

FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

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In the Matter of	)	
	)	
COMMUNITY BANK OF OAK PARK	)	
RIVER FOREST	)	CONSENT ORDER AND
OAK PARK, ILLINOIS	)	ORDER TO PAY
	)	CIVIL MONEY PENALTIES
	)	
	)	FDIC-11-272b
(STATE CHARTERED	)	FDIC-11-279K
INSURED NONMEMBER BANK)	)	
	)	

The Federal Deposit Insurance Corporation ("FDIC") is the appropriate Federal banking agency with regulatory interest over Community Bank of Oak Park River Forest, Oak Park, Illinois ("Bank") pursuant to section 3(q)(3) of the Federal Deposit Insurance Act ("Act"), 12 U.S.C. § 1813(q)(3).

The FDIC has advised the Bank of its right to a NOTICE OF CHARGES AND OF HEARING detailing the unsafe or unsound banking practices and violations of law or regulation alleged to have been committed by the Bank, and its right to a hearing on the charges under sections 8(b) and (i) of the Federal Deposit Insurance Act ("the FDI Act"), 12 U.S.C. §§ 1818(b) and (i), regarding the Equal Credit Opportunity Act ("ECOA"), 15 U.S.C. §§1691-1691f, and its

implementing regulation, Regulation B, 12 C.F.R Part 202 , the Fair Housing Act ("FHA"), 42 U.S.C. §§3601-3619, and its implementing regulation, the Fair Housing Act Regulations, 24 C.F.R. Part 100. (Hereinafter referred to as "Fair Lending Laws.")

The Bank, by and through its duly elected and acting Board of Directors ("Board"), has waived these rights and executed a STIPULATION AND CONSENT TO THE ISSUANCE OF A CONSENT ORDER AND ORDER TO PAY CIVIL MONEY PENALTIES ("STIPULATION"), dated 4/25/12, that is accepted by the FDIC. With the STIPULATION, the Bank has consented, without admitting or denying any charges of violations of law and/or regulations and unsafe or unsound banking practices, to the issuance of this CONSENT ORDER AND ORDER TO PAY CIVIL MONEY PENALTIES ("ORDER") by the FDIC.

I. CONSENT ORDER

Having also determined that the requirements for issuance of an order under 12 U.S.C. § 1818(b) and 8(i), have been satisfied, the FDIC HEREBY ORDERS that the Bank, its institution-affiliated parties, as that term is defined in section 3(u) of the Act, 12 U.S.C. § 1813(u), and its successors and assigns, take the following action:

PLAN FOR BANKING SERVICES

1. To address the alleged injury that the Bank caused by engaging in redlining in the communities of Maywood, Bellwood, and the Austin neighborhood of Chicago ("The Communities"), the Bank shall take the following steps to provide remediation to The Communities:

(a) Within forty-five (45) days from the effective date of this ORDER, the Bank shall update and submit to the Regional Director of the FDIC's Chicago Region ("Regional Director") its 2009 plan to improve the Bank's residential mortgage and commercial lending in the communities of Maywood, Belwood and the Austin neighborhood of Chicago ("The Communities") that is consistent with safe and sound underwriting criteria and within the Bank's financial capacity ("Plan").

(b) The Plan shall provide, at a minimum, the following:

- (i) the manner in which the Bank will provide direct banking services to The Communities;
- (ii) goals for increasing lending, investments, and services in The Communities, with specific timeframes and target dollar amounts of loans, investments, and services;
- (iii) an assessment of the residential and commercial credit needs of The Communities and the manner in which the

Bank will address the credit needs
identified;

(c) The Plan required by this paragraph shall be acceptable to the Regional Director. Subsequent to approval by the Regional Director, and implementation by the Bank, compliance with the Plan will be determined at subsequent examinations or visitations.

2. (a) Within sixty (60) days from the effective date of this ORDER, the Bank's Board shall have written procedures in place that provide for the monitoring of the Bank's compliance with this ORDER. At a minimum these monitoring procedures shall require that:

- (i) the Board shall meet at least monthly, and at each meeting shall review, acknowledge, and approve reports submitted by the Bank's Community Lending Officer, external audit reports, reports submitted by the Bank's Compliance Committee including the minutes of Compliance Committee meetings, progress reports required by this ORDER, any written responses to such reports, and the status of the

Bank's overall compliance with this ORDER. Board minutes shall document these reviews and approvals, including the names of any dissenting directors;

(b) The Board shall ensure proper and timely follow-up and resolution to audit and examination findings indicating the need for corrective action.

