

institution.

PUBLIC DISCLOSURE

June 10, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Hometown National Bank Charter Number: 2503

> 260 Bucklin Street La Salle, IL 61301

Office of the Comptroller of the Currency

Chicago - Schaumburg Field Office 1700 East Golf Road, Suite 800 Schaumburg, IL 60173

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

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

The following are the primary factors supporting this rating.

- The bank's loan-to-deposit ratio is reasonable.
- A majority of the bank's loans are within its assessment areas (AAs).
- The borrower distribution of loans reflects reasonable penetration among individuals at different income levels. Lending to businesses with revenues less than or equal to \$1 million is also reasonable.

SCOPE OF EXAMINATION

This examination evaluated the Community Reinvestment Act (CRA) performance of Hometown National Bank (HNB) using the Small Bank CRA examination procedures. The evaluation period for this assessment is October 30, 2007 through January 31, 2013. Under Small Bank CRA examination procedures, the primary performance evaluation is made under the lending test. The lending test assesses the bank's record of meeting the credit needs of its AA through lending activities. The lending test for HNB covers loans originated or purchased from January 1, 2010 through December 31, 2012. HNB has two delineated AAs, which were both evaluated under full scope procedures.

The primary loan products for HNB are home mortgage and commercial loans. Due to the higher volume of residential real lending conducted during the evaluation period, more weight was given to residential real estate lending performance. The lending test used the bank's Home Mortgage Disclosure Act (HMDA) loan data to evaluate residential real estate lending. The bank's aggregate HMDA reporting for the evaluation period reflects only nine home improvement loans originated or purchased in the bank's AAs. Due to the very small number of home improvement loans, the borrower or geographic distribution performance for that loan type was not taken into consideration in the lending test analysis. The lending test also evaluated a sample of 20 commercial loans originated in each AA made during 2010 through 2012. All data used in this public evaluation was validated and deemed reliable.

The CRA evaluation period covers two different sets of census information (year 2000 census results for the 2010 and 2011 data and the year 2010 census results for the 2012 data). Accordingly, this evaluation will show the analysis using both sets of data when discussing the bank's performance under the lending test.

As noted below in the discussion of the bank's AA, the demographics for the bank's AAs remained relatively unchanged between census data years. The lending analysis performed consisted of a review of all the bank's HMDA reported loans for the years 2010 and 2011 compared to the 2000 census demographics and 2012 lending data compared to the 2010 census demographics. The lending analysis of the bank's small business loans consisted of a sample of commercial loans originated over the three-

year evaluation period. The lending analysis compared small business loans originated in 2010 and 2011 to the 2011 updated small business/farm demographic data and 2012 originations were compared 2012 demographic data. The results of this analyses were combined to determine HNB's overall performance rating for the lending test. The bank's HMDA lending carried the most weight due to the significant volume of such lending originated during the evaluation period. The volume of lending in the 2010 and 2011 time period was greater than the volume of lending in 2012, thus the 2010 and 2011 lending performance was also given more weight in reaching overall conclusions.

This evaluation used reported Federal Deposit Insurance Corporation (FDIC) annual deposit information to determine the bank's deposit market share and market presence within its AAs. The most recent deposit market share information was as of June 30, 2012.

DESCRIPTION OF INSTITUTION

HNB, formally La Salle National Bank, is a wholly owned subsidiary of La Salle Bancorp, Inc., a one-bank holding company formed in 1984. Since the last CRA examination, there have been no significant changes to the corporate structure. The bank's business strategy continues to focus on commercial credits and specifically small business loans. HNB has approximately \$187.5 million in assets as of March 31, 2013.

HNB has three office locations. The main office is in LaSalle, Illinois on Bucklin Street and there are two other branches located in Peru, Illinois and Joliet, Illinois. All bank offices provide full banking services and include deposit-taking Automated Teller Machines (ATMs) and drive-up capabilities.

As of March 31, 2013, HNB had approximately \$112 million in gross loans and leases. The bank's primary loan type is commercial loans and residential real estate loans as shown in the chart below. Total deposits are approximately \$168 million. The bank reported tier 1 capital at \$17.7 million.

