



## Community Reinvestment Act Public File

1. Written comments received for current year and each of the prior two calendar years (must be updated quarterly), specifically related to the bank's performance in helping meet the needs of its community(ies) and responses by the bank
2. Copy of the public section of the CRA Performance Evaluation (must be placed in the public file within 30 days of receipt)
3. List of bank's branches including street addresses and census tracts
4. List of branches opened or closed by the bank during the current year and each of the two prior calendar years, street addresses, and census tracts (must be updated quarterly)
5. List of retail banking services, including hours of operation, available loan and deposit products, and transaction fees generally offered at bank's branches and description of material differences in availability or cost
6. Map of each facility-based assessment area and retail lending assessment area, as applicable, showing the boundaries of the area and identifying the census tracts contained within the area either on the map or in a separate list
7. For small banks - the bank's loan-to-deposit ratio for each quarter of the prior calendar year and, at its option, additional data on its loan-to-deposit ratio
8. Other information (optional) – CRA Lobby Notices with HMDA Notice

# **American Commerce Bank, N.A.**

## Comments from the Public

No comments from the public have been received.



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

March 03, 2025

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Commerce Bank, National Association  
Charter Number: 24456

400 Highway 27 North Bypass  
Bremen, GA 30110

Office of the Comptroller of the Currency

Three Ravinia Drive  
Suite 400  
Atlanta, GA 30346

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

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

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

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

The major factors that support this rating include:

- The Lending Test is based on two full-scope reviews, one in the state of Georgia and one in the state of Florida.
- American Commerce Bank's (ACB or bank) average loan-to-deposit (LTD) ratio reflects a more than reasonable level of lending.
- The bank exhibits a satisfactory distribution of loans in low- and moderate-income (LMI) geographies.
- The bank exhibits a reasonable distribution of lending to borrowers of different income levels and businesses of different sizes.
- The Community Development (CD) test is based on two full-scope reviews, one in the state of Georgia and one in the state of Florida.
- The bank demonstrates adequate responsiveness to the CD lending and investment needs within its assessment areas (AA).

### Loan-to-Deposit Ratio

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

The bank's quarterly LTD ratio averaged 97 percent over the past 12-quarters from January 1, 2021, to December 31, 2023. The bank's quarterly LTD ratio ranged from a high of 104 percent to a low of 92 percent. Examiners compared the average LTD ratio to three similarly situated banks in terms of asset size, loan portfolio, and business strategy. The quarterly average LTD ratio of the similarly situated banks during the same period was 59 percent, with a high of 85 percent and a low of 36 percent.

### Lending in Assessment Area

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

The bank originated and purchased 56.3 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	20	50	20	50	40	6,891,756	48.7	7,273,886	51.3	14,165,642
Home Mortgage	25	62.5	15	37.5	40	6,901,502	48.6	7,301,516	51.4	14,203,018
<b>Total</b>	45	56.3	35	43.8	80	13,793,258	48.6	14,575,406	51.4	28,368,660

*Source: 1/1/2021 – 12/31/2023 Bank Data  
Due to rounding, totals may not equal 100%*

## Description of Institution

ACB is a nationally chartered multi-state community bank wholly owned by American Commerce Bancshares, a one bank holding company. The bank and the holding company maintain headquarters in Bremen, Haralson County, Georgia. Established in October 2004, the bank changed its name from Peoples Community National Bank to American Commerce Bank in February 2015. ACB operates three other full-service locations, one in Carrollton, Carroll County, Georgia, one in Johns Creek, Fulton County, Georgia, and one in Tallahassee, Leon County, Florida.

The bank offers a variety of credit and deposit services to businesses and consumers. Lending products include home mortgages, construction loans, commercial real estate loans, and various commercial loans. Deposit products include certificates of deposit, money market, and various checking and savings accounts for individuals and businesses. The bank offers online banking, mobile banking, and remote deposit capture services. Safe deposit boxes are available at the Bremen location. There are four automated teller machines, one at each location, that accept deposits.

ACB is an approved lender with the U.S. Small Business Administration (SBA). During the Coronavirus disease 2019 (COVID-19) pandemic, the bank originated loans through the SBA's Paycheck Protection Program (PPP), which provided financial relief to local businesses throughout GA and FL. These loans qualify for consideration under the CD Test of this evaluation.

The bank designates two AAs: GA and FL. The AAs comply with the CRA regulation and do not arbitrarily exclude LMI geographies. As of December 31, 2023, ACB reported total assets of \$497.9 million, net loans of \$405.1 million, and total deposits of \$416.2 million. The loan portfolio included loans secured by real estate of \$393.2 million or 97.1 percent of net loans, commercial loans totaling \$14.9 million or 3.7 percent of net loans, and \$2.6 million in consumer loans or 0.6 percent of net loans. Net loans represented 81.4 percent of total assets. Tier one capital totaled \$65.5 million.

ACB does not have any affiliates. The bank opened the Carrollton branch in March 2022. No branches closed, and no merger or acquisition activities occurred during this evaluation period. ACB received an overall "Satisfactory" rating at its prior CRA review dated January 18, 2022.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) evaluated the CRA performance of ACB using Intermediate Small Bank performance criteria, which includes a lending test and a CD test. The lending test determines the distribution of the bank's primary loan products among different geographies and borrower characteristics within the bank's AAs. The CD test evaluates the bank's responsiveness to CD needs in the AAs through qualified lending, investments, and services. CD activities include CD loans, qualified CD investments, grants and donations, and retail services. Examiners also considered the level of innovation, complexity, and responsiveness to community credit needs. The evaluation period for this performance assessment covers January 1, 2021, through December 31, 2023.

To determine ACB's primary lending products, examiners assessed the composition of loan originations during the three-year evaluation period. The bank's primary lending products were home mortgage and small business loans. Home mortgage loan originations represented 30 percent by number of originations and 42 percent by dollar volume of originations. Small business loan originations represented 55 percent by number of originations and 53 percent by dollar volume of originations. Therefore, examiners selected random samples of home mortgage and small business loans for the lending test analyses.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### Ratings

The bank's overall rating is a blend of the Georgia state rating and the Florida state rating. The state of Georgia is more heavily weighted given the higher volume of deposits and loan originations in the state.

Refer to the "Scope" section under each state section for details regarding how the areas were weighted in arriving at the respective ratings.

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

Pursuant to 12 CFR 25.28(c) in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Georgia

**CRA rating for the State of Georgia:** Satisfactory.

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

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

The major factors that support this rating include:

- The bank exhibits a reasonable distribution of loans in LMI geographies.
- The bank exhibits a reasonable distribution of loans to borrowers of different income and businesses of different sizes.
- The bank exhibits adequate responsiveness to CD needs in the AA through CD activities.

