



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

August 18, 2008

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Mountain West Bank, National Association
Charter Number: 22141

1225 Cedar Street
Helena, MT 59601-0000

Office of the Comptroller of the Currency

SALT LAKE CITY
2795 East Cottonwood Parkway Suite 390
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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: Outstanding.

The Community Development Test is rated: Satisfactory.

The major factors supporting the institution's rating are as follows:

- MWB's loan-to-deposit ratio is more than reasonable given the financial institution's size, financial condition, and the AAs' credit needs.
- A substantial majority of the bank's loan originations are made within its AAs.
- The distribution of loans reflects excellent penetration among individuals of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects excellent dispersion throughout its AAs.
- The bank's community development performance demonstrates satisfactory responsiveness to community development needs in its AAs through qualified investments and community development services.

Scope of Examination

We evaluated MWB's Community Reinvestment Act performance under the Lending and Community Development Tests. In evaluating the bank's lending performance we reviewed lending data for the bank's two primary loan products. Accordingly, for each AA (refer to the Description of Assessment Areas section below), we reviewed a sample of small business loans and bank reported HMDA data for residential mortgage loans (home purchase loans) originated during the period of January 1, 2006 through June 30, 2008. For demographic comparisons, we used Dunn and Bradstreet data for business loans and HMDA data for home purchase loans for the same period.

The evaluation covers the period from the date of the previous CRA Examination, September 22, 2004, through August 18, 2008. The Lending Test evaluated home mortgage and small business lending from January 1, 2006 through June 30, 2008, and the Community Development Test covered community development loans, investments and services during the entire evaluation period. Concurrent with this evaluation, we tested the accuracy of the bank's HMDA data. We found the data to be accurate and used the data in the evaluation. We reviewed the bank's community development loans, investments and services based on information provided by the bank. We used only those that met the regulatory definition for community development in our analysis of the Community Development Test. For demographic analysis for the Community Development Test, we used the most recent available demographic data.

Description of Institution

Mountain West Bank, National Association, (MWB) is a full-service financial institution headquartered in Helena, Montana. Mountain West Financial Corp. owns 100 percent of the bank and is headquartered in Helena, Montana. The bank offers a full range of credit products within its assessment areas including consumer, commercial, and real estate loan products. The bank's primary lending focus is on commercial real estate, small business lending, and home loans. MWB sells most of the home loans it originates to the secondary market. MWB operates 11 full service branches offering various loan and deposit products and 14 automated teller machines (ATMs). In addition, the bank opens three temporary limited-service locations in Helena, Great Falls, and Bozeman on one or two days per week for 30 to 90 minutes depending on the location. As of June 30, 2008, MWB reported \$694 million in total assets, \$609 million in total loans, \$567 million in total deposits, and \$62 million in equity capital. Total loans represented 88 percent of total assets. The loan portfolio by dollar volume was composed of: 66 percent commercial real estate, 16 percent commercial/industrial, 15 percent residential real estate, and 3 percent consumer loans.

MWB received a Satisfactory rating at its last CRA examination as of September 22, 2004. As of the date of this evaluation, there were no legal, financial, regulatory, or other factors impeding the bank's ability to meet the credit needs of its assessment areas.

Description of Assessment Areas

MWB designated four assessment areas (AAs), all of which meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income areas. We contacted two community organizations during the evaluation. The contacts stated primary credit needs consist of loans for small businesses and affordable housing programs. The contacts indicated local financial institutions were active in meeting the credit needs of their communities.

Helena Assessment Area

The Helena AA consists of all of Lewis and Clark and Jefferson Counties, and one census tract (CT) in Broadwater County. The AA includes 16 CTs, of which there are no low-income or moderate-income CTs, seven middle-income CTs, and nine upper-income CTs.

MWB operates five full service branch locations, one temporary office, and seven ATMs. National financial institution affiliates, as well as affiliates of bank holding companies based in Montana provide strong banking competition. The Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits Report shows MWB ranked first in the AA with a deposit market share of 31 percent. Economic conditions are generally stable. Helena is Montana's capital city; accordingly the largest employer in the AA is the State of Montana. As of June 30, 2008, the unemployment rate for Lewis and Clark County was 3.3 percent. The unemployment rate for the State of Montana was 3.9

percent. Based on 2000 U.S. Census data, the total population of the Helena AA was 67,772. The updated non-MSA median family income for non-MSA counties in Montana was \$48,900.

