Lending Equity Ordinance Data: Presentation to Chicago City Council

Municipal Depositories Subject Matter Hearing
February 9, 2026

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Advancing Economic Justice and Racial Equity

The Banks

1. Albank (aka Albany Bank & Trust) (S)
2. Amalgamated Bank of Chicago (S)
3. Bank of America, N.A. (O)
4. BMO Bank, N.A. (O)
5. Citibank, N.A. (O)
6. Fifth Third Bank, N.A. (O)
7. First Eagle Bank (O)
8. GN Bank (NTI)
9. JPMorgan Chase Bank, N.A. (S)
10. Old National Bank (S)
11. PNC Bank, N.A. (O)
12. The Huntington National Bank (O)
13. US Bank, N.A. (O)
14. Wells Fargo Bank, N.A. (O)
15. Wintrust Bank, N.A. (O)

- GN Bank received Needs to Improve (NTI) on most recent CRA exam (2023).
- All others received CRA ratings of Satisfactory (S) or Outstanding (O) on their most recent exam.
- Community Development Financial Institutions (CDFI): First Eagle Bank, GN Bank
- Minority Depository Institutions (MDI): GN Bank

Notes on Data Analysis

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- Mortgage: Banks with fewer than 100 mortgage applications in Chicago in 2024 have been excluded from the mortgage charts, to do a fair comparison.
  - Albank, Amalgamated, First Eagle, GN excluded from mortgage charts.
  - All other banks that remain in the charts received at least 500 applications.
- Small Business: Reported under the CRA and is at the County level.
  - Albank, First Eagle, GN were not in the CRA small business loan dataset.
  - Amalgamated was also excluded from charts because their line of business for this product was much smaller than others in the charts.
- Wintrust operates under 16 different charters. For the purposes of today, we pooled them all together under the label "Wintrust."

Chart 1: Mortgage Applications from Minority Borrowers

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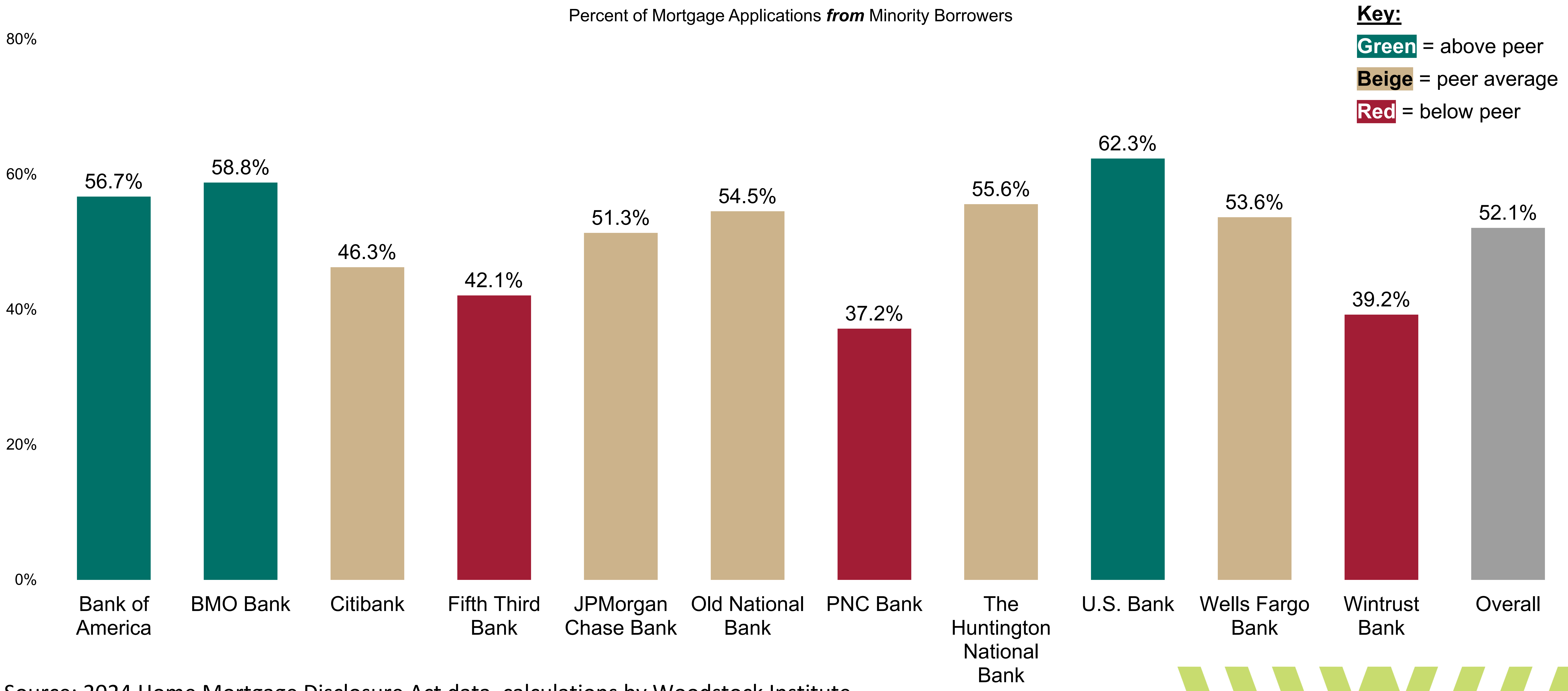