### Description of Institution's Operations in Georgia

ACB is a national bank operating three full-service locations in Georgia. The main office and holding company are in Bremen, Haralson County. The main office is in a moderate-income census tract (CT). The branch in Carrollton is in a middle-income CT. The branch in Johns Creek is in an upper-income CT.

ACB's AA consists of nine of the twenty-nine counties located in the Atlanta-Sandy Springs-Alpharetta Metropolitan Statistical Area (MSA): Haralson, Carroll, Cobb, Dekalb, Douglas, Forsyth, Fulton, Gwinnett, and Paulding. The MSA was originally established in 1950 as the Atlanta MSA, and comprised Fulton, Dekalb, Gwinnett, Cobb, and Clayton counties. These counties remain the core of the metro area and have the densest suburban development.

According to the 2015 American Community Survey (ACS) Census data, the AA comprised 688 CTs consisting of 84 low-, 165 moderate-, 177 middle-, 255 upper-income geographies, and seven not applicable CTs. The 2015 ACS reports the population was 3.9 million with 915,878 families. Total housing units were 1.6 million with an owner-occupied housing rate of 54.4 percent. Approximately 23 percent of the families in the AA are low-income and 16 percent are moderate-income. The median housing value was \$201,058. The median family income in the AA was \$67,322. Approximately 11.8 percent of families live below the poverty level. The unemployment rate was 6.4 percent. The 2020 U.S. Census Bureau data reflected 1,084 CTs comprising 88 low-, 236 moderate-, 295 middle-, and 419 upper-income geographies, with 46 CTs not applicable. The total population was 4.3 million with 991,457 families. Total housing units were 1.7 million with an owner-occupied housing rate of 57.1 percent. Approximately 21 percent of the families in the AA are low-income and 16 percent are moderate-income. The median housing value was \$274,612. The median family income was \$84,791. Approximately 8.1 percent of families lived below the poverty level. The unemployment rate was 3.6 percent.

ACB faces strong competition from many large financial institutions. There are 68 other Federal Deposit Insurance Corporation (FDIC) insured financial institutions operating 794 locations throughout the GA AA. As of June 30, 2023, the top three banks based on total deposits were Truist Bank at \$47.1 million with 22.9 percent market share, Bank of America at \$45.1 million with 21.9 percent market share, and Wells Fargo Bank with \$35 million and 17 percent market share. ACB had less than 1 percent market share.

Top employers in the AA include the University of West Georgia, Diamond Crystal Brands, Amazon.com Services, LLC, Gwinnett County Public Schools, Delta Airlines, Home Depot, Northside Hospital, Emory Health Care and Northeast Georgia Medical System.

Examiners interviewed representatives from two local non-profit organizations. The representatives noted community needs include more affordable housing, small business loans to promote entrepreneurship and economic development, and financial education for consumers. They identified affordable housing as the greatest concern as some areas are experiencing a limited supply of housing and rental properties.

## GA AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: GA AA – 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
<b>Geographies (Census Tracts)</b>	688	12.2	24	25.7	37.1	1
<b>Population by Geography</b>	3,899,917	8.5	23.9	29.8	37.4	0.4
<b>Housing Units by Geography</b>	1,568,929	9.6	24.6	28.3	37.3	0.2
<b>Owner-Occupied Units by Geography</b>	854,143	3.7	18.5	31.6	46.2	0.0
<b>Occupied Rental Units by Geography</b>	545,134	16.2	32.3	24.4	26.7	0.4
<b>Vacant Units by Geography</b>	169,652	17.9	30.7	24.3	26.9	0.2
<b>Businesses by Geography</b>	794,107	6.6	21.7	27.3	43.9	0.5
<b>Farms by Geography</b>	11,148	5.2	21.9	32.7	40	0.1
<b>Family Distribution by Income Level</b>	915,878	22.5	16	17.2	44.4	0
<b>Household Distribution by Income Level</b>	1,399,277	23.4	16	17	43.6	0
<b>Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA</b>		\$67,322	<b>Median Housing Value</b>			\$201,058
			<b>Median Gross Rent</b>			\$1,021
			<b>Families Below Poverty Level</b>			11.8%
2015 ACS 2021 D&B Data. Due to rounding, totals may not equal 100% (*) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: GA AA 2022 to 2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
<b>Geographies (Census Tracts)</b>	1,084	8.1	21.8	27.2	38.7	4.2
<b>Population by Geography</b>	4,267,551	6.6	22.6	28.9	39.1	2.8
<b>Housing Units by Geography</b>	1,662,842	7.5	22.7	27.8	38.9	3.1
<b>Owner-Occupied Units by Geography</b>	949,386	3.1	17.4	30.5	47.4	1.6
<b>Occupied Rental Units by Geography</b>	583,584	13.1	30.5	24.5	26.6	5.3
<b>Vacant Units by Geography</b>	129,872	14.2	26.4	22.2	32.3	4.9
<b>Businesses by Geography</b>	1,113,434	5.4	21.2	26.1	43.8	3.5
<b>Farms by Geography</b>	15,280	4.5	22.2	32.0	39.3	2.0
<b>Family Distribution by Income Level</b>	991,457	20.8	16.2	18.6	44.4	0.0
<b>Household Distribution by Income Level</b>	1,532,970	23.1	15.7	17.4	43.8	0.0
<b>Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA</b>		\$84,791	<b>Median Housing Value</b>			\$274,612
			<b>Median Gross Rent</b>			\$1,258
			<b>Families Below Poverty Level</b>			8.1%
2020 U.S. Census 2023 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

## Scope of Evaluation in Georgia

Based on the volume of deposits and loans originated during the evaluation period, the GA AA analysis reflects a full-scope review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

### LENDING TEST

The bank's performance under the Lending Test in Georgia is rated Satisfactory.

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

Based on a full-scope review, the bank's lending performance in the state of Georgia was reasonable.

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

The bank exhibited a reasonable geographic distribution of loans in the state.

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

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

The geographic distribution of home mortgage loans was reasonable.

In 2021, the bank's lending in low-income geographies exceeded both the percentage of owner-occupied housing units and aggregate lending performance. The bank's lending in moderate-income geographies significantly exceeded both the percentage of owner-occupied housing units and the aggregate performance data. During 2022-2023, the bank originated no home mortgages in low-income geographies and the percentage of bank loans in moderate-income geographies was significantly below the percentage of owner-occupied housing units and aggregate lending performance data.

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

Refer to Table Q in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was excellent.

In 2021, the percentage of small loans to businesses in low-income geographies exceeded the number of small businesses and the aggregate performance reported by other lenders in these geographies. The percentage of small loans to businesses in moderate-income geographies significantly exceeded both the number of small businesses and the aggregate performance data. During 2022-2023, the percentage of small loans to businesses in moderate-income geographies significantly exceeded the number of small businesses and the aggregate performance data. The bank made no loan originations in low-income geographies.

