



PUBLIC DISCLOSURE

March 04, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Greeneville Federal Bank, FSB
Charter Number 706518

101 W Summer St
Greeneville, TN 37743-4924

Office of the Comptroller of the Currency

320 Seven Springs Way
Suite 310
Brentwood, TN 37027

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

Greeneville Federal Bank, FSB (GFB) has an overall satisfactory record of meeting community credit needs. This is based on the following:

- The bank's quarterly loan-to-deposit ratio is more than reasonable and averaged 99.96% during the evaluation period. GFB's quarterly average loan-to-deposit ratio ranged from a low of 87.30% as of March 31, 2012 to a high of 120.15% as of March 31, 2009.
- Lending in the bank's assessment area (AA) is good. A majority of GFB's loans are within the bank's assessment area. Based on our 2012 and 2013 loan sample, approximately 84% of the number and 68% of the dollar of loans originated were to borrowers within the AA. Similarly, based on our 2010 and 2011 loan sample, approximately 84% of the number and 76% of the dollar of loans originated were to borrowers within the AA.
- GFB's distribution of loans to borrowers of different income (including low-and moderate-income) levels is reasonable, and loans to businesses of different sizes is satisfactory.

Scope of Examination

This Performance Evaluation is based on full-scope examination procedures for the time period April 21, 2009 through March 4, 2014. For comparative and analytical purposes, results were evaluated using 2000 and 2010 Census demographic information. GFB has no bank owned affiliates. GFB is not a Home Mortgage Disclosure Act (HMDA) reporter. Therefore, no data integrity review was conducted prior to the evaluation.

Conclusions regarding the Lending Test are based on residential loans including home purchases, home improvements, and home refinances. Residential loans considered in the Lending Test originated between January 1, 2010 and December 31, 2013. Small business loans originated during the same time period were also considered in the Lending Test. A sample of loans was selected for each loan category based on internal bank reports. This evaluation covers the period January 1, 2010 through March 4, 2014.

Description of Institution

GFB is a federally chartered, mutual savings association with total assets of approximately \$165 million as of December 31, 2013, and is located in Greeneville, Greene County, Tennessee. The institution operates four offices, all in Greene County. All locations are located in middle-income census tracts (CTs). There have not been any major changes in the bank's corporate structure, including merger or acquisition activities, since the last Community Reinvestment Act

(CRA) examination dated April 20, 2009, when the bank received a **Satisfactory** rating on the examination. Due to regulatory concerns, in July 2011 the directors of GFB signed Orders to Cease and Desist with its former regulator, Office of Thrift Supervision (OTS). Since signing the Orders to Cease and Desist, the Office of Thrift Supervision merged with the Office of Comptroller of the Currency (OCC), which is now the bank’s primary regulatory agency. Among other requirements, the Orders to Cease and Desist requires the bank to implement a written program to reduce the bank’s level of credit risk and strengthen loan workout and collection processes. The program imposes restrictions on the renewal of certain loans, requires stricter underwriting criteria on new loan requests, and requires the bank to identify, monitor, and reduce certain credit concentrations. The Orders to Cease and Desist may impose legal and financial impediments to the bank’s ability to generate loan production and meet the credit needs of its AA. The bank offers a full-range of loan and deposit services. GFB’s primary business focus is commercial and industrial loans, including commercial real estate loans and residential mortgage loans.

GFB operates drive-up ATMs at two of its branch locations, Tusculum Boulevard and East Andrew Johnson Highway. Neither ATM accepts deposits. The institution has not closed any branch offices during this evaluation period.

As of December 31, 2013, Greeneville Federal had total assets of \$165 million, of which net loans comprised 73%. The following table reflects the composition of Greeneville Federal’s loan portfolio based on the December 31, 2013 Call Report.

Product Category	Gross Loans as of December 31, 2013	
	Dollar (000’s)	Percent
Commercial & Industrial Including Commercial Real Estate	51,300	42.65
Residential Mortgage Loans	49,600	41.24
Individuals	2,257	1.88
Construction & Land Development	7,565	6.29
Farmland and Agriculture	8,955	7.44
All Other	602	0.50
Total	120,279	100.00

Source: December 31, 2013 Report of Condition.