Source: 2024 Home Mortgage Disclosure Act data, calculations by Woodstock Institute.

Chart 2: Mortgage Originations to Minority Borrowers

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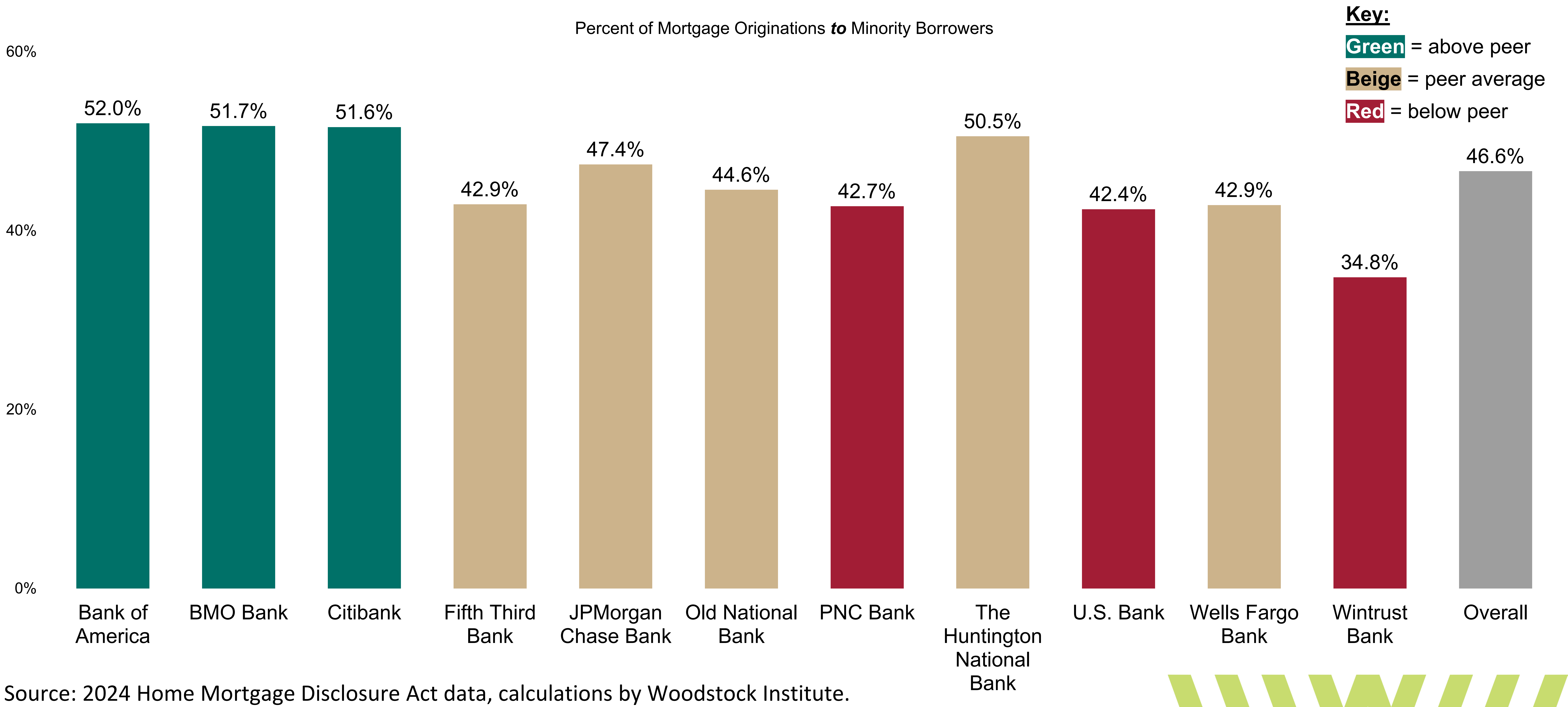
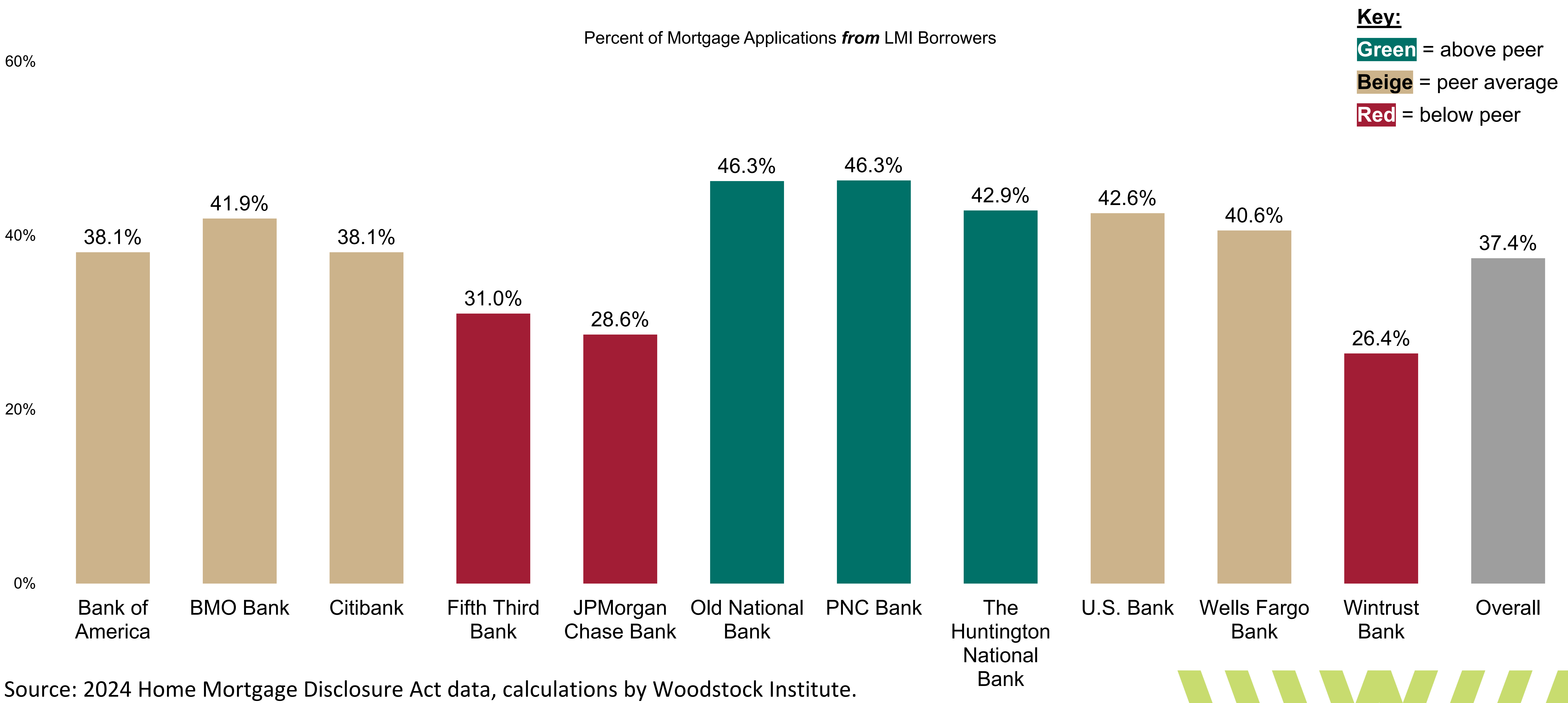