### **Lending Gap Analysis**

Examiners' review of summary reports and maps did not identify any unexplained conspicuous gaps. The bank's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude any LMI geographies.

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

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

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

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

The distribution of home mortgage loans to borrowers of different income levels was reasonable.

In 2021, the distribution of loans to moderate-income borrowers exceeded the percentage of moderate-income families and the aggregate lending performance. The bank did not originate home mortgage loans to low-income borrowers. During 2022 and 2023, the distribution of loans to moderate-income borrowers was near-to the percentage of moderate-income families and the aggregate lending performance. The bank did not originate home mortgage loans to low-income borrowers.

***Small Loans to Businesses***

Refer to Table R in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses of different sizes was reasonable.

In 2021, the percentage of bank loans was significantly below the percentage of small businesses in the AA. However, the bank’s percentage significantly exceeded the aggregate performance reported by other lenders in the AA. During 2022-2023, the percentage of bank loans was significantly below the percentage of small businesses in the AA. However, the bank’s percentage significantly exceeded the aggregate performance reported by other lenders in the AA.

**Responses to Complaints**

Neither ACB nor the OCC received complaints related to the bank’s CRA performance since the prior CRA examination.

**COMMUNITY DEVELOPMENT TEST**

The bank’s performance under the CD Test in the state of Georgia is rated Satisfactory.

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

Based on a full-scope review, the bank exhibited adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AA.

**Number and Amount of Community Development Loans**

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including any multifamily loans that also qualify as CD loans.

<b>Community Development Loans</b>				
<b>Assessment Area</b>	<b>Total</b>			
	<b>#</b>	<b>% of Total #</b>	<b>\$(000's)</b>	<b>% of Total \$</b>
<b>GA</b>	68	100	8,000	100

ACB's level of CD loans reflects adequate responsiveness to CD needs in the AA. During the evaluation period, the bank originated four CD loans totaling approximately \$3.7 million in the GA AA to renovate or expand mobile home communities in LMI geographies. In addition, during the COVID-19 pandemic, in 2021, the bank originated 64 PPP loans totaling approximately \$4.3 million to address the needs of small businesses throughout the state of GA.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>GA</b>	0	0	2	1,510	2	100	1,510	100	1	658
<b>Total</b>	0	0	2	1,510	2	100	1,510	100	1	658

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investment, including prior period investments that remain outstanding as of the end of evaluation period.

ACB qualified investments represent adequate responsive to CD needs in the AA given the bank's size, and capacity to provide such investments along with other performance context factors. During the evaluation period, there was one qualifying investment and one donation. Despite strong competition from large and regional banks within the AA, there are available opportunities to participate in CD investments.

The qualified investments in the AA were:

- A \$1.5 million Low-Income Housing Tax Credit (LIHTC) investment that financed the development of an affordable multifamily housing development in Dacula, GA.
- ACB donated \$10,000 to the Douglas County Development Authority for future economic development.

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

CD services demonstrate adequate responsiveness to CD needs in the AA given the bank's size and the capacity to provide such services. During the evaluation period, four bank employees volunteered approximately 103 hours of CD services in the GA AA. Activities included promoting economic development, small business growth, and job creation.

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

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

## State Rating

### State of Florida

**CRA rating for the State of Florida:** Needs to Improve.

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

**The Community Development Test is rated:** Needs to Improve.

The major factors that support this rating include:

- The bank exhibits a poor distribution of home mortgage loans in LMI geographies.
- The bank exhibits a reasonable distribution of loans to borrowers of different income levels.
- The volume of loan originations to small businesses was not at a level to produce a meaningful analysis with regards to performance tests.
- The bank exhibits poor responsiveness to CD needs in the AA through CD activities.

### Description of Institution's Operations in Florida

ACB operates a full-service location in Tallahassee, Leon County, Florida. The branch is in a middle-income CT. The AA is Leon County which is in the center of the Florida panhandle and borders Georgia to the north. The county is part of the Tallahassee MSA. The three other counties in the MSA are Gadsden, Wakulla, and Jefferson. Tallahassee is the county seat, and the state capital. The city is home to Florida State University, Florida A&M University, and Tallahassee State College.

According to the 2015 ACS Census data, the AA comprised 68 CTs consisting of 13 low-, 16 moderate-, 18 middle-, 19 upper-income geographies, and two not applicable CTs. The population was 282,940 with 60,921 families. Total housing units were 125,915 with an owner-occupied housing rate of 46.1 percent. The median housing value was \$163,333. Approximately 21 percent of the families in the AA are low-income and 16 percent are moderate-income. Approximately 10.9 percent of families live below the poverty level. The median family income was \$64,055. The unemployment rate was 7.1 percent.

The 2020 U.S. Census Bureau data reflected 79 CTs comprising 13 low-, 14 moderate-, 22 middle-, and 25 upper-income geographies, with five CTs not applicable. The population was 292,198 with 61,961 families. Total housing units were 131,341 with an owner-occupied housing rate of 46.7 percent. The median housing value was \$185,527. Approximately 21 percent of the families in the AA are low-income and 16 percent are moderate-income. Approximately 9.8 percent of families live below the poverty level. The median family income was \$72,943. The unemployment rate was 7.1 percent.

ACB faces strong competition from 19 other FDIC insured financial institutions with approximately 64 locations. Per the FDIC Market Share Report as of June 30, 2023, the bank's deposit market share in Leon County was low at 0.6 percent with total deposits of \$49.8 million. The four banks with the highest market share are much larger than ACB with respect to branch networks, total deposits, and asset size.

In addition to large and mid-size financial institutions, many mortgage loan providers and credit unions reside in Leon County.

The largest employers in the AA are the State of Florida and Florida State University.

Examiners interviewed a representative of a local non-profit organization. The representative noted community needs include more affordable housing and financing, and financial education for consumers.

