



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

April 27, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of McMinnville
Charter Number: 2221

200 East Main Street
McMinnville, TN 37110-0000

Office of the Comptroller of the Currency

Nashville Field Office
5200 Maryland Way, Suite 104
Brentwood, TN 37027-5018

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.

The First National Bank of McMinnville (FNB) has a satisfactory record of meeting community credit needs. This is based on the following:

- The bank's loan-to-deposit ratio is satisfactory and averaged 68.41% during the evaluation period. **FNB's** loan-to-deposit ratio ranged from a low of 61.4% in March 2006 to a high of 79.21% in March 2009.
- A majority of **FNB's** loans are within the bank's Warren County Assessment Area (AA). Approximately 74% of the number and 34% of the dollar volume of loans were to borrowers within the AA.
- **FNB's** distribution of loans to borrowers of different income (including low-and moderate-income) levels and business of different sizes is satisfactory.
- The geographic distribution of loans reflects satisfactory dispersion. While there are no low-and moderate income census tracts in **FNB's** AA, eight of the nine census tracts in the AA are middle-income census tracts which have been designated as "distressed." Approximately 83% of the number and 94% of the dollar volume of business loans were to businesses in middle-income census tracts so designated. Similarly, approximately 78% of the number and 66% of the dollar volume of residential loans were to individuals in middle-income census tracts so designated.
- **FNB's** community development performance demonstrates satisfactory responsiveness to the community development needs in its AA.

Scope of Examination

This Performance Evaluation covers the period May 18, 2005 through April 26, 2009 and is a full scope review. We reviewed the bank's community development loans and community development investments and services to ensure they met the definition of community development.

Conclusions regarding the Lending Test are based on residential loans including home purchases, home improvements, and home refinances. **FNB** is not a Home Mortgage Disclosure Act (HMDA) reporter. All residential loans considered in the Lending Test originated between January 1, 2006 and April 26, 2009. A sample of small business loans originated during the same time period was also considered in the Lending Test. A data integrity review was not conducted prior to this evaluation. Internal data was determined to be reliable during reviews by bank personnel.

Description of Institution

FNB is an independent, intrastate bank which opened for business in 1875. The bank is a wholly-owned subsidiary of First McMinnville Corporation, a one-bank holding company. Additionally, First Community Title and Escrow Company is a wholly-owned subsidiary of **FNB**. **FNB** has no bank owned affiliates. The holding company, bank, title and escrow company are located in McMinnville, Tennessee. The bank's main office and two branches are located in McMinnville, TN. One branch office each is located in Morrison and Viola, TN. All offices are located in Warren County. Since the previous CRA examination, the bank has not relocated or closed any branch offices and there have been no merger or acquisition activity. Although not considered a branch, a Loan Production Office (LPO) was opened in Murfreesboro, TN in May 2007. This facility is non-adjacent to the bank's AA.

McMinnville is approximately 75 miles southeast of Nashville, Tennessee. 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 May 19, 2005, when the bank received a **Satisfactory** rating. There are no legal or financial impediments to **FNB's** ability to meet the credit needs of its AA including retail and community development loans, qualified investments, and community development services needs. The bank offers a full-range of loan and deposit services. Since the previous CRA examination, the bank has not identified any community bank service needs.

FNB's primary business focus is commercial and industrial loans, including commercial real estate loans, and residential mortgage loans. As of March 31, 2009, the bank had total assets and gross loans of \$339 and \$210 million, respectively. Gross loans comprised 62% of total assets. Total assets for the holding company were \$327 million as of December 31, 2008. The following table reflects the composition of **FNB's** loan portfolio based on March 31, 2009 Report of Condition.

