



# INTERMEDIATE SMALL BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## PUBLIC DISCLOSURE

May 11, 2009

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The National Bank of Blacksburg  
Charter Number: 12229

100 South Main Street  
Blacksburg, VA 24060

**Office of the Comptroller of the Currency**  
Virginia Field Office  
3800 Electric Road, Suite 204  
Roanoke, VA. 24018

**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: Satisfactory.**

Below is a summary of the major factors supporting the institution's rating:

- The bank's average loan-to-deposit (LTD) ratio is reasonable compared to similarly situated institutions.
- A majority of the loans originated during the evaluation period were within the bank's assessment areas (AAs).
- The distribution of borrowers, given the demographics of the AAs, reflects an overall reasonable dispersion and satisfactory performance.
- The geographic distribution of loans reflects excellent dispersion throughout the assessment areas.
- The bank demonstrates adequate responsiveness to community development needs.

## **Scope of Examination**

National Bank of Blacksburg was evaluated under the Intermediate Small Bank examination procedures, which includes a lending test and a community development (CD) test. The lending test evaluates the bank's record of meeting the credit needs of its assessment areas (AA) through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AA through CD lending, qualified investments, and community development services. The evaluation period under the Lending Test covers the bank's performance from January 1, 2007 through March 31, 2009. The evaluation period for the community development test was from April 18, 2006 through May 11, 2009.

For the lending test, we reviewed home purchase, home improvement, and re-finance loans reported under the Home Mortgage Disclosure Act (HMDA). We also reviewed a sample of 65 small loans to businesses originated during the evaluation period. The sample of small loans to businesses was selected based on acc sampling guidelines.

We conducted Data Integrity reviews of the HMDA data and found the information to be accurate and reliable for use in this examination. Data for the loan sample was extracted directly from bank records.

## **Description of Institution**

The National Bank of Blacksburg (NBB) is a \$976 million intrastate bank headquartered in Blacksburg, Virginia (VA). The bank is solely owned by National Bankshares, Inc. (NBI), a \$980 million holding company. NBI also owns the National Bankshares Financial Services Inc., an investment services company. As of March 31, 2009, Tier I Capital was \$100 million, Tier I Risk-based Capital to Risk-weighted Assets equaled 15.29%, and Tier 1 Leverage Capital

equaled 10.63%.

NBB is a full service community bank, with 26 branches and 22 automated teller machines (ATMs) serving the cities of Radford and Galax, and the counties of Carroll, Giles, Grayson, Pulaski, Bland, Smyth, Tazewell, Washington, Wythe, and Montgomery. The bank did not open or close any branches during the evaluation period. NBB offers 24-hour banking by telephone and Internet banking.

NBB has three AAs in VA. The Blacksburg AA is a designated metropolitan statistical area (MSA) and is the bank's primary market area. The Blacksburg AA received a full-scope review. The Kingsport-Bristol AA is a designated MSA and received a limited-scope review due to the bank's limited market share. The VA Non-MSA AA includes the counties of Carroll, Grayson, Tazewell, Smyth, Wythe, Bland, and the city of Galax. The VA Non-MSA AA also received a full-scope review.

NBB's business strategy focuses on loans to businesses, residential mortgage loans, and consumer loans. As of March 31, 2009, loans to businesses, including loans secured by nonfarm non-residential property, represented approximately 48%, residential mortgages 26%, loans to individuals including credit card loans 8%, and construction and development 10%, of total loans outstanding. For purposes of this evaluation, we considered loans to businesses and residential mortgage loans as primary products, based on the bank's business strategy and balances outstanding.

There are no legal, financial or other factors impeding NBB's ability to help meet the credit needs in its AAs. NBB received a "Satisfactory" rating on its April 2006 CRA Performance Evaluation.

## **Description of Assessment Area(S)**

The National Bank of Blacksburg has three (3) assessment areas located in the southwestern portion of Virginia: the Blacksburg AA (MSA 13980), the Kingsport-Bristol AA (MSA 28700), and the Virginia Non-MSA AA.

### **Blacksburg AA**

NBB operates 26 bank branches in VA, 14 of which are located in the Blacksburg AA that includes the city of Radford, and the counties of Giles, Montgomery, and Pulaski. These geographies represent the entirety of the Blacksburg-Christiansburg-Radford MSA 13980. This metropolitan area is located in southwestern Virginia and includes the counties of Giles, Montgomery, and Pulaski, and the independent City of Radford. Manufacturing has historically been the largest employment sector. However, Virginia Tech, a major public university located in Blacksburg, has a significant effect on the local economy. The median home price is \$94,423, and the median family income is \$54,800. Households below the poverty level are 19.5%, and the unemployment rate is 9.4%. These percentages are impacted by the number of college students in the AA. This assessment area consists of 28 census tracts; one moderate income tract, 23 middle-income tracts, and three upper-income tracts. One tract does not have a designated

income level. There are no low income tracts in this assessment area.

