



## **PUBLIC DISCLOSURE**

June 30, 2014

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Old Plank Trail Community Bank, N. A.  
Charter Number 24646

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**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.

## Table of Contents

<b>OVERALL CRA RATING .....</b>	<b>2</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS.....</b>	<b>4</b>
<b>DESCRIPTION OF INSTITUTION .....</b>	<b>8</b>
<b>SCOPE OF THE EVALUATION .....</b>	<b>9</b>
<b>FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>111</b>
<b>MULTISTATE METROPOLITAN AREA RATING .....</b>	<b>122</b>
CHICAGO-NAPERVILLE-JOLIET IL-IN-WI MMSA.....	12
<b>APPENDIX A: SCOPE OF EXAMINATION.....</b>	<b>A-1</b>
<b>APPENDIX B: SUMMARY OF MULTISTATE METROPOLITAN AREA AND STATE RATINGS .....</b>	<b>B-1</b>
<b>APPENDIX C: MARKET PROFILES FOR FULL-SCOPE AREAS .....</b>	<b>C-1</b>
<b>APPENDIX D: TABLES OF PERFORMANCE DATA .....</b>	<b>D-1</b>

## Overall CRA Rating

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution’s record of meeting the credit needs of its entire community, including the low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Old Plank Trail Community Bank, N.A. (OPT) issued by the OCC, the institution’s supervisory agency, for the evaluation period ending 5/31/2014. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

**Institution’s CRA Rating:** This institution is rated **Outstanding**.

The following table indicates the performance level of Old Plank Trail Community Bank, N. A. with respect to the Lending, Investment, and Service Tests:

Performance Levels	Old Plank Trail Community Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\*The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- A majority of bank loans were originated within OPT’s delineated assessment areas (AAs).
- The loan distribution to borrowers within the IL-IN-WI Multistate Metropolitan Statistical Area (IL-IN-WI MMSA) reflected good performance for home mortgage lending and good performance for small loans to businesses.
- Community development (CD) lending had a positive impact on the Lending Test in the IL-IN-WI MMSA.
- The bank had an excellent level of qualified CD investments and grants and exhibited excellent responsiveness to credit and community economic development needs.

- The bank's delivery systems are accessible to geographies and individuals of different income levels within the IL-IN-WI MMSA.
- OPT provided a high level of CD services within the IL-IN-WI MMSA that were responsive to community needs.
- Lending activity within the IL-IN-WI MMSA was adequate.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**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 MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Census Tract (CT) - 2010:** Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

**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.

**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 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 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 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.

**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 MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Median Family Income (MFI) – 2010:** The median income derived from the United States Census Bureau's American Community Survey data every 5 years and used to determine the income level category geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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 One 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.

## Description of Institution

OPT is a full-service community bank headquartered in Mokena, Illinois, and is a subsidiary of Wintrust Financial Corporation (Wintrust). OPT, as of December 31, 2013, reported total assets of \$1 billion and \$93 million in Tier One Capital.

Wintrust is a financial services holding company based in Rosemont, Illinois, with assets above \$18 billion. Wintrust through its financial subsidiaries provides community-oriented, personal and commercial bank services, wealth management services, commercial insurance premium financing, mortgage origination, short-term accounts receivable financing, and certain administrative services, such as data processing of payrolls, billing and treasury management services. Wintrust market area includes the greater Chicago, Illinois and southern Wisconsin metropolitan areas through its 15 wholly owned banking subsidiaries. Wintrust also provides a range of wealth management services through three separate subsidiaries, operating under one name, Wintrust Wealth Management. Since, 1931, Chicago-based Wayne Hummer Investments has been providing a full-range of investment products and services tailored to meet the specific needs of individual investors throughout the country. Great Lakes Advisors, a registered investment adviser, provides portfolio management for individuals, as well as institutional investors. The Chicago Trust Company, N.A. provides trust and investment products and services to individuals and businesses in Wintrust community bank markets. Wintrust offers specialty lending through indirect non-bank subsidiaries and divisions of its banks. First Insurance Funding Corp. (FIRST), and its subsidiary Broadway Premium Funding Corp. (Broadway), is in the business of originating financing for the payment of commercial insurance premiums on a national basis. Tricom, Inc. provides short-term accounts receivable financing, value-added out-sourced administrative services to clients in the temporary staffing industry throughout the United States and payroll services to small businesses.

OPT is an interstate bank, currently with 14 full-service banking centers. The bank has seen tremendous growth in their market presence since the prior CRA examination when OPT had three locations, in Frankfort, New Lenox, and Mokena, IL. In April 2012, the bank acquired a branch of Suburban Bank and Trust located in Orland Park, IL and later that year the bank acquired First United Bank in Crete, IL. This transaction added three new bank locations, including one in Frankfort, one in Steger, and one in Crete, IL, expanding OPT's market area further east in Will County. In 2013, OPT purchased First National Bank of Illinois (FNB Illinois), expanding the bank's presence in southeastern Cook County and adding six new IL locations in Lansing, Lynwood, South Holland, Joliet, Plainfield, and Shorewood. The FNB Illinois acquisition also included a branch in Dyer, IN. The two financial institutions acquired by OPT in 2012 and 2013 had not been actively lending in several years. OPT has spent a significant amount of time in assessing, training, and empowering retail and small business staff to actively seek out these lines of business. No branches have been closed.

OPT's strategic focus is to become the largest (in terms of deposits) financial institution in the markets they serve. The bank describes their approach as always offering superior, innovative products, while still staying true to high-touch customer service. OPT offers a variety of deposit and lending products, focusing primarily on small business and commercial real estate lending, but also offering customers a selection of consumer and home equity loan products. On December 31, 2013, the bank's loan portfolio totaled \$617 million, representing 57 percent of total bank assets. The table below shows the composition of the bank's loan portfolio at that time. As illustrated by the table, commercial lending represented the largest portion of in-house loan originations and purchases.

