

PUBLIC DISCLOSURE

October 7, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Hickory Point Bank and Trust, FSB
Charter Number 714792

225 North Water Street
Decatur, IL 62523

Office of the Comptroller of the Currency

Harris Center - 3001 Research Road, Suite E-2, Champaign, IL 61822-1089

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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

The Lending Test is rated **Satisfactory**.

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

The major factors providing support for this rating include:

- Hickory Point Bank has a reasonable loan-to-deposit ratio.
- Hickory Point Bank originated a substantial majority of loans inside the assessment area (AA).
- Hickory Point Bank has reasonable distribution of loans to borrowers of different incomes and businesses of different sizes in the assessment area.
- Hickory Point Bank has reasonable geographic distribution of home and small business loans among various income tracts in the assessment area.
- Hickory Point Bank had adequate responsiveness to community needs, primarily through community development loans and ensuring that financial services are available to low- and moderate-income geographies and individuals.

Scope of Examination

We evaluated Hickory Point Bank (HPB, institution, or bank) using Intermediate Small Bank examination procedures, which evaluate the bank's record of meeting the credit needs of its assessment areas (AAs) through lending activities and community development activities. The evaluation period for this review is from December 7, 2010 to October 7, 2013. We reviewed the institution's Home Mortgage Disclosure Act (HMDA) data and business loans originated during the review period.

Based on both the number and dollar volume of loan origination data supplied by the bank, HPB's primary lending products are home mortgages and business loans. As the bank's business strategy and lending products have not significantly changed since the prior examination, the lending test used data from January 1, 2011 to June 30, 2013. The community development test used information for the entire evaluation period.

For analysis purposes, we compared 2011 loans to 2000 U.S. Census data, 2011 HMDA peer aggregate data, and 2011 small business peer aggregate data. We compared 2012 and 2013 loans to 2010 U.S. Census data, 2012 HMDA peer aggregate data, and 2012 small business peer aggregate.

HPB has three AAs: Decatur Metropolitan Statistical Area (MSA), Champaign MSA, and Springfield MSA. We gave more weight to the Decatur MSA AA in our analysis than to the Champaign MSA AA and Springfield MSA AA. A substantial majority of the branches, deposits, and loans are within the Decatur MSA AA.

Description of Institution

Hickory Point Bank is a federally chartered stock savings bank headquartered in Decatur, Illinois. The bank was founded in 1979 in Forsyth, Illinois. Hickory Point is a wholly-owned subsidiary of HPB Holdings, Inc., a one-bank holding company. First Illinois Corporation has been the sole parent company of HPB Holdings, Inc. since December 21, 2012. At the last CRA examination dated December 6, 2010, the institution was a wholly-owned subsidiary of Archer Daniels Midland Company (ADM). HPB Holdings, Inc. was formed to transition ownership from ADM to First Illinois Corporation during 2011 and 2012.

HPB is a full-service banking institution and operates seven branches in Decatur, Champaign, and Springfield, Illinois. Six branches are available for public use. The ADM corporate branch has limited access to the public due to its location in a secure environment. Each branch available to the public has convenient banking hours and drive-up facilities.

HPB offers conventional mortgage products, commercial business, commercial real estate, farmland loans, and consumer loans. The institution offers a full line of deposit products including checking and savings, money market accounts, certificate of deposits (CDs), and individual retirement accounts (IRAs). In addition, the bank offers cash management, wealth management, and agricultural services.

The institution has 11 automated teller machines (ATMs) in its assessment area. Eight of the ATMs are available for public use. ATM access increases through the bank's participation in the MoneyPass network. MoneyPass network allows customers to use any of MoneyPass network's thousands of ATMs nationwide free of charge.

As of June 30, 2013, HPB's total assets were \$614 million. The gross loan portfolio totaled \$293 million, or 48 percent of total assets. For funding sources, Hickory Point mainly relies on deposits. Borrowings are limited to reverse repurchase agreements of \$15 million, or 2.4 percent of assets. Tier 1 capital totals \$51 million. The following represents the loan portfolio mix:

Loan Portfolio Summary by Loan Product	
Loan Category	% of Outstanding Dollars
Commercial and Commercial Real Estate	57.82%
Residential Real Estate	16.65%
Consumer	13.97%
Other	7.44%
Agriculture and Farm Real Estate	4.12%

Source: June 30, 2013 Call Report.

There are no known impediments limiting HPB's ability to help meet the credit needs of its local community, including those of low- and moderate-income families. The bank's business strategy during the evaluation period has been growth of commercial, mortgage, and consumer loans portfolios. At its previous CRA examination dated December 6, 2010, HPB received a rating of "Satisfactory".

Description of Assessment Area(s)

HPB currently has three AAs in Illinois: Decatur MSA, Champaign MSA, and Springfield MSA. The AAs meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income areas.

Decatur MSA AA

This AA includes all of Macon County, MSA #19500. HPB has five branches in the Decatur MSA AA. One branch available for public use is located in a low- income geography. As of June 30, 2013, 88 percent of HPB's total deposits were in the Decatur MSA AA.

Based on the 2000 Census, there were 36 census tracts in the Decatur MSA AA. Five were low-income, 10 were moderate-income, 15 were middle-income, and six were upper-income census tracts. Based on the 2010 Census, tract demographics changed, and the total number of census tracts declined to 34. The new demographics consist of four low-income, 10 moderate-income, 10 middle-income, and 10 upper-income census tracts.