Source: 2024 Home Mortgage Disclosure Act data, calculations by Woodstock Institute.

Chart 3: Mortgage Applications from LMI Borrowers



Source: 2024 Home Mortgage Disclosure Act data, calculations by Woodstock Institute.

Chart 4: Mortgage Originations to LMI Borrowers

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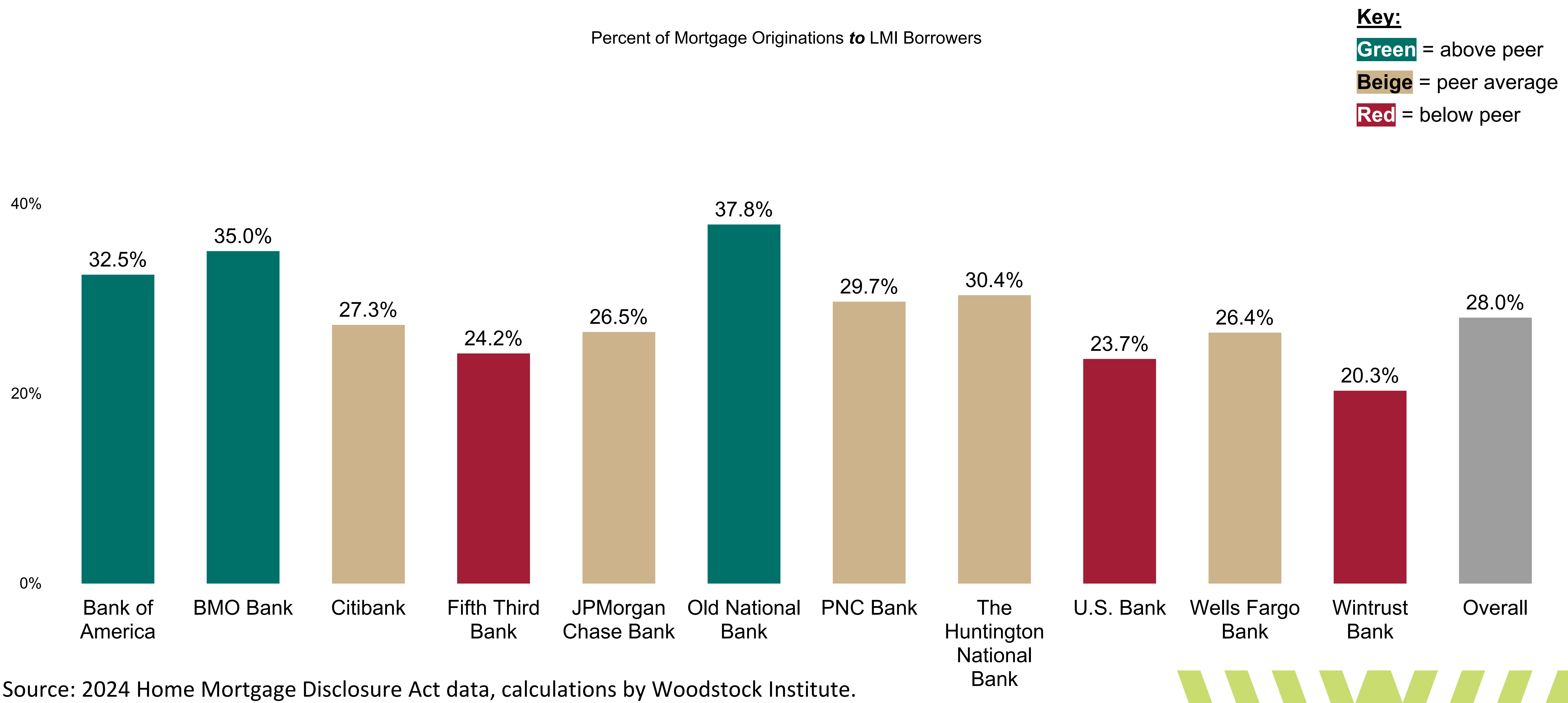

Source: 2024 Home Mortgage Disclosure Act data, calculations by Woodstock Institute.