	Product Category	
	Dollar (000's)	Percent
Construction & Land Development	23,481	11.19
Commercial & Industrial Including Commercial Real Estate	94,025	44.80
Residential Mortgage Loans	87,554	41.72
Individuals	2,420	1.15
Other	2,381	1.14
TOTAL	209,861	100.00

Source: March 31, 2009 Report of Condition

FNB provides a wide range of traditional deposit and loan products. Branches are generally located in areas that make them accessible to bank customers. Lobby hours and drive-up hours are set to meet customer needs. Four of the five branches have ATM's that disburse cash and take deposits. There are no free standing non-deposit taking ATMs.

Customers have 24-hour access to their accounts through telephone banking and through the internet (<http://www.fnbmt.com>). Internet and phone banking services include transfers between FNB accounts, review of account balances and transactions, access to loan account information, and the payment of loans. Internet banking customers also have bill-paying and e-statement capabilities. Through a third-party provider, customers have the option of applying for a Visa or MasterCard credit card. Through a separate bank issued ATM/Debit card, customers have additional access to their accounts at point-of-sale or ATM locations.

To counter high unemployment and weakened loan demand in the banks AA, **FNB** opened a loan production office (LPO) in Murfreesboro, TN in May 2006. The LPO does not accept deposits at this location, therefore this location is not included as part of the bank’s AA or branch offices. Approximately 35% (\$74 million) of **FNBs** total loan portfolio is concentrated in the Murfreesboro/Rutherford County and surrounding markets.

The bank’s AA includes nine census tracts. Eight of the census tracts are middle-income tracts and one tract is an upper-income tract. All census tracts are located in Warren County. The nine census tracts are not in a Metropolitan Statistical Area (MSA). Three offices are located in middle-income census tracts and two offices are located in the upper-income census tract. There are two ATMs each in the middle- and upper-income census tracts.

Distribution of Bank Offices and ATMs by Census Tract						
Census Tract Income Level	Tracts		Full-Service Branches		Automated Teller Machines	
	#	%	#	%	#	%
Low	0	0	0	0	0	0
Moderate	0	0	0	0	0	0
Middle	8	88.89	3	60.00	2	50.00
Upper	1	11.11	2	40.00	2	50.00
NA	0	0	0	0	0	0
TOTAL	9	100.00%	5	100.00%	4	100.00%

There are 4 branch offices with contiguous ATMs. All of the ATM machines at the branch offices accept deposits and dispense cash. There are no free-standing ATMs which dispense cash only.

FNB’s business strategy includes continued marketing of residential and commercial credit to small businesses through its products, staff, and locations. The bank offers small business loans for new business startups and to expand an existing business.

Description of Assessment Area(S)

The bank’s AA includes all census tracts in Warren County. Eight of the bank’s AA census tracts are middle-income while the remaining census tract is upper-income. Warren County is not in a MSA. While there is no low- or-moderate-income census tracts in the bank’s AA, the eight middle-income census tracts are identified as “distressed” income tracts due to excessive poverty levels. Distressed designation guidelines are: (1) an employment rate of at least 1.5 times the national average, (2) a poverty rate of 20% or more, or (3) a population loss of 10% or more. The AA meets the requirements of the regulation and does not arbitrarily exclude any low-

or moderate-income areas. There are no natural boundaries within the AA that hinder accessibility. All nine census tracts in Warren County are contiguous. The Murfreesboro LPO is not contiguous and is not considered part of the bank’s AA.

Demographic Information for Assessment Area						
Warren County, Tennessee						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	9	0	0	88.89	11.11	0
Population by Geography	38,276	0	0	85.68	14.32	0
Owner-Occupied Housing by Geography	16,689	0	0	86.35	13.65	0
Businesses by Geography	3,229	0	0	85.75	14.25	0
Farms by Geography	168	0	0	76.19	23.81	0
Family Distribution by Income Level	10,890	21.27	16.93	21.46	40.34	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	4,160	55.67	44.33	-	-	0
Median Family Income (MFI)	= \$38,585	Median Housing Value		= \$74,322		
HUD Adjusted Median Family Income (MFI) for 2007	= \$43,100	Unemployment Rates		= 13.9%		
Households Below the Poverty Level	= 2,641					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census and 2007 HUD updated MFI. Unemployment rate is as of March 31, 2009.