Distribution of Bank Offices and ATMs by Census Tract (Per 2010 and 2000 U. S. Census Data)						
Census Tract Income Level	Tracts		Full-Service Branches		Automated Teller Machines*	
	#	%	#	%	#	%
Low	0	0%	0	0%	0	0%
Moderate	1	6.67%	0	0.00%	0	0.00%
Middle	13	86.67%	4	100.00%	2	100.00%
Upper	1	6.67%	0	0.00%	0	0.00%
N/A	0	0%	0	0%	0	0%
Total	15	100%	4	100%	2	100%

**Two ATMs contiguous with banking locations disperse cash only and do not accept deposits. Two offices do not have ATMs. There are no off-site ATMs.*

Customers may also access their accounts through telephone banking or the Internet (www.greenevillefederalbank.com). Internet and phone banking services include transfers between GFB accounts, review of account balances or transactions, and bill-paying capability for the internet banking product. The bank also offers a Visa Check Card that provides customers with additional access to their accounts at point of sale or ATM locations.

Although it is not the goal of GFB to substantially grow the overall loan portfolio in the near future, the bank plans on limited funding in certain lower risk loan categories or with borrowers with the proper underwriting in other more high risk categories such as commercial real estate lending. The bank intends on focusing lending efforts on residential 1-4 family permanent mortgages, residential 1-4 family construction loans, residential lot loans located in subdivisions currently financed by the bank, land loans for agriculture production, commercial loans secured by accounts receivable inventory and equipment, as well as typical consumer loans secured by autos, boats, and etc. The residential 1-4 family permanent mortgage is the backbone of the bank and is an essential element of the overall loan portfolio. The bank’s business strategy includes continued marketing of commercial credit to small businesses through its products, staff, and locations. GFB also supports the purchase and long-term financing of residential home loans through its conventional secondary market home mortgage purchaser, Crescent Mortgage Company. Through Crescent Mortgage Company, the bank offers special programs for home buyers, buyers with less than perfect credit history, and low- and moderate-income family home buyers.

During this review period, the economic downturn impacted the bank’s AA and resulted in manufacturing plant closures, layoffs, and relocation as local industries adjusted to declining sales and lower demand. Business and retail loan demand declined significantly as borrowers deferred business expansion, development, residential, and retail purchases. The housing downturn also significantly impacted employment in the bank’s AA. Weaknesses in the housing market severely curtailed independent contractors and other trades livelihood during this period.

Description of Assessment Area

The bank has one assessment area (AA) that includes one county in rural Tennessee. None of the bank's AA is located in a Metropolitan Statistical Area (MSA). The AA is reasonable and meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geographies. The bank's AA includes all the 15 contiguous census tracts of Greene County with Greeneville being the principal city. Additionally, Greeneville serves as the county seat of Greene County. The bank's main office is located in Greeneville, TN. Greene County/Greeneville is centrally located in the eastern portion of the United States and is easily accessible by Interstate 81. Situated at the foothills of the Great Smoky Mountains, Greene County/Greeneville is 70 miles northeast of Knoxville, 30 miles southwest of the Tri-Cities region of Johnson City/Kingsport/Bristol, and 54 miles northwest of Asheville, NC.

No banking facilities have closed since the previous CRA examination. There are four banking locations. All of the facilities are located in middle-income census tract. Two of the offices are full-service offices, which provide ATMs with 24-hour availability. Routine business transactions such as cash disbursements, transfers, and balance inquiries are available through these island secured units. While the ATMs do not accept cash deposits, they do disburse cash. Two banking locations do not offer ATM service. Based on the 2010 U.S. Census, there are 15 census tracts within the AA. There are no low-income census tracts within the AA. There is one moderate, 13 middle, and one upper-income census tracts. All are located in Greene County. All 13 of the middle-income census tracts are designated "distressed" due to high unemployment. Per 2010 US Census information, 68,831 individuals reside within GFB's AA. The geographic dispersion of the population closely resembles the census tract geographies. Within the AA, there are approximately 32,000 owner-occupied homes and 4,400 businesses. 88% of owner-occupied housing is located in middle-income census tract with approximately 7% each being located in moderate- and upper-income census tracts. 83% of the businesses are located in middle-income census tracts with 12% and 5% of businesses being located in moderate and upper-income tracts respectively. The family distribution by income levels show 21% and 19%, respectively, are low- and moderate-income families. Slightly more than 19% of households in the AA are below the poverty level. At December 31, 2013, the preliminary unemployment rate average for Greene County was 10%. 100% of the bank offices are located in middle-income census tracts. Similarly, 100% of the bank's ATMs are also located in middle-income census tracts. The second table provides similar demographic information for the AA based on 2000 US Census data.