NBB has 21% of the deposit market share in the Blacksburg AA, and its primary competitors are StellarOne Bank, Wachovia Bank, N.A, and Branch Banking and Trust Company of Virginia (BB&T).

We conducted one community contact in the Blacksburg AA with a representative of an organization that supports economic development. The contact identified no specific credit needs in the AA.

### **Non-MSA AA**

This assessment area is also located in southwestern Virginia, and includes the following counties: Tazewell, Bland, Smyth, Washington, Grayson, Wythe, Carroll; and the city of Galax. Eleven (11) of the bank's branches are located within this assessment area, with one branch located in a designated distressed/underserved middle income tract. The assessment area consists of 33 census tracts: three moderate-income tracts and 30 middle-income tracts. There are no low income tracts in this assessment area. The median home price is \$62,349, and the median family income is \$50,600. Households below the poverty level are 15.06%, and the unemployment rate is 10.71%. Major employment sectors in this assessment area are: government, manufacturing, trade, and services.

NBB has 10.24% of the deposit market share in this AA, and its primary competitors are BB& T, Grayson National Bank, and Wachovia Bank, N.A.

### **Kingsport-Bristol, Bristol TN-VA MSA AA**

This assessment area is a multi-state Metropolitan Statistical Area. However, the bank only operates in one county, Washington County, which is located in the state of Virginia. National Bank of Blacksburg has one branch in this assessment area located in Abingdon, Virginia. Washington County consists of 10 census tracts: nine middle-income tracts and one upper-income tract. There are no low or moderate-income tracts in this assessment area.

The median home price in this assessment area is \$83,815, and the median family income is \$46,500. The percentage of households below the poverty level is 12.51%, and the unemployment rate is 8.9%. The major employers in this assessment area are: Bristol Compressors, Inc, the Washington County School Board, and Food City.

NEB has 0.31% of the deposit market share in the entire MSA. However, the bank's market share in Washington County is 1.35%. NBB's primary competitors in Washington County are Highlands Union Bank, Wachovia Bank, N.A, BB &T, and First Bank &, Trust Co. These four banks account for 71.60 percent of the deposit market share in the county.

We conducted one community contact in this AA with the Assistant County Administrator for the County Community & Economic Development Department. Although she did not identify any specific community development needs, she noted that some of the economic development programs funded by the city and state (such as the Small Business development programs,

Entrepreneurship training, and loan guarantee programs) are designed to leverage funds from financial institutions.

## Conclusions with Respect to Performance Tests

### LENDING TEST

NBB's overall lending performance is satisfactory.

The bank's lending performance within the multi-state MSA of Kingsport-Bristol, Bristol, TN-VA is satisfactory. NBB's loan-to-deposit ratio is reasonable, and a substantial majority of loans were originated inside its AA. The bank's geographic distribution reflects reasonable dispersion throughout census tracts of different income levels, and borrower distribution reflects reasonable penetration among borrowers of different incomes and businesses of different sizes.

To evaluate NBB's CRA lending performance, we focused on its: record of lending in its AA, loan-to-deposit ratio since the last CRA examination (including a comparison to similarly situated institutions), record of lending to borrowers of different incomes and businesses of different sizes, and the geographic distribution of lending in the bank's AAs.

#### Loan-to-Deposit Ratio

NBB's average LTD ratio is reasonable compared to similarly situated competitors. The bank's quarterly average LTD ratio since the last CRA examination is 67%. This ratio is below the average of 79% for similarly situated banks in the bank's AA. The bank is very conservative in their lending practices, and the LTD ratio has remained fairly consistent since the last CRA examination. StellarOne Bank and Wachovia Bank, N.A. are considered to be similarly situated based on total deposits and number of branches in NBB AAs.

#### Lending in Assessment Area

A majority of loans were inside the bank's AAs. Overall 72% of loans made during the evaluation period were in the bank's AAs. By loan product, 95% of business loans, and 71% of home mortgage loans were made inside the bank's AAs.