Great Falls MSA Assessment Area

The Great Falls MSA consists of all of Cascade County. The AA includes 23 CTs, of which there is one low-income CT, five moderate-income CTs, 10 middle-income CTs, and two upper-income CTs.

MWB operates two full service branch locations, one temporary office, and two ATMs. National financial institution affiliates provide most of the competition. The Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits Report shows MWB ranked fourth in the AA with a deposit market share of 13 percent. Moody's reports the economy in the MSA is slowing. Major employers include Malmstrom Air Force Base, Benefits Health Care Center, Montana Air National Guard, and the Great Falls Clinic. As of June 30, 2008, the unemployment rate for the Great Falls MSA was 3.7 percent, compared to 3.9 percent for the State of Montana. Based on 2000 U.S. Census data, the total population of the Great Falls MSA was 80,357. The updated MSA median family income for the Great Falls MSA was \$50,200.

Missoula MSA Assessment Area

The Missoula MSA consists of all of Missoula County. The MSA consists of 19 CTs, of which no CTs are low-income, four are moderate-income, 13 are middle-income, and two are upper-income CTs.

MWB operates three full service branch locations and four ATMs. National financial institution affiliates and locally-based community banks provide most of the banking competition. The Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits Report shows MWB ranked sixth in the AA with a deposit market share of 6 percent. Moody's reports the economy in the MSA is generally strong. Major employers include St. Patrick's Hospital, University of Montana, Community Medical Center, and Plum Creek Timber Company, Inc. As of June 30, 2008, the unemployment rate for the Missoula MSA was 3.8 percent, compared to 3.9 percent for the State of Montana. Based on 2000 U.S. Census data, the total population of the Missoula MSA 95,862. The updated MSA median family income for the Missoula MSA was \$54,500.

Bozeman Assessment Area

The Bozeman AA consists of all of Gallatin County and four of the six census tracts (CTs) in Park County. The AA includes 18 CTs, of which there are no low-income CTs, one moderate-income CT, ten middle-income CTs, and seven upper-income CTs.

MWB operates one full service branch location, one temporary office, and one ATM. Affiliates of bank holding companies based in Montana, community banks based in the AA, and affiliates of national financial institutions provide banking competition. The FDIC Summary of Deposits Report shows MWB ranked 11th in the AA with a deposit market share of 3 percent. Retail and education sectors provide the majority of the employment opportunities. As of June 30, 2009, the unemployment rate for Gallatin

County was 3.2 percent, compared to the State of Montana's 3.9 percent. Based on 2000 U.S. Census data, the total population of the Bozeman AA was 81,733. The updated non-MSA median family income for non-MSA counties in Montana was \$48,900.

Conclusions with Respect to Performance Tests

LENDING TEST

Overall, MWB's performance under the Lending Test is outstanding. We based this conclusion on residential home purchase loans and small business loans. We weighted our conclusions more toward performance in the Helena AA due to its significance to the bank's totals in both residential home purchase loans and small business loans.

Loan-to-Deposit Ratio

MWB's lending level is more than reasonable given the financial institution's size, financial condition, and the AAs' credit needs.

MWB's average quarterly loan-to-deposit ratio for all quarters since the prior CRA public evaluation dated September 22, 2004, is 103 percent. To achieve a comparison with similarly situated banks, we identified banks operating in Cascade, Lewis and Clark, Missoula, and Gallatin Counties that had similar total deposits as the MWB locations in that county. Two of these banks are subsidiaries of a bank holding company located in Montana; one bank is headquartered in a different part of the state and has branch locations in two of the AAs; and, one bank is a community bank with offices in one AA. We then compared MWB's average quarterly loan-to-deposit ratio for all quarters since the prior CRA public evaluation with the average loan-to-deposit ratio of these banks for the same period. The bank's loan-to-deposit ratio of 103 percent compares favorably with the four other banks. These banks had loan-to-deposit ratios during the same time period averaging 96 percent. The similarly situated banks' average loan-to-deposit ratios fell within a range of 116 percent on the high side and 84 percent on the low side.

