	RCON D974 0			RCON S411 0		3.a.
b. Securities purchased under agreements to resell.....	RCON H171 0	RCON H172 0												3.b.
4. Loans and leases held for sale:														
a. Residential mortgage exposures.....	RCON S413 0	RCON H173 0					RCON S415 0	RCON S416 0	RCON S417 0			RCON S418 0		4.a.
b. High volatility commercial real estate exposures.....	RCON S419 0	RCON H174 0					RCON H175 0	RCON H176 0	RCON H177 0			RCON S421 0		4.b.

<sup>1</sup> For national banks and federal savings associations, 12 CFR Part 3; for state member banks, 12 CFR Part 217; and for state nonmember banks and state savings associations, 12 CFR Part 324.

<sup>2</sup> All securitization exposures held as on-balance sheet assets of the reporting institution are to be excluded from items 1 through 8 and are to be reported instead in item 9.

<sup>3</sup> Institutions that have adopted ASU 2016-13 and have reported held-to-maturity securities net of allowances for credit losses in item 2.a, column A, should report as a negative number in item 2.a., column B, those allowances for credit losses eligible for inclusion in tier 2 capital, which excludes allowances for credit losses on purchased credit-deteriorated assets.



**Schedule RC-R—Continued**

**Part II—Continued**

(Column A) Totals From Schedule RC	(Column B) Adjustments to Totals Reported in Column A	Allocation by Risk-Weight Category									
		(Column C) 0%	(Column D) 2%	(Column E) 4%	(Column F) 10%	(Column G) 20%	(Column H) 50%	(Column I) 100%	(Column J) 150%		
Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	
RCON S423	RCON S424	RCON S425	RCON HJ78	RCON HJ79	RCON S426	RCON S427	RCON S428	RCON S429			
0	0	0	0	0	0	0	0	0			
RCON S431	RCON S432	RCON S433	RCON HJ80	RCON HJ81	RCON S434	RCON S435	RCON S436	RCON S437			
0	0	0	0	0	0	0	0	0			
RCON S439	RCON S440	RCON H178			RCON S441	RCON S442	RCON S443				
79,077	0	0			0	65,246	13,831				
RCON S445	RCON S446	RCON H179			RCON H180	RCON H181	RCON H182	RCON S447			
0	0	0			0	0	0	0			
RCON S449	RCON S450	RCON S451	RCON HJ82	RCON HJ83	RCON S452	RCON S453	RCON S454	RCON S455			
101	0	0	0	0	0	0	0	0			
RCON S457	RCON S458	RCON S459	RCON HJ84	RCON HJ85	RCON S460	RCON S461	RCON S462	RCON S463			
439,841	0	13,881	0	0	0	0	425,960	0			
RCON S123	RCON S123										
8,050	8,050										

- 4. Dollar Amounts in Thousands
  - a. Loans and leases held for sale (continued):
    - c. Exposures past due 90 days or more or on nonaccrual (1).....
    - d. All other exposures.....
  - b. Loans and leases held for investment: (2)
    - a. Residential mortgage exposures.....
    - b. High volatility commercial real estate exposures.....
    - c. Exposures past due 90 days or more or on nonaccrual (3).....
    - d. All other exposures.....
- 6. LESS: Allowance for loan and lease losses (4).....

1 For loans and leases held for sale, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.  
 2 Institutions that have adopted ASU 2016-13 should report as a positive number in column B of items 5.a through 5.d, as appropriate, any allowances for credit losses on purchased credit-deteriorated assets reported in column A of items 5.a through 5.d, as appropriate.  
 3 For loans and leases held for investment, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.  
 4 Institutions that have adopted ASU 2016-13 should report the allowance for credit losses on loans and leases in item 6, columns A and B.



**Schedule RC-R---Continued**

**Part II---Continued**

(Column A) Totals From Schedule RC	(Column B) Adjustments to Totals Reported in Column A	Allocation by Risk-Weight Category									
		(Column C) 0%	(Column D) 2%	(Column E) 4%	(Column F) 10%	(Column G) 20%	(Column H) 50%	(Column I) 100%	(Column J) 150%		
Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	
RCON D976	RCON S466	RCON D977	RCON H186	RCON H187		RCON D978	RCON D979	RCON D980	RCON S467		
0	0	0	0	0		0	0	0	0		
RCON D981	RCON S469	RCON D982	RCON H188	RCON H189		RCON D983	RCON D984	RCON D985	RCON H185		
37,159	26	158	0	0		2,731	59	34,185	0		

Dollar Amounts in Thousands

- 7. Trading assets..... 7.
- 8. All other assets (1,2,3)..... 8.
- a. Separate account bank-owned life insurance..... 8.a.
- b. Default fund contributions to central counterparties..... 8.b.

1. Includes premises and fixed assets; other real estate owned; investments in unconsolidated subsidiaries and associated companies; direct and indirect investments in real estate ventures; intangible assets; and other assets.  
 2. Institutions that have adopted ASU 2016-13 and have elected to apply the 3-year or the 5-year 2020 CECL transition provision should report as a positive number in item 8, column B, the applicable portion of the DTA transitional amount as determined in accordance with the 3-year or the 5-year 2020 CECL transition rule, respectively.  
 3. Institutions that have adopted ASU 2016-13 and have reported any assets, net of allowances for credit losses in item 8, column A, should report as a negative number in item 8, column B, those allowances for credit losses eligible for inclusion in tier 2 capital, which excludes allowances for credit losses on purchased credit-deteriorated assets.