OPT's loan portfolio, as of December 31, 2013, consisted of the following loan types:

Loan type	Dollar Amount (000's)	Percent of Total Loans
Construction, Land Development, and Other Land Loans	\$28,951	4.69
Secured by Farmland	\$922	.16
1-4 Family Residential	\$78,905	12.79
Multi-Family Residential	\$21,182	3.43
Nonfarm, Nonresidential Real Estate	\$128,354	20.81
Commercial and Industrial Loans	\$295,860	47.97
Consumer Loans	\$53,964	8.75
Other Loans	\$8,608	1.40
Total Loans	\$616,746	100.00

Residential mortgage lending is primarily provided to bank customers through Wintrust Mortgage Company (Wintrust Mortgage), which is a subsidiary of bank affiliate Barrington Bank and Trust Co. The bank has requested that lending activity of Wintrust Mortgage inside the bank's AAs be included in the analysis of its lending performance during this CRA performance evaluation. When the affiliate loans are combined with the bank's lending activity, residential mortgage loans are the products with the largest portion of loan originations and purchases during the assessment period, followed by small business lending.

There are no known legal or financial factors impeding the bank's ability to meet the credit needs of its community. OPT has the resources needed to help meet the legitimate credit needs of its AAs. OPT was rated Satisfactory at the prior CRA evaluation dated December 23, 2008.

## Scope of the Evaluation

### Evaluation Period and Products Evaluated

During this performance evaluation, we assessed the bank's performance under the Lending, Investment, and Service tests. In evaluating the bank's lending performance, we reviewed residential mortgage loans filed under the Home Mortgage Disclosure Act (HMDA). We also considered small loans to businesses reported under the Community Reinvestment Act. The evaluation period for the Lending Test was January 1, 2009 through December 31, 2013, except for community development loans, which were evaluated from January 1, 2009 through May 31, 2014. In this evaluation, at the bank's request, we also considered those HMDA loans reported by Wintrust Mortgage that were located within OPT's AAs.

Our analysis of data was completed using two separate analysis periods due to changes in the census data available. HMDA and small loans to businesses that were originated or purchased in 2009 through 2011 were evaluated using 2000 census data and compared to 2011 peer data. HMDA and small loans to businesses that were originated or purchased in 2012 through 2013 were analyzed using 2010 census data, and compared to 2012 peer data, which was the most recent peer data available. Market share data

was not considered meaningful and therefore was not analyzed in those instances where the market share was less than one percent.

When mortgage loans originated by Wintrust Mortgage were combined with bank lending, the largest portion of overall lending, receiving the most weight for performance analysis, was home mortgage loans, representing 79 percent of lending by number of loans. Small loans to businesses represented 20 percent, and the remaining 1 percent of lending was a combination of home improvement and small farm loans. Originations or purchases of home improvement loans, multi-family loans, and farm loans were minimal and would not have had a material impact in the evaluation of OPT's overall performance so analysis of those loans were not performed.

Refer to Table 1 Lending Volume for IL-IN-WI MMSA under Appendix D for the facts and data used to evaluate the bank's lending activity.

The Investment Test included a review of investments, grants, and donations made by OPT that met the CD criteria and were made from January 1, 2009 through May 31, 2014. In addition to evaluating the volume of grants, investments and donations made during the evaluation period, we also considered the responsiveness of those activities to identified CD needs. Investments made during prior evaluation periods that remain outstanding were also considered.

The Service Test evaluation period was also January 1, 2009 through May 31, 2014. The Service Test performance was based on branch distribution, hours of operation, branch openings and closings, alternative delivery systems, retail products and services and CD services provided by OPT employees.

### **Data Integrity**

As part of this CRA evaluation, we tested a sample of OPT's HMDA and CRA lending data. We determined that the data was reliable and the data was used for this evaluation.

We also reviewed bank-identified loans, investments, and services that management presented with a primary purpose of CD. We used only those loans, investments and services in this evaluation that had such a primary purpose.

### **Selection of Areas for Full-Scope Review**

In 2012 and 2013, the bank greatly expanded its size primarily due to the acquisition of two banks. The bank's AA increased from 29 geographies in 2011 to 443 geographies in 2013. As a result of the FNB acquisition in 2013, the bank now has one branch location in Lake County, Indiana. Therefore, the bank performance for this evaluation was assessed on a Multistate Metropolitan Statistical Area (MMSA) basis. The bank's Illinois AA was selected for a full-scope review. Full scope reviews consider performance context, quantitative, and qualitative factors. The AA selected for the full scope review within the MMSA was chosen because it represented a significant portion of the bank's deposit based and lending business in the multistate area. The other AA in the MMSA was analyzed using limited-scope procedures. Limited-scope procedures consider quantitative factors only. Refer to the "Scope" section under the Multistate Metropolitan Area Rating section for details regarding how the area was selected.

### **Ratings**

The bank's composite CRA rating was based on the performance within the IL-IN-WI MMSA. We placed greater weight on the bank's performance in the Illinois AA portion of the MMSA as OPT derives 97 percent of its deposits from that state and 93 percent of its locations are there. In addition, the Indiana AA rating represents OPT's activity in that state only since May 2013.

For analysis purposes, greater weight was placed on the loan data from 2012 through 2013 to reach our conclusions. Fifty four percent of the lending occurred within that timeframe and it was considered most reflective of the bank's overall and current performance. In addition, this timeframe most closely reflects the bank's current performance context.

### **Inside/Outside Ratio**

This ratio is a bank-wide calculation and was not calculated by individual rating area or AA. The number of loans made inside of the corresponding AA's for 2009 through 2011 and 2012 through 2013 were compared to the total number of loans originated or purchased by the bank from 2009 through 2013. A majority (63 percent) of the bank's total lending during the review period based on number of loans was inside the AAs. Fifty-two percent of the home mortgage lending was inside the AAs, and 64 percent of the small business lending was inside the AAs. This analysis included bank originations and purchases only.