Demographic Information for Assessment Area (Per 2010 Census Data)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	15	0	6.67%	86.67%	6.67%	0
Population by Geography	68,831	0	9.61%	85.89%	4.50%	0
Owner-Occupied Housing by Geography	31,618	0	7.81%	88.14%	4.05%	0
Businesses by Geography	4,382	0	12.44%	82.88%	4.68%	0
Farms by Geography	416	0	3.85%	94.23%	1.92%	0
Family Distribution by Income Level	20,279	21.15%	18.95%	22.32%	37.59%	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	8,131	52.75%	47.25%	0	0	0
Median Family Income	= \$44,006	Median Housing Value		= \$106,553		
HUD Adjusted Median Family Income (MFI) for 2012	= \$46,700	Unemployment Rate		= 10.0%		
Households Below the Poverty Level	= 19.21%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 U.S. Census and 2012 HUD updated MFI. The December 2013 unemployment rate for Greene County was 10.0%. The December 2013 unemployment rate was 7.3% and 6.5%, respectively, for State of Tennessee and US.

Demographic Information for Assessment Area (2000 Census Data)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	15	0	6.67%	86.67%	6.67%	0
Population by Geography	62,909	0	10.95%	85.34%	3.71%	0
Owner-Occupied Housing by Geography	28,116	0	8.31%	88.67%	3.01%	0
Businesses by Geography	5,436	0	11.50%	84.00%	4.51%	0
Farms by Geography	366	0	4.10%	94.26%	1.64%	0
Family Distribution by Income Level	18,210	19.43%	18.78%	23.56%	38.23%	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	6,958	50.85%	49.15%	0	0	0
Median Family Income	= \$37,716	Median Housing Value		= \$74,036		
HUD Adjusted Median Family Income (MFI) for 2011	= \$45,400	Unemployment Rate		= 10.8%		
Households Below the Poverty Level	= 15.93%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census and 2011 HUD updated MFI. The December 2011 unemployment rate for Greene County was 10.8%. The December unemployment rate for 2011 was 8.1% and 8.9%, respectively, for State of Tennessee and US.

Education and the medical services are major industry employers within the AA. One of the four Walters State Community College campus sites is located in Greeneville. The college has a combined enrollment of 6,900 students. Tusculum College is also located in Greeneville and has an enrollment of 2,300 students. Greeneville has two hospitals with a total of 240 beds. The county school system employs over 400 teachers. Major employers in Greene County include: Wal-Mart Logistics (distribution of general and hardline goods) 916 employees; DTR Tennessee, Inc. (automotive anti-vibration/hose products) 630 employees; American Greetings (gift wrap, ribbons, bows, and cards) 542 employees; Parker Hannifin (hydrostatic motors/manual steering gears) 450 employees; John Deere Power Products (lawn equipment) 431 employees; Angus-Palm Industries (rollover protective systems and cabs) 350 employees; TI Group Automotive Systems (automotive OEM parts supplier) 250 employees; HUF North America (automotive lock sets) 200 employees; Jarden Zinc Products (zinc casting, rolling, sitting, and fab) 200 employees; and, 6 other employers who employ from 111 up to 130 employees. Farming generates approximately \$76 million yearly and more than \$460 million in economic benefit to the local economy. Greene County is ranked number one in the state in its number of beef and dairy cattle and in all hay other than alfalfa, with more than 75 thousand acres harvested each year.

No business opportunities or credit needs of the community including community development lending, investment, and service needs have been identified through outreach activities. One community contact was made in March 2014. The contact identified two other local banks which were actively involved in contributing to community projects. The contact stated there was a need for increased involvement of all the local financial institutions. Other financial institutions will be solicited to participate in community projects stated the contact.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the Lending Test is rated "Satisfactory." Based on a full scope review, the bank's performance in the AA is satisfactory.

Conclusions for AA Full-Scope Review

GFB's lending performance is satisfactory in the full-scope review of its AA. For the years 2010, 2011, 2012, and 2013, GFB's internal tracking reports reflect that the bank originated approximately 340 residential mortgage loans totaling \$35 million. For the same period, GFB's internal tracking reports reflect that the bank also originated approximately 220 small business loans totaling \$55 million. Through its secondary home loan program, GFB originated 105 home loans totaling approximately \$14 million. These mortgage loan originations were underwritten and sold to another mortgage company.