According to the 2000 Census, the Decatur MSA AA has a population of 114,706. The table below provides additional demographic information for the AA.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	36	13.89	27.78	41.67	16.66	0.00
Population by Geography	114,706	6.43	27.76	44.95	20.86	0.00
Owner-Occupied Housing by Geography	33,379	3.18	21.90	50.66	24.26	0.00
Business by Geography	8,760	11.10	25.86	41.36	21.68	0.00
Farms by Geography	550	0.55	7.82	66.18	25.45	0.00
Family Distribution by Income Level	31,083	20.06	18.49	22.27	39.18	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	11,981	10.83	35.97	39.37	13.83	0.00
Median Family Income		47,475	Median Housing Value		62,761	
HUD Adjusted Median Family Income for 2011		59,400	Unemployment Rate (2000 US Census)		3.53%	
Households Below Poverty Level		12%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI.

According to the 2010 Census, the Decatur MSA AA has a population of 110,768. The table below provides additional demographic information for the AA.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	34	11.76	29.41	29.41	29.42	0.00
Population by Geography	110,768	9.23	23.98	33.53	33.26	0.00
Owner-Occupied Housing by Geography	31,959	5.23	18.54	37.61	38.62	0.00
Business by Geography	6,890	13.96	22.57	31.96	31.51	0.00
Farms by Geography	546	0.73	6.41	50.18	42.68	0.00
Family Distribution by Income Level	28,514	18.00	19.93	24.01	38.06	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	10,814	7.34	20.94	35.32	36.40	0.00
Median Family Income		57,570	Median Housing Value		87,694	
HUD Adjusted Median Family Income for 2012		60,300	Unemployment Rate (2010 US Census)		4.01%	
Households Below Poverty Level		13%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2012 HUD updated MFI.

Champaign MSA AA

This AA includes Champaign, Ford, and Piatt Counties, MSA #16580. HPB has one branch in the Champaign MSA AA located in an upper-income census tract. As of June 30, 2013, 6 percent of HPB's total deposits were in the Champaign MSA AA.

Based on the 2000 Census, there were 50 census tracts in the Champaign AA. Three were low-income, 12 were moderate-income, 25 were middle-income, nine were upper-income, and one was unclassified. Based on the 2010 Census, tract demographics changed, and the total number of census tracts increased to 52. The new demographics consist of six low-income, 10 moderate-income, 25 middle-income, nine upper-income and two unclassified census tracts.

According to the 2000 Census, the Champaign MSA AA has a population of 210, 275. The table below provides additional demographic information for the AA.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	50	6.00	24.00	50.00	18.00	2.00
Population by Geography	210,275	5.29	24.52	52.43	17.68	0.08
Owner-Occupied Housing by Geography	48,819	0.73	14.97	61.63	22.67	0.00
Business by Geography	17,734	3.50	21.65	53.50	19.83	1.52
Farms by Geography	1,620	0.56	4.38	87.35	7.59	0.12
Family Distribution by Income Level	48,417	17.76	19.22	25.12	37.90	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	17,903	5.02	27.38	57.10	10.50	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		51,878 67,100 15%	Median Housing Value Unemployment Rate (2000 US Census)	87,849 2.82%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI.

According to the 2010 Census, the Champaign MSA AA has a population of 231,891. The table below provides additional demographic information for the AA.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	52	11.54	19.23	48.08	17.30	3.85
Population by Geography	231,891	10.15	15.67	53.13	17.27	3.78
Owner-Occupied Housing by Geography	53,342	1.96	12.64	65.35	20.05	0.00
Business by Geography	14,764	9.00	17.64	53.08	19.44	0.84
Farms by Geography	1,587	1.20	13.23	79.33	6.24	0.00
Family Distribution by Income Level	51,609	18.38	18.03	25.40	38.19	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	18,795	4.34	13.90	63.45	18.31	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		65,521 68,000 18%	Median Housing Value Unemployment Rate (2010 US Census)	130,247 3.37%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2012 HUD updated MFI.

Springfield MSA AA

This AA includes Menard and Sangamon Counties, MSA #44100. HPB has one branch in the Springfield MSA AA located in an upper-income census tract. As of June 30, 2013, 6 percent of HPB's total deposits were in the Springfield MSA AA.

Based on the 2000 Census, there were 55 census tracts in the Springfield MSA AA. Five were low-income, 14 were moderate-income, 21 were middle-income, and 15 were

upper-income. Based on the 2010 Census, tract demographics changed, and the total number of census tracts increased to 56. The new demographics consist of nine low-income, 11 moderate-income, 22 middle-income, 13 upper-income, and one unclassified census tract.

According to the 2000 Census, the Springfield MSA AA has a population of 201,437. The table below provides additional demographic information for the AA.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	55	9.09	25.45	38.18	27.28	0.00
Population by Geography	201,437	5.05	22.27	42.31	30.37	0.00
Owner-Occupied Housing by Geography	58,944	2.43	19.13	44.75	33.69	0.00
Business by Geography	20,818	6.86	21.33	35.93	35.88	0.00
Farms by Geography	1,063	1.13	7.53	59.55	31.79	0.00
Family Distribution by Income Level	53,660	18.52	18.90	24.00	38.58	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	20,081	8.67	32.87	41.24	17.22	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		53,573 69,100 8%	Median Housing Value Unemployment Rate (2000 US Census)	95,047 2.18%		

Source: 2000 US Census and 2011 HUD updated MFI.

According to the 2010 Census, the Springfield MSA AA has a population of 210,170. The table below provides additional demographic information for the AA.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	56	16.07	19.64	39.29	23.21	1.79
Population by Geography	210,170	10.70	17.51	41.32	29.98	0.49
Owner-Occupied Housing by Geography	61,992	6.00	16.29	44.47	33.24	0.00
Business by Geography	16,865	10.60	20.02	35.87	29.94	3.57
Farms by Geography	1,069	2.62	6.74	59.49	31.15	0.00
Family Distribution by Income Level	54,826	17.71	18.02	26.15	38.12	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	19,584	9.70	17.98	41.04	31.28	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		66,823 70,000 12%	Median Housing Value Unemployment Rate (2010 US Census)	116,017 3.69%		

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

Source: 2010 US Census and 2012 HUD updated MFI.

