



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

September 26, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens National Bank of Greater Saint Louis
Charter Number: 12955

7305 Manchester Avenue
Maplewood, MO 63143

Office of the Comptroller of the Currency

St. Louis Field Office
2350 Market Street, Room 100
St. Louis, MO 63103

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: Satisfactory.
The Community Development Test is rated: Outstanding.**

Summarize the major factors supporting the institution's rating.

- The distribution of loans among borrowers of different income levels reflects reasonable penetration.
- The distribution of loans among geographies reflects poor dispersion.
- Community Development (CD) activities reflect excellent responsiveness to the community needs.
- A substantial majority of loans were originated or purchased within the bank's assessment area (AA).
- The bank's quarterly average loan-to-deposit (LTD) ratio is more than reasonable.

Scope of Examination

This Performance Evaluation of Citizens National Bank of Greater Saint Louis (CNB) assesses its record of meeting the credit needs of the communities in which it operates. We evaluated CNB under the Intermediate Small Bank performance criteria, which consist of a lending test and a CD test. The lending test evaluates a bank's record of helping to meet the credit needs of its AAs through its lending activities. The CD test evaluates a bank's CD lending, qualified investments, and CD services activities.

The evaluation period is from December 11, 2007 through September 26, 2011. Conclusions regarding the bank's lending performance are based on CNB's primary loan products consisting of residential real estate (RRE) and business (non-agricultural) loans. We conducted a data integrity review of the RRE loans reported under the Home Mortgage Disclosure Act (HMDA). We found the HMDA data to be accurate and reliable. We analyzed all HMDA loans and a sample of business loans that CNB originated or purchased from January 1, 2009 through August 31, 2011.

Description of Institution

CNB is wholly owned by Cardinal Bancorp, Inc., a one-bank holding company located in Maplewood, Missouri. As of June 30, 2011, CNB reported total assets of \$477 million and Net Tier One Capital of \$50.5 million.

CNB's business strategy focuses on commercial loans to large businesses and RRE loans. Loan products offered include one-to-four family RRE loans, commercial loans, commercial real estate loans, and consumer loans. As of June 30, 2011, net loans represented 73% of total assets and consisted of commercial and commercial real

estate loans (73%), RRE loans (21%), agricultural and agricultural real estate loans (1%), consumer loans (3%), and other loans (2%).

CNB is an intrastate bank with six offices located in St. Louis County (4) and St. Charles County (2). The four branches in St. Louis County are located in the cities of Maplewood, Florissant, Affton, and Maryland Heights. The two offices in St. Charles County are located in the cities of St. Charles and St. Peters. The six offices are located in moderate- (1), middle- (4), and upper- (1) income geographies. Each office has a deposit-taking ATM on the premises. The bank has two additional ATMs, which are cash-dispensing only, placed for the convenience of business customers in downtown St. Louis and St. Louis County. There are no legal, financial, or other factors impeding CNB's ability to help meet the credit needs of the AAs it serves.

CNB was rated "Satisfactory" at its last CRA evaluation dated December 10, 2007.

Description of Assessment Area(s)

CNB's AA until January 1, 2011, consisted of St. Charles County, St. Louis County, 22 geographies in the northern portion of Jefferson County, and 17 geographies in the southwest portion of the City of St. Louis. The 22 geographies in Jefferson County consisted of 7001.04, 7001.07, 7001.08, 7001.09, 7001.10, 7001.11, 7001.12, 7001.13, 7002.02, 7002.03, 7002.04, 7002.05, 7003.02, 7003.03, 7003.04, 7004.00, 7005.01, 7005.02, 7006.01, 7006.03, 7006.04, and 7006.05. The 17 geographies in the City of St. Louis consisted of 1021.00, 1022.00, 1031.00, 1034.00, 1036.00, 1037.00, 1038.00, 1039.00, 1041.00, 1042.00, 1045.00, 1131.00, 1134.00, 1135.00, 1141.00, 1142.00, and 1143.00. This AA represents a portion of the St. Louis, MO-IL Metropolitan Statistical Area (MSA) # 41180. Although the AA only includes a portion of Jefferson County and the City of St. Louis, it conforms to regulatory requirements since it includes the portions of the political subdivisions that it can reasonably serve. On January 1, 2011, CNB changed its AA to exclude the 22 geographies in Jefferson County and include all of the City of St. Louis. We are evaluating CNB's performance under the prior AA since it was in effect for all but 9 months of the evaluation period.