**Schedule RC-R—Continued**  
**Part II—Continued**

(Column K)	(Column L)	(Column M)	(Column N)	(Column O)	(Column P)	(Column Q)	(Column R)	(Column S)
250%	300%	400%	600%	625%	937.5%	1250%	Application of Other Risk-Weighting Approaches <sup>1</sup>	
Amount	Exposure Amount	Risk-Weighted Asset Amount						
	RCON H186	RCON H290	RCON H187				RCON H291	RCON H292
	0	0	0				0	0
RCON H293	RCON H188	RCON S470	RCON S471				RCON H294	RCON H295
0	0	0	0				0	0
							RCON H296	RCON H297
							RCON H298	RCON H299
							0	0
								0

Dollar Amounts in Thousands

7. Trading assets.....

8. All other assets (2).....

    a. Separate account bank-owned life insurance.....

    b. Default fund contributions to central counterparties.....

1. Includes, for example, investments in mutual funds/investment funds, exposures collateralized by securitization exposures or mutual funds, separate account bank-owned life insurance, and default fund contributions to central counterparties.

2. Includes premises and fixed assets; other real estate owned; investments in unconsolidated subsidiaries and associated companies; direct and indirect investments in real estate ventures; intangible assets; and other assets.

**Schedule RC-R—Continued**

**Part II—Continued**

(Column A) Totals	(Column B) Adjustments to Totals Reported in Column A	(Column Q) Allocation by Risk-Weight Category (Exposure Amount)	(Column T) Total Risk-Weighted Asset Amount by Calculation Methodology	(Column U) Gross-Up Amount
		1250%		
	Amount	Amount	Amount	Amount
RCON S475	RCON S476	RCON S477	RCON S478	RCON S479
0	0	0	0	0
RCON S480	RCON S481	RCON S482	RCON S483	RCON S484
0	0	0	0	0
RCON S485	RCON S486	RCON S487	RCON S488	RCON S489
0	0	0	0	0
RCON S490	RCON S491	RCON S492	RCON S493	RCON S494
0	0	0	0	0
RCON S495	RCON S496	RCON S497	RCON S498	RCON S499
0	0	0	0	0

**Dollar Amounts in Thousands**

**Securitization Exposures: On- and Off-Balance Sheet**

- 9. On-balance sheet securitization exposures:
  - a. Held-to-maturity securities (2).....
  - b. Available-for-sale securities.....
  - c. Trading assets.....
  - d. All other on-balance sheet securitization exposures.....
- 10. Off-balance sheet securitization exposures.....

(Column A) Total From Schedule RC	(Column B) Adjustments to Totals Reported in Column A	Allocation by Risk-Weight Category										
		(Column C)	(Column D)	(Column E)	(Column F)	(Column G)	(Column H)	(Column I)	(Column J)			
Amount	Amount	0%	2%	4%	10%	20%	50%	100%	150%			
RCON 2170	RCON S500	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount			
950,140	(8,705)	RCON D987	RCON HJ90	RCON HJ91	RCON D988	RCON D989	RCON D990	RCON S503				
		229,612	0	0	189,850	65,305	473,976	101				

**Dollar Amounts in Thousands**

- 11. Total balance sheet assets (3).....

(Column K)	(Column L)	(Column M)	(Column N)	(Column O)	(Column P)	(Column Q)	(Column R)
Allocation by Risk-Weight Category							
250%	300%	400%	600%	625%	937.5%	1250%	Exposure Amount
Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount
RCON S504	RCON S505	RCON S506	RCON S507			RCON S510	RCON H300
0	0	0	0	0	0	0	0

**Dollar Amounts in Thousands**

- 11. Total balance sheet assets (3).....

<sup>1</sup> Simplified Supervisory Formula Approach.

<sup>2</sup> Institutions that have adopted ASU 2016-13 and have reported held-to-maturity securities, net of allowances for credit losses in item 9.a, column A, should report as a negative number in item 9.a., column B, those allowances for credit losses eligible for inclusion in tier 2 capital, which excludes allowances for credit losses on purchased credit-deteriorated assets.

<sup>3</sup> For each of columns A through R of item 11, report the sum of items 1 through 9. For item 11, the sum of columns B through R must equal column A. Item 11, column A, must equal Schedule RC, item 12.

