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Comptroller of the Currency Administrator of National Banks

Washington, DC 20219

# PUBLIC DISCLOSURE

February 17, 2009

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Herget National Bank of Pekin Charter Number 9788

33 South Fourth Street Pekin, IL. 61554,

Office of the Comptroller of the Currency

ADC- North Central Illinois & Eastern Iowa 111 West Washington Street Suite 300 East Peoria, IL. 60611, ]

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.

Summarize the major factors supporting the institution's rating.

- Factors supporting the bank's rating should be briefly summarized in bullet format. The summary should highlight only the primary reasons for the rating. It is not necessary to address all five performance criteria in the summary.
- When evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs has been identified in the supervisory process, the conclusion must include a statement if the rating was influenced by this evidence. The conclusion should not mention any technical violations.
- This performance evaluation (PE) format is for EV purposes and does not include detailed guidance. Refer to the Small Bank Training and Tool Kit for guidance on writing the performance evaluation. The kit is available on the Compliance Policy intranet page under CRA.

## SCOPE OF EXAMINATION

Write a short description of the scope of the examination. Discuss how CRA activities were reviewed (using full-scope or limited-scope reviews). At a minimum, discuss the time period covered in the review, the specific lending products reviewed, the names of (any) affiliates reviewed and their corresponding lending products, and how they were considered in the evaluation. Include a description of loan samples used in your analysis and discuss any applicable data integrity review.

# **DESCRIPTION OF INSTITUTION**

Write a brief description of the institution's ability to meet various credit needs based on its financial condition and size, product offerings, prior performance, legal impediments and other factors. Information that may be important to consider includes relationships with a holding company or affiliates, total assets, asset/loan portfolio mix, primary business focus, branching network, and any merger or acquisition activity. Information included in the bank's Public File need not be repeated here; instead, you may refer to the Public File.

# **DESCRIPTION OF ASSESSMENT AREA(S)**

Briefly describe the assessment area(s) under review by providing appropriate information (and any trends) on local economic conditions, including community credit needs and business opportunities identified through outreach activities. Include a discussion of the number and kinds of CRA-related community contacts that were consulted and relevant information obtained and used, if any, in the CRA evaluation. Information included in the bank's Public File need not be repeated here; instead, you may refer to the Public File.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Discuss the institution's CRA performance. The facts and data that support your conclusions must be included in the PE. The PE should clearly demonstrate how the core performance criteria were considered in order to rate the institution. The PE should include information on qualified investments and services **only** when they help raise a bank's rating to Outstanding.

In order to make it easier for the reader to find the support for the rating, describe the bank's performance using the following headings:

#### Loan-to-Deposit Ratio

[Conclusion]

Lending in Assessment Area

[Conclusion]

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

[Conclusion for full-scope AA(s)]

[Conclusion for limited-scope AA(s)]

### **Geographic Distribution of Loans**

[Conclusion for full-scope AA(s)]

[Conclusion for limited-scope AA(s)]

### **Qualified Investments and CD Services (Optional)**

[Conclusion]

### **Responses to Complaints**

[Conclusion]

# Fair Lending or Other Illegal Credit Practices Review

Write a paragraph about the institution's record of complying with the laws relating to discrimination and other illegal credit practices inconsistent with helping to meet community credit needs using the following guidelines:

If no substantive violations are found, the PE must state: "We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs."

OR

When substantive violations involving discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs have been identified in the supervisory process and were taken into account in the CRA evaluation, state that substantive violations were found, the nature and scope of the violations, whether they caused the CRA rating to be adjusted downward, and why the rating was or was not adjusted. Identify the law(s) and regulations(s) violated, the extent of the violation(s) (e.g., widespread or limited to a particular office, division, subsidiary, or affiliate) and characterize management's response in acting upon the violation(s).