



SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

December 23, 2008

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Old Plank Trail Community Bank NA
Charter Number: 24646

20012 Wolf Road
Mokena, IL 60448

Office of the Comptroller of the Currency
Central District
ADC-Chicago North
2 Century Centre
1700 E. 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 institution.

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

The major factors supporting Old Plank Trail Community Bank NA's (OPTCB) rating include:

- The bank's loan-to-deposit ratio is good given the bank's de-novo status and size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are within the bank's AA.
- A substantial majority of the loans to businesses are small business loans and the overall distribution of loans to businesses of different sizes and borrowers of different incomes is adequate.
- Retail services are readily accessible to individuals of various income levels within the bank's AA.

SCOPE OF EXAMINATION

This Community Reinvestment Act (CRA) examination covers the bank's lending performance from the opening of the bank in March 2006 through December 2008. The bank has only one AA surrounding its three office locations.

The scope of the CRA examination included an assessment of the bank's primary loan types being small business lending as well as consumer home equity lines of credit (HELOC) lending. We utilized bank prepared data that was validated during our examination. We also analyzed the bank's real estate mortgage data captured on the Home Mortgage Disclosure Act Loan Application Register (HMDA LAR). In addition, we included HMDA loans located in the bank's AA made through the bank's mortgage affiliate, Wintrust Mortgage Corporation. Our analysis included 100% of the loans originated or purchased by OPTCB during the performance periods noted above. In addition we considered 100% of the home purchase and refinancing mortgage loans originated or purchased during the evaluation period by Wintrust Mortgage Corporation which were located in OPTCB's AA.

We also reviewed community development investments and services from March 2006 through year-end 2008. The community development investments and services noted within this public evaluation were validated as being qualified under the CRA.

We used deposit information, reported to the Federal Deposit Insurance Corporation, to determine the bank's deposit market share and market presence with its AA. The latest deposit information available for use was as of June 30, 2008.

DESCRIPTION OF INSTITUTION

OPTCB is a \$187 million intrastate financial institution located in New Lenox, Illinois. New Lenox is a suburb of Chicago, Illinois and is approximately 35 miles southwest of the city. The bank is wholly owned by the Wintrust Financial Corporation (Wintrust) located in Lake Forest, Illinois. In addition to OPTCB, Wintrust owns and operates 14 other banks, an insurance finance company, a trust company, and an investment firm. Wintrust has a full service mortgage company which is an operating subsidiary of Barrington Bank & Trust Company, NA, one of the 15 banks in the Wintrust group. As of December 31, 2008 Wintrust reported total assets of \$10,658 million.

OPTCB is a full service bank offering a variety of loan and deposit products. The bank's primary lending focus is small and mid-sized business lending and residential home equity lending. Residential mortgage lending is primarily provided by Wintrust Mortgage Corporation. As of December 31, 2008 the bank's loan portfolio totaled \$166 million and consisted of 75% commercial and commercial real estate, 14% 1-4 family real estate, 2% farm, 2% multi-family residential lending, and 7% individual.

The bank operates three facilities. In March of 2006, the bank opened with two temporary locations in the communities of New Lenox and Frankfort. In May 2006 a temporary facility was established in Mokena. Permanent facilities were completed in Mokena and New Lenox, replacing the temporary offices, in July and September 2007, respectively. A permanent office for Frankfort opened in June 2008.

OPTCB has the financial capacity to assist in meeting the credit needs of its AA. There are no legal or financial constraints that impede the bank's ability to help meet the credit needs in its AA.

This is the first CRA examination of OPTCB.

DESCRIPTION OF ASSESSMENT AREA(S)

OPTCB has delineated a portion of the Chicago Metropolitan Statistical Area (MSA) as their AA. They have defined their AA to primarily include a portion of Will County, Illinois with a few contiguous census tracts in Cook County, Illinois. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude any low- or moderate-income geographies.

There are 29 census tracts in the AA. There are no low-income census tracts and only seven moderate-income census tracts in the bank's AA. 68.84 percent of the businesses have \$1 million or less in annual gross revenues and 60.45 percent have 1-4 employees. In the bank's AA there are 12.97 percent low-income families, 15.14 percent moderate-income families, and 82 percent of the housing units are owner occupied. The delineated community has 14.88 percent low-income households and 13.96 percent moderate-income households. Census data shows five percent of the AAs households are below the poverty level. In the seven moderate-income tracts

there are approximately seven percent of the AA's businesses, 17 percent of the moderate-income tracts households are below the poverty level, and only 57 percent of the housing units are owner occupied.

Competition among financial institutions in the AA is strong. OPTCB competes with several large national and regional banks that are well established throughout their delineated community. According to the Federal Deposit Insurance Corporation's June 30, 2008 deposit market share report, OPTCB ranks fourth out of 36 banks in their AA with 5.03% of the deposit market share. The local economic climate mirrors the recessionary national condition with declining real estate values, stalled housing market, higher unemployment, and weaker retail performance.