**Schedule RC-R—Continued**  
**Part II—Continued**

(Column A) Face, Notional, or Other Amount	CCF <sup>1</sup>	(Column B) Credit Equivalent Amount <sup>2</sup>	Allocation by Risk-Weight Category											
			(Column C) 0%	(Column D) 2%	(Column E) 4%	(Col F) 10%	(Column G) 20%	(Column H) 50%	(Column I) 100%	(Column J) 150%				
Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount
RCON D991		RCON D992	RCON D993	RCON HI92	RCON HI93	RCON D994	RCON D995	RCON D996	RCON D996	RCON S511				
543	1.0	543	174	0	0	0	0	369	0	0				
RCON D997		RCON D998	RCON D999			RCON G603	RCON G604	RCON G605	RCON S512					
0	0.5	0	0			0	0	0	0					
RCON G606		RCON G607	RCON G608	RCON HI94	RCON HI95	RCON G609	RCON G610	RCON G611	RCON S513					
0	0.2	0	0	0	0	0	0	0	0					
RCON G612		RCON G613	RCON G614			RCON G615	RCON G616	RCON G617	RCON S514					
0	1.0	0	0			0	0	0	0					

Dollar Amounts in Thousands  
**Derivatives, Off-Balance Sheet Items,  
and Other Items Subject to Risk  
Weighting (Excluding Securitization  
Exposures) (3)**

- 12. Financial standby letters of credit.....
- 13. Performance standby letters of credit and transaction-related contingent items.....
- 14. Commercial and similar letters of credit with an original maturity of one year or less.....
- 15. Retained recourse on small business obligations sold with recourse.....

<sup>1</sup> Credit conversion factor.  
<sup>2</sup> Column A multiplied by credit conversion factor. For each of items 12 through 21, the sum of columns C through J plus column R must equal column B.  
<sup>3</sup> All derivatives and off-balance sheet items that are securitization exposures are to be excluded from items 12 through 21 and are to be reported instead in item 10.

**Schedule RC-R—Continued**

**Part II—Continued**

	(Column A) Face, Notional, or Other Amount	CCF <sup>1</sup>	(Column B) Credit Equivalent Amount <sup>2</sup>	Allocation by Risk-Weight Category										
				(Column C) 0%	(Column D) 2%	(Column E) 4%	(Column F) 10%	(Column G) 20%	(Column H) 50%	(Column I) 100%	(Column J) 150%			
	Amount		Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount
16. Repo-style transactions (3).....	RCON S515		RCON S516	RCON S517	RCON S518	RCON S519	RCON S520	RCON S521	RCON S522	RCON S523				
17. All other off-balance sheet liabilities.....	RCON G618	1.0	RCON G619	RCON G620			RCON G621	RCON G622	RCON G623	RCON S524				
18. Unused commitments (exclude unused commitments to asset-backed commercial paper conduits):		1.0												
a. Original maturity of one year or less.....	RCON S525	0.2	RCON S526	RCON S527	RCON H196	RCON H197	RCON S528	RCON S529	RCON S530	RCON S531				
b. Original maturity exceeding one year.....	RCON G624	0.5	RCON G625	RCON G626	RCON H198	RCON H199	RCON G627	RCON G628	RCON G629	RCON S539				
19. Unconditionally cancelable commitments.....	RCON S540	0.0	RCON S541											
20. Over-the-counter derivatives.....			RCON S542	RCON S543	RCON HK00	RCON HK01	RCON S544	RCON S545	RCON S546	RCON S547	RCON S548			
21. Centrally cleared derivatives.....			RCON S549	RCON S550	RCON S551	RCON S552		RCON S554	RCON S555	RCON S556	RCON S557			
22. Unsettled transactions (failed trades) (4).....	RCON H191			RCON H193				RCON H194	RCON H195	RCON H196	RCON H197			
	0			0				0	0	0	0			

1 Credit conversion factor.  
 2 For items 16 through 19, column A multiplied by credit conversion factor.  
 3 Includes securities purchased under agreements to resell (reverse repos), securities sold under agreements to repurchase (repos), securities borrowed, and securities lent.  
 4 For item 22, the sum of columns C through Q, must equal column A.

**Schedule RC-R—Continued**  
**Part II—Continued**

	Dollar Amounts in Thousands	(Column O)		(Column P)	(Column Q)	(Column R)		(Column S)
		625%	937.5%	Allocation by Risk-Weight Category	Amount	Credit Equivalent Amount	Risk-Weighted Asset Amount	Application of Other Risk-Weighting Approaches <sup>1</sup>
		Amount	Amount	Amount	Amount	Amount	Amount	Amount
16. Repo-style transactions (2).....								0
17. All other off-balance sheet liabilities.....								0
18. Unused commitments (excludes unused commitments to asset-backed commercial paper conduits):								
a. Original maturity of one year or less.....								0
b. Original maturity exceeding one year .....								0
19. Unconditionally cancelable commitments .....								0
20. Over-the-counter derivatives .....								0
21. Centrally cleared derivatives .....								0
22. Unsettled transactions (failed trades) (3).....								0

<sup>1</sup> Includes, for example, exposures collateralized by securitization exposures or mutual funds.

<sup>2</sup> Includes securities purchased under agreements to resell (reverse repos), securities sold under agreements to repurchase (repos), securities borrowed, and securities lent.

<sup>3</sup> For item 22, the sum of columns C through Q must equal column A.