TRAINING PROGRAM

3. During the life of this ORDER the Bank shall maintain its Training Program and continue to provide on-going training on an annual basis concerning Fair Lending Laws for all Bank personnel, including senior management and the Board, commensurate with their individual job functions and duties. The training program required by this paragraph shall be acceptable to the Regional Director.

EXTERNAL AUDIT

4. (a) Within one hundred twenty (120) days from the receipt of the Compliance Report of Examination which commenced in December of 2011, the Bank shall cause an external audit to be conducted to ensure compliance with Fair Lending Laws.

(b) The audit will assess the Bank's Compliance Management System in conjunction with the standards described in the FDIC's Compliance Examination Manual, Section II-2.1 to 2.4, (also known as the "Compliance Management System Guidance"), for its capacity to affect compliance with the Fair Lending Laws and at a minimum, shall:

- (i) be comprehensive in scope;
- (ii) identify any deficiencies;
- (iii) provide descriptions and suggestions for corrective actions and time frames necessary for correction; and
- (iv) establish follow-up procedures to verify that corrective actions are implemented effectively.

(c) Audit findings, any deficiencies, and recommendations shall be documented in a written report and provided to the Board.

(d) Within thirty (30) days of receipt of the external auditor's written report, the Board shall meet and take action to address the audit findings, correct any deficiencies noted, and implement recommendations, or explain in a written report why a particular recommendation

has not been implemented, which shall be signed by all Board members and attached to Board minutes.

(e) The Bank shall provide the Regional Director with a copy of the engagement letter with the external auditor for review. The engagement letter, at a minimum, should include:

- (i) a description of the work to be performed under the engagement letter;
- (ii) the responsibilities of the external auditor;
- (iii) an identification of the professional standards used in relation to the work being performed;
- (iv) identification of the specific procedures to be used when carrying out the work to be performed;
- (v) the qualifications of the employee(s) who are to perform the work;
- (vi) the time frame for completion;
- (vii) any restrictions on the use of the reported finding;
- (viii) a provision for unrestricted examiner access to work papers; and

(ix) a provision stating that the external auditor will present the audit findings directly to the Board.

(f) The Bank shall have external audits conducted on an annual basis. The Bank shall comply with all of the provisions of this paragraph for subsequent audits.

(g) A copy of any external audit(s) received by the Bank shall be submitted to the Regional Director.

DISCLOSURE TO SHAREHOLDER

5. Following the effective date of this ORDER, the Bank shall send to its shareholder a copy of this ORDER in conjunction with, either: (a) the Bank's next shareholder communication; or (b) its notice or proxy statement preceding the Bank's next shareholder meeting.

PROGRESS REPORTS

6. Within thirty (30) days from the end of the first calendar quarter following the effective date of this ORDER, and within thirty (30) days after the end of each successive calendar quarter thereafter, the Bank shall furnish written progress reports to the Regional Director addressing, at a minimum:

(a) the form and manner of all actions taken to secure compliance with this ORDER during each quarter, and a discussion of the results of such efforts, including applicant, lending, and depository activity;

(b) copies of the monthly reports prepared by the Community Lending Officer and submitted to the Compliance Committee and Board; and

(c) copies of minutes of meetings held by the Compliance Committee and the Board.

II. ORDER TO PAY CIVIL MONEY PENALTIES

After considering: the violations of law and/or regulation; the gravity of the conduct; the history of previous conduct by the Bank; the appropriateness of the penalty with respect to the financial resources and good faith of the Bank; the CONSENT ORDER; and other matters as justice may require, the FDIC FURTHER ORDERS that, pursuant to Section 8(i)(2) of the FDI Act, a Civil Money Penalty of seventy five thousand dollars (\$75,000.00) be assessed against the Bank. The Bank shall pay the Civil Money Penalty to the United States Treasury.

III. CLOSING PARAGRAPHS

The Order shall be effective upon its issuance by the FDIC.

The provisions of this ORDER shall be binding upon the Bank, its institution-affiliated parties, successors, and assigns.

The provisions of this ORDER shall remain effective and enforceable except to the extent that, and until such time as, any provision of this ORDER shall have been modified, terminated, suspended, or set aside by the FDIC.

Pursuant to delegated authority.

Dated this 27th day of April, 2012.

_____/s/_____

Sylvia H. Plunkett
Senior Deputy Director
Compliance and CRA
Examinations
Division of Depositor and
Consumer Protection
Federal Deposit Insurance
Corporation