During this evaluation we conducted two community contacts and reviewed one other community contact that was recently done in the bank's delineated area. We used the community contacts to assess the credit needs and economic conditions within the bank's delineated community. The primary credit programs identified as being needed in the local communities served by OPTCB were small business loans to assist in the establishment and retention of commercial and retail activity. Both the community contacts made during this evaluation stated specifically that OPTCB was very involved in community activities for the betterment of the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Loan-to-Deposit Ratio

OPTCB's quarterly average loan-to-deposit ratio is good given the bank's de-novo status and size, financial condition, and AA credit needs. OPTCB's quarterly average loan-to-deposit ratio for the evaluation period from March 2006 through December 2008 was 76.94%. The quarterly loan-to-deposit ratio for the bank's peer financial institutions averaged at 92.99% for the period from March 2006 through December 2008. Taking into consideration OPTCB's de-novo status by removing the bank's first year of operation from the quarterly average, the bank's average loan-to-deposit ratio from March 2007 through December 2008 increases to 86.46%. The peer group's ratio for the same time period was 92.45%.

Lending in Assessment Area

OPTCB's record of lending within its AA is reasonable as a majority of the bank's loans assessed during our examination were originated within the delineated AA. See the breakdown by loan type, number, and amount of loans in Table 1.

As the bank has elected to include residential mortgage lending from Wintrust Mortgage Corporation for this evaluation, the top portion of the table shows the bank's lending inside their AA combined with the HMDA loans from Wintrust Mortgage Corporation. The bottom portion is bank only HMDA data.

Table 1 - Lending in Chicago MSA AA										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$
HMDA*	343	95.01	18	4.99	361	65,315	96.5	2,367	3.50	67,682
Small Business	109	51.66	102	48.34	211	13,364	32.31	27,994	67.69	41,358
Consumer	160	79.60	41	20.40	201	20,183	79.77	5,118	20.23	25,301
Totals	612	79.17	161	20.83	773	98,862	73.59	35,479	26.41	134,341
HMDA-bank only	37	67.27	18	32.73	55	1,925	44.85	2,367	55.15	4,292
Small Business	109	51.66	102	48.34	211	13,364	32.31	27,994	67.69	41,358
Consumer	160	79.60	41	20.40	201	20,183	79.77	5,118	20.23	25,301
Totals	306	65.52	161	34.48	467	35,472	50.00	35,479	50.00	70,951

Source: Data reported under HMDA and loan listings provided by the bank.

*HMDA loans consists of home purchase, home improvement, and home refinancing loans reported by the bank under the Home Mortgage Disclosure Act.

Borrower Distribution of Loans

The distribution of loans reflects a reasonable penetration among businesses of different sizes and individuals of different income levels.

Business Loans

Overall the bank’s distribution of lending to small businesses is good. The bank has excellent performance in making small loans to businesses and adequate performance in lending to businesses with gross annual revenues of \$1 million or less.

The distribution of loans to businesses of different sizes is adequate. Lending to businesses with gross annual revenues of \$1 million or less is near to the percentage of the businesses with gross annual revenues of \$1 million or less located in the bank’s AA. See Table 2 below.

Table 2 - Borrower Distribution of Loans to Businesses in Chicago MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	68.84	5.65	25.52	100%
% of Bank Loans in AA by #	53.21	28.44	18.35	100%
% of Bank Loans in AA by \$	48.92	42.30	8.78	100%

Source: Loan listings provided by the bank; Dunn and Bradstreet data.

The distribution of small loans to businesses based on loan size is excellent. Approximately ninety-four percent of the banks business loans in the Chicago MSA AA are \$500,000 or less. See Table 2A below.

Table 2A - Borrower Distribution of Loans to Businesses by Loan Size in Chicago MSA AA		
Loan Size (000's)	Number of Loans	Percent of Number
\$0 - \$100,000	78	71.56
\$100,001 - \$250,000	17	15.60
\$250,001 - \$500,000	7	6.42
\$500,001 - \$1,000,000	7	6.42
Over \$1,000,000	0	0.00

Source: Loan listings provided by the bank.

HMDA Loans

Overall, the borrower distribution of HMDA loans to low- and moderate-income borrowers in the Chicago MSA AA is good.

The bank’s overall HMDA lending performance to low- income borrowers is poor as the percentage of home purchase and refinancing loans to low- income borrowers is significantly below the percentage of low- income families in the AA. It is noted that the percentage of home improvement loans to low- income borrowers significantly exceeds the percentage of low- income families in the AA. The bank’s overall HMDA lending performance to moderate- income borrowers is excellent. The percentage of home purchase and home improvement loans made to moderate-income borrowers greatly exceeds the percentage of moderate- income families in the AA and the percentage of refinancing loans to moderate- income borrowers is very close to the percentage of moderate- income families in the AA.

Table 3 shows the breakdown and distribution of HMDA lending among borrowers of different income levels as compared to the percent of families for each income category.