There are no low- and moderate-income census tracts within **FNB’s** AA. However, eight of nine census tracts have been designated as “distressed.” Additionally, of the 10,890 families residing in Warren County, 2,316 families (21.27%) and 1,844 (16.93%), respectively, are low- and moderate-income families based on the family distribution by income levels. As of March 31, 2009, the unemployment rate for the State of Tennessee and the U.S. was 9.6% and 8.5%, respectively. Both rates are lower than the 13.9% unemployment rate in Warren County for the same period and the Warren County unemployment rate is more than 1.5 times the national average.

FNB is located in middle Tennessee. McMinnville serves as the county seat of Warren County and is located approximately 75 miles southeast of Nashville, TN and 69 miles northwest of Chattanooga, TN. Located some 23 miles east of Interstate 24, McMinnville is easily accessible. Interstate 24 is the major corridor between Nashville and Chattanooga. Centertown, Morrison, and Viola are other incorporated cities within Warren County.

Warren County’s economic base is diverse. Primary industries in Warren County include nursery businesses, manufacturers, retail establishments, and service organizations. There are

approximately 16,650 individuals employed full-time and part-time in Warren County. Many individuals commute to nearby Murfreesboro (37 miles) for employment. Major employers in Warren County are: Bridgestone/Firestone (radial truck and bus tires) 1,100 employees; Yorozu Corporation (metal stamping) 1,100 employees; Jarden Consumer Solutions (pet and human hair clippers) 400 employees; Morrison Tool & Fabricating (welding and fabrication) 144 employees; Cumberland Lumber & Mfg. (hardwood strip flooring) 115 employees; McMinnville Mfg. Co. (hardwood floors) 100 employees; Metal Products Co. (metal stamping) 90 employees; Burroughs-Ross-Colville (striking tool handles/hardwood lumber) 90 employees; Bouldin Corp. (greenhouse equipment) 75 employees; and three other employers (sheet metal, custom injection molding, and screw machine production) which employ a total of 185 individuals. Natural resources include crushed stone and hardwood timber products. Agricultural products include hay, soybeans, corn, wheat, and nursery stock. McMinnville is known as the nursery capital of the world. In recent years annual nursery sales have declined to \$100 million from \$200 million. Contributing causes to this revenue decline include weather-related factors (freezes/droughts), high fuel costs, fire ant infestation, and real estate recession which has significantly impacted residential home construction. Some nurseries have gone out of business while others have cut back on hours of operation.

Warren County has been hard hit in recent years as some ten industrial plants have closed. A long-time major employer, The Carrier Corporation (heating/cooling mfg) which employed as many as 2,200 employees, closed its doors June 2005. Other manufacturers have scaled back shift work and their hours of operation. Bridgestone/Firestone, for example, closes one week per month in order to aid inventory control.

No business opportunities were identified by FNB through outreach activities or through bank surveys during this evaluation period. An affordable housing agency serving numerous counties in middle Tennessee was interviewed for a community contact. This agency acts as an intermediary and provides down payment to first-time home buyers and credit counseling to low- and moderate-income individuals. The community contact did not identify any specific credit needs in the bank's AA.

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.

Loan-to-Deposit Ratio

The quarterly average loan-to deposit ratio for **FNB** was "**satisfactory**" at **68.41%** for the sixteen quarters ending March 31, 2009. **FNB's** quarterly average loan-to-deposit ratio was the lowest when compared to the three regional institutions and four independent banks in the AA for the period. Two regional banks (Regions Bank and US Bank, NA) and one savings association (Beacon Federal) are headquartered out of state. At 116.71%, Beacon Federal has the highest quarterly average loan-to-deposit ratio for the period, followed by US Bank NA at

105.98%, and Security FSB of McMinnville (savings association) 105.11%. Of the three remaining home town banks, Homeland Community Bank’s quarterly average loan-to-deposit ratio was 76.41%, followed by Citizens Tri-County Bank 72.70%, and **FNB** 68.41%. **FNB**’s highest loan-to-deposit ratio for the sixteen quarter period was 79.21% as of March 31, 2009 and the lowest ratio was 61.4% as of March 31, 2006. Over the three year period, **FNB**’s loan-to-deposit ratio increased by 17.81%. This increase is attributable to the bank’s Murfreesboro LPO which opened in May 2006.