Loan Products	Outstanding Dollars (\$000s)	% of Total Loans
Commercial Loans (including CRE** & construction loans)	85,961	76.40%
Residential Real Estate Loans (including HELOCs*)	24,305	21.60%
Individual Loans	1,424	1.27%
Agricultural Loans	828	0.73%
Total Loans	112,518	100%

Source: Call Report data as of March 31, 2013 * Home Equity Lines of Credit ** Commercial Real Estate

This examination did not identify any legal, financial, or other factors that would encumber the bank's ability to help meet the credit needs in its AA. HNB received a "Satisfactory" rating at the last CRA examination dated October 29, 2007.

DESCRIPTION OF ASSESSMENT AREAS

The bank's two AAs include a small portion in Will County in the Chicago-Naperville-Joliet Metropolitan Division (MD) (16974) and a section of La Salle County in a non-Metropolitan Statistical Area (MSA). Since the last CRA examination, the number of census tracts in the bank's AAs has increased significantly from 41 census tracts to 71 census tracts as of year-end 2012. This was mainly due to the new 2010 U.S. Census data. As of the 2010 U.S. Census, the current 71 census tracts in the AA contains six (9 percent) low-income tracts, 12 (17 percent) moderate-income tracts, 22 (31 percent) middle-income tracts, 30 (42 percent) upper-income tracts, and one (1 percent) tract that is not applicable.

All three branch locations are inside the bank's delineated AAs as well as the majority of the bank's deposit and loan activity. The bank's AAs meet the requirements of the CRA. The areas consist of whole geographies, areas that the bank can reasonably assist in meeting credit needs, and there are no arbitrarily excluded low- or moderate-income geographies.

The real estate market is improving and the 2010 U.S. Census data estimates there are 100,683 housing units in HNB's AAs for the year 2012. These housing units consist of 72 percent owner occupied units, 21 percent rental occupied, and seven percent vacant housing units. According to the 2010 U.S. Census data and for the year 2012, service businesses made up the majority of businesses for portions of the AA in La Salle County and Will County.

As part of this review, we conducted two community contacts. One contact was from La Salle County and the other contact was from the City of Joliet in Will County. Discussions with both community contacts indicated that the local economy is stable and improving slightly since the recession in the mid-2000s. The contacts noted that local banks are meeting the community and business credit needs.

Competition within the AA is strong. Including HNB, there are 71 financial institutions within La Salle County and Will County. HNB ranks 16th out of both counties with 1.39 percent of the deposit market share as of June 30, 2012. BMO Harris Bank National Association has the highest deposit market share at approximately 18 percent.

La Salle County AA

The La Salle County AA contains eight out of the 28 census tracts in the county. These census tracts are located in the western portion of the county. The 2000 census data for this AA noted one moderate-income tract. Under the 2010 census data, there are no low- or moderate-income census tracts in the La Salle County AA. The La Salle County AA contains two bank branches, including the main office in LaSalle, Illinois and one branch in Peru, Illinois.

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According to the 2010 U.S. Census data, the La Salle County portion of HNB's AA median family income for the year 2012 is \$62,124 with an estimated 8,445 families. There are 14,183 housing units in the La Salle County census tracts. Of these, 69 percent are owner occupied units, 22 percent are rental occupied, and nine percent are vacant housing units.

According to the FDIC Summary of Deposit Market Share Report as of June 30, 2012, HNB ranks seventh for deposit market share among the 24 banks in La Salle County, with 5.48 percent of the deposit market share. First State Bank has the highest deposit market share at 15 percent.

Based on the 2012 business geodemographic data for the AA, the main industries are service businesses at 40 percent; retail trade at 17 percent; finance, insurance, and real estate at seven percent; and construction at six percent. The unemployment rate for the county as of March 2013 at 11.9 percent was higher than both the nation's unemployment rate of 7.6 percent and the State of Illinois rate of 9.4 percent.

Will County AA

The Will County AA contains 63 of the 152 census tracts in the county and is located in the western portion of the county. Of the 63 census tracts in the AA, six (9 percent) are low-income geographies, 12 (19 percent) are moderate-income, 20 (32 percent) are middle-income, 24 (38 percent) are upper-income and one (2 percent) is not applicable. The bank's third branch is located in this AA in Joliet, Illinois.