### **Other**

As part of this performance evaluation, we utilized three community contacts with organizations in the bank's AA in order to gain a better understanding of community credit needs and opportunities. One of the organizations provides community services to individuals in Will County; one is a regional fair housing enforcement and counseling agency serving the south metropolitan Chicago area. The other provides financing and technical assistance for community stabilization and development efforts. The economy continues to recover from the recent recession, with continuing high unemployment and foreclosure rates. In fact, the recovery within the AA has been slower than that experienced at the state and national levels. Commercial retail corridors are receiving little investments and small business credit remains tight. Affordable housing continues to be a need, especially 1-4 unit buildings in low- and moderate-income communities.

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

Pursuant to 12 C.F.R. 25.28(c), in determining a national bank's 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.

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

## Multistate Metropolitan Area Rating

### Chicago-Naperville-Joliet IL-IN-WI MMSA

<b>CRA rating for the rating area:</b>	<b>Outstanding</b>
<b>The lending test is</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The service test is rated:</b>	<b>Outstanding</b>

- The bank's lending levels reflected adequate responsiveness to AA residential credit needs and adequate responsiveness to AA small business credit needs.
- Overall, poor geographic distribution was demonstrated by poor home mortgage distribution and good small business distribution.
- Overall, good borrower income distribution was evidenced by good distribution to borrowers of different income levels and to businesses of different sizes.
- CD Lending performance was excellent and had a positive effect on the Lending Test rating.
- The bank had excellent CD investment performance that addressed needs for affordable housing, community services to low- or moderate-income individuals, and economic development within its AA.
- Product and service delivery systems are accessible to low- and moderate-income individuals and geographies.
- The bank is a leader in providing CD services.

### Description of Institution's Operations in the IL-IN-WI MMSA

The rating area consists of the geographies within the IL-IN-WI MMSA where the bank has branches and conducts operations. The Illinois portion of the MMSA (Illinois AA) consists of 391 census tracts located in Will County and the southeastern part of Cook County in the Chicago-Naperville-Joliet Metropolitan Division (MD). The Indiana portion of the MMSA (Indiana AA) consists of 52 census tracts located along the most northwestern border of Indiana in the Gary MD.

Within the IL-IN-WI MMSA, the bank operates 14 locations, representing 100 percent of the bank's total branch network. Thirteen of the locations are in Illinois and one is in Indiana.

As of June 30, 2013, bank deposits in the IL-IN-WI-MMSA totaled \$972 million, ranking the bank 30th among 168 financial institutions operating within this area, with a 0.39 percent market share. Bank competitors with the largest deposit market shares included JP Morgan Chase with a 25.9 percent market share, and BMO Harris, with a 12.9 percent market share. The top four financial institutions held 56.4 percent of the total market share.

Refer to the market profile in the IL-IN-WI MMSA in Appendix C for detailed demographics and other performance context information for the Illinois AA, which received a full-scope review,

## **Scope of Evaluation in IL-IN-WI MMSA**

Within the IL-IN-WI MMSA, the Illinois AA was subject to a full-scope review because it was the AA where the vast majority of the bank's deposit and lending activity occurred. Thirteen of the 14 bank locations, or 92.9 percent, were in the Illinois AA. In addition, 97.3 percent of the MMSA deposits, as of June 30, 2013, were in the Illinois AA. For this performance evaluation, more weight was placed on loan activity in 2012 through 2013, which makes up a majority of the lending activity during the review period. Lending activity from 2009 through 2011 was included in the full scope review. Performance in the Indiana AA received a limited scope review due to its small size and the fact that Indiana has only been a part of the bank's AA since May 2013. Refer to Appendix A for further information.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

**The bank's performance under the lending test in the IL-IN-WI MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance was good.**

### **Lending Activity**

Refer to Tables 1 Lending Volume in the IL-IN-WI MMSA section of Appendix D for the facts and data used to evaluate the bank's lending activity. Our analysis of the bank's lending volume focused on the bank's deposit market share ranking in the full-scope AA in comparison to the most current residential loan and small business market share ranking analysis.

**Overall lending activity in the Illinois AA reflects adequate responsiveness to AA residential and small business credit needs. Lending activity in the Illinois AA in 2012 through 2013 was adequate.**

### ***Market Share Analysis***

In the Illinois AA, OPT ranked 30th out of 158 financial institutions accepting deposits within this AA, with a market share of 0.39 percent. This placed the bank in the top 19th percentile. Market shares for mortgage lending were calculated using combined bank and affiliate data. The most recent peer reports for lending available at the time of this examination were based on 2012 data. For 2012 purchase lending, the bank's 2012 market share was 2.11 percent based on number of loans. The bank ranked eighth of 373 lenders, placing it in the top 2 percentile. Likewise, the bank's market share for home refinance loans exceeded its deposit market share at 0.69 percent, and the bank ranked 26th out of 465 lenders, putting it in the top 6th percentile. The bank achieved a 0.14 percent market share based on the number of small loans to businesses originated in the Illinois AA and the bank ranked 41<sup>st</sup> out of 180 lenders, placing it in the top 23rd percentile.

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

**Overall, OPT's geographic distribution of home mortgage loans and small loans to businesses reflected poor dispersion in the designated AA. The geographic distribution of home mortgage loans reflected poor penetration in the AA. The geographic distribution of small loans to businesses reflected good penetration in the AA.**

### *Home Mortgage Loans*

Refer to Tables 2 and 4 in the IL-IN-WI MMSA 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.

Overall the geographic distribution of OPT's home mortgage lending was poor. The geographic distribution for all home mortgage loans in 2012 through 2013 was poor. More weight was given to home purchase loans in this analysis as this product represented the highest percentage of mortgage lending during this period.

One of the primary factors considered in evaluating the bank's mortgage lending performance in its AAs was the percentage of owner-occupied housing units (OOHUs) located in each AA. Under the 2010 census, 2.96 percent of the OOHUs within the Illinois AA are in low-income geographies and 21.80 percent are in moderate-income geographies.