Loan Type	Number of Loans					Dollars of Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Residential Mortgage Loans	866	70.64	360	29.36	1226	84,268	72.74	31,573	27.26	115,841
Small Loans to Businesses	79	95.18	4	4.82	83	8,029	98.58	116	1.42	8,145
Totals	945	72.19	364	27.81	1,309	92,297	74.44	31,689	25.56	123,986

*Source: Data reported under HMDA from January 1, 2007 - March 31, 2009 and a sample of loans to businesses for the same period*

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

NBB's borrower distribution reflects an overall reasonable dispersion and satisfactory performance.

**Blacksburg AA**

The borrowers' distribution of loans reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels and businesses of different sizes. The overall distribution of HMDA loans is satisfactory. The percentage of total HMDA loans to low income borrowers (11.59%) is lower than the percentage of low-income families in the assessment area (20.15%). The percentage of total HMDA loans to moderate-income borrowers (21.28%) exceeds the percentage of moderate-income families in the assessment area (17.69%). The distribution of loans to small businesses (those with less than \$1 million in gross annual revenues) is also satisfactory. By number volume, the percentage of loans to small businesses is proportionate to the percentage of small businesses in the assessment area.

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 - 207 Loans	20.15	8.24	17.69	18.68	23.23	18.68	38.93	54.40
Home Improvement - 182 Loans	20.15	20.47	17.69	36.84	23.23	18.71	38.93	23.98
Home Refinance - 189 Loans	20.15	11.58	17.69	17.11	23.23	23.68	38.93	48.03
TOTAL HMDA: 578 <sup>1</sup>	20.15	11.59	17.69	21.28	23.23	17.65	38.93	36.85

Source: Data reported under HMDA; U.S. Census data

Business Revenues (or Sales)	<=\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	60.62	4.07	35.31	100%
% of Bank Loans in AA by #	64.06	20.31	15.63	100%
% of Bank Loans in AA by \$	28.37	56.85	14.78	100%

Source: CRA Data and Loan sample; Dun and Bradstreet data.

**Non-MSA AA**

The borrowers' distribution of loans reflects reasonable penetration among individuals of different income levels and businesses of different sizes. The overall distribution of HMDA loans is satisfactory. The percentage of total HMDA loans to low-income borrowers (20.60%) is

<sup>1</sup> Loans for which borrower income was available.

proportionate to the percentage of low-income families in the assessment area (20.81 %). The percentage of total HMDA loans to moderate-income borrowers (29.96%) exceeds the percentage to moderate-income families in the assessment area (21.00%). The distribution of loans to small businesses is satisfactory.

<b>Table 2 - Borrower Distribution of Residential Real Estate Loans in Non-MSA AA</b>								
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 Loans - 52	20.81	17.39	21.00	23.91	24.32	17.39	33.87	41.30
Home Improvement Loans - 121	20.81	26.67	21.00	32.50	24.32	17.50	33.87	23.33
Home Refinance - 94	20.81	16.30	21.00	32.61	24.32	19.57	33.87	31.52
<b>TOTAL HMDA: - 267<sup>2</sup></b>	<b>20.81</b>	<b>20.60</b>	<b>21.00</b>	<b>29.96</b>	<b>24.32</b>	<b>17.60</b>	<b>33.87</b>	<b>28.46</b>

Source: Data reported under HMDA, U.S. Census data

<b>Table 2A - Borrower Distribution of Loans to Businesses in Non-MSA AA</b>				
Business Revenues (or Sales)	<=\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	58.97	3.96	37.07	100%
% of Bank Loans in AA by #	75.00	5.00	20.00	100%
% of Bank Loans in AA by \$	50.46	43.13	6.41	100%

Source: CRA Data and Loan sample; Dun and Bradstreet data.

**Kingsport-Bristol, Bristol TN-VA MSA AA (Washington County)**

The borrowers' distribution of loans, given the demographics of the AA and the bank's market share, reflects reasonable penetration among individuals of different income levels and businesses of different sizes. The overall distribution of HMDA loans is satisfactory. There were no HMDA loans made to low-income borrowers. NBB's poor distribution of HMDA loans to low-income borrowers was offset by its excellent distribution of HMDA loans to moderate income borrowers. The percentage of total HMDA loans to moderate-income borrowers (33.33%) exceeds the percentage of moderate-income families in the assessment area (19.22%). The distribution of loans to small businesses is satisfactory. By number volume, the percentage of loans to small businesses exceeds the percentage of small businesses in the assessment area. The percentage of loans to small businesses is proportionate to the percentage of small businesses in the assessment area.

<sup>2</sup>Loans for which borrower income was available.