There are 3 low- and 38 moderate-income geographies within this AA. No CNB branches are located in or adjacent to low-income geographies. One branch is located in a moderate-income geography and another branch is adjacent to a moderate-income geography.

CNB's deposits total \$396 million as of June 30, 2011. CNB is the twenty-fourth largest deposit-taking institution in the AA with less than a 1% market share based upon FDIC deposit data. Competition for financial services is strong. Ninety-five other financial institutions have a presence in the AA. Competition in low- and moderate-income geographies is also strong as these financial institutions have a presence in 18 of the 41 low- and moderate-income geographies (low - 1 and moderate - 17). The five largest financial institutions in the AA consist of US Bank, N.A., Bank of America, N.A., Commerce Bank, N.A., PNC Bank, N.A., and First Bank.

In St. Charles County, St. Louis County, Jefferson County, and the City of St. Louis, non-agricultural wage and salaried employment declined from 941,889 in December 2007 to 915,168 in September 2011, a decrease of 3%. The unemployment rate increased from 5.9% to 8.5%. The state of Missouri’s unemployment rate was 8.3% as of September 2011. The City of St. Louis and St. Charles County had the highest and lowest unemployment rates of 10.7% and 7.1%, respectively. Major industries in the St. Louis, MO-IL MSA # 41180 consist of education and health services, followed by professional and business services, and government. Major employers include BJC Health Care, Boeing Integrated Defense Systems, Scott Air Force Base, and Schnuck Markets, Inc.¹ Five percent of families live below the poverty level in the AA based on 2000 Census Data.

The 2011 Department of Housing and Urban Development (HUD) adjusted median family income for the AA is \$68,300. Fourteen percent and 17% of families are low- and moderate-income, respectively, based on 2000 Census Data. The 2000 median housing value for the AA is \$127,099. The following is additional demographic data for the AA.

| DEMOGRAPHIC DATA FOR CNB’s AA (Portion of the St. Louis, MO-IL MSA # 41180) | | | | | | |
|--|-----------|------------|----------------------|---------------|--------------|------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs) | 129 | 1.12 | 14.13 | 47.58 | 36.80 | 0.37 |
| Population by Geography | 1,502,814 | 0.37 | 13.24 | 48.15 | 38.24 | 0.03 |
| Owner-Occupied Housing by Geography | 444,485 | 0.27 | 11.21 | 48.64 | 39.88 | 0.01 |
| Business by Geography | 151,428 | 0.25 | 9.37 | 43.11 | 47.27 | 0.00 |
| Farms by Geography | 2,115 | 0.19 | 7.52 | 50.64 | 41.65 | 0.00 |
| Family Distribution by Income Level | 403,747 | 13.84 | 16.70 | 22.50 | 46.96 | 0.00 |
| Distribution of Low and Moderate Income Families throughout AA Geographies | 123,309 | 0.90 | 24.04 | 54.86 | 20.20 | 0.00 |
| Median Family Income | | \$53,435 | Median Housing Value | \$127,099 | | |
| HUD Adjusted Median Family Income for 2011 | | \$68,300 | (2000 US Census) | | | |
| Households Below Poverty Level | | 6% | | | | |

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI.

We determined the community’s needs by contacting representatives from two housing organizations, one economic development entity, and one entity that operates a revolving micro-loan pool for low- and moderate-income individuals. We also reviewed the HUD Consolidated Housing and CD Plans for the City of St. Louis and St. Louis County. HUD Consolidated Housing and CD Plans are comprehensive planning documents that identify community needs.