### *Home Purchase Loans*

The geographic distribution of home purchase loans in the Illinois AA was poor. The geographic distribution of home purchase loans in 2012 through 2013 was poor. The level of home purchase originations or purchases in low-income geographies was poor as it was well below the percentage of OOHUs. The bank's market share of home purchase lending in low-income geographies was below one percent and analysis of market share performance was not meaningful. Home purchase lending was also poor in moderate-income geographies as bank lending was well below the percentage of OOHUs in moderate-income geographies. The market share in moderate-income geographies was adequate at 1.50 percent compared to the bank's overall market share of 2.06 percent.

During the period from 2009 through 2011, there were no low-income geographies in the bank's AA. The bank's home purchase lending performance in moderate-income geographies was not inconsistent with 2012 through 2013 performance.

### *Home Refinance Loans*

Overall, the geographic distribution of home refinance loans was poor in the Illinois AA. The percentage of home refinance loans originated or purchased in 2012 through 2013 was poor. There were no home refinance loans originated or purchased in low-income geographies. The bank's refinance originations or purchases in moderate-income geographies was poor as it was well below the percentage of OOHUs. With an overall market share of less than one percent, an analysis of market share performance was not meaningful.

From 2009 through 2011, the bank's performance was not inconsistent with their 2012 through 2013 performance.

### *Small Loans to Businesses*

Refer to Table 6 in the IL-IN-WI MMSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses within the Illinois AA reflects good penetration. The geographic distribution of small loans to businesses in 2012 through 2013 was good. Bank lending to small businesses located in low-income geographies was lower than the percentage of small businesses in low-income geographies, but adequate. In moderate-income geographies the bank's origination or purchase of small loans to businesses was excellent as it exceeded the percentage of businesses in moderate-income geographies. The bank's overall market share for small loans to businesses was less than one percent and analysis was not meaningful.

From 2009 through 2011, the bank's performance was weaker than in 2012 through 2013. There were no low-income geographies in the AA at that time. The bank's performance in moderate-income geographies was adequate.

### *Lending Gap Analysis*

Analysis of the bank's HMDA and small business loans in the bank's Illinois AA originated or purchased in 2012 through 2013 was performed. OPT has no gaps in their lending activities. Areas of various income ranges where the bank has little or no lending activity are shared by one or more affiliate banks.

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

**The overall distribution of lending based on borrower income levels was good. The borrower distribution of home mortgage loans reflected good penetration in the AA. The borrower distribution of small loans to businesses reflected excellent penetration in the AA.**

### *Home Mortgage Loans*

Refer to Tables 8 and 10 in the IL-IN-WI MMSA 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.

Overall, the borrower distribution of OPT's home mortgage lending was good. The borrower distribution of home mortgage lending in 2012 through 2013 was good.

Our analysis focused on the bank's lending to low- and moderate-income borrowers as compared to the level of low- and moderate-income families within the AA. In the Illinois AA, at the 2010 census, the percentage of low-income families was 21.23 percent, while the percentage of moderate-income families was 17.48 percent. Another factor considered in the evaluation of the borrower distribution of home mortgage loans was the number of families that live below the poverty level and the unemployment rate

within the AA. According to the 2010 census, the percentage of families that live below the poverty level was 8.70 percent of the AA population. Also, according to the US Bureau of Labor Statistics, the unemployment rate in 2013 for Cook County was 9.6 percent and in Will County, the unemployment rate in 2013 was 9.4 as compared to a state unemployment rate of 8.9 percent and a national unemployment rate of 6.7 percent

### ***Home Purchase Loans***

Overall, the borrower income distribution of home purchase loans reflects excellent penetration for the Illinois AA. The borrower income distribution of home purchase loans in 2012 through 2013 was excellent. While the percentage of home purchase loans was below the percentage of low-income families, the performance was good considering the percentage of families living below the poverty level. The bank's market share for originations or purchases to low-income borrowers was excellent as it exceeded the overall home purchase market share. The percentage of home purchase loans to moderate-income borrowers was excellent as it exceeded the percentage of moderate-income families in the AA. The bank's market share was excellent as it exceeded the bank's overall market share for home purchase loans in moderate-income geographies.

In 2009 through 2011, bank performance was not inconsistent with its excellent 2012 through 2013 performance.

### ***Home Refinance Loans***

The overall borrower distribution of home refinance loans reflects adequate penetration in the Illinois AA. The borrower distribution of home refinance loans in 2012 through 2013 was adequate. The percentage of bank lending to low-income borrowers was poor as it was much less than the percentage of low-income families. The percentage of home refinance loans to moderate-income borrowers was good as it was near the percentage of moderate-income families. With an overall market share of less than one percent, an analysis of market share performance to low- and moderate-income borrowers was not meaningful.

In 2009 through 2011, bank performance was inconsistent with and stronger than its adequate 2012 through 2013 performance. The borrower distribution for 2009 through 2011 was good. The bank's lending level to low-income borrowers was poor; however, the bank's lending level to moderate-income borrowers was excellent.

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

Refer to Table 11 in the IL-IN-WI MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

OPT's distribution of small loans to businesses with revenues of \$1 million or less was excellent. OPT's distribution of small loans to businesses with revenues of \$1 million or less in 2012 through 2013 was excellent as the bank's percentage of originations and purchases exceeded the percentage of small businesses in the Illinois AA. Bank loan originations or purchases in amounts of \$250 thousand or less represented 90 percent of all small loans to businesses.

Bank performance in 2009 through 2011 was weaker than its 2012 through 2013 performance as the percentage of small loans to businesses originated or purchased by the bank was below the percentage of small businesses in the AA. Bank loan originations or purchases in amounts of \$250 thousand or less represented 74 percent of all small loans to businesses.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the IL-IN-WI MMSA section of Appendix D for the facts and data used to evaluate the bank's level of community development (CD) lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

The bank's CD lending activity in the Illinois AA had a positive impact on the Lending Test Rating.

OPT originated an excellent level of CD loans during this performance evaluation review period. OPT originated and renewed loans inside the Illinois AA totaling \$27 million. The \$27 million consisted of 20 new originations totaling \$27 million and one renewal totaling \$50 thousand. The \$27 million in CD loans represents 29 percent of the Tier One Capital allocated to the Illinois AA on March 31, 2014. These CD loans helped to provide affordable housing and community services to LMI families within the AA.