Chart 5: Mortgage Applications from Majority-Minority Tracts

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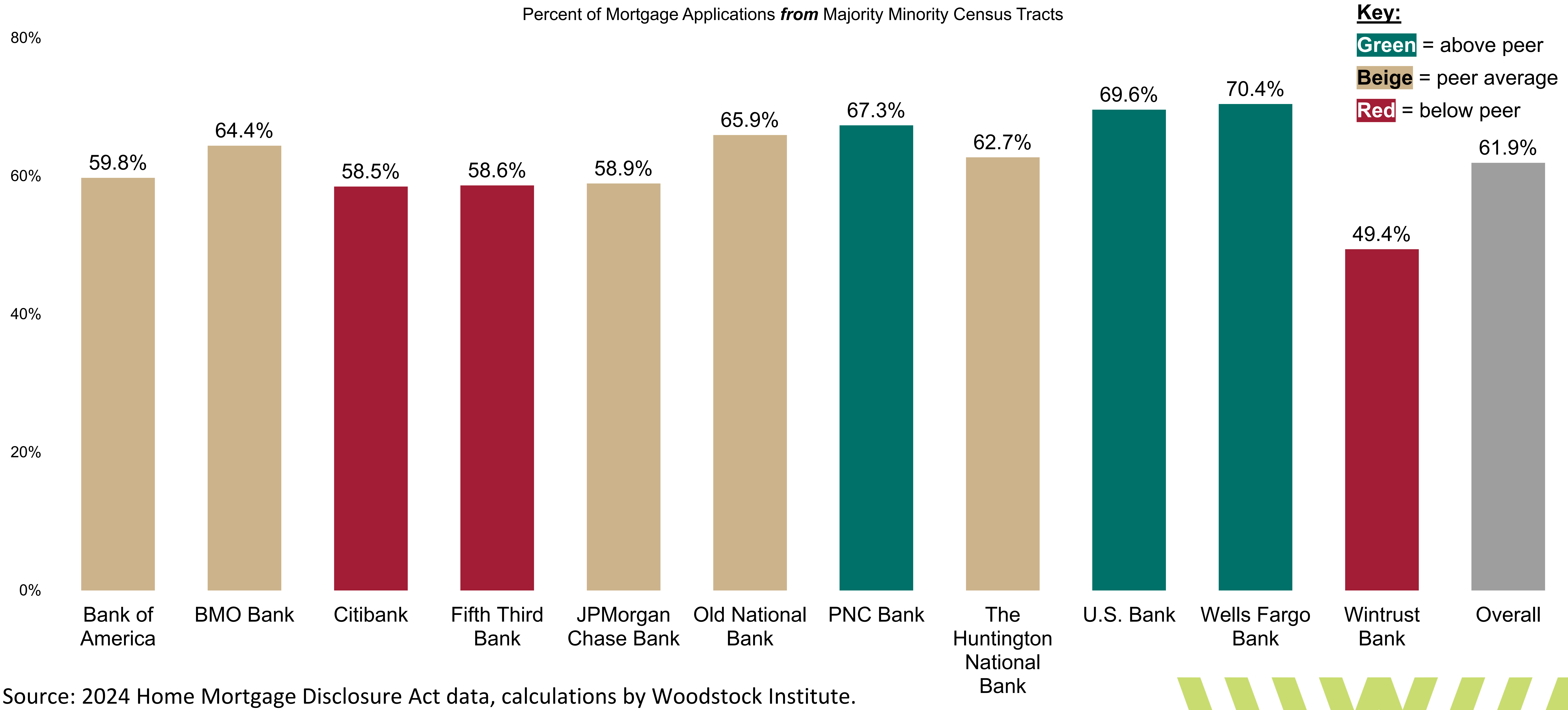
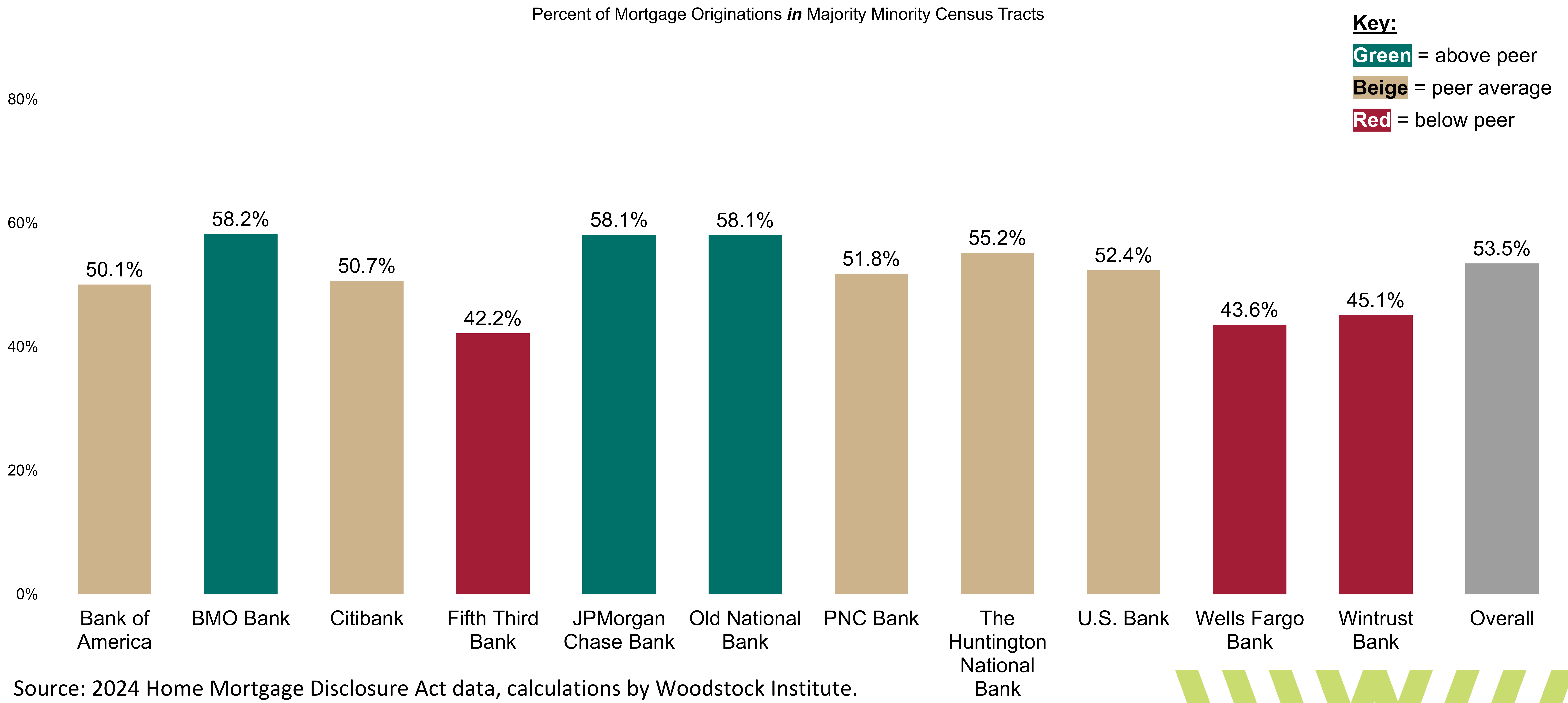


Source: 2024 Home Mortgage Disclosure Act data, calculations by Woodstock Institute.

Chart 6: Mortgage Originations in Majority-Minority Tracts



Source: 2024 Home Mortgage Disclosure Act data, calculations by Woodstock Institute.