¹ Moody’s Economy.com, October 2010

We identified the following credit and non-credit related needs in the AA:

- Home improvement support programs for low- and moderate-income homeowners. Nearly half of the owner-occupied homes in St. Louis County were built prior to 1970. These homes often suffer from deferred maintenance problems.
- New affordable rental units for low- and moderate-income individuals. The majority of rental housing units were built prior to 1980. Consequently, the stock of affordable housing will be progressively threatened as these units continue to age.
- Handicapped accessible rental units.
- Transitional housing for the homeless. Over 50% of the homeless households are families with children.
- Acquisition and/or clearance of dilapidated and blighted structures that destabilize residential neighborhoods and adversely affect commercial areas.
- Supportive services for the non-homeless special need individuals. These individuals may require supportive housing and social services to keep them adequately housed and prevent bouts of homelessness.
- Public housing and Section 8 rent subsidized housing. The Housing Authority of St. Louis County (HASLC) and St. Louis Housing Authority (SLHA) reported 6,033 and 5,165 households, respectively, are on their public housing waiting lists. Additionally, HASLC and SLHA reported 6,732 and 5,164 households, respectively, on their Section 8 waiting lists.
- Foreclosure prevention counseling.
- Investments in CD Financial Institutions to allow more credit to local businesses.

We determined the opportunities to make CD loans, provide CD services, and acquire qualified investments are abundant within CNB's AA.

Conclusions with Respect to Performance Tests

LENDING TEST

CNB's performance under the lending test is rated Satisfactory.

Loan-to-Deposit Ratio

CNB's LTD ratio is more than reasonable given the institution's size, its financial condition, and AA credit needs.

As of June 30, 2011, CNB's LTD ratio was 88%. The bank's quarterly average of LTD ratios since the last CRA evaluation was 98%. This ratio is higher than twelve comparable banks and lower than one comparable bank. The average LTD ratios of these banks, which are comparable in size and location, range from 73% to 110% for the same time period.

Lending in Assessment Area

A substantial majority (86%) of loans were originated or purchased within CNB's AA. CNB originated or purchased 79%, 87%, and 89% of home purchase, home improvement, and home mortgage refinance loans, respectively, within its AA. Based upon our sample, CNB originated or purchased 90% of business loans within its AA.

| Lending in AA (Portion of the St. Louis, MO-IL MSA #41180) | | | | | | | | | | |
|---|-----------------|-----|---------|-----|-------|--------------------------|-----|----------|-----|------------|
| Loan Type | Number of Loans | | | | | Dollars of Loans (000's) | | | | |
| | Inside | | Outside | | Total | Inside | | Outside | | Total (\$) |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Purchase | 155 | 79% | 42 | 21% | 197 | \$27,135 | 81% | \$6,309 | 19% | \$33,444 |
| Home Improvement | 45 | 87% | 7 | 13% | 52 | 2,761 | 81% | 648 | 19% | 3,409 |
| Home Mortgage Refinance | 464 | 89% | 57 | 11% | 521 | 90,870 | 90% | 10,651 | 10% | 101,521 |
| Business | 18 | 90% | 2 | 10% | 20 | 5,112 | 99% | 53 | 1% | 5,165 |
| Totals | 682 | 86% | 108 | 14% | 790 | \$125,878 | 88% | \$17,661 | 12% | \$143,539 |

Source: RRE loan data reported under HMDA for the period 2009 through August 31, 2011 and a sample of 20 business loans.

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

CNB's lending distribution to borrowers of different income levels and businesses of different sizes reflects reasonable penetration. In evaluating the bank's performance, we placed more weight on the distribution of RRE loans than business loans, because they represented the largest percentage of loans originated and purchased by the bank.

Residential Real Estate Loans

The borrower distribution of RRE loans originated or purchased during the evaluation period is reasonable. In evaluating CNB's performance, we placed the most weight on the distribution of home mortgage refinance loans and then home purchase loans because they represented the largest percentage of RRE loans originated and purchased by the bank.