Some specific examples of the CD loans originated during this evaluation period follow:

- Over \$13 million in funding was provided to an organization that focuses on LMI individuals with developmental or physical disabilities. Services provided include home based services, employment services, residential services, and acting as a resource center. Three loans were originated or refinanced by OPT during the review period. Loans were used to fund construction and maintenance of different facilities used by the organization for administrative or educational purposes. Loan proceeds were also used to purchase various group and single-family residential buildings to be used to provide independent living for the agency's clients, who are low-income individuals.
- A \$5.3 million loan was made to a community service agency that provides services to LMI individuals with intellectual and age-related disabilities who reside in Southeastern Cook County and Northwestern Will County. The funds were used for the construction of a new training facility within the bank's AA.
- Old Plank extended five loans totaling \$3.75 million to refinance various multifamily rental properties that meet Section 8 standards and apartments that are rented primarily through the Section 8 program.

We also gave positive consideration to one community development loan renewal totaling \$6.3 million outside the bank's AA. Funds were used to provide affordable housing in the Chicagoland area.

## **Product Innovation and Flexibility**

OPT offers a variety of lending products that offer flexible terms in order to aid LMI individuals as well as small businesses in receiving credit. The bank collaborates with an affiliate, Village Bank, to originate SBA loans. Additionally, the bank offers small business micro loans and overdraft protection (ODP) lines of credit. The bank has purchased 21 loans originated by ACCION. ACCION will use those funds to generate new loans for small business owners.

To help individuals in the bank's AA to establish credit or improve their credit history, the bank offers the money smart everyday loan program as an alternative to payday loans. Loans originated under this program are designed to meet small dollar or emergency needs of individuals, and the program has been actively marketed to low- and moderate-income households within the AA. The bank also offers a Certificate of Deposit Secured loan. The proceeds from this loan are used to purchase a certificate of deposit and helps individuals to establish or improve their credit history.

The following table shows the volume of lending activity under these programs during the review period.

<b>Innovative and Flexible Loans Originated during the Performance Evaluation Period</b>	<b>Number of Loans Originated/Renewed</b>	<b>Total Dollar Amount</b>
SBA – Express Loans	1	100,000
Small Business Micro Loans	29	452,500
Small Business ODP Line	170	906,700
Accion Loans	21	119,000
Money Smart Everyday Loan Program	36	55,667
Money Smart CD-Secured Loan Program	2	2,179
<b>Exam Period Totals</b>	<b>259</b>	<b>\$1,636,045</b>

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the lending test in the Indiana AA was weaker than the bank's overall good performance under the lending test in the IL-IN-WI MMSA. Contributing to the bank's weaker performance in the Indiana AA is that there is only one branch in the Indiana AA. The Indiana AA has only been part of the bank since 2013 when FNB Illinois was acquired. Lending in the Indiana AA included one CD loan for \$270,000 to an organization in the AA that provides services to at-risk LMI youth. This one loan represents 11% of the Tier One capital allocated to the Indiana AA on March 31, 2014. This performance conclusion did not have a significant impact on the bank's overall lending test rating. Refer to Tables 1 through 13 in the IL-IN-WI MMSA section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

**The bank's performance under the investment test in the IL-IN-WI MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Illinois AA was excellent.**

Refer to Table 14 in the IL-IN-WI MMSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Total bank investments and grants made by the bank during the review period in the Illinois AA totaled \$12 million, which is 13.42 percent of the Tier 1 capital allocated to the AA on March 31, 2014. Total investments made by OPT included 32 investments during the evaluation period totaling \$11.6 million and the book value of five funded investments made in prior periods totaling \$177 thousand, which continue to meet the needs of the communities, which the bank serves. In addition, OPT supported 83 different community organizations with 184 donations totaling \$244 thousand.

Some of the more significant qualifying investments and grants made during this evaluation period include \$7 million invested by the bank in bonds issued by 17 school districts in the bank's AA with student populations that are primarily LMI. A total of \$2.2 million was invested in various Small Business Investment Company (SBIC) funds. Six CD's totaling \$1.35 million were purchased from Shore Bank and its successor the Urban Partnership Bank, which is both a Community Development Financial Institution and a Minority Depository Institution with an emphasis on serving economically distressed communities and underserved people by providing access to financial services and products that are often unavailable. An investment totaling \$575 thousand was made in the Chicagoland Community Loan Fund. The mission of the Chicago Community Loan Fund is to provide flexible, affordable, and responsible financing and technical assistance for community stabilization and development efforts and initiatives that benefit LMI neighborhoods, families, and individuals throughout metropolitan Chicago. An Illinois State Housing Authority Bond for \$500 thousand was also purchased by the bank. In addition to these funded investments, the bank has ongoing binding commitments to provide an additional \$1.5 million in funding to organizations that provide housing and small business assistance within the bank's AAs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the investment test in the Indiana AA is inconsistent with and weaker than the bank's overall outstanding performance under the investment test in the IL-IN-WI MMSA. No investments were made and seven donations were made in Indiana totaling \$4.5 thousand. The weaker performance in the Indiana AA can be attributed to only having one branch in Indiana, which was acquired in 2013. This performance conclusion did not have a significant impact on the bank's overall investment test rating. Refer to the Table 14 in the IL-IN-WI-MMSA section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

**The bank's performance under the service test in the IL-IN-WI MMSA is Outstanding. Based on a full-scope review, the bank's performance in the Illinois AA is excellent.**

### **Retail Banking Services**

Refer to Table 15 in the IL-IN-WI-MMSA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

OPT's branch distribution in the Illinois AA is good.