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 Loans - 12	16.36	0.00	19.22	18.18	22.86	45.45	41.56	36.36
Home Improvement Loans - 4	16.36	0.00	19.22	50.00	22.86	25.00	41.56	25.00
Home Refinance - 5	16.36	0.00	19.22	0.00	22.86	33.33	41.56	66.67
TOTAL HMDA: -21 <sup>3</sup>	16.36	0.00	19.22	33.33	22.86	33.33	41.56	14.29

Source: Data reported under HMDA; U.S. Census data

Business Revenues (or Sales)	<=\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	61.44	4.07	34.49	100%
% of Bank Loans in AA by #	81.82	9.09	9.09	100%
% of Bank Loans in AA by \$	51.32	20.91	27.78	100%

Source: CRA Data and Loan sample; Dun and Bradstreet data.

### Small Loans to Businesses in the AA

Small loans to businesses for amounts less than \$100,000 represented 44.62 percent of the total small business loans sampled.

Loan Size (000's)	Number of Loans	Percent of Number	Dollar Volume of Loans	Percent of Dollar Volume
\$0 - \$100,000	17	41.46	179	8.50
\$100,001 - \$250,000	12	29.27	1,257	59.65
\$250,001 - \$1,000,000	12	29.27	671	31.86

Source: Loan sample

Loan Size (000's)	Number of Loans	Percent of Number	Dollar Volume of Loans	Percent of Dollar Volume
\$0 - \$100,000	8	53.33	241	62.37
\$100,001 - \$250,000	4	26.67	86	22.18
\$250,001 - \$1,000,000	3	20.00	59	15.45

Source: Loan sample

<sup>3</sup> Loans for which borrower income was available.

<b>Table 2C - Borrower Distribution of Loans to Businesses by Loan Size in Washington County MSA AA</b>				
Loan Size (000's)	Number of Loans	Percent of Number	Dollar Volume of Loans	Percent of Dollar Volume
\$0 - \$100,000	4	44.45	203	23.64
\$100,001 - \$250,000	2	22.22	450	52.38
\$250,001 - \$1,000,000	3	33.33	206	23.98

*Source: Loan Sample*

## Geographic Distribution of Loans

NBB's geographic distribution of loans reflects excellent dispersion and is indicative of excellent performance. There are four moderate-income geographies, and no low-income geographies in the AA. Overall, the bank made loans in moderate-income geographies more than proportionate to the percentage of owner occupied housing units located in the AA. More weight is given to the bank's performance in the Non-MSA AA due to the number of moderate income geographies in the area (3), and the presence of two (2) distressed/underserved middle income tracts. We identified no apparent gaps or areas of low penetration in the bank's lending patterns.

### Blacksburg AA

There are 28 census tracts located in this assessment area. There are no low-income census tracts, and there is only one (1) moderate income tract located in the assessment area. The percentage of households living below the poverty level is 19.50 percent. The percentage of owner-occupied housing units located in the moderate income tract totals 69.45 percent (2,527 units).

Overall, the distribution of HMDA loans in the Blacksburg AA reflects reasonable dispersion among the geographic areas. The percentage of home purchase loans made in moderate income geographies is significantly lower than the percentage of owner occupied housings units in the census tract. The percentage of home refinance loans exceeds the percentage of owner occupied units, and the percentage of home improvement loans is proportionate to the ratio of owner occupied housing units.

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 - 207	0.00	0.00	4.88	1.98	86.82	86.63	8.30	11.39
Home Improvement – 182	0.00	0.00	4.88	4.44	86.82	87.78	8.30	7.78
Home Refinance - 189	0.06	0.00	4.88	5.98	86.82	76.63	8.30	17.39
TOTAL HMDA - 578 <sup>4</sup>	0.00	0.00	4.88	3.98	86.82	83.91	8.30	12.11

Source: Data reported under HMDA; U.S. Census data

The distribution of loans to businesses also reflects reasonable dispersion in the assessment area. The percentage of loans to businesses reasonably approximates the percentage of businesses located in the moderate-income geography.

<sup>4</sup> Loans for which census tracts were available.

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	0.00	0.00	1.80	1.56	90.90	90.63	6.45	7.81

Source: CRA Data and Loan sample: Dun and Bradstreet data.

**Non-MSA AA**

There are 33 census tracts located in the Non-MSA AA, of which three (3) are moderate income tracts. In addition, there are two (2) distressed/underserved middle-income tracts located in this assessment area. The distressed/underserved middle income tracts are located in the city of Bland, VA, and Galax, VA. The Non-MSA AA consists of the counties of Tazewell, Bland, Smyth, Washington, Grayson, Wythe, Carroll, and the city of Galax. We note that the bank's branch in Galax is located in a designated distressed/underserved middle-income tract.