Loan-To-Deposit Ratios		
Institution	Assets as of 03/31/09(*)	Average LTD Ratio % (**)
First National Bank, McMinnville, TN	\$339	68.41%
Regions Bank, Birmingham, AL	\$137,000	99.38%
Security FSB of McMinnville, McMinnville, TN	\$134	105.11%
Homeland Community Bank, McMinnville, TN	\$93	76.41%
Beacon Federal, East Syracuse, NY	\$1,040	116.71%
Citizens Tri-County Bank, Dunlap, TN	\$502	72.70%
US Bank NA, Cincinnati, OH	\$258,527	105.98%

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

The quarterly average LTD ratio for **FNB and the 6 comparable banks is for the 16 quarter period from June 30, 2005 through March 31, 2009.

As of June 30, 2008, total deposits within the AA aggregated \$683 million. Of that amount, **FNB** controlled \$249 million (37%), Regions Bank controlled \$144 million (21%), Security FSB of McMinnville controlled \$110 million (16%), Homeland Community Bank, McMinnville controlled \$67 million (10%), Beacon Federal controlled \$64 million (9%), Citizens Tri-County Bank, Dunlap, TN controlled \$33 million (5%), and US Bank, NA, Cincinnati, Ohio controlled \$16 million (2%).

Of the 18 banking offices located in the AA, **FNB** has 5 (28%), Regions Bank, Homeland Community Bank, and Citizens Tri-County Bank 3 (16%) each, Security FSB of McMinnville 2 (11%), Beacon Federal and US Bank, NA have 1 (6%) banking office each.

Lending in Assessment Area

FNB’s record of lending in its AA is “**satisfactory.**” A majority of the number of **FNB** loans are within the bank’s AA. The number of residential and business loans inside the bank’s AA was 83.33% and 64.82%, respectively. Similarly, the dollar amount of residential and business loans inside the bank’s AA was 58.82% and 22.12%, respectively. Collectively, the number and dollar amount of loans in **FNB**’s AA was 74.07% and 33.55%, respectively. Conclusions are based on residential and business loan samples originated during 2006, 2007, 2008, and through April 26, 2009, respectively. Loan samples included loans originated by the bank’s Murfreesboro LPO. However, for comparative and analysis purposes these loans are not part of the bank’s Warren County AA.

Lending in Warren County, TN Non-MSA AA										
Loan Type(s)	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
2006-2009 Residential Loans	45	83.33	9	16.67	100%	3,256	58.82	2,280	41.18	100%
2006-2009 Business Loans	35	64.82	19	35.18	100%	2,710	22.12	9,539	77.88	100%
Total	80	74.07	28	25.93	108	5,966	33.55	11,819	66.45	17,785

Source: Residential loan sample and Business loan sample include loans which originated during 2006, 2007, 2008, and through April 26, 2009. Residential loans include home purchase, home improvement, and home-refinance loans. Business loan sample also includes farm loans; 2000 U.S. Census Data.

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

FNB's record of lending to borrowers of different incomes and to businesses of different sizes is "satisfactory." At 11.11%, the number of residential loans to low-income families is less than the 21.27% of low-income families within the Warren County AA. At 22.22%, the number of residential loans to moderate-income families exceeds the 16.93% of moderate-income families in the Warren County AA. Since mid-2007, home loan products offered by FNB include long-term, residential home financing. The loans, however, are funded by a third party with the bank receiving a fee for its efforts. These loans are sold in the secondary market, never funded by the bank, and not reported as loan originations on the bank's books. Underlying mortgages securing these loans may be guaranteed by the Veterans Administration (VA), Federal Housing Authority (FHA), or Rural Development (RD). In other instances, these loans may be purchased by Fannie Mae, Freddie Mac, and Rural Housing Authority. Since opening for business in mid-2007, the bank has generated approximately \$2,661 thousand (30 loans) which have been sold in the secondary market. Some of these loans were to low-and moderate-income families. These loans are not reflected in the table below.