The percentage of home purchase loans to low-income borrowers (14.57%) and moderate-income borrowers (24.50%) exceeded the percentage of AA families who are low-income (13.84%) and moderate-income (16.70%), respectively. The bank's market share of loans to low-income borrowers (0.39%) exceeded the bank's overall market share (0.28%). The bank's market share of loans to moderate-income borrowers (0.22%) was somewhat lower than the bank's overall market share (0.28%).

The percentage of home improvement loans to low-income borrowers (18.60%) and moderate-income borrowers (20.93%) exceeded the percentage of AA families who are low-income (13.84%) and moderate-income (16.70%), respectively. The bank's market share of loans to low-income borrowers (4.80%) and moderate-income borrowers (1.95%) both exceeded the bank's overall market share (1.73%).

The percentage of home mortgage refinance loans to low-income borrowers (5.39%) was significantly lower than the percentage of AA families who are low-income (13.84%). The percentage of home mortgage refinance loans to moderate-income borrowers (13.11%) was somewhat lower than the percentage of AA families who are moderate-income (16.70%). The bank’s market share of loans to low-income borrowers (0.25%) and moderate-income borrowers (0.23%) were both somewhat lower than the bank’s overall market share (0.34%).

| Borrower Distribution of Residential Real Estate Loans in AA (Portion of the St. Louis, MO-IL MSA # 41180) | | | | | | | | |
|---|------------------|----------------------|------------------|----------------------|------------------|----------------------|------------------|----------------------|
| 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 | 13.84% | 14.57% | 16.70% | 24.50% | 22.50% | 20.53% | 46.96% | 40.40% |
| Home Improvement | 13.84% | 18.60% | 16.70% | 20.93% | 22.50% | 23.26% | 46.96% | 37.21% |
| Home Mortgage Refinance | 13.84% | 5.39% | 16.70% | 13.11% | 22.50% | 22.01% | 46.96% | 59.49% |

Source: RRE loan data reported under HMDA for the period 2009 through August 31, 2011; 2000 U.S. Census Data.

| Borrower Distribution – Market share Information in the AA (Portion of the St. Louis, MO-IL MSA # 41180) | | | | | |
|---|---------|-------|----------|--------|-------|
| Borrower Income Level | Overall | Low | Moderate | Middle | Upper |
| Loan Type | | | | | |
| Home Purchase | 0.28% | 0.39% | 0.22% | 0.34% | 0.25% |
| Home Improvement | 1.73% | 4.80% | 1.95% | 1.66% | 1.02% |
| Home Mortgage Refinance | 0.34% | 0.25% | 0.23% | 0.35% | 0.38% |

Source: Based on 2010 Peer Mortgage Data (USPR)

Business Loans

The distribution of loans to businesses of different sizes is poor based on a sample of 60 loans originated or purchased during the evaluation period. The percentage (32%) of loans extended to businesses with revenues of \$1 million or less was significantly lower than the percentage (65%) of area businesses that had revenues of \$1 million or less. The bank’s performance reflects CNB’s strategy that focuses on commercial loans to large businesses.

| Borrower Distribution of Loans to Businesses in the AA (Portion of the St. Louis, MO-IL MSA # 41180) | | | | |
|---|--------------|--------------|-------------------------|-------|
| Business Revenues | ≤\$1,000,000 | >\$1,000,000 | Unavailable/ Unknown | Total |
| % of AA Businesses | 65% | 3% | 32% | 100% |
| % of Bank Loans in AA by # | 32% | 68% | 0% | 100% |
| % of Bank Loans in AA by \$ | 26% | 74% | 0% | 100% |

Source: Sample of 60 business loans; 2011 Dun and Bradstreet Data.