## FL AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FL AA – 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
<b>Geographies (Census Tracts)</b>	68	19.1	23.5	26.5	27.9	2.9
<b>Population by Geography</b>	282,940	16.4	20.6	26.4	31.8	4.8
<b>Housing Units by Geography</b>	125,915	17.7	20.8	28.7	29.7	3.1
<b>Owner-Occupied Units by Geography</b>	58,008	5	14.3	30.7	49.2	0.8
<b>Occupied Rental Units by Geography</b>	52,826	29.1	26.3	26.9	12.1	5.6
<b>Vacant Units by Geography</b>	15,081	26.2	27	27.4	16.7	2.7
<b>Businesses by Geography</b>	47,798	9.2	21	33	35.1	1.8
<b>Farms by Geography</b>	1,257	5.6	15.4	33.5	44.8	0.8
<b>Family Distribution by Income Level</b>	60,921	21.1	15.6	18.4	45	0
<b>Household Distribution by Income Level</b>	110,834	25.1	14.4	16.6	43.9	0
<b>Median Family Income MSA - 45220 Tallahassee, FL MSA</b>		\$64,055	<b>Median Housing Value</b>			\$163,333
			<b>Median Gross Rent</b>			\$923
			<b>Families Below Poverty Level</b>			10.9%
2015 ACS 2021 D&B Data Due to rounding, totals may not equal 100%. (*) The NA category consists of geographies that have not been assigned an income classification.						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FL AA – 2022 to 2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
<b>Geographies (Census Tracts)</b>	79	16.5	17.7	27.8	31.6	6.3
<b>Population by Geography</b>	292,198	14.4	17.6	29.6	32.4	6
<b>Housing Units by Geography</b>	131,341	15.8	18.8	33.0	30	2.4
<b>Owner-Occupied Units by Geography</b>	61,283	4.6	12.1	33.3	50	0
<b>Occupied Rental Units by Geography</b>	55,247	25.5	25.6	32.9	11.7	4.4
<b>Vacant Units by Geography</b>	14,811	26.6	21.2	32.2	15.3	4.7
<b>Businesses by Geography</b>	60,927	8.6	15.7	39.2	34.2	2.2
<b>Farms by Geography</b>	1,517	6.1	13.2	36.5	43.5	0.7
<b>Family Distribution by Income Level</b>	61,961	20.7	15.7	18.8	44.8	0
<b>Household Distribution by Income Level</b>	116,530	24.9	15.3	16.6	43.2	0
<b>Median Family Income MSA - 45220 Tallahassee, FL MSA</b>		\$72,943	<b>Median Housing Value</b>			\$185,527
			<b>Median Gross Rent</b>			\$1,026
			<b>Families Below Poverty Level</b>			9.8%
2020 U.S. Census 2023 D&B Data Due to rounding, totals may not equal 100%. (*) The NA category consists of geographies that have not been assigned an income classification.						

## Scope of Evaluation in Florida

Based on the volume of deposits and loans originated during the evaluation period, the Florida AA analysis reflects a full-scope review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

### LENDING TEST

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

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

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

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

The bank exhibited a poor geographic distribution of loans in the state.

### *Home Mortgage Loans*

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

The geographic distribution of home mortgage loans was poor.

During the evaluation period, the bank originated nine home mortgage loans in the AA. This volume of lending activity was not at a level to produce a meaningful analysis.

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

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was poor.

During the evaluation period, the bank originated four loans to small business in the Florida AA. This volume of lending activity was not at a level to produce a meaningful analysis.

### **Lending Gap Analysis**

We reviewed summary reports and maps. We did not identify any unexplained conspicuous gaps. The bank's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude any LMI geographies.

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

The bank exhibited a poor distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

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

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

The distribution of home mortgage loans to borrowers of different income levels was poor.

During the evaluation period, the bank originated nine home mortgage loan originations in the AA. This volume of lending activity was not at a level to produce a meaningful analysis.

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

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to small businesses of different sizes was poor.

During the evaluation period, the bank originated four loans to small business in the Florida AA. This volume of lending activity was not at a level to produce a meaningful analysis.

## Responses to Complaints

Neither ACB nor the OCC received complaints related to the bank's CRA performance since the prior CRA examination.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Florida is rated Needs to Improve.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited poor responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

## Number and Amount of Community Development Loans

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including any multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
FL	19	100	2,000	100

The level of CD loans reflects poor responsiveness to CD needs in the AA. The bank did not originate CD loans during this evaluation period. During the COVID-19 pandemic, in 2021, the bank originated 19 PPP loans totaling approximately \$2 million to address the needs of small businesses throughout the state of FL.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
FL	0	0	1	500	1	100	500	100	1	219
<b>Total</b>	0	0	1	500	1	100	500	100	1	219

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

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

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investment, including prior period investments that remain outstanding as of the end of evaluation period.

The level of qualified investments and donations reflects poor responsiveness to CD needs in the AA.

During the evaluation period the bank made a \$500,000 LIHTC investment that financed an affordable multifamily housing development in Tallahassee, FL. The bank did not make any qualified donations in the AA.

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

CD services demonstrate poor responsiveness to CD needs in the AA, given the bank's size and the capacity to provide such services. During the evaluation period, two employees volunteered six hours with two local non-profit organizations working to end hunger and illiteracy in children.

## Appendix A: Scope of Examination

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The following table identifies the period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	January 1, 2021, to December 31, 2023.	
<b>Bank Products Reviewed:</b>	Small business and home mortgage loans. CD loans, qualified investments, CD services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State: Georgia</b>		
Georgia AA	Full-scope	CTs in Haralson, Carroll, Cobb, Dekalb, Douglas, Forsyth, Fulton, Gwinnett, and Paulding Counties, part of the Atlanta-Sandy Springs-Alpharetta MSA.
<b>State: Florida</b>		
Florida AA	Full-scope	CTs in Leon County, part of the Tallahassee MSA.

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS American Commerce Bank, NA</b>			
<b>Overall Bank:</b>	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
American Commerce Bank	Satisfactory	Satisfactory	Satisfactory
<b>State:</b>			
Georgia	Satisfactory	Satisfactory	Satisfactory
Florida	Needs to Improve	Needs to Improve	Needs to Improve

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

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. CTs ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to LMI individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize LMI, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas (MMSA), if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2021</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
GA AA	20	6,278,627	100.0	266,992	3.7	5	3.6	18.5	35	15.9	31.6	50	30.3	46.2	10	50.1	0	0	0.1	
<b>Total</b>	<b>20</b>	<b>6,278,627</b>	<b>100.0</b>	<b>266,992</b>	<b>3.7</b>	<b>5</b>	<b>3.6</b>	<b>18.5</b>	<b>35</b>	<b>15.9</b>	<b>31.6</b>	<b>50</b>	<b>30.3</b>	<b>46.2</b>	<b>10</b>	<b>50.1</b>	<b>0</b>	<b>0</b>	<b>0.1</b>	

*Source: 2015 ACS; 01/01/2021 - 12/31/2021, Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100%.*

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2022-23</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
GA AA	20	4,842,974	100.0	104,473	3.1	0.0	4.2	17.4	10	19.9	30.5	70.0	31	47.4	20	42.7	1.6	0	2.1	
<b>Total</b>	<b>20</b>	<b>4,842,974</b>	<b>100.0</b>	<b>104,473</b>	<b>3.1</b>	<b>0.0</b>	<b>4.2</b>	<b>17.4</b>	<b>10</b>	<b>19.9</b>	<b>30.5</b>	<b>70.0</b>	<b>31</b>	<b>47.4</b>	<b>20</b>	<b>42.7</b>	<b>1.6</b>	<b>0</b>	<b>2.1</b>	