General Assessment Area Information

HPB faces competition from numerous community banks within the three AAs, as well as larger regional and national financial institutions. Excluding HPB, there are 62 financial institutions with 231 branches located in the three AAs. HPB ranks fourth with deposit market share of 4.52 percent based on the June 30, 2013 Federal Deposit Insurance Corporation (FDIC) market share report for all the bank's AAs. The market share in the Decatur MSA AA is 26 percent, while market share in the Champaign MSA AA and the Springfield MSA AA is less than one percent each.

Manufacturing and agricultural processing are the leading industries in the Decatur MSA AA. Some of the largest employers are Caterpillar, Archer Daniels Midland (ADM), and Decatur Memorial Hospital. Education and healthcare sectors largely drive the Champaign MSA AA. Some of the largest employers are the University of Illinois, Carle Foundation Hospital, and Kraft Foods. State and local government along with healthcare drives the Springfield MSA AA. Outside of government employment, some of the largest employers are Memorial Health System, St. John's Hospital, and Springfield Clinic, LLP.

As of June 30, 2013, the average unemployment rate for all three AAs was 9.6 percent. The state unemployment rate was 9.1 percent and the national unemployment rate was 7.6 percent for the same time period. The unemployment rate for each AA was 12.5 (Decatur MSA AA), 8.7 (Champaign MSA AA), and 7.5 (Springfield MSA AA) percent. Dependence on the manufacturing industry in the Decatur MSA AA contributes to the higher unemployment rate. The closure/downsizing of several factories/major employers has adversely affected the Decatur MSA AA over the last several years.

During the examination, we conducted community contacts with two economic development organizations and one community-based organization. One economic development organization serves the Decatur MSA AA. The other economic development organization serves the Springfield MSA AA. The community-based organization serves all three AAs. Based upon the community contacts and other recent CRA public evaluations, we determined that all three AAs have similar credit and community development needs.

Credit needs include affordable housing, small business loans for fixed assets and working capital, and smaller dollar consumer loans. Additionally, the Decatur MSA AA credit needs include first-time homebuyer assistance programs and home repair loans for code compliance. Community development needs in all three AAs include financial literacy. The Decatur MSA AA has additional community needs that include homeownership counseling and employment training. There are several different community development organizations in all three AAs for banks to work with.

Conclusions with Respect to Lending Performance Criteria

HPB's performance of meeting community credit needs in the AAs is satisfactory. HPB has a reasonable loan-to-deposit ratio and a substantial majority of loans originated in the AAs. HPB has reasonable distribution of loans to borrowers of different incomes and businesses of different sizes in the AAs. HPB has reasonable geographic distribution of loans among various income tracts in the AAs.

Loan-to-Deposit Ratio

HPB's loan-to-deposit ratio is reasonable based on its size, financial condition, AAs' credit needs, and local competition. The loan-to-deposit ratio has averaged 52.70 percent over the past 12 quarters, or since last CRA examination through June 30, 2013. Over the last 12 quarters, the institution's highest ratio was 57.54 percent, while the lowest was 46.9 percent. The bank's loan-to-deposit ratio is significantly lower than its peer group. The peer group average loan-to-deposit ratio was 74.44 percent. However, the weaker performance during the evaluation period is largely driven by a large cash management relationship with HPB's former owner, ADM. This wholesale relationship skews the loan-to-deposit performance lower. The highest peer group average was 89.44 percent, while the lowest was 54.69 percent. The peer group consists of 11 institutions with assets between \$220 million and \$930 million located in Macon, Piatt, Champaign, Menard and Sangamon counties.

HPB's performance context indicates external and internal factors affected the loan-to-deposit ratio during the evaluation period. Management's effort to improve the loan-to-deposit ratio by growing the commercial loan portfolio has been challenged by declines in 1-4 family and auto loan portfolios because of competition. Data show commercial loans have increased \$39 million, or 28 percent, during the evaluation period, while 1-4 family loans have declined \$12 million, or 20 percent, and auto loans have declined \$30 million, or 48 percent. During the evaluation period, HPB sold \$67 million in home loans into the secondary market. The data supports the reasonableness of the HPB's loan-to-deposit ratio.

Lending in Assessment Area

HPB originated a substantial majority of its primary loan products in the bank's AAs. The following table shows the number and dollar amount of HMDA reportable loans and our random sample of business loans HPB originated during the review period, and their location with regard to HPB's assessment areas:

Lending in the AA										
Type of Loans	Number of Loans					Dollar of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Business	16	80%	4	20%	20	\$11,024	80.69%	\$2,638	19.31%	\$13,662
Home Purchase	190	88.79%	24	11.21%	214	\$37,656	90.14%	\$4,117	9.86%	\$41,773
Home Refinances	383	93.41%	27	6.59%	410	\$80,431	90.42%	\$8,522	9.58%	\$88,953
Home Improvement	70	89.74%	8	10.26%	78	\$4,723	92.61%	\$377	7.39%	\$5,100
Total	659	91.27%	63	8.73%	722	\$133,834	89.53%	\$15,654	10.47%	\$149,488

Source: HMDA loan application registers (LARs) and 20 business loans originated from 1/1/2011 to 6/30/2013.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

HPB's lending to borrowers of different incomes and to businesses of different sizes is reasonable. As 62 percent of the primary products originated within the lending evaluation period were within the Decatur MSA AA, we placed more weight on their conclusions. The borrower distribution for both the Decatur MSA AA and Champaign MSA AA were reasonable. The borrower distribution for the Springfield MSA AA was weak.