Chart 7: Small Business Loans to LMI Tracts

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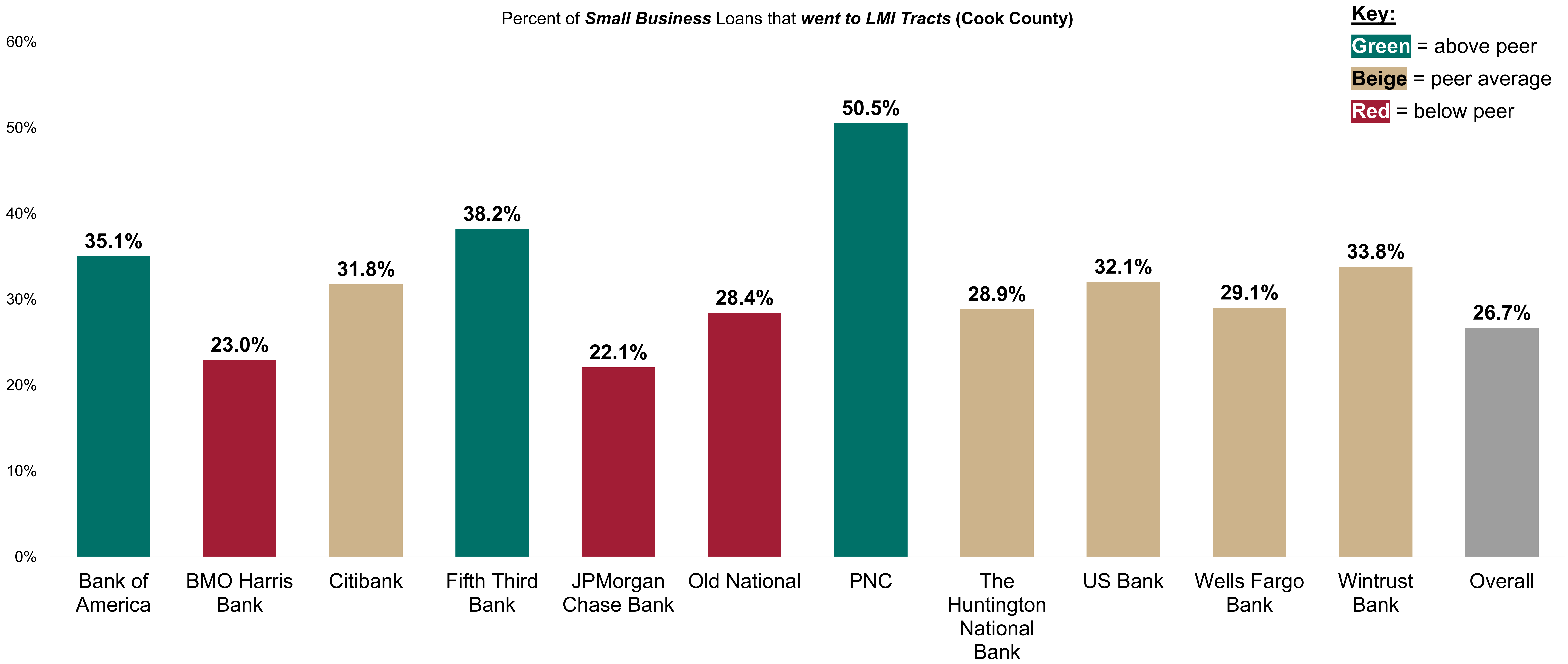

Source: 2024 Community Reinvestment Act small business lending data, calculations by Woodstock Institute.

Appendix: Data Analysis Definitions

- Charts include color coding for a peer analysis – green are the high performers among this group, red are the low performers among this group.
  - Below peer = 1st quartile, aka “bottom 25%”
  - Peer average = 2nd and 3rd quartiles, aka “middle 50%”
  - Above peer = 4th quartile, aka “top 25%”
- “Minority” in these charts include: Asian, Black or African American, Native American, Pacific Islander, Latine, and Multi-racial
- “LMI” = low- and moderate-income. Low = 60% or below of Area Median Income (AMI). Moderate = 60-80% of AMI


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