The distribution of HMDA loans in the Non-MSA AA reflects excellent dispersion among the geographic areas. The percentage of all HMDA loans for home purchase, home improvement and home refinance made in the moderate-income geographies exceeds the ratio of owner occupied housing units in these geographies.

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 - 52	0.00	0.00	6.12	14.00	93.88	86.00	0	0
Home Improvement - 121	0.00	0.00	6.12	6.61	93.88	93.39	0	0
Home Refinance - 94	0.00	0.00	6.12	7.53	93.88	92.47	0	0
TOTAL HMDA - 267 <sup>5</sup>	0.00	0.00	6.12	8.61	93.88	91.39	0	0

Source: Data reported under HMDA; U.S. Census data.

The distribution of loans to businesses also reflects excellent dispersion in the assessment area. The percentage of loans to businesses exceeds the percentage of businesses located in the moderate income geography.

<sup>5</sup> Loans for which census tracts were available.

<b>Table 3A - Geographic Distribution of Loans to Businesses in Non-MSA AA</b>								
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	0.00	0.00	7.69	20.00	92.31	80.00	0.00	0.00

Source: CRA Data and Loan sample; Dun and Bradstreet data.

**Kingsport-Bristol, Bristol TN-VA MSA AA (Washington County)**

There are no low- or moderate-income census tracts in the Kingsport, Bristol TN-VA MSA AA; therefore an analysis of the geographic distribution of loans would not be meaningful.

**Responses to Complaints**

There were no complaints regarding the bank's CRA performance during the evaluation period.

**COMMUNITY DEVELOPMENT TEST**

The Community Development test is rated satisfactory. NBB's community development activities demonstrate adequate responsiveness to the Community Development (CD) needs of its AA, when considering the bank's capacity, performance context, and the availability of community development opportunities in the bank's AA.

**Number and Amount of Community Development Loans**

National Bank of Blacksburg (NBB) originated seven qualified community development loans totaling \$7.11 million during the evaluation period. \$6.3 million of the loan proceeds are given to the Giles County Industrial Development Authority for construction and renovation activities. The remaining loan proceeds were to organizations that provide community services and affordable housing for low-to moderate-income individuals. All CD loans made during this assessment period benefited the Blacksburg AA. There were no community development loans in the Non-MSA AA or the Kingsport-Bristol-Bristol TN-VA AA.

**Number and Amount of Qualified Investments**

Thirty (30) community development investments totaling \$51,035 were made during the evaluation period. The level of CD investments is considered adequate, based on the performance context. NBB operates in predominantly middle income geographies. There are no low-income tracts in the bank's assessment area, and there are only four (4) moderate income tracts in all assessment areas: one (1)

located the Blacksburg-Christiansburg-Radford MSA, and the other three (3) located in the VA non-MSA assessment area. Two (2) of the middle income tracts located in the Non-MSA AA are designated Distressed/underserved middle income tracts.

Seventeen (17) of the investments made were in the Blacksburg-Christiansburg-Radford assessment area, and totaled \$31,835. This represents 62.38 percent of all qualified community development investments. Seven investments totaling \$3,100 (6.07 percent of qualified investments) were made in the Non-MSA assessment area. There were six statewide investments made, with the potential to impact the bank's assessment areas. These investments totaled \$16,100 (31.55% of all qualified investments).

### **Extent to Which the Bank Provides Community Development Services**

The employees and officers of the National Bank of Blacksburg provided services and support to eleven (11) qualified community development organizations over the evaluation period. The majority (8) of the community development services benefited the Blacksburg-Christiansburg-Radford MSA assessment area. Two (2) of the CD services provided benefited the Non-MSA AA. One of the CD services provided was to the Ninth District Development Financing, Inc. This service benefits all of the assessment areas. The Ninth District Development Financing oversees a revolving loan fund, and its purpose is to assist in providing working capital and fixed asset financing (to small businesses and expanding non-profit organizations) for projects that develop and enhance tourism in the Ninth Congressional District.

### **Responsiveness to Community Development Needs**

The bank's community development activities demonstrate adequate responsiveness to the community development needs of its assessment areas. Thus takes into consideration the bank's capacity, the need, and the availability of such opportunities for community development in the bank's assessment areas. We did not identify any un-met community development needs 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.