**Schedule RC-R—Continued**

**Part II—Continued**

(Column C)	(Column D)	(Column E)	(Column F)	(Column G)	(Column H)	(Column I)	(Column J)
Allocation by Risk-Weight Category							
0%	2%	4%	10%	20%	50%	100%	150%
Amount	Amount	Amount	Amount	Amount	Amount	Amount	Amount
RCON G630	RCON S558	RCON S559	RCON S560	RCON G631	RCON G632	RCON G633	RCON S561
229,786	0	0	0	189,850	65,305	493,008	101
X 0%	X 2%	X 4%	X 10%	X 20%	X 50%	X 100%	X 150%
RCON G634	RCON S569	RCON S570	RCON S571	RCON G635	RCON G636	RCON G637	RCON S572
0	0	0	0	37,970	32,653	493,008	152

- 23. Total assets, derivatives, off-balance sheet items, and other items subject to risk weighting by risk-weight category (for each of columns C through P, sum of items 11 through 22; for column Q, sum of items 10 through 22) .....
- 24. Risk weight factor .....
- 25. Risk-weighted assets by risk-weight category (for each column, item 23 multiplied by item 24) .....

**Schedule RC-R—Continued**

**Part II—Continued**

(Column K)	(Column L)	(Column M)	(Column N)	(Column O)	(Column P)	(Column Q)
Allocation by Risk-Weight Category						
250% Amount	300% Amount	400% Amount	600% Amount	625% Amount	937.5% Amount	1250% Amount
RCON S562	RCON S563	RCON S564	RCON S565	RCON S566	RCON S567	RCON S568
0	0	0	0	0	0	0
X 250%	X 300%	X 400%	X 600%	X 625%	X 937.5%	X 1250%
RCON S573	RCON S574	RCON S575	RCON S576	RCON S577	RCON S578	RCON S579
0	0	0	0	0	0	0

Dollar Amounts in Thousands

23. Total assets, derivatives, off-balance sheet items, and other items subject to risk weighting by risk-weight category (for each of columns C through P, sum of items 11 through 22; for column Q, sum of items 10 through 22) .....

24. Risk weight factor .....

25. Risk-weighted assets by risk-weight category (for each column, item 23 multiplied by item 24) .....

Items 26 through 31 are to be completed quarterly.

	Dollar Amounts in Thousands	
	RCON	Amount
26. Risk-weighted assets base for purposes of calculating the allowance for loan and lease losses 1.25 percent threshold (1).....	S580	563,783
27. Standardized market-risk weighted assets (applicable only to banks that are covered by the market risk capital rules).....	S581	0
28. Risk-weighted assets before deductions for excess allowance for loan and lease losses and allocated transfer risk reserve (2,3).....	B704	563,783
29. LESS: Excess allowance for loan and lease losses (4,5).....	A222	1,002
30. LESS: Allocated transfer risk reserve .....	3128	0
31. Total risk-weighted assets (item 28 minus items 29 and 30).....	G641	562,781

1 For institutions that have adopted ASU 2016-13, the risk-weighted assets base reported in item 26 is for purposes of calculating the adjusted allowances for credit losses (AACL) 1.25 percent threshold.

2 Sum of items 2.b through 20, column S; items 9.a, 9.b, 9.c, 9.d, and 10, columns T and U; item 25, columns C through Q; and item 27 (if applicable).

3 For institutions that have adopted ASU 2016-13, the risk-weighted assets reported in item 28 represents the amount of risk-weighted assets before deductions for excess AAAL and allocated transfer risk reserve.

4 Institutions that have adopted ASU 2016-13 should report the excess AAAL.

5 Institutions that have adopted ASU 2016-13 and have elected to apply the 3-year or the 5-year 2020 CECL transition provision should subtract the applicable portion of the AAAL transitional amount or the modified AAAL transitional amount, respectively, from the AAAL, as defined in the regulatory capital rule, before determining the amount of excess AAAL.

**Schedule RC-R—Continued**

**Part II—Continued**

**Memoranda**

*Memorandum items 1, 2, and 3 are to be completed semiannually in the June and December reports only.*

1. Current credit exposure across all derivative contracts covered by the regulatory capital rules ..... M.1.

Dollar Amounts in Thousands		RCON	Amount
		G642	0
			M.1.

	Dollar Amounts in Thousands					
	(Column A) One year or less		(Column B) Over one year through five years		(Column C) Over five years	
	RCON	Amount	RCON	Amount	RCON	Amount
2. Notional principal amounts of over-the-counter derivative contracts:						
a. Interest rate .....	\$582	0	\$583	0	\$584	0
b. Foreign exchange rate and gold .....	\$585	0	\$586	0	\$587	0
c. Credit (investment grade reference asset) .....	\$588	0	\$589	0	\$590	0
d. Credit (non-investment grade reference asset) .....	\$591	0	\$592	0	\$593	0
e. Equity .....	\$594	0	\$595	0	\$596	0
f. Precious metals (except gold) .....	\$597	0	\$598	0	\$599	0
g. Other .....	\$600	0	\$601	0	\$602	0
3. Notional principal amounts of centrally cleared derivative contracts:						
a. Interest rate .....	\$603	0	\$604	0	\$605	0
b. Foreign exchange rate and gold .....	\$606	0	\$607	0	\$608	0
c. Credit (investment grade reference asset) .....	\$609	0	\$610	0	\$611	0
d. Credit (non-investment grade reference asset) .....	\$612	0	\$613	0	\$614	0
e. Equity .....	\$615	0	\$616	0	\$617	0
f. Precious metals (except gold) .....	\$618	0	\$619	0	\$620	0
g. Other .....	\$621	0	\$622	0	\$623	0

Dollar Amounts in Thousands		RCON	Amount
4. Amount of allowances for credit losses on purchased credit-deteriorated assets: <sup>1</sup>			
a. Loans and leases held for investment .....	JJ30	NR	M.4.a.
b. Held-to-maturity debt securities .....	JJ31	NR	M.4.b.
c. Other financial assets measured at amortized cost .....	JJ32	NR	M.4.c.