Additionally, during the evaluation period, the bank made residential real estate loans totaling more than \$77 million that were sold on the secondary market.

Lending in Assessment Area

The bank's lending in its AAs exceeds the standard for satisfactory performance.

A substantial majority of loans are in the bank's AAs. The bank originated and/or purchased 1,077 loans in their primary lending products during the evaluation period. Of those loans, 83 percent by number and 80 percent by total dollar value were within the AAs.

Table 1 - Lending in the Combined Assessment Areas (Helena, Great Falls, Missoula, Bozeman)								
Loan Type	Number of Loans				Dollars of Loans			
	Inside		Outside		Inside		Outside	
	#	%	#	%	\$ (000s)	%	\$ (000s)	%
Home Purchase	815	82	182	18	127,392	79	34,340	21
Business	74	93	6	7	16,262	96	631	4
Totals	889	83	188	17	143,654	80	34,971	20

Source: Loan samples and bank-reported HMDA data January 1, 2006, to June 30, 2008.

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

Conclusions for Areas Receiving Full-Scope Reviews

The overall borrower distribution of loans to borrowers of different incomes and to businesses of different sizes is excellent.

The borrower distribution of residential real estate loans is excellent. Based on HMDA records for home purchase loans for the Helena AA, the bank’s lending was near the area demographics for moderate-income families but was less than area demographics for low-income borrowers. The significant barriers banks face in making home loans to low-income individuals mitigates this negative comparison. For the Great Falls MSA, the bank’s home loan performance met the demographics for moderate-income families. The percentage of the bank’s home purchase loans to low-income families was less than area demographics but still represented 10 percent of all home purchase loans. For the Missoula MSA, the bank’s home loan performance exceeded the demographics for moderate-income families and was less than demographics for low-income families, which is mitigated again by significant barriers in making home loans to low-income borrowers. The following three tables show the borrower distribution of home purchase loans based on the income level of the borrower.

Table 2 - Borrower Distribution of Residential Real Estate Loans in the Helena AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% 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	13.10	3.09	14.93	11.97	22.28	28.36	49.69	56.56

Source: AA data from 2000 U.S. Census data. Bank data from bank-prepared HMDA data from loans originated January 1, 2006, to June 30, 2008.

Table 2A - Borrower Distribution of Residential Real Estate Loans in the Great Falls MSA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% 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	18.42	9.74	18.98	18.97	24.09	20.51	38.51	50.77

Source: AA data from 2000 U.S. Census data. Bank data from bank-prepared HMDA data from loans originated January 1, 2006, to June 30, 2008.

Table 2B - Borrower Distribution of Residential Real Estate Loans in the Missoula MSA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% 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	19.20	5.52	18.95	19.63	22.65	33.74	39.20	41.10

Source: AA data from 2000 U.S. Census data. Bank data from bank-prepared HMDA data from loans originated January 1, 2006, to June 30, 2008.

The borrower distribution of the MWB’s loans to businesses of different revenue levels is good. The distribution of the MWB’s loans to businesses of different revenue levels exceeds area demographic data for the Helena AA and the Great Falls MSA. MWB’s distribution of loans to businesses of different revenue levels for the Missoula MSA is somewhat lower than demographic data. Based on our samples, the following tables illustrate the bank’s distribution of commercial loans based on whether the businesses had less than \$1 million in revenue or more than \$1 million. Although the percentage of loans the bank made to businesses with revenues less than \$1 million generally compares favorably to the percentage of businesses reporting revenues less than \$1 million, there was a significant number of businesses that did not report revenues.

Table 3 - Borrower Distribution of Loans to Businesses in the Helena AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	60.00	3.87	36.12	100%
% of Bank Loans in AA by #	80.00	10.00	10.00	100%
% of Bank Loans in AA by \$	67.32	28.44	4.24	100%

Source: Assessment Area (AA) data from 2007 Dunn and Bradstreet. Bank data from business loan sample of loans originated January 1, 2006, to June 30, 2008.