Decatur MSA AA

The distribution of loans reflects reasonable distribution among borrowers of different incomes and businesses of different sizes in the Decatur MSA AA.

Home Loans

The distribution of home loans reflects reasonable distribution among borrowers of different income levels. As refinance loans represented 55 percent and 64 percent of the reported home loans for the Decatur MSA AA, for the 2011 and 2012/2013 analyses respectively, home refinance loans were weighed heavier than the other home loan products. Additionally, due to volume, we weighed the 2012/2013 analysis heavier than the 2011 analysis. The distribution for the 2012/2013 analysis showed reasonable distribution to borrowers of different income levels. The bank's performance of originating home refinance loans to moderate-income borrowers was stronger than the aggregate data, while the performance of originating home refinance loans to low-income borrowers was lower than aggregate information. The distribution for the 2011 is weak.

Borrower Distribution for Home Loans within Decatur MSA AA (2011)								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	13.98%	12.50%	24.89%	12.50%	24.27%	31.25%	36.86%	43.75%
Home Refinance	7.15%	3.66%	16.60%	13.41%	21.17%	20.73%	55.08%	62.20%
Home Improvement	12.60%	5.88%	23.23%	23.53%	28.74%	35.29%	35.43%	35.30%

Source: 2011 HMDA LAR and 2011 HMDA Peer Aggregate Data.

Borrower Distribution for Home Loans within Decatur MSA AA (2012 & 2013)								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	14.76%	2.99%	24.20%	8.96%	24.20%	28.36%	36.84%	59.69%
Home Refinance	6.51%	5.10%	13.30%	14.29%	22.95%	18.88%	57.24%	61.73%
Home Improvement	13.77%	12.20%	25.62%	12.20%	27.00%	17.07%	33.61%	58.53%

Source: 2012 and first two quarter of 2013 HMDA LARs and 2012 HMDA Peer Aggregate Data.

Business Loans

The borrower distribution of loans among businesses of different sizes is reasonable. This was determined by reviewing the bank's origination of loans to small businesses. A small business is defined as a business with annual gross revenues of \$1 million or less. In our analysis, we weighed the 2012/2013 sample heavier than the 2011 sample. Seventy-five percent of the business loans originated since January 1, 2011 were originated during the 2012/2013 sample timeframe. When compared with aggregate data, the distribution of loans to small businesses is reasonable. Both the bank's performance and aggregate data are significantly below demographic data. This is due to the local economy, which has experienced significant layoffs and high unemployment.

Borrower Distribution for Business Loans within the Decatur MSA AA (2011)				
Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of Bank Loans in AA by #	30.00%	70.00%	0	100%
% Aggregate Lenders	42.58%	57.42%	0	100%
% of AA businesses	64.12%	3.29%	32.59%	100%

Source: Sample of 20 business loans originated in 2011, 2011 Aggregate data, and 2011 Business Geodemographic Data.

Borrower Distribution for Business Loans within the Decatur MSA AA (2012 & 2013)				
Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of Bank Loans in AA by #	25.00%	75.00%	0	100%
% Aggregate Lenders	30.15%	69.85%	0	100%
% of AA businesses	68.36%	4.36%	27.28%	100%

Source: Sample of 20 business loans originated from 1/1/2012 to 6/30/2013, 2012 Aggregate Data, and 2012 Business Geodemographic Data.

Champaign MSA AA

The distribution of loans is reasonable among borrowers of different income levels and businesses of different sizes in the Champaign MSA AA. The volumes of home loans and businesses loans originated within this AA during the lending evaluation period were nearly identical. Therefore, the excellent distribution of business loans pulled the overall conclusion to reasonable. This is despite the weak performance in home loans.

Home Loans

The borrower distribution for home loans is weak among borrowers of different income levels in the Champaign MSA AA. As only 20 of the 134 loans reported during the lending evaluation period were in 2011, we placed more weight on the 2012/2013 analysis. We did place slightly more weight on the performance in home refinance loans. Home refinance loans represented 55 percent of the loans originated in 2012/2013, while the home purchase loans represented 44 percent. There was only one home improvement loan originated within this timeframe.

For the 2012/2013 analysis, the distribution of both home refinance and home improvement loans to moderate-income borrowers was reasonable. The performance for both products to low-income borrowers is weak or inadequate. The bank's performance of originating loans to low-income borrowers is significantly below the performance of other lenders. As 18 percent of the families within this AA are low-income, the performance originating loans to low-income borrowers impacted our conclusion.

Borrower Distribution for Home Loans in the Champaign MSA AA (2011)								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	11.70%	0	24.47%	20%	27.89%	0	35.94%	80%
Home Refinance	6.54%	0	17.87%	11.11%	25.31%	11.11%	50.28%	77.78%
Home Improvement	10.75%	25%	22.22%	0	26.16%	0	40.87%	75%

Source: 2011 HMDA LAR and 2011 HMDA Peer Aggregate Data.

Borrower Distribution for Home Loans in the Champaign MSA AA (2012 & 2013)								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	11.35%	4%	26.63%	22%	25.43%	24%	36.59%	50%
Home Refinance	6.00%	3.28%	17.54%	14.75%	24.64%	11.48%	51.82%	70.49%
Home Improvement	17.42%	0	25.54%	0	23.15%	0	33.89%	100%

Source: 2012 and first two quarter of 2013 HMDA LARs and 2012 HMDA Peer Aggregate Data.

Business Loans

The borrower distribution of loans to businesses of different sizes in the Champaign MSA AA is excellent. The 2012 and 2013 distribution is excellent compared to the small business aggregate percentage. The 2011 distribution is reasonable. As 75 percent of the bank's business loans originated within the Champaign AA were from the last 18 months of the lending evaluation period, the 2012/2013 sample weighed heavily in the conclusion.