The Will County portion of HNB's AA shows median family income for the year 2012 of \$70,823 with an estimated 58,569 families. Housing units in the Will County AA total 68,241. Of these, 71 percent are owner-occupied units, 24 percent are rental-occupied units, and 5 percent are vacant housing units. Leading industries in the Will County AA for 2012 are service businesses (42 percent); retail trade (13 percent); construction (8 percent); and finance, insurance and real estate (6 percent). The unemployment rate for the county as of March 2013 at 10 percent was higher than both the nation's unemployment rate of 7.6 percent and the State of Illinois rate of 9.4 percent.

In Will County, there are 56 institutions with deposits and HNB ranks 44th with a deposit market share of 0.30 percent as of June 30, 2012. Some of the highest-ranking institutions in Will County include BMO Harris Bank National Association (22.55 percent), First Midwest Bank (14.43 percent), and JP Morgan Chase Bank, National Association (11.13 percent).

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

HNB has demonstrated a SATISFACTORY performance in meeting the credit needs of its AAs.

Loan-to-Deposit Ratio

HNB's loan-to-deposit ratio is reasonable given the bank's size, financial condition, competitive market place, and AA credit needs. The bank's quarterly average loan-to-deposit ratio is 76.24 percent based on data from 22 consecutive quarters from September 30, 2007 through December 31, 2012. When compared to 21 other peer banks, HNB ranks 14th, with peer ratios ranging from 44 to 109 percent during this time period. The average peer loan-to-deposit ratio is 73.99 percent. As of March 31, 2013, HNB's loan-to-deposit ratio is 65.11 percent. A primary reason for the lower loan-to-deposit ratio is the strong competition with 71 institutions competing for loan and deposit activity within the bank's entire AA.

Lending in Assessment Area

HNB originates a majority of its loans inside its AAs. Given the reported HMDA data for the years 2010, 2011, and 2012, 59.14 percent by total number or 275 of the total 465 bank loan originations were inside the AAs. There were 55.50 percent by total dollar volume of loans made to borrowers within the AAs.

The analysis included an original sample of 30 commercial loans that originated during the evaluation period for the years 2010, 2011, and 2012. This sample was later expanded to include 40 commercial loans originated within the bank's two delineated AAs. HNB's commercial lending is satisfactory with a majority 74.07 percent originated inside the AA by number and 78.64 percent originated inside the AA by dollar volume. Table 1 summarizes the results from the AA lending analysis.

Table 1: Lending in Hometown National Bank AA											
		In Asses	sment Are	as	Out of Assessment Areas				Totals		
Loan Type	#	% of #	\$ (000s)	% of \$	#	% of #	\$ (000s)	% of \$	#	\$	
Home Purchase	40	8.60%	4,923	7.51%	33	7.10%	4,053	6.18%	73	8,976	
Home Refinancing	226	48.60%	31,005	47.30%	153	32.90%	24,844	37.90%	379	55,849	
Home Improvement	9	1.94%	450	0.69%	4	0.86%	272	0.41%	13	722	
GRAND TOTAL	275	59.14%	36,378	55.50%	190	40.86%	29,169	44.50%	465	65,547	
Commercial Loans*	40	74.07%	5,521	78.64%	14	25.93%	1,500	21.36%	54	7,021	

Source: Combined data reported under HMDA for the years 2010, 2011, and 2012 (verified through sample testing); U.S. Census data from 2000 and 2010. *Based on sample of 54 business loans originated in the years 2010, 2011, and 2012.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

As previously stated, this CRA evaluation covers two different sets of demographic data (year 2000 census data for the 2010 – 2011 lending period and year 2010 census data for the 2012 review period). The results of each analysis was combined to determine the overall rating for this portion of the lending test.

Overall, borrower distribution has reasonable penetration with the bank meeting the community needs of borrowers at all income levels. This evaluation reviewed La Salle County AA and Will County AA separately. The analysis below includes reviews for home mortgage lending and commercial lending, which constitute the majority of HNB's loan mix.

Home Mortgages

The distribution of home mortgages to borrowers of various income levels reflects reasonable penetration.

LaSalle County AA

HNB's penetration in home purchase and home refinance lending to low-income borrowers in the La Salle County AA is lower than the percentage of low-income families in the AA. However, considering the family poverty rate of 7.53 percent for 2000 census year and 9.09 percent for the 2010 census year and the fact that those low-income families could not readily afford home ownership, the bank's penetration to low-income borrowers is reasonable. The penetration to moderate-income borrowers is excellent for home purchase loans for both time periods. The percentage of home purchase loans to moderate-income borrowers is significantly greater than the percentage of moderate-income families in the AA. The penetration among moderate-income borrowers is reasonable for home refinance loans for both time periods. The percentage of home refinance loans to moderate-income borrowers is near the percentage of moderate-income families in the AA. See Table 2 for details.