*2020 U.S. Census; 01/01/2022 - 12/31/2023  
Bank Data, 2023 HMDA Aggregate Data,  
"--" data not available. Due to rounding, totals may not equal 100%.*

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2021</b>
<b>Total Home Mortgage Loans</b>					<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
GA AA	20	6,278,627	100	266,992	22.5	0	5.6	16	20	15	17.2	0	18.7	44.4	80	41.5	0	0	19.1	
<b>Total</b>	<b>20</b>	<b>6,278,627</b>	<b>100</b>	<b>266,992</b>	<b>22.5</b>	<b>0</b>	<b>5.6</b>	<b>16</b>	<b>20</b>	<b>15</b>	<b>17.2</b>	<b>0</b>	<b>18.7</b>	<b>44.4</b>	<b>80</b>	<b>41.5</b>	<b>0</b>	<b>0</b>	<b>19.1</b>	

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2022-23</b>
<b>Total Home Mortgage Loans</b>					<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
GA AA	20	4,842,974	100	104,473	20.8	0	4.9	16.2	15	16.4	18.6	15	20.4	44.4	65	38.3	0	5	20	
<b>Total</b>	<b>20</b>	<b>4,842,974</b>	<b>100</b>	<b>104,473</b>	<b>20.8</b>	<b>0</b>	<b>4.9</b>	<b>16.2</b>	<b>15</b>	<b>16.4</b>	<b>18.6</b>	<b>15</b>	<b>20.4</b>	<b>44.4</b>	<b>65</b>	<b>38.3</b>	<b>0</b>	<b>5</b>	<b>20</b>	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%.*

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2021</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
GA AA	18	5,771,767	100	192,774	6.6	11.1	5.8	21.7	44.4	21	27.3	38.9	27.6	43.9	5.6	45.2	0.5	0	0.4	
<b>Total</b>	<b>18</b>	<b>5,771,767</b>	<b>100</b>	<b>192,774</b>	<b>6.6</b>	<b>11.1</b>	<b>5.8</b>	<b>21.7</b>	<b>44.4</b>	<b>21</b>	<b>27.3</b>	<b>38.9</b>	<b>27.6</b>	<b>43.9</b>	<b>5.6</b>	<b>45.2</b>	<b>0.5</b>	<b>0</b>	<b>0.4</b>	

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2022-23</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
GA AA	20	4,958,990	100.0	173,882	5.4	0	4.2	21.2	40	19	26.1	30	26.7	43.8	30	47.1	3.5	0	2.9	
<b>Total</b>	<b>20</b>	<b>4,958,990</b>	<b>100.0</b>	<b>173,882</b>	<b>5.4</b>	<b>0</b>	<b>4.2</b>	<b>21.2</b>	<b>40</b>	<b>19</b>	<b>26.1</b>	<b>30</b>	<b>26.7</b>	<b>43.8</b>	<b>30</b>	<b>47.1</b>	<b>3.5</b>	<b>0</b>	<b>2.9</b>	

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2023 CRA Aggregate Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%.

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
GA AA	18	5,771,767	100.0	192,774	93	72.2	42.4	2.2	27.8	4.8	0
<b>Total</b>	<b>18</b>	<b>5,771,767</b>	<b>100.0</b>	<b>192,774</b>	<b>93</b>	<b>72.2</b>	<b>42.4</b>	<b>2.2</b>	<b>27.8</b>	<b>4.8</b>	<b>0</b>
<i>Source: 2021 D&amp;B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100%.</i>											

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022-23</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
GA AA	20	4,958,990	100	173,882	94.6	70	50.8	1.6	30	3.8	0
<b>Total</b>	<b>20</b>	<b>4,958,990</b>	<b>100</b>	<b>173,882</b>	<b>94.6</b>	<b>70</b>	<b>50.8</b>	<b>1.6</b>	<b>30</b>	<b>3.8</b>	<b>0</b>
<i>Source: 2023 D&amp;B Data; 01/01/2022 - 12/31/2023 Bank Data; 2023 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100%.</i>											

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

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2021</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
FL AA	5	848,500	100.0	12,086	5	60	4.3	14.3	0	12.2	30.7	40	30.7	49.2	0	51.6	0.8	0	1.1	
<b>Total</b>	<b>5</b>	<b>848,500</b>	<b>100.0</b>	<b>12,086</b>	<b>5</b>	<b>60</b>	<b>4.3</b>	<b>14.3</b>	<b>0</b>	<b>12.2</b>	<b>30.7</b>	<b>40</b>	<b>30.7</b>	<b>49.2</b>	<b>0</b>	<b>51.6</b>	<b>0.8</b>	<b>0</b>	<b>1.1</b>	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100%.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2022-23</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
FL AA	4	740,855	100	5,474	4.6	0	6.7	12.1	0	15.4	33.3	75	38.4	50	25	39.2	0	0	0.4	
<b>Total</b>	<b>4</b>	<b>740,855</b>	<b>100</b>	<b>5,474</b>	<b>4.6</b>	<b>0</b>	<b>6.7</b>	<b>12.1</b>	<b>0</b>	<b>15.4</b>	<b>33.3</b>	<b>75</b>	<b>38.4</b>	<b>50</b>	<b>25</b>	<b>39.2</b>	<b>0</b>	<b>0</b>	<b>0.4</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100%.

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2021</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FL AA	5	848,500	100	12,086	21.1	20	6.2	15.6	0	17.8	18.4	20	20.4	45	60	40	0	0	15.7
<b>Total</b>	<b>5</b>	<b>848,500</b>	<b>100</b>	<b>12,086</b>	<b>21.1</b>	<b>20</b>	<b>6.2</b>	<b>15.6</b>	<b>0</b>	<b>17.8</b>	<b>18.4</b>	<b>20</b>	<b>20.4</b>	<b>45</b>	<b>60</b>	<b>40</b>	<b>0</b>	<b>0</b>	<b>15.7</b>

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.*  
*Due to rounding, totals may not equal 100%.*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2022-23</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FL AA	4	740,855	100.0	5,474	20.7	0	6.1	15.7	25	17.8	18.8	0	19.5	44.8	75	32	0	0	24.5
<b>Total</b>	<b>4</b>	<b>740,855</b>	<b>100.0</b>	<b>5,474</b>	<b>20.7</b>	<b>0</b>	<b>6.1</b>	<b>15.7</b>	<b>25</b>	<b>17.8</b>	<b>18.8</b>	<b>0</b>	<b>19.5</b>	<b>44.8</b>	<b>75</b>	<b>32</b>	<b>0</b>	<b>0</b>	<b>24.5</b>

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.*  
*Due to rounding, totals may not equal 100%.*