Borrower Distribution for Business Loans within the Champaign MSA AA (2011)				
Business Revenues (or Sales)	< = \$1,000,000	> \$1,000,000	Unavailable	Total
% of Bank Loans in AA by #	45%	50%	5%	100%
% Aggregate Lenders	47.14%	52.86%	0	100%
% of AA businesses	64.62%	2.81%	32.58%	100%

Source: Sample of 20 business loans originated in 2011, 2011 Aggregate data, and 2011 Business Geodemographic Data.

Borrower Distribution for Business Loans within the Champaign MSA AA (2012 & 2013)				
Business Revenues (or Sales)	< = \$1,000,000	> \$1,000,000	Unavailable	Total
% of Bank Loans in AA by #	50%	50%	0	100%
% Aggregate Lenders	33.17%	66.83%	0	100%
% of AA businesses	68.73%	3.73%	27.54%	100%

Source: Sample of 20 business loans originated from 1/1/2012 to 6/30/2013, 2012 Aggregate Data, and 2012 Business Geodemographic Data.

Springfield MSA AA

The distribution of loans among borrowers of different incomes and businesses of different sizes is weak in the Springfield MSA AA.

Home Loans

The borrower distribution for home loans reflects weak distribution among borrowers of different incomes in the Springfield MSA AA. We placed more weight on home refinance loans, as they represented 59 percent of the home loans originated within this AA during the lending evaluation period. The bank's distribution for home refinancing to both low-income and moderate-income borrowers was weak in both analyses.

We placed greater emphasis on the 2012/2013 analysis, as 78 percent of the home loans were originated during this lending evaluation period. Home purchase loans represent 33 percent of the loans within this analysis. The bank's performance in home purchase loans was excellent for low-income borrowers, but inadequate for moderate-income borrowers.

Borrower Distribution for Home Loans within the Springfield MSA AA (2011)								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	15.33%	0	25.58%	0	24.06%	100%	35.03%	0
Home Refinance	6.98%	0	16.66%	0	24.51%	20%	51.85%	80%
Home Improvement	8.93%	0	18.35%	0	26.12%	0	46.60%	0

Source: 2011 HMDA LAR and 2011 HMDA Peer Aggregate Data.

Borrower Distribution for Home Loans within the Springfield MSA AA (2012 & 2013)								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	13.49%	16.67%	25.08%	0	25.84%	33.33%	35.59%	50%
Home Refinance	6.83%	0	17.08%	10%	24.52%	20%	51.57%	70%
Home Improvement	10.59%	33.33%	17.69%	0	24.26%	0	47.46%	66.67%

Source: 2012 and first two quarter of 2013 HMDA LARs and 2012 HMDA Peer Aggregate Data.

Business Loans

The distribution of loans is weak among businesses of different sizes in the Springfield MSA AA. Eighty-six percent of the business loans were originated within the last 18 months of the lending evaluation period. We weighed the 2012/2013 analysis heavily when arriving at the conclusion. The bank's performance within this analysis was weak compared to the aggregate data.

Borrower Distribution for Business Loans within the Springfield MSA AA (2011)				
Business Revenues (or Sales)	< = \$1,000,000	> \$1,000,000	Unavailable	Total
% of Bank Loans in AA by #	40%	60%	0	100%
% Aggregate Lenders	43.37%	56.63%	0	100%
% of AA businesses	64.03%	3.18%	32.79%	100%

Source: Sample of 5 business loans originated in 2011, 2011 Aggregate data, and 2011 Business Geodemographic Data. This sample represents 100 percent of the loans available to review for this time period.

Borrower Distribution for Business Loans within the Springfield MSA AA (2012 & 2013)				
Business Revenues (or Sales)	< = \$1,000,000	> \$1,000,000	Unavailable	Total
% of Bank Loans in AA by #	21.05%	73.68%	5.26%	100%
% Aggregate Lenders	28.77%	71.23%	0	100%
% of AA businesses	68.28%	4.11%	27.61%	100%

Source: Sample of 19 business loans originated from 1/1/2012 to 6/30/2013, 2012 Aggregate Data, and 2012 Business Geodemographic Data. This sample represents 100 percent of the loans available to review for this time period.

Geographic Distribution of Loans

The distribution of loans reflects reasonable distribution among different income tracts throughout the bank's assessment area. The distribution of loans reflects reasonable

distribution among different income tracts throughout the Decatur and Springfield MSA AAs. The geographic distribution for Champaign MSA AA was excellent. The Decatur MSA AA was weighed most heavily. We did not identify any conspicuous lending gaps within the AAs.

Decatur MSA AA

The distribution of loans reflects reasonable distribution throughout the Decatur MSA AA. We placed greater weight on home loan performance for this AA due to the volume of home loans originated within the AA. The geographic distribution for home loans was reasonable, while the distribution for business loans was excellent.

Home Loans

The geographic distribution of home loans reflects reasonable distribution throughout the Decatur MSA AA. As mentioned under the borrower distribution criteria, we weighed refinance loans and the 2012/2013 analysis heavily for this AA. HPB’s refinance performance for moderate-income geographies within the 2012/2013 analysis was excellent. The bank did not originate any loans within the low-income geographies. However, only five percent of the AA’s owner-occupied housing was located within the low-income geographies. The bank’s performance of originating purchase and home improvement loans was weak in both low-income and moderate-income geographies.

Geographic Distribution for Home Loans within the Decatur MSA AA (2011)								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	.31%	2.04%	12.00%	12.24%	52.79%	48.98%	34.90%	36.74%
Home Refinance	.20%	0	7.04%	6.10%	55.02%	46.34%	37.74%	47.56%
Home Improvement	1.92%	0	17.24%	27.78%	49.04%	33.33%	31.80%	38.89%

Source: 2011 HMDA LAR and 2011 HMDA Peer Aggregate Data.