<sup>1</sup> Memorandum items 4.a through 4.c should be completed quarterly only by institutions that have adopted ASU 2016-13.

### Schedule RC-T—Fiduciary and Related Services

1. Does the institution have fiduciary powers? (If "NO", do not complete Schedule RC-T).....
2. Does the institution exercise the fiduciary powers it has been granted?.....
3. Does the institution have any fiduciary or related activity (in the form of assets or accounts) to report in this schedule? (If "NO," do not complete the rest of Schedule RC-T).....

RCON	YES / NO	
A345	YES	1.
A346	YES	2.
B867	YES	3.

If the answer to item 3 is "YES," complete the applicable items of Schedule RC-T, as follows:

Institutions with total fiduciary assets (item 10, sum of columns A and B) greater than \$1 billion (as of the preceding December 31) or with gross fiduciary and related services income greater than 10% of revenue (net interest income plus noninterest income) for the preceding calendar year must complete:

- Items 4 through 22 and Memorandum item 3 quarterly,
- Items 23 through 26 annually with the December report, and
- Memorandum items 1, 2, and 4 annually with the December report.

Institutions with total fiduciary assets (item 10, sum of columns A and B) greater than \$250 million but less than or equal to \$1 billion (as of the preceding December 31) that do not meet the fiduciary income test for quarterly reporting must complete:

- Items 4 through 22 and Memorandum item 3 semiannually with the June and December reports,
- Items 23 through 26 annually with the December report, and
- Memorandum items 1, 2, and 4 annually with the December report.

Institutions with total fiduciary assets (item 10, sum of columns A and B) less than or equal to \$250 million (as of the preceding December 31) that do not meet the fiduciary income test for quarterly reporting must complete:

- Items 4 through 13 annually with the December report, and
- Memorandum items 1 through 3 annually with the December report.
- Institutions with total fiduciary assets greater than \$100 million but less than or equal to \$250 million (as of the preceding December 31) that do not meet the fiduciary income test for quarterly reporting must also complete Memorandum item 4 annually with the December report.

Dollar Amounts in Thousands

	(Column A) Managed Assets	(Column B) Non-Managed Assets	(Column C) Number of Managed Accounts	(Column D) Number of Non-Managed Accounts	
	Amount	Amount	Number	Number	
<b>Fiduciary and Related Assets</b>	RCON B868	RCON B869	RCON B870	RCON B871	
4. Personal trust and agency accounts.....	32,613	142,289	6	16	4.
5. Employee benefit and retirement-related trust and agency accounts:					
a. Employee benefit - defined contribution.....	RCON B872	RCON B873	RCON B874	RCON B875	5.a.
	259	692,387	1	6	
b. Employee benefit - defined benefit.....	RCON B876	RCON B877	RCON B878	RCON B879	5.b.
	2,411,149	8,814,536	40	89	
c. Other employee benefit and retirement-related accounts.....	RCON B880	RCON B881	RCON B882	RCON B883	5.c.
	576,544	1,140,489	22	37	
6. Corporate trust and agency accounts.....	RCON B884	RCON B885	RCON C001	RCON C002	6.
	0	3,654,274	0	1,376	
7. Investment management and investment advisory agency accounts.....	RCON B886	RCON J253	RCON B888	RCON J254	7.
	341,668	0	54	0	
8. Foundation and endowment trust and agency accounts..	RCON J255	RCON J256	RCON J257	RCON J258	8.
	3,537	0	1	0	
9. Other fiduciary accounts.....	RCON B890	RCON B891	RCON B892	RCON B893	9.
	7,077	181,772	5	24	
10. Total fiduciary accounts (sum of items 4 through 9).....	RCON B894	RCON B895	RCON B896	RCON B897	10.
	3,372,847	14,625,747	129	1,548	

Schedule RC-T—Continued

	(Column A) Managed Assets	(Column B) Non-Managed Assets	(Column C) Number of Managed Accounts	(Column D) Number of Non-Managed Accounts	
	Amount	Amount	Number	Number	
Dollar Amounts in Thousands					
11. Custody and safekeeping accounts.....		RCON B898 979,345		RCON B899 52	11.
12. Not applicable					
13. Individual Retirement Accounts, Health Savings Accounts, and other similar accounts (included in items 5.c and 11).....	RCON J259 0	RCON J260 0	RCON J261 0	RCON J262 0	13.