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FL AA	2	890,770	100.0	7,790	9.2	0	8.3	21	50	23.2	33	50	33.4	35.1	0	34.2	1.8	0	0.8
<b>Total</b>	<b>2</b>	<b>890,770</b>	<b>100.0</b>	<b>7,790</b>	<b>9.2</b>	<b>0</b>	<b>8.3</b>	<b>21</b>	<b>50</b>	<b>23.2</b>	<b>33</b>	<b>50</b>	<b>33.4</b>	<b>35.1</b>	<b>0</b>	<b>34.2</b>	<b>1.8</b>	<b>0</b>	<b>0.8</b>

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100%.*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2022-23</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FL AA	2	1,387,000	100.0	6,666	8.6	0	7.4	15.7	0	12	39.2	0	41	34.2	100	37.5	2.2	0	2.1
<b>Total</b>	<b>2</b>	<b>1,387,000</b>	<b>100.0</b>	<b>6,666</b>	<b>8.6</b>	<b>0</b>	<b>7.4</b>	<b>15.7</b>	<b>0</b>	<b>12</b>	<b>39.2</b>	<b>0</b>	<b>41</b>	<b>34.2</b>	<b>100</b>	<b>37.5</b>	<b>2.2</b>	<b>0</b>	<b>2.1</b>

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2023 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100%.*

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
FL AA	2	890,770	100	7,790	90.6	50	45.5	2.4	50	7	0	
<b>Total</b>	<b>2</b>	<b>890,770</b>	<b>100</b>	<b>7,790</b>	<b>90.6</b>	<b>50</b>	<b>45.5</b>	<b>2.4</b>	<b>50</b>	<b>7</b>	<b>0</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100%.</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2022-23</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
FL AA	2	1,387,000	100	6,666	91.6	50	52.6	1.8	50	6.6	0	
<b>Total</b>	<b>2</b>	<b>1,387,000</b>	<b>100</b>	<b>6,666</b>	<b>91.6</b>	<b>50</b>	<b>52.6</b>	<b>1.8</b>	<b>50</b>	<b>6.6</b>	<b>0</b>	
<i>Source: 2023 D&amp;B Data; 01/01/2022 - 12/31/2023 Bank Data; 2023 CRA Aggregate Data "--" data not available.                      Due to rounding, totals may not equal 100%.</i>												

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

# American Commerce Bank N.A.

## Branch Locations

### **Bremen, Georgia\***

400 U.S. Highway 27 Bypass  
Bremen, GA 30110

#### **Census Tract Location**

13.143.0104.02

### **Carrollton, Georgia**

314 Newnan Street  
Carrollton, GA 30117

#### **Census Tract Location**

13.045.9106.00

### **Johns Creek, Georgia**

10690 Medlock Bridge Road  
Johns Creek, GA 30097

#### **Census Tract Location**

13.121.0116.32

### **Tallahassee, Florida**

536 North Monroe Street  
Tallahassee, FL 32301

#### **Census Tract Location**

12.073.0002.00

### **Online App for Mobile Devices**

Available on iPhone and Android Devices

### **Online Banking/Website**

[www.americancommercebank.com](http://www.americancommercebank.com)

### **Email**

[info@americancommercebank.com](mailto:info@americancommercebank.com)

**\*Safe Deposit Boxes**

# American Commerce Bank N.A.

## Branches Opened or Closed

**2026:** (Current Year) No new branches opened

**2025:** No branches opened or closed

**2024:** Monesty digital channel opened to the public in March 2024

**2023:** No branches opened or closed

## Branch Location Hours

Bremen, GA	
Lobby	
Monday – Thursday	9:00AM – 4:30PM
Friday	9:00AM – 5:00PM
Saturday	9:00AM – 12:00PM
Drive-Thru	
Monday – Thursday	8:30AM – 4:30PM
Friday	8:30AM – 5:00PM
Saturday	8:30AM – 12:00PM
ATM	
Cirrus/Pulse	24 Hours

Carrollton, GA	
Lobby	
Monday – Thursday	9:00AM – 4:30PM
Friday	9:00AM – 5:00PM
Closed Saturdays	
Drive-Thru	
Monday – Thursday	8:30AM – 4:30PM
Friday	8:30AM – 5:00PM
Closed Saturdays	
ATM	
Cirrus/Pulse	24 Hours

Johns Creek, GA	
Lobby	
Monday – Friday	9:00AM – 4:00PM
Drive-Thru	
Monday – Thursday	8:30AM – 4:00PM
Friday	8:30AM – 5:00PM
Closed Saturdays	
ATM	
Cirrus/Pulse	24 Hours

Tallahassee, FL	
Lobby	
Monday – Friday	8:30AM – 5:00PM
Drive-Thru	
Monday – Friday	8:30AM – 5:00PM
Closed Saturdays	

# **PRODUCTS and SERVICES SAVINGS**

## **Personal Savings**

*Safe and secure savings account that allows easy access to your money*

## **Young Savers**

*Available to young people age 18 and younger, joint with parent, grandparent or legal guardian.*

## **Personal Money Market**

*A high yield interest-earning account for individuals maintaining higher balances*

# **CHECKING**

## **Secure 50 Checking**

*Special benefits for anyone age 50 and above*

## **Direct Checking**

*No Fee checking with Direct Deposit*

## **Hero Checking**

*No fee account exclusively for Teachers, Medical Professionals, Police Officers, Fire Fighters and Military*

## **Personal Interest Checking**

*An interest-earning account for individuals that allows easy access to your money*

## **Student Checking**

*Full time students under 24 years, under age 18 must be joint with parent, grandparent or legal guardian*

## **Health Savings Account - Checking**

*An account created for individuals who are covered under high-deductible health plans (HDHPs) to save for medical expenses that HDHPs do not cover.*

## **TIME DEPOSITS**

### **Certificates of Deposits**

*High-yield time deposits with terms to suit investor's needs*

*Education IRA allows funding college expenses for children, on a tax-advantaged basis*

### **Individual Retirement Accounts (IRAs)**

*Traditional IRA provides immediate tax benefits for funding an IRA from pre-tax income*

*Roth IRA is funded with after-tax dollars and is distributed tax-free for eligible savers*

## **BUSINESS ACCOUNTS**

### **Business Interest**

*An interest-earning account designed for businesses with moderate transaction activity*

### **Business Checking**

*An account designed for businesses with limited activity*

### **Business Advantage**

*A full-service account for businesses with above-average transaction activity*

### **Business Savings**

*A safe and secure savings account that allows easy access to your money*

### **Business Money Market**

*Our highest interest-earning business account, with limited access to funds*

# LOANS

## CONSUMER LOANS

*Automobiles*  
*Boat/RV*  
*Certificate of Deposit Secured*  
*Lines of Credit*  
*Mortgages*  
*Personal*  
*Credit Cards*