Loan-to-Deposit Ratio

The quarterly average loan-to-deposit ratio for GFB was more than reasonable at 99.96% for the nineteen quarters ending September 2013. GFB's quarterly average loan-to-deposit ratio compared very favorably to competitor banks in the AA for the same period. Of the four independent banks headquartered in the AA, GFB had the highest quarterly average loan-to-deposit ratio of 99.96% followed by Andrew Johnson Bank of 93.41%, Heritage Community Bank of 86.51%, and American Patriot Bank of 73.68%. GFB's highest loan-to-deposit ratio was 120.15% on March 31, 2009, and the lowest was 85.62% on March 31, 2013. For the period, GFB had the highest quarterly loan-to-deposit ratio of 120.15% as of March 31, 2009. American Patriot Bank reported the lowest quarterly loan-to-deposit ratio for the period of 62.7% at March 31, 2012.

Loan-To-Deposit Ratios		
Institution	Total Assets (As of 09/30/13*)	Average Loan-to-Deposit Ratio(**)
Greeneville Federal Bank, FSB, Greeneville, TN	\$165	99.96%
Andrew Johnson Bank, Greeneville, TN	\$288	93.41%
Heritage Community Bank, Greeneville, TN	\$99	86.51%
American Patriot Bank, Greeneville, TN	\$75	73.68%

* Asset sizes of institutions are in millions (000,000's)

**Source: Institution Reports of Condition for 19 quarter period from March 2009 to September 2013.

As of June 30, 2013, eight financial institutions with 24 offices controlled \$902 million in deposits within the AA. Of the local competitor banks, GFB controlled the third largest market share within the AA at \$135 million, or 14.95% of total deposits. Independent competitor banks included Andrew Johnson Bank controlled \$165 million, or 18.29% of total deposits, followed by Heritage Community Bank \$88 million, or 9.79%, then American Patriot Bank \$74 million, or 8.21% of total deposits for the period. Branches of large holding company institutions in the area are: Capital Bank, N.A. (headquarters Coral Gables, FL) \$215 million, or 23.86% of total deposits; First Tennessee Bank, N.A. (headquarters Memphis, TN) \$133 million, or 14.69%; Bank of America, N.A. (headquarters Charlotte, NC) \$67 million, or 7.38%; and Branch Banking and Trust Co. (headquarters Winston Salem, NC) \$25 million, or 2.81% of total deposits.

Lending in Assessment Area

GFB's record of lending in its AA is satisfactory. A majority of the number and dollar amount of residential and business loans made were within the bank's AA as evidenced by the chart below. Conclusions are based on the number and dollar amount of residential and business loans in our loan sample, which originated during 2010, 2011, 2012, and 2013. 2012 and 2013 loan samples are based on 2010 US Census data while 2010 and 2011 loan samples are based on 2000 US Census data.

Table 1 – Lending in AA Greene (059) County, Tennessee										
Loan Sample	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
2012-2013 Residential Loans	49	90.74	5	9.26	54	4,668	82.40	997	17.60	5,665
2012-2013 Business Loans	32	74.42	11	25.58	43	4,612	58.07	3,330	41.93	7,942
Total	81	83.51	16	16.49	97	9,280	68.20	4,327	31.80	13,607

Source: 2010 Census Data; Loan Sample for 2012 and 2013. Residential loan sample includes home purchases, home improvements, and home refinances.

Table 1 – Lending in AA Greene (059) County Tennessee										
Loan Sample	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
2010-2011 Residential Loans	52	92.86	4	7.14	56	4,534	80.91	1,070	19.09	5,604
2010-2011 Business Loans	36	73.47	13	26.53	49	6,308	72.81	2,356	27.19	8,664
Total	88	83.81	17	16.19	105	10,842	75.99	3,426	24.01	14,268

Source: 2000 Census Data; Loan Sample for 2010 and 2011. Residential loan sample includes home purchases, home improvements, and home refinances.

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

GFB’s record of lending to borrowers of different incomes reflects reasonable penetration based on the 2010 and 2000 US Census data. GFB’s record of lending to businesses of different sizes reflects good penetration. The number of loans in our residential loan sample is reasonably consistent with borrower income levels within the bank’s AA. Based on 2010 and 2000 US Census data within the AA, low-income families comprised 21.15% and 19.43% of the population, moderate-income families 18.95% and 18.78%, middle-income families 22.32% and 23.56%, and upper-income families 37.59% and 38.23%. As reflected by the schedules below, the number of our loan sample reflect reasonable penetration when compared to borrowers of different income levels within the AA based on 2010 and 2000 US Census data.