Table 3A – Borrower Distribution of Loans to Businesses in the Great Falls MSA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	61.54	4.99	33.47	100%
% of Bank Loans in AA by #	65.00	25.00	10.00	100%
% of Bank Loans in AA by \$	45.89	48.66	5.44	100%

Source: Assessment Area (AA) data from 2007 Dunn and Bradstreet. Bank data from business loan sample of loans originated January 1, 2006, to June 30, 2008.

Table 3B - Borrower Distribution of Loans to Businesses in the Missoula MSA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	66.80	5.29	27.91	100%
% of Bank Loans in AA by #	55.00	45.00	0.00	100%
% of Bank Loans in AA by \$	38.49	61.51	0.00	100%

Source: Assessment Area (AA) data from 2007 Dunn and Bradstreet. Bank data from business loan sample of loans originated January 1, 2006, to June 30, 2008.

Conclusion for Limited-Scope AA

The bank’s lending performance in the Bozeman AA is inconsistent with the bank’s lending performance in assessment areas we reviewed using full-scope examination procedures. The bank’s performance in the limited-scope AA was below that of the AAs in which we used full-scope examination procedures.

Table 2C - Borrower Distribution of Residential Real Estate Loans in the Bozeman 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	12.96	2.06	15.44	10.31	24.16	24.74	47.44	62.89

Source: AA data from 2000 U.S. Census data. Bank data from bank-prepared HMDA data from loans originated January 1, 2006, to June 30, 2008.

Table 3C - Borrower Distribution of Loans to Businesses in the Bozeman AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	67.86	4.19	27.94	100%
% of Bank Loans in AA by #	45.00	55.00	0.00	100%
% of Bank Loans in AA by \$	16.88	83.12	0.00	100%

Source: Assessment Area (AA) data from 2007 Dunn and Bradstreet. Bank data from business loan sample of loans originated January 1, 2006, to June 30, 2008.

Geographic Distribution of Loans

Conclusions for Areas Receiving Full-Scope Reviews

MWB's distribution of loans among the various CTs in its AAs is excellent.

The bank's performance in the Great Falls MSA exceeds the demographics in both low- and moderate-income tracts for home purchase lending and is near AA demographics in small business lending. In the Missoula MSA, the bank's performance exceeded MSA demographics for both home purchase lending and small business loans in moderate-income CTs. There are no low-income CTs in the Missoula MSA. Analysis of the geographic distribution of loans in the Helena AA is not meaningful because the AA does not include any low- or moderate-income CTs.

Table 4 - Geographic Distribution of Residential Real Estate Loans in the Great Falls MSA								
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	0.11	0.49	11.87	15.12	72.01	63.90	16.02	20.49

Source: AA data from 2000 U.S. Census data. Bank data from bank-prepared HMDA data from loans originated January 1, 2006, to June 30, 2008.

Table 5 - Geographic Distribution of Loans to Businesses in the Great Falls MSA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses/ Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans
	10.12	5.00	19.98	15.00	59.94	65.00	10.06	15.00

Source: Assessment Area (AA) data from 2007 Dunn and Bradstreet. Bank data from business loan sample of loans originated January 1, 2006, to June 30, 2008.

Table 4A - Geographic Distribution of Residential Real Estate Loans in the Missoula MSA								
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	N/A	N/A	1.80	4.95	48.97	41.58	49.23	53.47

Source: AA data from 2000 U.S. Census data. Bank data from bank-prepared HMDA data from loans originated January 1, 2006, to June 30, 2008.

Table 5A - Geographic Distribution of Loans to Businesses in the Missoula MSA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses/ Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans
	N/A	N/A	4.49	5.00	46.39	25.00	49.11	70.00

Source: Assessment Area (AA) data from 2007 Dunn and Bradstreet. Bank data from business loan sample of loans originated January 1, 2006, to June 30, 2008.

Table 4B – Geographic Distribution of Residential Real Estate Loans in the Helena 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	N/A	N/A	N/A	N/A	39.06	37.54	60.94	62.46

Source: AA data from 2000 U.S. Census data. Bank data from bank-prepared HMDA data from loans originated January 1, 2006, to June 30, 2008.

Table 5B - Geographic Distribution of Loans to Businesses in the Helena AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses/ Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans
	N/A	N/A	N/A	N/A	34.32	40.00	65.68	60.00

Source: Assessment Area (AA) data from 2007 Dunn and Bradstreet. Bank data from business loan sample of loans originated January 1, 2006, to June 30, 2008.