Table 3 - Borrower Distribution of Residential Real Estate Loans in Chicago MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	12.97	3.9	15.14	20.9	25.2	27.9	46.69	47.3
Home Improvement	12.97	18.8	15.14	18.8	25.2	31.3	46.69	31.3
Refinancing	12.97	5.0	15.14	13.7	25.2	35.4	46.69	46.0
Total	12.97	5.2	15.14	17.0	25.2	32.0	46.69	45.8

Source: Data reported under HMDA and loan listings provided by the bank; U.S. Census data.

Consumer Loans

The overall lending to consumers with low- and moderate-income levels in the bank's AA is poor.

OPTCB's lending performance to low-income borrowers in the Chicago MSA AA is poor; however, the percentage of loans made to moderate-income borrowers in the Chicago MSA AA is near the percentage of the AA area's moderate-income households and is adequate. See Table 4 below.

Table 4 - Borrower Distribution of Consumer Loans in Chicago MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans						
Consumer Loans	14.88	3.13	13.96	10.63	20.31	18.75	50.85	67.49

Source: Loan listings provided by the bank; U.S. Census data.

Geographic Distribution of Loans

The bank has no low- income census tracts within its AA and the geographic distribution of loans in their AA reflects a poor dispersion of loans in the moderate- income tracts. However, while 24% of the bank’s census tracts are moderate- income, only 7% of the AAs small businesses are located in those census tracts, 17% of the households in the moderate- income census tracts are below poverty, and only 57% of the housing units in the moderate- income census tracts are owner occupied, These factors lead to limited lending opportunities. There were no conspicuous lending gaps identified within OPTCB’s AA.

Business Loans

The bank’s geographic distribution of business loans reflects excellent dispersion of loans to the moderate- income census tracts. The bank’s lending performance in moderate- income census tracts exceeded the percentage of the AA businesses in moderate- income tracts.

Table 5 details the bank’s performance as compared to the percentage of businesses in each census tract income level.

Table 5 - Geographic Distribution of Loans to Businesses in Chicago MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Small Business	NA	NA	8.29	10.10	31.31	55.96	60.40	33.94

Source: Loan listings provided by the bank; Dunn and Bradstreet data.

HMDA Loans

The bank’s geographic distribution of HMDA loans in the Chicago MSA AA is poor. The percentage of home loans made in moderate- income census tracts was significantly less than the percentage of the owner-occupied housing units located in the moderate-income tracts. See Table 6.

Following is a table that details the bank’s performance as compared to the percentage of owner-occupied housing units in each census tract income level.

Table 6 - Geographic Distribution of Residential Real Estate Loans in Chicago MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	NA	NA	9.31	4.8	36.14	37.0	54.54	58.2
Home Improvement	NA	NA	9.31	6.3	36.14	62.5	54.54	31.3
Refinancing	NA	NA	9.31	2.7	36.14	38.0	54.54	59.2
Total	NA	NA	9.31	3.8	36.14	38.7	54.54	57.5

Source: HMDA data and loan listings provided by the bank; U.S. Census data.

Consumer Loans

The bank’s geographic distribution of consumer loans reflects poor dispersion in the bank’s moderate- income census tracts. Home equity lending was significantly less than the percentage of the AA households in the moderate-income tracts. It is again noted that 17% of the households in the moderate- income census tracts are below poverty and only 57% of the housing units in the moderate- income census tracts are owner occupied. Both factors significantly limit the bank’s opportunities to extend home equity lines of credit in those census tracts.

Table 7 details the bank’s performance as compared to the percentage of households in each census tract income level.

Table 7 - Geographic Distribution of Consumer Loans in Chicago MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans						
Consumer Loans	NA	NA	12.97	0.60	38.20	40.00	48.83	59.40

Source: Loan listings provided by the bank; U.S. Census data.

Qualified Investments and CD Services

Community Development Investments and Services

The bank has made approximately \$1 million in qualified community development investments. These investments include a \$250,000 investment in a regional Community Development Financial Institution and \$670,184 investment in four mortgage backed securities secured by specific loans to low- or moderate- income borrowers or property located in a moderate- income census tract in the bank's AA. In addition, the bank has made \$17,500 in donations, grants, or payment-in-kind to qualified community development organizations in their AA. The bank's officer's and employees are involved in several community organizations that offer qualified community development services.

Retail Services

The bank's retail services are reasonably accessible to all individuals within the AA. The bank has two branch locations. In addition to the main bank located in Mokena, there is one branch location in New Lenox and another one in Frankfort. All locations have drive up facilities as well as at least one 24 hour-accessible ATM. They are open Monday through Friday from 7:00 a.m. until 7:00 p.m. and from 7:00 a.m. to 1:00 p.m. on Saturday.

In addition to traditional avenues of delivery, the bank also offers 24/7 access to accounts via the telephone and internet as well as offering bank-by-mail.

Responses to Complaints

OPTCB has not received any written comments or complaints regarding its performance in its efforts to help meet the credit needs of their delineated AAs during the evaluation period. The OCC has not received any written comments, complaints, or inquiries concerning OPTCB and its effort to comply with the spirit and intent of the CRA.

Fair Lending or Other Illegal Credit Practices Review

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