Branch delivery systems are assessable to low- and moderate-income individuals within the AA. The bank's branch delivery system in the Illinois AA consists of 13 branches throughout Will County and southeastern Cook County. The bank acquired 10 of its current branches through the acquisitions made during the review period, with two of the ten branches in moderate-income geographies and one in a low-income geography. No branch locations were closed. Of the 13 bank locations in the Illinois AA, 7.69 percent are in low-income geographies as compared to a population percentage of 5.93 percent and 15.38 percent are in moderate-income geographies as compared to a population percentage of 25.64 percent. Some of the LMI geographies in the Cook County portion of the bank's Illinois AA overlap with Beverly Bank and Trust's AA and branch locations, a Wintrust affiliate.

The bank operates fourteen full-service ATMs; each branch has an ATM except the Steger branch, which has an ATM located within one block of the bank. OPT also operates four ATMs that dispense cash only, located in Lansing, IL. In addition to its own ATM network the bank participates in the Allpoint, Moneypass, and Sum ATM networks, allowing bank customers to use over 65,000 surcharge-free ATMs nationwide. Other alternative delivery systems used by the bank include telephone and on-line banking, electronic bill pay and mobile banking services.

Banking hours do not vary in a way that inconveniences low- or moderate-income areas or individuals, and provide reasonable accommodations to the bank's AA. OPT offers a variety of standard deposit and lending products and services at each of its branch locations, including the flexible products described in under the Lending Test portion of this performance evaluation. Mortgage products are offered through Wintrust Mortgage Company.

## **Community Development Services**

Overall OPT's level of CD services was excellent during the evaluation period, with bank personnel demonstrating leadership positions in various community development organizations. The bank's level of CD services had a positive impact on the Service Test Rating. OPT is a leader in providing CD services that are highly responsive to community needs. Bank representatives are involved in a large number of CD service activities within the AA, often in a leadership capacity. During the review period, 40 employees provided approximately 5,000 hours in CD services in the communities that OPT serves. OPT provided CD services to 25 organizations that provide community services to LMI individuals and families; four organizations that provide economic development services; one that provides affordable housing; and one that promotes the revitalization and stabilization of low- and moderate geographies within the AA. The types of services provided included serving as board members, acting as organization treasurers, and participating as committee members, advisors, and mentors for these CD organizations.

Community Development Service activities include:

- A senior officer of the bank serves as the chairman of the board, and treasurer of the Hispanic Housing Development Corporation, which helps create affordable housing in the Chicagoland area.

- A senior officer of the bank serves as a loan committee member for the Southland Community Development fund, established to provide financing for predevelopment and land acquisition costs relating to economic development in and around south suburban communities.
- A senior officer of the bank serves as a finance committee member for New Hope Center, a nonprofit agency that provides services to LMI individuals with developmental disabilities who reside in southeast Cook County and northeast Will County.
- Several bank employees have served on different committees as financial advisors to Aunt Martha's Youth Service Center, which offers a variety of programs and services designated to provide child welfare, community based healthcare and juvenile justice and prevention services for LMI families in the Chicagoland area.
- A senior officer of the bank is on the board of directors of the Neighborhood Capital Institute. This entity works with municipalities, public-private partnerships, community development corporations, and philanthropies to develop comprehensive economic revitalization plans that are community driven and economically viable.
- The bank has conducted over 30 Money Smart seminars to LMI individuals during the review period at various locations throughout the AA.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the service test in the Indiana AA is inconsistent with and weaker than the bank's overall excellent performance under the service test in the IL-IN-WI MMSA. The bank has only one branch in the Indiana AA, which the bank acquired in May 2013 as part of its purchase of FNB Illinois. One branch employee has provided 30 hours of community development services to three different organizations in the Indiana AA. Two of the organizations provide services to LMI individuals and families within the Indiana AA. The other organization is a community development initiative with the goal of creating stronger and economically successful neighborhoods in Lake County, Indiana. This performance conclusion did not have a significant impact on the bank's overall service test rating. Refer to the Table 15 in the IL-IN-WI MMSA section of Appendix D for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/2009 – 12/31/2013 Investment and Service Tests and CD Loans: 01/01/2009 – 05/31/2014	
<b>Financial Institution</b>		<b>Products Reviewed</b>
(Old Plank Trail Community Bank, N.A. (OPT) Mokena, IL)		Residential home purchase, home refinance loans, and small loans to businesses, Community Development Loans, Investments, and Services.
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Barrington Bank and Trust, N.A. (BBT)	Both entities are owned by WTFC. Wintrust Mortgage is a subsidiary of BBT and originates residential mortgage loans for all banks in the WTFC holding company.	Residential home purchase and home refinance loans
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Chicago-Naperville-Joliet IL-IN-WI MMSA ( Illinois AA)	Full-Scope	Southeastern Cook County and Will County, IL
Indiana AA	Limited Scope	Northeastern Lake County, Indiana

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

RATINGS		BANK NAME		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Old Plank Trail Community Bank, N.A.	High Satisfactory	Outstanding	Outstanding	Outstanding
Multistate Metropolitan Area or State:				
IL-IN-WI MMSA	High Satisfactory	Outstanding	Outstanding	Outstanding
State of Indiana	Needs to Improve	Needs to Improve	Needs to Improve	Needs to Improve

(\*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

## Appendix C: Market Profiles for Full-Scope Areas

### IL-IN-WI MULTISTATE MSA Illinois AA

Demographic Information for Full-Scope Area: Illinois AA 2000 Census Data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	29	0.00	24.14	37.93	37.93	0.00
Population by Geography	199,465	0.00	14.91	35.41	49.68	0.00
Owner-Occupied Housing by Geography	55,558	0.00	9.31	36.14	54.54	0.00
Businesses by Geography	13,917	0.00	8.29	31.31	60.40	0.00
Farms by Geography	567	0.00	7.58	40.56	51.85	0.00
Family Distribution by Income Level	52605	12.97	15.14	25.20	46.69	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	14,786	0.00	27.55	38.76	33.69	0.00
Median Family Income = \$60,166 HUD Adjusted Median Family Income = \$76,200 for 2011 Households Below the Poverty Level = 4.87						Median Housing Value \$162,267 Unemployment Rate =3.03 %

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

Demographic Information for Full-Scope Area: Illinois AA 2010 Census Data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	391	8.70	28.64	36.06	26.34	0.00
Population by Geography	1,706,129	5.93	25.64	37.41	31.02	0.00
Owner-Occupied Housing by Geography	464,651	2.96	21.80	40.86	34.38	0.00
Businesses by Geography	104,380	4.06	21.14	38.90	35.89	.01
Farms by Geography	2,026	3.41	17.32	36.67	42.45	.15
Family Distribution by Income Level	427,277	21.23	17.48	21.42	39.88	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	165,369	10.62	37.81	36.10	15.47	0.00
Median Family Income = \$72,747 HUD Adjusted Median Family Income = \$73,400 for 2013 Households Below the Poverty Level = 10.15						Median Housing Value \$211,929 Unemployment Rate =6.95 %

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 U.S. Census, and 2013 HUD updated MFI.