Geographic Distribution of Loans

The geographic distribution of RRE and business loans originated or purchased during the evaluation period reflects poor dispersion. In evaluating the bank's performance, we placed more weight on the distribution of RRE loans than business loans, because they represented the largest percentage of loans originated and purchased by the bank. In evaluating the bank's performance, we considered the competition from other financial institutions and the location of CNB's branches. See page 2 for further information.

Residential Real Estate Loans

The geographic distribution of RRE loans is poor. In evaluating CNB's performance, we placed the most weight on the distribution of home mortgage refinance loans and then home purchase loans because they represented the largest percentage of RRE loans originated and purchased by the bank. The bank did not originate or purchase any loans in the 3 low-income geographies and 18 of the 38 moderate-income geographies.

The percentage of home purchase loans in moderate-income geographies (3.87%) was significantly lower than the percentage of owner-occupied housing units within those geographies (11.21%). The bank's market share of loans in moderate-income geographies (0.11%) was lower than the bank's overall market share (0.24%).

The percentage of home improvement loans in moderate-income geographies (6.67%) was lower than the percentage of owner-occupied housing units within those geographies (11.21%). The bank's market share of loans in moderate-income geographies (0.81%) was lower than the bank's overall market share (1.57%).

The percentage of home mortgage refinance loans in moderate-income geographies (2.80%) was significantly lower than the percentage of owner-occupied housing units within those geographies (11.21%). The bank's market share of loans in moderate-income geographies (0.28%) was somewhat lower than the bank's overall market share (0.31%).

| Geographic Distribution of Residential Real Estate Loans in the AA (Portion of the St. Louis, MO-IL MSA # 41180) | | | | | | | | |
|---|--------------------------------|----------------------|--------------------------------|----------------------|--------------------------------|----------------------|--------------------------------|----------------------|
| 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 | 0.27% | 0.00% | 11.21% | 3.87% | 48.64% | 49.68% | 39.88% | 46.45% |
| Home Improvement | 0.27% | 0.00% | 11.21% | 6.67% | 48.64% | 40.00% | 39.88% | 53.33% |
| Home Mortgage Refinance | 0.27% | 0.00% | 11.21% | 2.80% | 48.64% | 43.10% | 39.88% | 54.10% |

Source: RRE loan data reported under HMDA for the period 2009 through August 31, 2011; 2000 U.S. Census Data.

| Geographic Distribution – Market share Information in the AA (Portion of the St. Louis, MO-IL MSA # 41180) | | | | | |
|---|---------|-------|----------|--------|-------|
| Census Tract Income Level | Overall | Low | Moderate | Middle | Upper |
| Loan Type | | | | | |
| Home Purchase | 0.24% | 0.00% | 0.11% | 0.25% | 0.25% |
| Home Improvement | 1.57% | 0.00% | 0.81% | 1.34% | 1.99% |
| Home Mortgage Refinance | 0.31% | 0.00% | 0.28% | 0.33% | 0.31% |

Source: Based on 2010 Peer Mortgage Data (USPR)

Business Loans

The geographic distribution of business loans is reasonable based on a sample of 20 loans originated or purchased during the evaluation period. In evaluating the bank’s performance, we considered there were more opportunities to lend in moderate-income geographies than in low-income geographies. The percentage of business loans in moderate-income geographies (10%) exceeded the percentage of businesses within those geographies (9.37%). The bank did not originate or purchase any loans in low-income geographies.

| Geographic Distribution of Business Loans in the AA (Portion of the St. Louis, MO-IL MSA # 41180) | | | | | | | | |
|--|--------------------|----------------------|--------------------|----------------------|--------------------|----------------------|--------------------|----------------------|
| 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 |
| Business | 0.25% | 0.00% | 9.37% | 10.00% | 43.11% | 20.00% | 47.27% | 70.00% |

Source: Sample of 20 business loans; 2011 Dun and Bradstreet Data.

Responses to Complaints

No CRA-related complaints have been received by CNB or the OCC since the prior CRA evaluation.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD test is rated Outstanding. The bank's CD performance reflects excellent responsiveness to the needs of the community. CNB adequately addressed the needs of its AA; therefore, we considered CD activities outside of their AA in evaluating performance.