## REAL ESTATE LOANS

*Owner Occupied 1-4 Family*  
*Construction*  
*Home Equity Line of Credit*  
*Improved Commercial/Industrial*  
*Improved Agricultural Land*

## Trade Focused Lending

*Manufactured Housing Communities*  
*Small Business Administration (SBA)*  
*United States Department of Agriculture (USDA)*  
*Agriculture*  
*Asset Based Lending*  
*Commercial*  
*Multi-family Residences*  
*Religious Organizations*

## Equipment Leasing

## FEE SCHEDULE



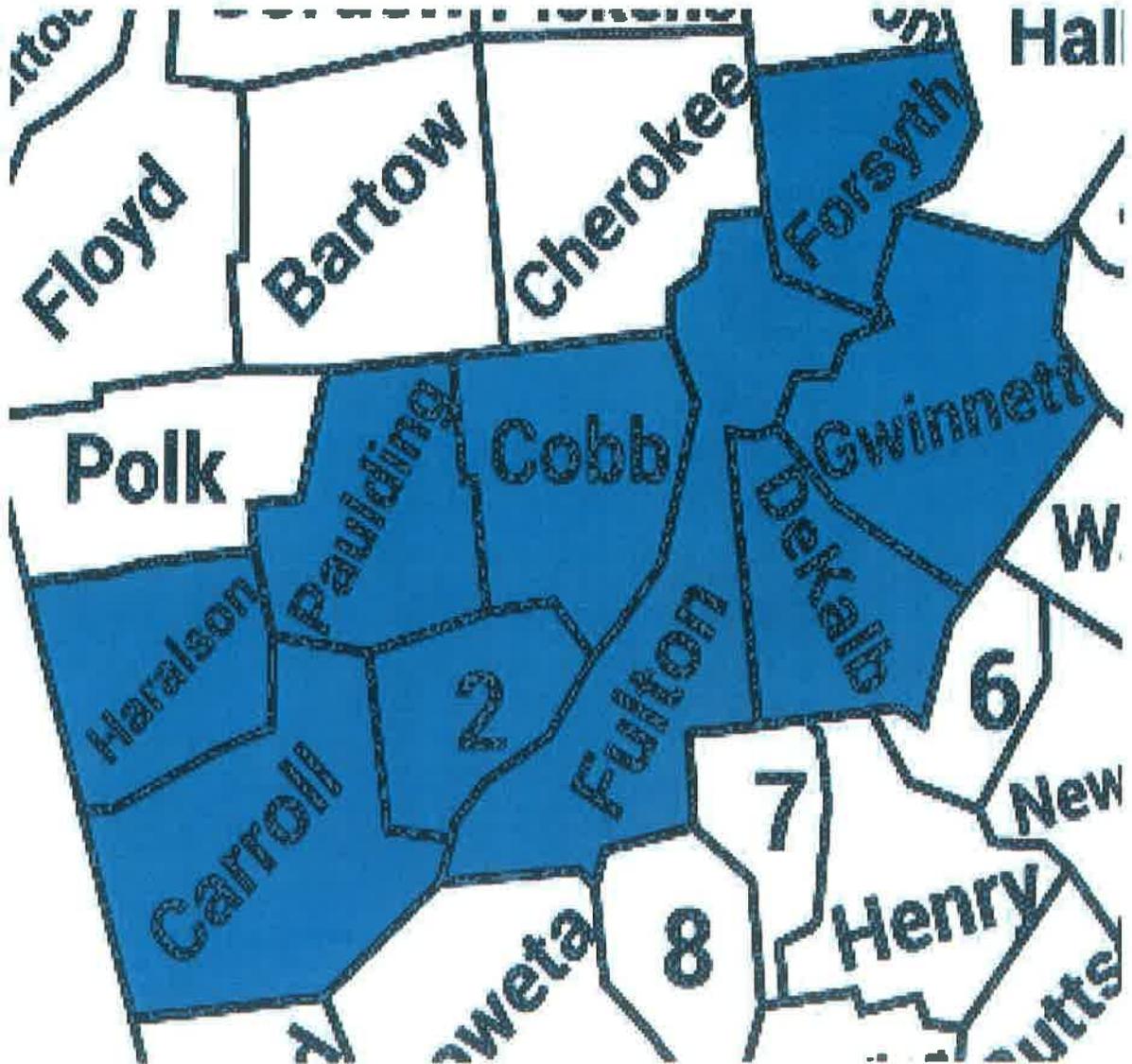
**FEES AND CHARGES.** The following fees and charges may be assessed against your account:

Check printing fees vary by the style of check ordered.

An overdraft fee of \$35.00 will be charged per item for covering overdrafts created by check or draft, in-person withdrawal, ATM withdrawal, or other electronic means.

Account Closing Fee	\$15.00
Account research per hour (one hour minimum)	\$25.00
Photocopies of a check or deposit slip	\$2.00
Photocopies of miscellaneous documents (per page)	\$0.50
Cashier's Check	\$5.00
Temporary Checks (8)	\$3.00
Debit Card replacement	\$5.00
Dormant account fee per month	\$5.00
Return item fee: per item, per time presented for payment	\$35.00
Returned deposited items fee ** Commercial Accounts Only	\$4.00
Sweep Fees	\$5.00
Stop Payments - original and renewal	\$35.00
Statement Re-Print	\$5.00
Interim Statement Copy	\$2.00
Duplicate Statement Mailing (per month)	\$3.00
Garnishment/Levies/Attorney Request/Subpoena	\$40.00
Verification of Deposits (VOD)	\$10.00
Wire Transfer Fee for Incoming Domestic Wires	\$15.00
Wire Transfer Fee for Outgoing Domestic Wires	\$20.00
Wire Transfer Fee for Incoming International Wires	\$40.00
Wire Transfer Fee for Outgoing International Wires	\$40.00
Collection items Domestic (incoming and outgoing)	\$15.00
Collection items International (incoming and outgoing)	\$40.00
Collection items Bonds (incoming and outgoing)	\$15.00
Safe Deposit Box Annual Rental - Box size 3 x 5	\$20.00
Safe Deposit Box Annual Rental - Box size 3 x 10	\$30.00
Safe Deposit Box Annual Rental - Box size 5 x 10	\$40.00
Safe Deposit Box Annual Rental - Box size 10 x 10	\$60.00
Safe Deposit Box Lost Key Fee	\$20.00
Safe Deposit Box Drilling Cost	\$150.00
Paper Statement Fee	\$3.00
Overdraft fee, per item	\$35.00

**American Commerce Bank, N.A.  
Atlanta Area Assessment Area**



**2 = Douglas County**

**Haralson County, GA Census tracts**

TRACT;13143010100;13;143;101.00;1  
TRACT;13143010201;13;143;102.01;1  
TRACT;13143010202;13;143;102.02;1  
TRACT;13143010301;13;143;103.01;1  
TRACT;13143010303;13;143;103.03;1  
TRACT;13143010304;13;143;103.04;1  
TRACT;13143010401;13;143;104.01;1  
TRACT;13143010402;13;143;104.02;1