	Dollar Amounts in Thousands		
	RIAD	Amount	
<b>Fiduciary and Related Services Income</b>			
14. Personal trust and agency accounts.....	B904	59	14.
15. Employee benefit and retirement-related trust and agency accounts:			
a. Employee benefit - defined contribution.....	B905	5	15.a.
b. Employee benefit - defined benefit.....	B906	3,241	15.b.
c. Other employee benefit and retirement-related accounts.....	B907	996	15.c.
16. Corporate trust and agency accounts.....	A479	1,401	16.
17. Investment management and investment advisory agency accounts.....	J315	390	17.
18. Foundation and endowment trust and agency accounts.....	J316	4	18.
19. Other fiduciary accounts.....	A480	72	19.
20. Custody and safekeeping accounts.....	B909	138	20.
21. Other fiduciary and related services income.....	B910	0	21.
22. Total gross fiduciary and related services income (sum of items 14 through 21) (must equal Schedule RI, item 5.a).....	4070	6,306	22.
23. Less: Expenses.....	C058	NR	23.
24. Less: Net losses from fiduciary and related services.....	A488	NR	24.
25. Plus: Intracompany income credits for fiduciary and related services.....	B911	NR	25.
26. Net fiduciary and related services income.....	A491	NR	26.

Memoranda

	Dollar Amounts in Thousands					
	(Column A) Personal Trust and Agency and Investment Management Agency Accounts		(Column B) Employee Benefit and Retirement-Related Trust and Agency Accounts		(Column C) All Other Accounts	
	RCON	Amount	RCON	Amount	RCON	Amount
1. Managed assets held in fiduciary accounts:						
a. Noninterest-bearing deposits.....	J263	NR	J264	NR	J265	NR
b. Interest-bearing deposits.....	J266	NR	J267	NR	J268	NR
c. U.S. Treasury and U.S. Government agency obligations.....	J269	NR	J270	NR	J271	NR
d. State, county, and municipal obligations.....	J272	NR	J273	NR	J274	NR
e. Money market mutual funds.....	J275	NR	J276	NR	J277	NR
f. Equity mutual funds.....	J278	NR	J279	NR	J280	NR
g. Other mutual funds.....	J281	NR	J282	NR	J283	NR
h. Common trust funds and collective investment funds.....	J284	NR	J285	NR	J286	NR
i. Other short-term obligations.....	J287	NR	J288	NR	J289	NR
j. Other notes and bonds.....	J290	NR	J291	NR	J292	NR
k. Investments in unregistered funds and private equity investments.....	J293	NR	J294	NR	J295	NR

**Schedule RC-T—Continued**

**Memoranda—Continued**

	(Column A) Personal Trust and Agency and Investment Management Agency Accounts		(Column B) Employee Benefit and Retirement-Related Trust and Agency Accounts		(Column C) All Other Accounts		
	RCON	Amount	RCON	Amount	RCON	Amount	
Dollar Amounts in Thousands							
1. l. Other common and preferred stocks.....	J296	NR	J297	NR	J298	NR	M.1.l.
m. Real estate mortgages.....	J299	NR	J300	NR	J301	NR	M.1.m.
n. Real estate.....	J302	NR	J303	NR	J304	NR	M.1.n.
o. Miscellaneous assets.....	J305	NR	J306	NR	J307	NR	M.1.o.
p. Total managed assets held in fiduciary accounts (for each column, sum of Memorandum items 1.a through 1.o).....	J308	NR	J309	NR	J310	NR	M.1.p.

	(Column A) Managed Assets		(Column B) Number of Managed Accounts		
	RCON	Amount	RCON	Number	
Dollar Amounts in Thousands					
1. q. Investments of managed fiduciary accounts in advised or sponsored mutual funds.....	J311	NR	J312	NR	M.1.q.

	(Column A) Number of Issues		(Column B) Principal Amount Outstanding		
	RCON	Number	RCON	Amount	
Dollar Amounts in Thousands					
2. Corporate trust and agency accounts:					
a. Corporate and municipal trusteeships.....	B927	NR	RCON B928		M.2.a.
(1) Issues reported in Memorandum item 2.a that are in default.....	J313	NR	RCON J314		M.2.a.1.
b. Transfer agent, registrar, paying agent, and other corporate agency.....	B929	NR			M.2.b.

Memorandum items 3.a through 3.h are to be completed by banks with collective investment funds and common trust funds with a total market value of \$1 billion or more as of the preceding December 31.

Memorandum item 3.h only is to be completed by banks with collective investment funds and common trust funds with a total market value of less than \$1 billion as of the preceding December 31.

	(Column A) Number of Funds		(Column B) Market Value of Fund Assets		
	RCON	Number	RCON	Amount	
Dollar Amounts in Thousands					
3. Collective investment funds and common trust funds:					
a. Domestic equity.....	B931	NR	B932	NR	M.3.a.
b. International/Global equity.....	B933	NR	B934	NR	M.3.b.
c. Stock/Bond blend.....	B935	NR	B936	NR	M.3.c.
d. Taxable bond.....	B937	NR	B938	NR	M.3.d.
e. Municipal bond.....	B939	NR	B940	NR	M.3.e.
f. Short-term investments/Money market.....	B941	NR	B942	NR	M.3.f.
g. Specialty/Other.....	B943	NR	B944	NR	M.3.g.
h. Total collective investment funds (sum of Memorandum items 3.a through 3.g).....	B945	3	B946	4,564	M.3.h.