OPT is headquartered in Mokena, Illinois. Mokena is within Chicago-Naperville-Joliet Metropolitan Division 16974. The bank's defined AA within the Illinois AA includes parts of Will and southeastern Cook Counties, which are contiguous. As of June 30, 2013, the bank had \$945 million in deposits in the Illinois AA. There were 158 financial institutions taking deposits in the Illinois AA. OPT's major competitors in 2013 were JP Morgan Chase Bank, BMO Harris, Bank of America, and The Northern Trust Company. OPT operates 14 locations, 14 deposit-taking ATMs, and four cash dispensing only ATMs in the AA. OPT is a community bank that offers a full range of consumer, home equity, small business loan, and deposit products. Purchase money mortgages and refinances are referred to Wintrust Mortgage Company, a subsidiary of affiliate bank, Barrington Bank and Trust.

During the 2009 through 2011 portion of the evaluation period the bank's AA consisted of 29 geographies; 24 in Will County and 5 in Cook County. The population of the AA at that time, based on the 2000 census was 199,465. The current Illinois AA consists of 391 geographies, with a population of 1,706,129. Of the 391 geographies that make up the current Illinois AA, 143 are located in Will County, and 248 are located in southeastern Cook County. The current AA is legal, and consists of a reasonable market area that can be serviced by OPT.

The updated Housing and Urban Development (HUD) 2013 median family income for the AA was \$73,400. A breakdown of family income levels within the AA showed that 21.23 percent were low-income, 17.48 percent are moderate income, 21.42 percent are middle-income, and 39.88 percent are upper-income. 8.70 percent of the families and 10.15 percent of the households in the bank's AA have incomes below the poverty level.

Of the 644,154 housing units in the AA, 545,275 (84.65 percent) are 1-4 family housing units. Seventy-two percent of the housing units are owner occupied, 13.75 are multi-family units, and 1.58 percent are mobile homes. The median housing value within Cook County per Zillow.com in December 2013 was \$179 thousand while the median housing value in Will County was \$176 thousand.

According to the US Bureau of Labor Statistics, the unemployment rate in 2013 for Cook County was 9.6 percent and in Will County, the unemployment rate in 2013 was 9.4 as compared to a state unemployment rate of 8.9 percent and a national unemployment rate of 6.7 percent. Per the Will County Center for Economic Development, the top five employers in Will County include St. Joseph Medical Center, Will County Government, Silver Cross Hospital, and Walmart. Per Crain's Chicago Business, top employers in Chicago include federal, state and local government offices, Chicago Public Schools, Jewel-Osco, SBC Ameritech, and Advocate Health Care.

As part of this performance evaluation, we utilized three community contacts with organizations in the bank's AA in order to gain a better understanding of community credit needs and opportunities. One of the organizations provides community services to individuals in Will County, one is a regional fair housing enforcement and counseling agency serving the south metropolitan Chicago area, and the other provides financing and technical assistance for community stabilization and development efforts. Current economic conditions were described as continuing to recover from the recent recession, with continuing high unemployment and foreclosure rates, with recovery being slower than that experienced at the state and national levels. Commercial retail corridors are receiving little investments and small business credit remains tight. Affordable housing continues to be a need, especially 1-4 unit buildings in low- and moderate-income communities.

## 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 areas 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. 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. [Note: Do not renumber the tables.]

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of

multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: OPT 2013 AA												
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013												
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Old Plank Trail IL	97.47	1,418	250,509	330	24,719	3	300	23	33,140	1,774	308,668	97.25
BROADER STATEWIDE OR REGIONAL AREA								1	6,275	1	6,275	
<b>Limited Review:</b>												
Old Plank Trail IN	2.53	39	6,865	6	1,205	0	0	1	270	46	8,340	2.75

\* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2011 to May 31, 2014.

\*\*\* Deposit Data as of June 30, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: OPT 2013 AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013								
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>														
Old Plank Trail IL	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100.00
<b>Limited Review:</b>														
Old Plank Trail IN	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00

\* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

\*\*\* Deposit Data as of June 30, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE															Geography: OPT 2013 AA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>1</sup>							
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Over all	Low	Mod	Mid	Upp			
<b>Full Review:</b>																		
Old Plank Trail IL	834	97.09	2.96	0.36	21.80	9.71	40.86	45.20	34.38	44.72	2.06	.50	1.50	****	****			
<b>Limited Review:</b>																		
Old Plank Trail IN	25	2.91	1.66	0.00	22.84	0.00	26.20	36.00	49.30	64.00	0.00	0.00	0.00	****	****			

\* Based on 2012 Peer Mortgage Data (USPR) Market share based on Bank and Affiliate lending data.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\*\*\*\* Market share for middle- and upper-income data not determined as this data was not analyzed.