**Carroll County, GA Census Tracts**

TRACT;13045910101;13;045;9101.01;1  
TRACT;13045910103;13;045;9101.03;1  
TRACT;13045910105;13;045;9101.05;1  
TRACT;13045910106;13;045;9101.06;1  
TRACT;13045910201;13;045;9102.01;1  
TRACT;13045910202;13;045;9102.02;1  
TRACT;13045910203;13;045;9102.03;1  
TRACT;13045910301;13;045;9103.01;1  
TRACT;13045910302;13;045;9103.02;1  
TRACT;13045910400;13;045;9104.00;1  
TRACT;13045910502;13;045;9105.02;1  
TRACT;13045910503;13;045;9105.03;1  
TRACT;13045910504;13;045;9105.04;1  
TRACT;13045910600;13;045;9106.00;1  
TRACT;13045910704;13;045;9107.04;1  
TRACT;13045910705;13;045;9107.05;1  
TRACT;13045910706;13;045;9107.06;1  
TRACT;13045910707;13;045;9107.07;1  
TRACT;13045910708;13;045;9107.08;1  
TRACT;13045910709;13;045;9107.09;1  
TRACT;13045910800;13;045;9108.00;1  
TRACT;13045910900;13;045;9109.00;1  
TRACT;13045911001;13;045;9110.01;1  
TRACT;13045911002;13;045;9110.02;1  
TRACT;13045911101;13;045;9111.01;1  
TRACT;13045911102;13;045;9111.02;1  
TRACT;13045911201;13;045;9112.01;1  
TRACT;13045911202;13;045;9112.02;1

**Fulton County, GA Census Tracts**

TRACT;13121000100;13;121;1.00;3  
TRACT;13121000201;13;121;2.01;3  
TRACT;13121000202;13;121;2.02;3  
TRACT;13121000400;13;121;4.00;3  
TRACT;13121000501;13;121;5.01;3  
TRACT;13121000502;13;121;5.02;3  
TRACT;13121000601;13;121;6.01;3  
TRACT;13121000602;13;121;6.02;3  
TRACT;13121000700;13;121;7.00;3  
TRACT;13121001001;13;121;10.01;3  
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**Fulton County, GA Census Tracts**

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**Fulton County, GA Census Tracts**

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**Fulton County, GA Census Tracts**

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**Fulton County, GA Census Tracts**

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**Fulton County, GA Census Tracts**

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**Fulton County, GA Census Tracts**

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**Fulton County, GA Census Tracts**

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**Douglas County, GA Census Tracts**

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**Paulding County, GA Census Tracts**

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**Cobb County, GA Census Tracts**

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**Cobb County, GA Census Tracts**

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**Cobb County, GA Census Tracts**

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**Cobb County, GA Census Tracts**

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**Dekalb County, GA Census Tracts**

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**Dekalb County, GA Census Tracts**

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**Gwinnett County, GA Census Tracts**

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**Gwinnett County, GA Census Tracts**

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**Gwinnett County, GA Census Tracts**

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**Gwinnett County, GA Census Tracts**

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**Gwinnett County, GA Census Tracts**

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**Forsyth County, GA Census Tracts**

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**Forsyth County, GA Census Tracts**

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**Leon County, FL Census Tracts**

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**Leon County, FL Census Tracts**

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### Quarterly Loan to Deposit Ratios

<b>Quarter Ending</b>	<b>Year</b>	<b>Loan to Deposit Ratio</b>
March 31	2025	103.71%
June 30	2025	103.43%
September 30	2025	99.72%
December 31	2025	105.28%

## **COMMUNITY REINVESTMENT ACT NOTICE**

Under the Federal Community Reinvestment Act (CRA), the Comptroller of the Currency evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Comptroller also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the Comptroller; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Comptroller publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Deputy Comptroller, 1700 Pacific Ave, Suite 3600, Dallas, TX 75201. You may send written comments about our performance in helping to meet community credit needs to David Lee, 400 US Hwy 27 Bypass, Bremen, GA 30110, email [dlee@americancommercebank.com](mailto:dlee@americancommercebank.com) and Deputy Comptroller, 1700 Pacific Ave, Suite 3600, Dallas, TX 75201, email [CRAComments@occ.treas.gov](mailto:CRAComments@occ.treas.gov). Your letter, together with any response by us, will be considered by the Comptroller in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Deputy Comptroller. You may also request from the Deputy Comptroller an announcement of our applications covered by the CRA filed with the Comptroller. We are an affiliate of American Commerce Bancshares, a bank holding company. You may request from the President, Federal Reserve Bank of Atlanta, 1000 Peachtree Street, NE, Atlanta, GA 30309 an announcement of applications covered by the CRA filed by bank holding companies.

## **Home Mortgage Disclosure Act Notice**

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. HMDA data for many other financial institutions are also available online. For more information, visit the Consumer Financial Protection Bureau's Web site ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)).

## **COMMUNITY REINVESTMENT ACT NOTICE**

Under the Federal Community Reinvestment Act (CRA), the Comptroller of the Currency evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Comptroller also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may review today the public section of our most recent CRA evaluation, prepared by the Comptroller, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make a request to us: (1) A map showing the assessment area containing this branch, which is the area in which the Comptroller evaluates our CRA performance in this community; (2) information about our branches in this assessment area; (3) a list of services we provide at those locations; (4) data on our lending performance in this assessment area; and (5) copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

If you would like to review information about our CRA performance in other communities served by us, the public file for our entire bank is available at American Commerce Bank, located at 400 US Hwy 27 Bypass, Bremen, GA 30110.

At least 30 days before the beginning of each quarter, the Comptroller publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Deputy Comptroller, 1700 Pacific Ave, Suite 3600, Dallas, TX 75201. You may send written comments about our performance in helping to meet community credit needs to David Lee, 400 US Hwy 27 Bypass, Bremen, GA 30110, email [dlee@americancommercebank.com](mailto:dlee@americancommercebank.com) and Deputy Comptroller, 1700 Pacific Ave, Suite 3600, Dallas, TX 75201 email [CRAComments@occ.treas.gov](mailto:CRAComments@occ.treas.gov). Your letter, together with any response by us, will be considered by the Comptroller in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Deputy Comptroller. You may also request from the Deputy Comptroller an announcement of our applications covered by the CRA filed with the Comptroller. We are an affiliate of American Commerce Bancshares, a bank holding company. You may request from the President, Federal Reserve Bank of Atlanta, 1000 Peachtree Street, NE, Atlanta, GA 30309 an announcement of applications covered by the CRA filed by bank holding companies.

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