### Schedule RC-T—Continued

#### Memoranda—Continued

	(Column A) Gross Losses Managed Accounts		(Column B) Gross Losses Non-Managed Accounts		(Column C) Recoveries	
	RIAD	Amount	RIAD	Amount	RIAD	Amount
Dollar Amounts in Thousands						
4. Fiduciary settlements, surcharges, and other losses:						
a. Personal trust and agency accounts.....	B947	NR	B948	NR	B949	NR
b. Employee benefit and retirement-related trust and agency accounts.....	B950	NR	B951	NR	B952	NR
c. Investment management and investment advisory agency accounts.....	B953	NR	B954	NR	B955	NR
d. Other fiduciary accounts and related services.....	B956	NR	B957	NR	B958	NR
e. Total fiduciary settlements, surcharges, and other losses (sum of Memorandum items 4.a through 4.d) (sum of columns A and B minus column C must equal Schedule RC-T, item 24).....	B959	NR	B960	NR	B961	NR

Person to whom questions about Schedule RC-T - Fiduciary and Related Services should be directed:

ROBERT LESAK, VICE PRESIDENT  
Name and Title (TEXT B962)

RLESAK@ABOC.COM  
E-mail Address (TEXT B926)

(312) 822-8349  
Telephone: Area code/phone number/extension (TEXT B963)

(312) 541-7395  
FAX: Area code/phone number (TEXT B964)

## Schedule SU—Supplemental Information

All institutions must complete the indicator questions with either a "Yes" or a "No". For questions for which the response is "Yes", the corresponding items must be completed.

		Dollar Amounts in Thousands		RCON	YES / NO	
<b>Derivatives</b>						
1. Does the institution have any derivative contracts? .....						
				FT00	YES	1.
					Amount	
a.	Total gross notional amount of interest rate derivatives held for trading .....		0	A126		1.a.
b.	Total gross notional amount of all other derivatives held for trading .....		0	FT01		1.b.
c.	Total gross notional amount of interest rate derivatives not held for trading .....		6,000	8725		1.c.
d.	Total gross notional amount of all other derivatives not held for trading .....		0	FT02		1.d.
<b>1-4 Family Residential Mortgage Banking Activities</b>						
2. For the two calendar quarters preceding the current calendar quarter, did the institution meet one or both of the following mortgage banking activity thresholds: (1) Sales of 1-4 family residential mortgage loans during the calendar quarter exceeded \$10 million, or (2) 1-4 family residential mortgage loans held for sale or trading as of calendar quarter-end exceeded \$10 million? .....						
				RCON	YES / NO	
				FT03	NO	2.
					Amount	
a.	Principal amount of 1-4 family residential mortgage loans sold during the quarter .....			FT04	NR	2.a.
b.	Quarter-end amount of 1-4 family residential mortgage loans held for sale or trading .....			FT05	NR	2.b.
<b>Assets and Liabilities Measured at Fair Value on a Recurring Basis</b>						
3. Does the institution use the fair value option to measure any of its assets or liabilities?.....						
				RCON	YES / NO	
				FT06	NO	3.
					Amount	
a.	Aggregate amount of fair value option assets.....			HK18	NR	3.a.
b.	Aggregate amount of fair value option liabilities.....			HK19	NR	3.b.
				RIAD		
c.	Year-to-date net gains (losses) recognized in earnings on fair value option assets.....			F551	NR	3.c.
d.	Year-to-date net gains (losses) recognized in earnings on fair value option liabilities.....			F553	NR	3.d.
<b>Servicing, Securitization and Asset Sale Activities</b>						
4. Does the institution have any assets it has sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements?.....						
				RCON	YES / NO	
				FT07	NO	4.
					Amount	
a.	Total outstanding principal balance of assets sold and securitized by the reporting institution with servicing retained or with recourse or other seller-provided credit enhancement.....			FT08	NR	4.a.
5. Does the institution have any assets it has sold with recourse or other seller-provided credit enhancements but has not securitized?.....						
					YES / NO	
				FT09	NO	5.
					Amount	
a.	Total outstanding principal balance of assets sold by the reporting institution with recourse or other seller-provided credit enhancements, but not securitized by the reporting institution.....			FT10	NR	5.a.
6. Does the institution service any closed-end 1-4 family residential mortgage loans for others or does it service more than \$10 million of other financial assets for others?.....						
				FT11	NO	6.
					Amount	
a.	Total outstanding principal balance of closed-end 1-4 family residential mortgage loans serviced for others plus the total outstanding principal balance of other financial assets serviced for others if more than \$10 million.....			FT12	NR	6.a.
<b>Variable Interest Entities</b>						
7. Does the institution have any consolidated variable interest entities?.....						
					YES / NO	
				FT13	NO	7.
					Amount	
a.	Total assets of consolidated variable interest entities (1).....			FT14	NR	7.a.
b.	Total liabilities of consolidated variable interest entities.....			FT15	NR	7.b.

<sup>1</sup> Institutions that have adopted ASU 2016-13 should report assets net of any applicable allowance for credit losses.

## Schedule SU—Continued

All institutions must complete the indicator questions with either a "Yes" or a "No". For questions for which the response is "Yes", the corresponding items must be completed.