FNB's record of lending to businesses of different sizes is excellent. Business revenues within the Warren County AA reflect that 56.31% have annual sales less of \$1 million or less, 3.65% exceed \$1 million, and 40.04% of business sales are unavailable. Comparatively, at 82.86% and 81.07% both the number and dollar amount of loans to businesses with annual sales of \$1 million or less is excellent. Similarly, at 8.57% and 16.28% respectively, the number and dollar amount of loans to businesses with annual sales in excess of \$1 million is also excellent. The bank does a good job in obtaining business revenue information on its business loans as reflected by the low percentage of unavailable information.

Borrower Distribution of Residential Real Estate Loans in Warren County, TN Non-MSA AA								
Borrower Income Level	LOW		MODERATE		MIDDLE		UPPER	
Loan Type(s)	% of AA Families	% of Number	% of AA Families	% of Number	% of AA Families	% of Number	% of AA Families	% of Number
Residential Loans	21.27%	11.11	16.93	22.22	21.46	42.22	40.34	22.22

Source: Residential loan sample from 2006, 2007, 2008, and through April 26, 2009. Residential loans include residential home purchases, home improvement loans, and home refinance loans sampled; 2000 U.S. Census Data Note: No income information filed on one residential loan sampled.

Borrower Distribution of Loans to Businesses in Warren County, TN Non-MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
Full Review: Warren County AA				
% of AA Businesses	56.31	3.65	40.04	100%
% of Bank Loans in AA by #	82.86	8.57	8.57	100%
% of Bank Loans in AA by \$	81.07	16.28	2.65	100%

Source: 2007 Business Geodemographic data compared to 2006, 2007, 2008 and through April 26, 2009 loan sample.

Geographic Distribution of Loans

There are no low- and-moderate-income census tracts in the Warren County AA. Ordinarily, under these circumstances a geographic distribution comparison of loans to businesses and residential real estate loans is not meaningful. However, eight of the nine census tracts in the Warren County AA are middle-income census tracts that have been designated as “distressed.” The geographic distribution of business and residential loans reflects satisfactory dispersion. At 82.86%, the number of loans to businesses in middle-income census tracts designated as “distressed” compares very favorably to the 89.20% of AA businesses. At 77.78%, the number of residential loans to borrowers in middle-income census tracts designated as “distressed” is slightly less than the 88.89% of AA owner occupied housing.

2006 – 2009 Geographic Distribution of Loans to Businesses in Warren County, TN Non MSA AA								
Census Tract Income Level	LOW		MODERATE		MIDDLE		UPPER	
Loan Type	% of AA Businesses	% of Number	% of AA Businesses	% of Number	% of AA Businesses	% of Number	% of AA Businesses	% of Number
Small Business Loans	0.00%	0.00%	0.00%	0.00%	89.20%	82.86%	10.80%	17.14%

Source: Loan sample for 2006, 2007, 2008 through April 26, 2009.

2006 – 2009 Geographic Distribution of Residential Real Estate Loans in Warren County, TN Non MSA AA

Census Tract Income Level	LOW		MODERATE		MIDDLE		UPPER	
Loan Type	% of AA Owner Occupied Housing	% of Number	% of AA Owner Occupied Housing	% of Number	% of AA Owner Occupied Housing	% of Number	% of AA Owner Occupied Housing	% of Number
Residential Loans	0.00%	0.00%	0.00%	0.00%	88.89%	77.78%	11.11%	22.22%

Source: Residential loans sampled for 2006, 2007, 2008, through April 26, 2009.