**Institution ID:** OLD PLANK TRAIL COMMUNITY BANK

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: OPT 2013 AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Old Plank Trail IL	6	100.00	2.96	0.00	21.80	33.33	40.86	16.67	34.38	50.00	*****	*****	*****	*****	*****
<b>Limited Review:</b>															
Old Plank Trail IN	0	0.00	1.66	0.00	22.84	0.00	26.20	0.00	49.30	0.00	0.00	*****	*****	*****	*****

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\*\*\*\*\* Market share not determined as this product was not analyzed

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OPT 2013 AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Old Plank Trail IL	570	97.60	2.96	0.00	21.80	4.56	40.86	21.93	34.38	73.51	0.69	0.00	0.22	*****	*****	
<b>Limited Review:</b>																
Old Plank Trail IN	14	2.40	1.66	0.00	22.84	7.14	26.20	14.29	49.30	78.57	0.00	0.00	0.00	0.00	0.00	

\* Based on 2012 Peer Mortgage Data (USPR) Market Share based on Bank and Affiliate lending data.

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\*\*\*\*\* Market share not determined for middle- and upper-income geographies as they were not analyzed.

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: OPT 2013 AA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>					
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Old Plank Trail IL	8	100.00	9.07	0.00	33.07	12.50	45.48	87.50	12.38	0.00	*****	*****	*****	*****	*****	
<b>Limited Review:</b>																
Old Plank Trail IN	0	0.00	18.06	0.00	27.89	0.00	24.39	0.00	29.65	0.00	*****	*****	*****	*****	*****	

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

\*\*\*\*\* Market share not determined as this product was not analyzed

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: OPT 2013 AA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Old Plank Trail IL	330	98.21	4.06	2.73	21.14	21.82	38.90	27.58	35.89	47.88	0.14	0.02	0.04	0.05	0.26									
<b>Limited Review:</b>																								
Old Plank Trail IN	6	1.79	5.45	0.00	18.06	50.00	24.38	33.33	52.11	16.67	0.01	0.00	0.00	0.00	0.04									

\* Based on 2012 Peer Small Business Data -- US and PR Market share based on Bank lending data only

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

\*\*\* Source Data - Dun and Bradstreet (2013).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: OPT 2013 AA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Old Plank Trail IL	3	100.00	3.41	0.00	17.32	0.00	36.67	0.00	42.45	100.00	****	****	****	****	****	
<b>Limited Review:</b>																
Old Plank Trail IN	0	0.00	2.37	0.00	17.06	0.00	27.01	0.00	53.55	0.00	0.00	****	****	****	****	

\* Based on 2012 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2013).

\*\*\*\* Market share not determined as this product was not analyzed

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: OPT 2013 AA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>1</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Old Plank Trail IL	834	97.09	21.23	13.20	17.48	31.84	21.42	27.36	39.88	27.60	2.06	3.06	2.52	*****	*****	
<b>Limited Review:</b>																
Old Plank Trail IN	25	2.91	21.11	0.00	17.12	44.00	21.12	28.00	40.65	28.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

<sup>1</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\*\*\*\*\* Market share not determined for Middle- and Upper-income borrowers as this data was not analyzed

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: OPT 2013 AA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share <sup>5</sup>				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>2</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
Old Plank Trail IL	6	100.00	21.23	0.00	17.48	0.00	21.42	0.00	39.88	100.00	*****	*****	*****	*****	*****	
<b>Limited Review:</b>																
Old Plank Trail IN	0	0.00	21.11	0.00	17.12	0.00	21.12	0.00	40.65	0.00	*****	*****	*****	*****	*****	

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 16.7% of loans originated and purchased by bank.

<sup>2</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\*\*\*\*\* Market share was not determined as this product was not analyzed

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: OPT 2013 AA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>3</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Old Plank Trail IL	570	97.60	21.23	2.34	17.48	14.57	21.42	29.32	39.88	53.78	0.69	0.28	0.63	*****	*****	
<b>Limited Review:</b>																
Old Plank Trail IN	14	2.40	21.11	0.00	17.12	14.29	21.12	7.14	40.65	78.57	0.00	0.00	0.00	*****	*****	

\* Based on 2012 Peer Mortgage Data (USPR) Market share based on Bank and Affiliate lending data

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by bank.

<sup>3</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\*\*\*\*\* Market share for middle- and upper-income borrowers was not determined as this data was not analyzed

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OPT 2013 AA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Old Plank Trail IL	330	98.21	73.92	80.61	81.82	8.48	9.70	0.14	0.19
<b>Limited Review:</b>									
Old Plank Trail IN	6	1.79	71.87	50.00	66.67	0.00	33.33	0.01	0.05

\* Based on 2012 Peer Small Business Data -- US and PR Market share based on bank lending data only

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OPT 2013 AA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>1</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Old Plank Trail IL	3	100.00	94.77	100.00	66.67	33.33	0.00	*****	*****
<b>Limited Review:</b>									
Old Plank Trail IN	0	0.00	96.21	0.00	0.00	0.00	0.00	*****	*****

\* Based on 2012 Peer Small Business Data -- US and PR Based on Bank lending data only.

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

\*\*\*\*\* Market share not determined as this product was not analyzed.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
			Geography: OPT 2013 AA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Old Plank Trail IL	4	96	200	6,916	204	7,012	58.38		
BROADER STATEWIDE OR REGIONAL AREA	1	81	15	4,912	16	4,993	41.57	3	1,503
<b>Limited Review:</b>									
Old Plank Trail IN	0	0	7	5	7	5	0.05	0	0

\* 'Prior Period Investments' means investments made in a previous 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.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
										Geography: OPT 2013 AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Old Plank Trail IL	97.25	13	92.86	7.69	15.38	30.77	46.15	0	0	0	0	0	0	5.93	25.64	37.41	31.02
<b>Limited Review:</b>																	
Old Plank Trail IN	2.75	1	7.14	0.00	0.00	0.00	100.00	0	0	0	0	0	0	5.57	29.00	24.26	41.17

**Distribution of Branch and ATM Delivery System**

Distribution of Branch and ATM Delivery System				Geography: OPT 2013 AA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Old Plank Trail IL	97.25	13	92.86	8	15	31	46	17	92.85	1	2	4	6	5.93	25.64	37.41	31.02
<b>Limited Review:</b>																	
Old Plank Trail IN	2.75	1	7.14	0	0	0	1	1	5.00	0	0	0	1	5.57	29.00	24.26	41.17