Geographic Distribution for Home Loans within the Decatur MSA AA (2012 & 2013)								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	2.23%	1.43%	13.50%	8.57%	39.12%	30%	45.15%	60%
Home Refinance	1.08%	0	7.72%	10.50%	34.78%	37%	56.42%	52.50%
Home Improvement	4.86%	2.44%	20.27%	9.76%	37.84%	39.02%	37.03%	48.78%

Source: 2012 and first two quarter of 2013 HMDA LARs and 2012 HMDA Peer Aggregate Data.

Business Loans

The institution's geographic distribution of business loans reflects excellent distribution. The geographic distribution in moderate-income census tracts was excellent compared to aggregate data for both analyses. The geographic distribution within low-income geographies was reasonable for the 2011 sample and weak for the 2012/2013 sample. We gave more weight to the performance within the moderate-income geographies, as the percent of businesses located in the moderate-income geographies is significantly larger than the percentage of businesses located within the low-income geographies.

Geographic Distribution of Loans to Businesses within the Decatur MSA AA (2011)			
Census Tract Income Level	% of Number of Loans	% Aggregate Lenders	% of AA Businesses
Low	15.00%	17.14%	11.10%
Moderate	50.00%	28.99%	25.86%
Middle	15.00%	31.36%	41.36%
Upper	20.00%	22.51%	21.68%

Source: Sample of 20 business loans originated in 2011, 2011 Aggregate data, and 2011 Business Geodemographic Data.

Geographic Distribution of Loans to Businesses within the Decatur MSA AA (2012 & 2013)			
Census Tract Income Level	% of Number of Loans	% Aggregate Lenders	% of AA Businesses
Low	10.00%	17.88%	13.27%
Moderate	40.00%	23.46%	22.06%
Middle	40.00%	28.94%	32.41%
Upper	10.00%	29.72%	32.26%

Source: Sample of 20 business loans originated from 1/1/2012 to 6/30/2013, 2012 Aggregate Data, and 2012 Business Geodemographic Data.

Champaign MSA AA

The geographic distribution reflects excellent distribution throughout the census tracts of different income levels in the Champaign MSA AA. Home loans and business loans had similar volume levels for this AA. As the distribution was so strong in business loans, it pulled the overall geographic conclusion for this AA to excellent.

Home Loans

The geographic distribution is reasonable for home loans in Champaign MSA AA. The 2012/2013 analysis conclusions were weighed heavier than the 2011 analysis, as 2011 loans equal only 15 percent of the home loans originated in the lending evaluation period. We put slightly greater emphasis on refinance loans, as refinance loans represented 56 percent of the home loans and purchase loans represented 44 percent. The distribution to low-income geographies was excellent for both refinance and purchase. The distribution to moderate-income geographies was reasonable for both products. We weighed the moderate-income geographies conclusion more heavily as 13 percent of the AA owner-occupied housing was located in the moderate-income geographies, as compared to two percent in the low-income geographies.

Geographic Distribution for Home Loans in the Champaign MSA AA (2011)								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	.29%	0	11.76%	0	63.52%	40%	24.43%	60%
Home Refinance	.39%	0	8.51%	9.09%	60.15%	36.36%	30.95%	54.55%
Home Improvement	.70%	0	9.41%	0	74.56%	100%	15.33%	0

Source: 2011 HMDA LAR and 2011 HMDA Peer Aggregate Data.

Geographic Distribution for Home Loans in the Champaign MSA AA (2012 & 2013)								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	1.55%	6%	8.87%	8%	66.17%	64%	23.41%	22%
Home Refinance	2.04%	3.17%	7.24%	6.35%	62.57%	60.32%	28.15%	30.16%
Home Improvement	2.71%	0	8.58%	0	74.04%	0	14.67%	100%

Source: 2012 and first two quarter of 2013 HMDA LARs and 2012 HMDA Peer Aggregate Data.

Business Loans

The institution's geographic distribution of business loans reflects excellent distribution throughout census tracts of different income levels in the Champaign MSA AA. The percentage of loans originated in low- and moderate-census geographies exceeded aggregate data for both analyses.

Geographic Distribution of Loans to Businesses within the Champaign MSA AA (2011)			
Census Tract Income Level	% of Number of Loans	% Aggregate Lenders	% of AA Businesses*
Low	30%	4.43%	3.50%
Moderate	20%	18.79%	21.65%
Middle	10%	52.75%	53.50%
Upper	40%	24.03%	19.83%

* 1.52 percent of the AA businesses are located in NA geographies. Source: Sample of 20 business loans originated in 2011, 2011 Aggregate data, and 2011 Business Geodemographic Data.

Geographic Distribution of Loans to Businesses within the Champaign MSA AA (2012 & 2013)			
Census Tract Income Level	% of Number of Loans	% Aggregate Lenders	% of AA Businesses*
Low	15%	7.82%	8.90%
Moderate	45%	16.99%	17.54%
Middle	25%	55.47%	53.72%
Upper	15%	19.72%	19.00%

* 0.84 percent of the AA businesses are located in NA geographies. Source: Sample of 20 business loans originated from 1/1/2012 to 6/30/2013, 2012 Aggregate Data, and 2012 Business Geodemographic Data.

Springfield MSA AA

The geographic distribution reflects reasonable distribution throughout the census tracts of different income levels in the Springfield MSA AA. The institution's geographic distribution of business loans reflects reasonable distribution throughout the census tracts of different income levels. The geographic distribution for home loans reflects weak distribution. Due to volume levels, business loans were weighed more heavily for this AA.