Number and Amount of Community Development Loans

CNB originated 21 CD loans to four entities and their related interests totaling \$7.3 million. Information regarding these loans is summarized below.

- CNB purchased portions of 15 loans granted to related entities, totaling \$6,469,576, to revitalize and stabilize approximately 1,100 acres in an Empowerment Zone located outside of their AA in north St. Louis. CNB's portion of the loans represented 12.5% of the total indebtedness. The project known as "North Side Regeneration" is part of the City of St. Louis' plan to revitalize and stabilize low- and moderate-income geographies. It is anticipated Tax Incremental Financing (TIF) will be used to subsidize this project as the State of Missouri has continued to fund the tax credits in anticipation the TIF will be ultimately approved by the City of St. Louis. This area is generally bounded by North Grand Blvd and Glasgow to the west, Natural Bridge Ave and Pam Street to the north, North Florissant Ave and Interstate 70 to the east, and a boundary generally following Delmar and Dr. Martin Luther King Drive to the south. The projected estimated cost of the entire project is approximately \$8 billion. The project is estimated to create over 11,900 construction jobs and 9,400 permanent jobs over the 15-year build out period.
- CNB renewed a \$137,348 loan to a non-profit organization to purchase and renovate a 16-unit apartment complex primarily for low- and moderate-income individuals. The substantial majority of the units consist of Section 8 rent subsidized housing.
- CNB originated four loans, totaling \$462,599, to a non-profit organization that provides affordable rental housing to low- and moderate-income individuals. Funding sources include private investors, low income housing tax credits, historical preservation tax credits, and loan proceeds. This organization has developed 3,766 affordable housing units since their inception in 1988.
- CNB originated a \$249,000 loan to a non-profit organization to renovate a group home for low- and moderate-income individuals with mental disabilities. The home houses four individuals.

Number and Amount of Qualified Investments

CNB made qualified investments (QI) totaling \$809,396 during the evaluation period. An additional \$502,950 of prior period investments remains outstanding. Information regarding these QI is summarized below.

- CNB made equity investments totaling \$800,000, during the evaluation period, to the non-profit organization mentioned above that provides affordable rental housing to low- and moderate-income individuals. The unfunded committed amount that is legally binding and tracked on the bank's financial reporting system is \$654,964. Prior period equity investments that remain outstanding total \$502,950.
- CNB donated \$9,396 to six organizations that have a CD purpose and serve low- and moderate-income individuals inside and outside of their AA. A portion (\$3,000) of this amount directly benefited their AA.

Extent to Which the Bank Provides Community Development Services

CNB provided CD services to three organizations that provide community services and two organizations that provide affordable housing to low- and moderate-income individuals. Information regarding these CD services is summarized below. The last two CD services benefited low- and moderate-income individuals located outside of CNB's AA.

- A CNB representative provided CD services to Bridgeway Behavioral Health, Inc., an organization that provides community services primarily to low- and moderate-income individuals. Services include temporary shelter for battered and abused women and children, and social services to assist individuals with drug abuse and mental health issues. CD services included reviewing and preparing financial information and assisting in obtaining funding for the entity's various programs.
- A CNB representative provided CD services to the Maplewood Housing Corporation that operates a 16-unit apartment complex primarily for low- and moderate-income individuals. CD services included reviewing and preparing financial information, selecting the management company that oversees the day-to-day operations of the complex, and collecting delinquent rent.
- A CNB representative provided CD services to Friends of L'Arche St. Louis that operates a group home for low- and moderate-income individuals with developmental disabilities. CD services include reviewing and preparing financial information and assisting in obtaining funding for the home.
- A CNB representative participated in an eight-hour homebuyer seminar for first time homebuyers who are primarily low- and moderate-income. Twenty-six individuals attended the seminar.

- A CNB representative, and a representative from another bank, taught 24 elementary school students, primarily from low- and moderate-income families, the use of money.

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.