Responses to Complaints

There have been no consumer complaints relating to the bank's community Reinvestment Act performance during this evaluation period, therefore this criterion is not applicable.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test is rated **"Satisfactory."** Based on a full-scope review, the bank's performance is satisfactory.

Number and Amount of Community Development Loans

FNB originated 3 community development loans and 3 community development investments totaling \$2,652,000 during this evaluation period. As evidenced by the table below, 3 loans totaling \$2,599,276 were for community development purposes.

Community Development Loans

Qualifying community development loans are loans that meet the definition of community development, as defined in the CRA regulation. During the evaluation period, **FNB** originated 3 community development loans aggregating \$2,599 thousand. Specific examples of loans qualifying as community development loans are described below.

Loan to Refinance and Purchase Apartments and Residences Available for Rental to Low-and Moderate-Income Individuals

FNB originated one loan aggregating \$576,000 to refinance and purchase a 96 unit apartment complex in a distressed area. All of these apartments are Section 8 and rented to low-and moderate-income individuals.

FNB originated one \$1,777,496 loan to a Partnership which owns and rents 76 apartments and residences to low-and moderate-income individuals. However, these individuals are not under the Government Sponsored Section 8 program.

FNB originated one \$245,780 loan to a development company which rents 35 units to low-and moderate-income individuals. These individuals, however, are not under the

Government Sponsored Section 8 program.

Number and Amount of Qualified Investments

Qualifying community development investments are investments that meet the definition of community development, as defined in the CRA regulation. Although **FNB** is an active supporter of Warren County and the City of McMinnville through the purchase of various investments, none of these investments meet the definition of community development, as defined by the CRA regulation.

FNB did make several donations which benefit low-and moderate-income individuals during this evaluation period.

Originated Donations to Habitat for Humanities Which Promotes Affordable Housing for Low- and Moderate-Income Individuals and Other Non-profit Organizations

FNB has a five year commitment to Habitat for Humanity at \$10,000 per year (\$50,000) to aid in providing affordable housing for low- and moderate-income individuals. The commitment expires in 2010. Donations of \$2,500 are being made quarterly. **FNB** has also provided volunteers to assist in affordable housing development.

FNB donated \$75 per month (\$900 annually) to McMinnville Housing Authority to benefit government subsidized housing including low- and moderate-income individuals. Through other local civic organizations, bank employees have volunteered to provide assistance to government subsidized housing recipients.

FNB donated \$1,625 to Main Street McMinnville, a non-profit organization which aids in the revitalization of Downtown McMinnville. City of McMinnville is located in distressed middle-income census tracts.

Community Development Lending and Investments in AA			
Community Development Lending		#	\$ Amount (000's)

Originated CD Loans	AA	3	\$2,599
Unfunded Commitments*	AA	0	0
Total CD Loans		3	\$2,599
Community Development Investments			
Qualified Investments	AA	0	\$0
Originated Grants/Donations	AA	3	\$45
Unfunded Commitments*	A/A	*	\$8
Total Qualified Investments		3	\$53
Total Community Development Lending and Investments	AA	6	\$2,652

**"Unfunded Commitments" means legally binding loan and investment commitments that are tracked and recorded by the bank's financial reporting system. Unfunded commitment number included in originated CD loans.*

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

The level of community development services is **“satisfactory.”** Among other activities, community development services are targeted to low- and moderate-income individuals.

The following are examples of qualifying community development services. **FNB** has participated in and sponsored several programs that provide community services for low- and moderate-income individuals.

Get Smart about Credit Day

Bank employees partnered with American Banker Association (ABA) and employees from other organizations to educate students about credit, savings, and other related banking services. This program was taught to Warren County High School and Hickory Creek Elementary students. Participants included economically disadvantaged students.

Battered Women’s Shelter

Bank employees volunteered to assist the local nonprofit women’s shelter which assists abused women in finding safety. Time has been donated by an employee during normal banking hours.

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..