Home Loans

The geographic distribution for home loans reflects weak distribution in the Springfield MSA AA. The 2012/2013 analysis was weighed heavily, due to volume levels. Additionally, refinance loans received more weight than the other home loan products. The distribution of home refinance loans in the moderate-income geographies was reasonable for the 2012/2013 analysis. The bank did not originate any other home products in low- or moderate-income geographies.

Geographic Distribution for Home Loans in the Springfield MSA AA (2011)								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	1.08%	0	13.58%	0	44.46%	100%	40.88%	0
Home Refinance	.52%	0	7.68%	0	39.90%	40%	51.90%	60%
Home Improvement	1.12%	0	7.87%	0	48.80%	0	42.21%	0

Source: 2011 HMDA LAR and 2011 HMDA Peer Aggregate Data.

Geographic Distribution for Home Loans in the Springfield MSA AA (2012 & 2013)								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans	% of Aggregate Lender	% of Number of Loans
Home Purchase	3.76%	0	14.81%	0	42.40%	42.86%	39.03%	57.14%
Home Refinance	2.07%	0	8.72%	9.09%	37.43%	9.09%	51.78%	81.82%
Home Improvement	4.03%	0	10.52%	0	46.10%	0	39.35%	100%

Source: 2012 and first two quarter of 2013 HMDA LARs and 2012 HMDA Peer Aggregate Data.

Business Loans

The institution's geographic distribution of business loans reflects reasonable distribution throughout the census tracts of different income levels in the Springfield MSA AA. The geographic distribution in low-income census tracts was excellent for all years reviewed. The 20 percent distribution in 2011 and 22 percent distribution in 2012 and 2013 significantly exceeded aggregate data.

The geographic distribution in moderate-income census tracts was weak for all years reviewed. The bank originated no loans in moderate-income census tracts in 2011 and the 5.56 percent of loans originated in 2012 and 2013 years was well below small business aggregate percentage. The assessment area contains a similar number of low- and moderate-income census tracts. The excellent distribution throughout low-income census tracts results in an overall conclusion of reasonable.

Geographic Distribution of Loans to Businesses within the Springfield MSA AA (2011)			
Census Tract Income Level	% of Number of Loans	% Aggregate Lenders	% of AA Businesses
Low	20%	5.75%	6.86%
Moderate	0%	22.05%	21.33%
Middle	60%	31.91%	35.93%
Upper	20%	40.29%	35.88%

Source: Sample of 5 business loans originated in 2011, 2011 Aggregate data, and 2011 Business Geodemographic Data. This sample represents 100 percent of the loans available to review for this time period.

Geographic Distribution of Loans to Businesses within the Springfield MSA AA (2012 & 2013)			
Census Tract Income Level	% of Number of Loans	% Aggregate Lenders	% of AA Businesses*
Low	22.22%	10.84%	10.60%
Moderate	5.56%	18.76%	20.02%
Middle	16.67%	36.70%	35.87%
Upper	55.56%	33.70%	29.94%

**3.57 percent Source: Sample of 20 business loans originated from 1/1/2012 to 6/30/2013, 2012 Aggregate Data, and 2012 Business Geodemographic Data. This sample represents 100 percent of the loans available to review for this time period.*

Responses to Complaints

HPB has not received any complaints about its performance in helping to meet the assessment area needs during this evaluation period.

Community Development Test

HPB's performance under the community development test is satisfactory. HPB had adequate responsiveness to community credit needs. We placed the greatest weight on Decatur MSA AA due to branch distribution and deposit breakdown. The bank had adequate responsiveness to community credit needs in the Decatur MSA AA and Springfield MSA AA, while HPB had excellent responsiveness to community credit needs in the Champaign MSA AA.

HPB provided \$43 million in community development loans to respond to community needs. Additionally, the bank operates a branch with a deposit-taking ATM in a low-income geography, and ten employees provided financial expertise to community development organizations.

Number and Amount of Community Development Loans

HPB's level of community development loans is excellent. The bank made 31 community development loans totaling \$43 million in the assessment areas during the evaluation period. Loans were made to various individuals, corporations, and organizations to provide affordable housing to low- and moderate-income (LMI) families, provide services to LMI individuals, and to aid in revitalizing and stabilizing LMI areas.

Decatur MSA AA

HPB's level of community development loans was adequate in the Decatur MSA AA. HPB originated three community development loans totaling \$3.1 million. HPB provided two loans totaling \$3 million to a not-for-profit organization that provides training, support services, and housing for the mentally disabled of which 80 percent are LMI individuals. Additionally, the bank originated one loan for \$50,000 to a community housing organization that helps revitalize and stabilize LMI neighborhoods.

Champaign MSA AA

HPB's level of community development loans was excellent in the Champaign MSA AA. HPB originated 21 community development loans to various individuals and property management corporations totaling \$38 million in the Champaign MSA AA. Forty-one percent of these loans were made to provide affordable multi-family housing. Fifty-nine percent of the loans were made to revitalize and stabilize LMI areas (low- and moderate-income census tracts).

Springfield MSA AA

HPB's level of community development loans was adequate in the Springfield MSA AA. HPB originated seven community development loans totaling \$1.9 million. These loans were made to an organization that provides services, such as education and training to overcome financial hurdles, to LMI individuals and families.

Number and Amount of Qualified Investments

The level of qualified investments and qualified donations is weak. HPB made a total of \$105,000 in qualified donations during the evaluation period. HPB also received credit for a prior investment with a current balance of \$25,000.

In addition to these qualified investments, the bank made numerous donations that benefited the community, but did not qualify as community development under the Community Reinvestment Act.