Table 2: Borrower Distribution of Real Estate Loans in La Salle County											
Borrower Income Level	Low		Moderate		Middle		Upper				
Loan Type	% of AA Families	% of # of loans	% of AA Families	% of # of loans	% of AA Families	% of # of loans	% of AA Families	% of # of loans			
2010 – 2011 Data*											
Home Purchase	15.96	5.00	17.42	25.00	21.75	25.00	44.88	45.00			
Home Refinance	15.96	3.26	17.42	10.87	21.75	17.39	44.88	68.48			
Total	15.96	5.08	17.42	13.56	21.75	17.80	44.88	63.56			
			201	2 Data**							
Home Purchase	14.92	9.09	15.07	36.36	23.67	18.18	46.34	36.36			
Home Refinance	14.92	2.99	15.07	11.94	23.67	32.84	46.34	52.24			
Total	14.92	3.85	15.07	15.38	23.67	30.77	46.34	50.00			

^{*} Source: Reported HMDA data for years 2010 and 2011 (verified through sample testing); 2000 U.S. Census data.

Will County AA

The penetration to low- and moderate-income borrowers is excellent for home purchase loans for 2010 and 2011. The percentage of home purchase loans to low-income borrowers is greater than the percentage of low-income families in the AA. The percentage of home purchase loans to moderate-income borrowers is equal to the

^{**} Source: Reported HMDA data for the year 2012 (verified through sample testing); 2010 U.S. Census data.

percentage of moderate-income families. The bank's penetration to low-income borrowers for home refinance loans for 2010 and 2011 is lower than the percentage of low-income families. However, considering the poverty rate of 6.02 percent for the 2000 census year and the fact that those low-income families could not readily afford home ownership, the bank's penetration to low-income borrowers for home refinance loans is reasonable. HNB's lending for both home purchase and home refinance loans to low-income borrowers for the 2012 lending period is poor. The bank did not make any home purchase or home refinance loans in 2012 to low-income borrowers in the Will County AA. The bank's penetration to moderate-income borrowers for home purchase lending to moderate-income borrowers in 2012 exceeded the percentage of moderate-income families in the AA. The bank's penetration to moderate-income borrowers for home refinance loans in 2012 is reasonable. The bank's percentage of home refinance loans to moderate-income borrowers in 2012 is near the percentage of moderate-income families in the AA. See Table 3 for details.

Table 3: Borrower Distribution of Real Estate Loans in Will County												
Census Tract Income Level	Low		Moderate		Middle		Upper					
Loan Type	% of owner occupied	% of # of loans	% of owner occupied	% of # of loans	% of owner occupied	% of # of loans	% of owner occupied	% of # of loans				
	2010 – 2011 Data*											
Home Purchase	18.41	20.00	20.20	20.00	26.26	20.00	35.13	40.00				
Home Refinance	18.41	4.35	20.20	0	26.26	26.09	35.13	69.57				
Total	18.41	5.56	20.20	1.85	26.26	24.07	35.13	68.52				
			2012	Data**								
Home Purchase	20.68	0	18.23	25.00	23.86	25.00	37.22	50.00				
Home Refinance	20.68	0	18.23	13.33	23.86	13.33	37.22	73.33				
Total	20.68	0	18.23	15.79	23.86	15.79	37.22	68.42				

^{*} Source: Reported HMDA data for years 2010 and 2011 (verified through sample testing); 2000 U.S. Census data.

Business Loans

HNB's distribution for business loans overall has reasonable penetration. The analysis used data from a sample of 40 loans, 20 from each AA.

La Salle County AA

Lending within La Salle County has reasonable penetration for lending to businesses with revenues less than or equal to \$1 million inside the AA. The sample included a total of 20 business loans. For the 2010 to 2011 data, the percentage of loans made to businesses with revenues less than \$1 million was lower than the percentage of La Salle County's businesses with reported revenues less than \$1 million. For 2012 data,

^{**} Source: Reported HMDA data for the year 2012 (verified through sample testing); 2010 U.S. Census data.

the bank's percentage of loans originated to businesses with revenues less than \$1 million improved and is near the percentage of businesses with revenues less than \$1 million in the bank's AA, which reflects reasonable penetration. See Table 4 for details.