		Dollar Amounts in Thousands		RCON	YES / NO
<b>Credit Card Lending Specialized Items</b>					
8.	Does the institution, together with affiliated institutions, have outstanding credit card receivables that exceed \$500 million as of the report date or is the institution a credit card specialty bank as defined for Uniform Bank Performance Report purposes?.....	FT16	NO		8.
		Amount			
a.	Outstanding credit card fees and finance charges included in credit cards to individuals for household, family, and other personal expenditures (retail credit cards).....	C391	NR		8.a.
		RIAD			
b.	Separate valuation allowance for uncollectible retail credit card fees and finance charges.....	C389	NR		8.b.
c.	Amount of allowance for loan and lease losses attributable to retail credit card fees and finance charges (1).....	C390	NR		8.c.
d.	Uncollectible retail credit card fees and finance charges reversed against year-to-date income.....	C388	NR		8.d.
<b>FDIC Loss-Sharing Agreements</b>					
9.	Does the institution have assets covered by FDIC loss-sharing agreements?.....	FT17	NO		9.
		Amount			
a.	Loans and leases covered by FDIC loss-sharing agreements.....	FT18	NR		9.a.
b.	Past due and nonaccrual loans and leases covered by FDIC loss-sharing agreements:				
	(1) Past due 30 through 89 days and still accruing.....	FT19	NR		9.b.1.
	(2) Past due 90 days and still accruing.....	FT20	NR		9.b.2.
	(3) Nonaccrual.....	FT21	NR		9.b.3.
c.	Portion of past due and nonaccrual covered loans and leases that is protected by FDIC loss-sharing agreements:				
	(1) Past due 30 through 89 days and still accruing.....	K102	NR		9.c.1.
	(2) Past due 90 days and still accruing.....	K103	NR		9.c.2.
	(3) Nonaccrual.....	K104	NR		9.c.3.
d.	Other real estate owned covered by FDIC loss-sharing agreements.....	FT22	NR		9.d.
e.	Portion of covered other real estate owned that is protected by FDIC loss-sharing agreements.....	K192	NR		9.e.

<sup>1</sup> Institutions that have adopted ASU 2016-13 should report in item 8.c the amount of allowance for credit losses on loans and leases attributable to retail credit card fees and finance charges.

## Optional Narrative Statement Concerning the Amounts Reported in the Consolidated Reports of Condition and Income

The management of the reporting bank may, if it wishes, submit a brief narrative statement on the amounts reported in the Consolidated Reports of Condition and Income. This optional statement will be made available to the public, along with the publicly available data in the Consolidated Reports of Condition and Income, in response to any request for individual bank report data. However, the information reported in Schedule RI-E, item 2.g, and Schedule RC-C, Part I, Memorandum items 17.a and 17.b, is regarded as confidential and will not be made available to the public on an individual institution basis. **BANKS CHOOSING TO SUBMIT THE NARRATIVE STATEMENT SHOULD ENSURE THAT THE STATEMENT DOES NOT CONTAIN THE NAMES OR OTHER IDENTIFICATIONS OF INDIVIDUAL BANK CUSTOMERS, REFERENCES TO THE AMOUNTS REPORTED IN THE CONFIDENTIAL ITEMS IDENTIFIED ABOVE, OR ANY OTHER INFORMATION THAT THEY ARE NOT WILLING TO HAVE MADE PUBLIC OR THAT WOULD COMPROMISE THE PRIVACY OF THEIR CUSTOMERS.** Banks choosing not to make a statement may check the "No comment" box below and should make no entries of any kind in the space provided for the narrative statement; i.e., **DO NOT** enter in this space such phrases as "No statement," "Not applicable," "N/A," "No comment," and "None."

The optional statement must be entered on this sheet. The statement should not exceed 100 words. Further, regardless of the number of words, the statement must not exceed 750 characters, including punctuation, indentation, and standard spacing between words and sentences. If any submission should exceed 750 characters, as defined, it will be truncated

at 750 characters with no notice to the submitting bank and the truncated statement will appear as the bank's statement both on agency computerized records and in computer-file releases to the public.

All information furnished by the bank in the narrative statement must be accurate and not misleading. Appropriate efforts shall be taken by the submitting bank to ensure the statement's accuracy.

If, subsequent to the original submission, material changes are submitted for the data reported in the Consolidated Reports of Condition and Income, the existing narrative statement will be deleted from the files, and from disclosure; the bank, at its option, may replace it with a statement appropriate to the amended data.

The optional narrative statement will appear in agency records and in release to the public exactly as submitted (or amended as described in the preceding paragraph) by the management of the bank (except for the truncation of statements exceeding the 750-character limit described above). **THE STATEMENT WILL NOT BE EDITED OR SCREENED IN ANY WAY BY THE SUPERVISORY AGENCIES FOR ACCURACY OR RELEVANCE. DISCLOSURE OF THE STATEMENT SHALL NOT SIGNIFY THAT ANY FEDERAL SUPERVISORY AGENCY HAS VERIFIED OR CONFIRMED THE ACCURACY OF THE INFORMATION CONTAINED THEREIN. A STATEMENT TO THIS EFFECT WILL APPEAR ON ANY PUBLIC RELEASE OF THE OPTIONAL STATEMENT SUBMITTED BY THE MANAGEMENT OF THE REPORTING BANK.**

Comments?.....

RCON	YES / NO
6979	NO

**BANK MANAGEMENT STATEMENT** (please type or print clearly):  
(TEXT 6980)