Conclusion for Limited-Scope AA

The bank’s lending performance in the Bozeman assessment area is consistent with the bank’s lending performance in the assessment areas we reviewed using full-scope procedures.

Table 4C – Geographic Distribution of Residential Real Estate Loans in the Bozeman 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	N/A	N/A	1.80	4.95	48.97	41.58	49.23	53.47

Source: AA data from 2000 U.S. Census data. Bank data from bank-prepared HMDA data from loans originated January 1, 2006, to June 30, 2008.

Table 5C - Geographic Distribution of Loans to Businesses in the Bozeman AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses/ Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans
	N/A	N/A	4.49	5.00	46.39	25.00	49.11	70.00

Source: Assessment Area (AA) data from 2007 Dunn and Bradstreet. Bank data from business loan sample of loans originated January 1, 2006, to June 30, 2008.

Responses to Complaints

MWB has not received any complaints during this evaluation period in regards to its CRA performance.

COMMUNITY DEVELOPMENT TEST

MWB's responsiveness through community development lending, investments, and services is satisfactory.

Number and Amount of Community Development Loans

Limited opportunities for community development lending exist within MWB's assessment areas. Competition from both large regional and other area financial institutions for originating community development loans is strong.

MWB did not originate any community development loans within its assessment areas over the evaluation period. However, MWB did originate within its assessment areas small business loans that had community development purposes.

MWB originated:

- An operating line of credit for \$150,000 to a Helena organization that provides youth programs targeted to low- and moderate-income individuals.

- An operating line of credit for \$25,000 to a Missoula organization that provides youth programs targeted to low- and moderate-income individuals.
- A construction loan for \$550,000 to a Helena organization that provides technical assistance on financial matters to small businesses.
- An operating line of credit for \$150,000 to a Montana Indian non-profit organization in Helena established to develop, implement, and maintain cultural, social and economic programs for families, seniors, and youth.

Number and Amount of Qualified Investments

MWB's community development investments reflect their responsiveness to the needs within its AAs. During the evaluation period, the bank purchased Single Family Mortgage Revenue bonds issued by the Montana Board of Housing totaling \$111,000. These bonds qualified for community development consideration as the proceeds provide a lender pool for low- and moderate-income borrowers.

MWB made qualified donations totaling more than \$43,000 to 18 community organizations within its AAs. Community organizations provided the following services: 1) facilitate affordable housing options or alternatives to low- and moderate-income individuals; 2) services for abused women and children; 3) youth programs targeted to low- or moderate-income individuals; 4) financial education services; and 5) provides technical assistance on financial matters to small businesses.

Extent to Which the Bank Provides Community Development Services

MWB's community development services program demonstrates the bank's responsiveness to the needs within its AAs. We evaluated both the bank's retail banking services and community development services.

The distribution of MWB's branches and service delivery systems are satisfactory and accessible to individuals of different income levels in the four AAs. MWB operates 11 full service branches offering various loan and deposit products and 14 automated teller machines (ATMs). In addition, the bank opens three temporary limited-service locations in Helena, Great Falls, and Bozeman on one or two days per week for 30 to 90 minutes depending on the location.

Both the extent and innovativeness of the bank's community development services are reasonable. Bank employees are involved in numerous volunteer services and activities. Eleven of these volunteer services and activities meet the qualifications for community development services. A sample of activities performed include bank personnel: 1) providing financial expertise to a non profit government organization that serves low- and moderate-income families with housing needs; 2) providing instruction

for an organization that provides credit counseling, home-buyer and home-maintenance counseling, financial planning or other financial services education to promote affordable housing; 3) serving on the board of directors of an organization that provides shelter and a safe haven at no charge for women and children who have suffered domestic violence and sexual abuse; 4) serving on the loan committee and on the board of directors of an organization that provides technical assistance on financial matters to small businesses; and 5) serving on the committee of an organization targeted to reduce poverty through education.

Responsiveness to Community Development Needs

MWB representatives, over the evaluation period, participated in a variety of community development services which were responsive to its AAs' needs.

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.