Table 4: Borrower Distribution for Loans to Businesses in La Salle County AA										
2010 – 2011 Data*										
Business Revenues ≤\$1,000,000 >\$1,000,000 Unavailable Total										
% of AA Businesses	63.83	4.03	32.14	100.00						
% of Bank Loans in AA by #	45.45	54.55	0.00	100.00						
% of Bank Loans in AA by \$	8.26	91.74	0.00	100.00						
	2012 Data**									
Business Revenues	≤\$1,000,000	>\$1,000,000	Unavailable	Total						
% of AA Businesses	66.85	5.52	27.63	100.00						
% of Bank Loans in AA by # 55.56 44.44 0.00 100.00										
% of Bank Loans in AA by \$	5.30	94.70	0.00	100.00						

Source: Non-farm business loan sample (20 loans inside the AA) originated in the years 2010, 2011, and 2012 (verified through sample testing).

Will County AA

Commercial lending within the Will County AA has excellent penetration for lending to businesses with revenues less than or equal to \$1 million for both time periods. The sample included a total of 20 loans. The percentage of non-farm commercial lending originated by the bank exceeded the percentage of businesses with reported revenues of \$1 million or less. See Table 5 below for details.

Table 5: Borrower Distribution for Loans to Businesses in Will County AA									
2010 – 2011 Data*									
Business Revenues ≤\$1,000,000 >\$1,000,000 Unavailable Total									
% of AA Businesses	65.12	2.95	31.93	100.00					
% of Bank Loans in AA by #	87.50	12.50	0.00	100.00					
% of Bank Loans in AA by \$	89.22	10.78	0.00	100.00					
	2012 Data**								
Business Revenues	≤\$1,000,000	>\$1,000,000	Unavailable	Total					
% of AA Businesses	69.64	3.60	26.76	100.00					
% of Bank Loans in AA by #	71.43	28.57	0.00	100.00					
% of Bank Loans in AA by \$	61.29	38.71	0.00	100.00					

Source: Non-farm business loan sample (20 loans inside the AA) originated in the years 2010, 2011, and 2012 (verified through sample testing).

Geographic Distribution of Loans

The geographic distribution of lending in low- and moderate-income geographies has reasonable dispersion. The analysis reviewed home mortgages and non-farm commercial lending as the primary loan mix products.

^{*} Source: 2000 U.S. Census data. ** Source: 2010 U.S. Census data.

^{* 2000} U.S. Census data. ** 2010 U.S. Census data.

Home Mortgages

The distribution of residential lending in low- and moderate-income geographies within the bank's AAs reflects reasonable dispersion. The analysis included HMDA data for the years 2010 to 2011 and for 2012.

La Salle County AA

Geographic distribution for home mortgages has reasonable dispersion. The 2000 Census data showed only one moderate-income census tract for the La Salle County AA and no low-income census tracts. The only moderate-income geography showed 1,381 housing units with 5.47 percent owner occupied for the census tract. HMDA data for 2010 to 2011 reported five home mortgage loan originations in this moderate-income census tract, accounting for 4.24 percent of the bank's originated loans. The percentage of the HMDA loans originated during 2010 and 2011 in the moderate-income census tract of La Salle County AA is near the percentage of owner occupied housing units of that census tract. There are no low- or moderate-income geographies in the La Salle County AA as of the 2010 U.S. Census, thus we performed no geographic distribution analysis on the HMDA loans originated in 2012. See Table 6 below for details.

Will County AA

Overall, the bank's HMDA lending in low- and moderate-income level geographies is reasonable in the Will County AA. The bank's dispersion of loans to the low-income census tract is poor as the bank did not originate or purchase any HMDA loans in the one low-income census tract. However, the low-income census tract contains a very small number of owner occupied housing units significantly restricting the bank's lending opportunities. The bank also did not originate or purchase any home purchase loans during 2010 and 2011 in the moderate-income census tracts. For 2010 and 2011, the percentage of home refinance loans originated is near the percentage of owner occupied housing units in the moderate-income census tracts resulting in reasonable performance. Home purchase and home refinance lending in the moderate-income geographies for 2012 exceeds the percentage of owner occupied housing units in moderate-income census tracts resulting in excellent performance. See Table 6 below for details.