Decatur MSA AA

HPB's level of qualified investments is weak in the Decatur MSA AA. HPB provided 59 qualified donations to approximately 20 organizations for a total of \$84,000, which equated to only 0.17 percent of Tier 1 capital. The largest donation, totaling \$8,697, was to an organization that provides housing for LMI individuals and families. The bank also donated \$4,824 to four different organizations to support economic development. The

remainder of the donations went to various organizations that provide services to LMI individuals and families.

HPB received credit for an equity investment in a local housing project. The investment was first made in 2003 for \$2.5 million and had a current balance of \$25,000.

Champaign MSA AA

HPB's level of qualified investments is poor in the Champaign MSA AA. The bank made qualified donations of \$9,000 to four different organizations. The largest donation of \$5,000 was to an organization that provides food for LMI individuals and families. HPB also donated \$1,000 to an organization that provides affordable housing to LMI individuals and families. The remaining donations were to organizations that provide services for LMI individuals and families.

Springfield MSA AA

HPB's level of qualified investments is poor in the Springfield MSA AA. HPB made qualified donations of \$12,240 to 11 organizations. Two of these donations, totaling \$1,000, were made to an organization that provides housing for LMI individuals and families. One small donation (\$500) was made to an organization that provides for economic development. The remaining donations were made to various organizations that provide services to LMI individuals and families.

Extent to Which the Bank Provides Community Development Services

The extent to which HPB provides community development services is adequate.

Decatur MSA AA

The extent to which the bank provides community development services in the Decatur MSA AA is adequate. Excluding the ADM corporate branch and ATMs, the bank has one branch with a deposit-taking ATM in a low-income census tract in this AA. Based on 2010 census data, the thirteen low- and moderate-income census tracts with no branches or ATMs in the Decatur MSA AA are located within four miles of the nearest branch, making access reasonable to these geographies.

Nine senior bank officers, including the Chairman of the Board, provided financial expertise by serving in various capacities (i.e. Board, Finance Committee, Investment Committee, Loan Committee, Secretary, Treasurer, Fundraising Committee, etc.) to 13 different organizations in the Decatur MSA AA. Three of the 13 organizations provide affordable housing to LMI families, one is an economic development organization, and the other nine provide services to LMI individuals and families.

HPB offers a free "Electronic Transfer Account", which provides deposit-banking services (checking) to individuals who are reported on Chex Systems and who receive federal benefits. The bank also offers a student checking account with no minimum balance that provides free checking, electronic banking, debit cards, on-line banking, bill-pay, and mobile banking. A similar direct deposit account is available to anyone that receives federal or state benefits. While the bank does not maintain records to show

access provided to LMI individuals, these services generally help to increase access to financial services for those individuals.

Champaign MSA AA

The extent to which the bank provides community development services in the Champaign MSA AA is adequate. The bank has no branches and no ATMs in low- and moderate-income census tracts in this AA.

One Retail Banking Officer served as president and/or was a member of the finance committee for two organizations, which aid in providing housing for low- and moderate-income individuals and families. This same individual also assisted in obtaining housing grants for one of these organizations. Additionally, this individual was a board member of a local service organization, where he provided financial expertise/counseling to benefit low- and moderate-income individuals.

Bank products discussed in the Decatur MSA AA are also available in this AA.

Springfield MSA AA

The extent to which the bank provides community development services in the Springfield MSA AA is poor. The bank has no branches and no ATMs in low- and moderate-income census tracts in this AA.

No bank employees provided community development services to organizations within this AA.

Bank products discussed in the Decatur MSA AA are also available in this AA.

Responsiveness to Community Development Needs

HPB had adequate responsiveness to community development needs. The Decatur MSA AA was weighed heavier than the other AAs, due to deposit and branch distribution.

Decatur MSA AA

HPB's community development activities, as a whole, demonstrate adequate responsiveness to the needs and opportunities in this AA. Community credit needs identified financial literacy and affordable housing for LMI as community credit needs. A mortgage loan officer presented a homebuyer education seminar to LMI and assisted a housing organization in reviewing applicants and credit reports. Additionally, \$8,697 qualified grants were provided to an organization providing affordable housing for LMI. Small business loans for fixed assets and working capital were also identified, as community credit needs. An executive officer serves on the loan committee for an organization providing loans to small and minority-owned businesses, including start-up loans. The bank also donated \$4,824 to support economic development.

HPB provided two loans totaling \$3 million to a not-for-profit organization that provides training, support services, and housing for the mentally disabled of which 80 percent are LMI individuals. Additionally, the bank originated one loan for \$50,000 to a community housing organization that helps revitalize and stabilize LMI neighborhoods.

Bank employees also provided services to nine organizations that provide community services to LMI individuals and families.

Champaign MSA AA

HPB's community development activities, as a whole, demonstrate excellent responsiveness to the needs and opportunities in this AA. Affordable housing was a credit need and financial literacy was a community need identified by community contacts. HPB originated 21 community development loans to various individuals and property management corporations totaling \$38 million in the Champaign MSA AA. Forty-one percent of these loans were made to provide affordable multi-family housing.

One Retail Banking Officer served as president and/or was a member of the finance committee for two organizations, which aid in providing housing for low- and moderate-income individuals and families. This same individual also assisted in obtaining housing grants for one of these organizations and provided financial counseling for moderate-income individuals. Additionally, this individual was a board member of a local service organization, where he provided financial expertise/counseling to benefit low- and moderate-income individuals.

Springfield MSA AA

HPB's community development activities, as a whole, demonstrate adequate responsiveness to the needs and opportunities in this AA. Financial literacy was a community need identified by community contacts and the bank made community development loans totaling \$1.9 million. These loans were made to an organization that provides services, such as education and training to overcome financial hurdles, to LMI individuals and families.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), or 12 CFR 195.28(c), in determining a national bank's or federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance. We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.