Business revenues within the AA reflect that 72.70% and 72.107% have annual sales less than \$1 million, 3.80% and 2.30% exceed \$1 million, and 23.50% and 25.60% of business sales are unavailable. Comparatively, the number and dollar amount of loans to businesses of different sizes is also reasonable. The bank does a good job in obtaining business revenue information on its business loans as reflected by the number of loans in our sample of 0% and 2.78% rate of unavailable information.

Table 2 - Borrower Distribution of Residential Real Estate Loans in AA Greene (059) County, Tennessee								
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/Improvement/Refinance	21.15	8.16	18.95	20.41	22.32	8.16	37.59	59.19

Source: 2010 U.S. Census data. Residential loan sample included residential home purchases, home improvement loans, and home refinance loans for the period 2012 and 2013. Note: Income not reported on 4.08% of residential loan sample.

Table 2 - Borrower Distribution of Residential Real Estate Loans in AA Greene (059) County, Tennessee								
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/Improvement/Refinance	19.43	13.46	18.78	21.15	23.56	17.31	38.23	46.15

Source: 2000 U.S. Census data. Residential loan sample included residential home purchases, home improvement loans, and home refinance loans for the period 2010 and 2011. Note: Income not reported on 1.92% of residential loan sample.

Table 2A - Borrower Distribution of Loans to Businesses in AA Greene (059) County, Tennessee				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	72.70%	3.80%	23.50%	100%
% of Bank Loans in AA by #	78.13%	21.87%	0%	100%
% of Bank Loans in AA by \$	69.79%	30.21%	0%	100%

Source: Data collected by bank; Dun and Bradstreet data. Loan Sample for the period 2012 and 2013.

Table 2A – Borrower Distribution of Loans to Businesses in AA Greene (059) County Tennessee				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	72.10%	2.30%	25.60%	100%
% of Bank Loans in AA by #	80.55%	16.67%	2.78%	100%
% of Bank Loans in AA by \$	62.30%	33.34%	4.36%	100%

Source: Data collected by bank; Dun and Bradstreet data. Loan Sample for the period 2010 and 2011.

Geographic Distribution of Loans

GFB’s geographic distribution of loans reflects a reasonable rate of dispersion and meets the standard for satisfactory performance.

Based on 2010 and 2000 US Census data, no low-income CTs exist in the bank’s AA. At 8.16%, the number of residential loans in moderate-income CTs shows reasonable dispersion based on the 2012 and 2013 loan sample. At 7.69%, the number of residential loans in moderate –income census tracts also shows reasonable dispersion based on the 2010 and 2011 loan sample. At 15.62%, the number of business loans in moderate-income census tracts exceeds the percent of AA businesses based on the 2012 and 2013 loan sample. At 27.78%, the number of business loans in moderate-income census tracts is significantly above the percent of AA businesses located in moderate-income census tracts based on the 2010 and 2011 loan sample. There were no gaps or areas of low dispersion in the bank’s lending patterns identified during this review period.

Table 3 - Geographic Distribution of Residential Real Estate Loans in 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
Residential Loan Sample	0.00	0.00	6.67	8.16	86.66	91.84	6.67	0.00

Source: 2010 U.S. Census data: Residential loan sample included residential home purchases, home improvement loans, and home refinance loans for the period 2012 and 2013.

Table 3 - Geographic Distribution of Residential Real Estate Loans in 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
Residential Loan Sample	0.00	0.00	6.67	7.09	86.66	90.39	6.67	1.92

Source: 2000 U.S. Census data: Residential loan sample included residential home purchases, home improvement loans, and home refinance loans for the period 2010 and 2011.

Table 3A - Geographic Distribution of Loans to Businesses in 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
Businesses	0.00	0.00	12.40	15.62	82.90	81.25	4.70	3.13

Source: Data collected by bank; Dunn & Bradstreet data. Loan Sample for period 2012 and 2013.

Table 3A - Geographic Distribution of Loans to Businesses in 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
Businesses	0.00	0.00	11.50	27.78	84.00	66.67	4.50	5.55

Source: Data collected by bank; Dunn & Bradstreet data. Loan Sample for period 2010 and 2011.

Responses to Complaints

There were no consumer complaints regarding the bank’s Community Reinvestment Act performance during the evaluation period.

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.