Table 6	Table 6: Geographic Distribution of Real Estate Loans in Will County AA											
2010 - 2011*												
Census Tract								er				
Loan Type	% of owner occupied	% of # of loans	% of owner occupied	% of # of loans	% of owner occupied	% of # of loans	% of owner occupied	% of # of loans				
Home Purchase	0.67	0	16.41	0	54.34	60.00	29.59	40.00				
Home Refinance	0.67	0	16.41	12.77	54.34	51.06	29.59	36.17				
Total	0.67	0	16.41	10.53	54.34	49.12	29.59	40.35				

2012**											
Census Tract Income Level	Low		I OW		Mode	rate	Midd	dle	Upp	oer	
Loan Type	% of owner occupied	% of # of loans	% of owner occupied	% of # of loans	% of owner occupied	% of # of loans	% of owner occupied	% of # of loans			
Home Purchase	3.22	0	23.83	25.00	48.60	50.00	24.36	25.00			
Home Refinance	3.22	0	23.83	25.00	48.60	43.75	24.36	31.25			
Total	3.22	0	23.83	25.00	48.60	45.00	24.36	30.00			

^{*} Source: Reported HMDA data for years 2010 and 2011 (verified through sample testing); 2000 U.S. Census data.

Business Loans

Business lending in low- and moderate-income geographies within the bank's AAs reflects reasonable performance. The analysis used data from a sample of 40 loans, 20 business loans within each AA.

LaSalle County AA

The 2000 census data showed only one moderate-income census tract for the La Salle County AA and no low-income census tracts. The bank's small business geographic lending performance is excellent for the 2010 and 2011 evaluation period. The bank's percentage of loans made in the moderate-income geography exceeds the percentage of businesses with revenues less than \$1 million in that geography. There are no low-or moderate-income geographies in the La Salle County AA as of the 2010 U.S. Census, thus no geographic distribution analysis was performed on the small business loans originated in 2012.

Table 7: Geographic Distribution of Business Loans in LaSalle County AA										
	2010 – 2011									
Tract Income Level	#	% of #	\$ (000s)	% of \$ (000s)	% of Business					
Low	-	0.00%	-	0.00%	0.00%					
Moderate	4	36.36%	399	15.36%	12.50%					
Middle	6	54.54%	2,152	82.90%	62.50%					
Upper	1	9.09%	45	1.73%	25.00%					
Total	11	100.00%	2,596	100.00%	100.00%					

Source: Business loan sample originated in the years 2010 and 2011 (data verified through sample testing); 2000 U.S. Census data.

Will County AA

Overall, the bank's small business lending in low- and moderate- income geographies in the Will County AA is poor. For 2010 and 2011, none of the sampled loans was in a low- or moderate-income census tract. The sample of loans for 2012 did not reflect any loans in the low-income census tract either. The percentage of small business loans originated in 2012 in the moderate-income census is lower than the percentage of small

^{**} Source: Reported HMDA data for the year 2012 (verified through sample testing); 2010 U.S. Census data.

businesses located in the moderate-income census tracts. This is considered a reasonable lending performance.

Table 8: Geographic Distribution of Non-Farm Business Loans in Will County AA									
Tract Income	2010 – 2011*		2012**						
Level	% of Business	#	% of Business						
Low	2.94%	-	0.00%	-	0.00%	9.52%			
Moderate	32.35%	2	16.67%	130	21.11%	31.75%			
Middle	50.00%	4	33.33%	71	11.49%	38.10%			
Upper	14.71%	6	50.00%	415	67.40%	19.05%			
NA	-	-	-	-	-	1.59			
Total	100.00%	12	100.00%	616	100.00%	100.00%			

Source: Non-farm business loan sample originated in the years 2010, 2011, and 2012 (data verified through sample testing).

Responses to Complaints

HNB did not receive any written complaints relating to its performance in helping meet the credit needs within its AAs during this evaluation period. The OCC did not receive any CRA related comments or complaints during the evaluation period.

Fair Lending Review or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c) in determining a national bank's (bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or in any assessment area 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.

^{*2000} U.S. Census data. ** 2010 U.S. Census data.