



PUBLIC DISCLOSURE

January 07, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Federal Savings Bank
Charter Number 716195

300 N. Elizabeth Street, Floor 3e
Chicago, IL 60607

Office of the Comptroller of the Currency

7101 College Boulevard
Suite 1600
Overland Park, KS 66210

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.

GENERAL INFORMATION AND OVERALL CRA RATING:

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of The Federal Savings Bank (TFSB) issued by the OCC, the institution's supervisory agency, for the evaluation period ending January 7, 2014. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A of 12 CFR Part 25.

This institution is rated Satisfactory.

State Name: Illinois Rating: Satisfactory

State Name: Kansas Rating: Satisfactory

The bank's overall rating is based on its state ratings and its bank-wide performance under the loan-to-deposit and lending in assessment area criteria.

- TFSB's loan-to-deposit ratio is more than reasonable.
- TFSB originated a majority of its loans outside of its assessment areas (AAs). The bank's business strategy is to operate as a mortgage banking entity with a nationwide presence and market place. The effect of not meeting the standard for satisfactory performance under this performance criterion does not impact the overall CRA rating.
- The bank's distribution of lending in its AAs reflects reasonable penetration among individuals of different income levels in both the state of Illinois and the state of Kansas.
- The geographic distribution of loans reflects reasonable dispersion in both the state of Illinois and the state of Kansas.

Scope of Examination

The CRA examination for small banks includes only the lending test. The review period for this CRA examination is January 1, 2012 through September 30, 2013. We only reviewed Home Mortgage Disclosure Act (HMDA) reportable loan products for this examination since they account for over 99 percent of the bank's loan portfolio as of September 30, 2013.

TFSB has two assessment areas (AAs). In the state of Illinois, the AA includes the counties of Cook, DuPage, and Will, which is part of the Chicago-Joliet-Naperville, IL Metropolitan Division (MD). In the state of Kansas, the AA includes counties in both Kansas and Missouri that are part of the Kansas City, MO-KS Metropolitan Statistical Area (MSA). This includes the counties of Johnson, Wyandotte, Leavenworth, and Miami in the state of Kansas, and the counties of Jackson, Platte, Clay, and Cass in the State of Missouri.

We performed full-scope reviews for each assessment area. However, we gave more weight to the bank's lending performance in the state of Illinois since it includes over 91 percent of HMDA loan originations during the evaluation period.

The bank contracted with an independent third party to perform an integrity review of its 2012 HMDA data. Based on the findings, data used for the purposes of this exam is accurate and reliable. We compared the bank's lending results to 2010 demographic data taken from 2010 Census data and 2012 aggregate/peer lending data of other regulated financial institutions.

Description of Institution

TFSB is a full service interstate savings bank headquartered in Chicago, IL. As of September 30, 2013, FSB had \$158 million in total assets and \$23.8 million in Tier 1 capital. The bank is wholly owned by National Bankcorp Holdings, Inc. (NBH), a one-bank holding company with consolidated assets of \$158 million. The bank offers a full range of financial products and services, including checking, savings, and money market accounts, certificates and jumbo certificates of deposit (CDs), Individual Retirement Accounts (IRAs), residential real estate loans, consumer installment loans, consumer and business credit card loans (issued and serviced by a third party), and commercial loans.

The bank was formerly Brooke Savings Bank (until July 2008) and Generations Bank (headquartered in Overland Park, KS) owned by Brooke Bancshares. NBH purchased the bank on April 4, 2011 and changed the bank's name to The Federal Savings Bank, effective May 31, 2011. Since the purchase by NBH, TFSB operates as a mono-line

mortgage operation with a nationwide presence and market place. As such, the bank opened loan production offices (LPOs) in Illinois, New York, Maryland, Arizona, and California in the 2nd quarter of 2012. Additional LPOs were opened in Long Island, NY (3rd quarter 2012), Baltimore, MD (1st quarter 2013), and Las Vegas, NV (2nd quarter 2013). The bank closed its California and Baltimore LPOs in August 2013. On January 30, 2013, TFSB's Chicago, IL LPO became a depository branch. In October 2013, the bank officially moved its headquarters to the Chicago branch office.

The bank currently has two branch offices; one is located in Chicago, IL and the other branch is in Overland Park, KS. Both offices are located in upper income geographies. TFSB has two deposit-taking ATMs located at its main office and its Naperville, IL LPO in DuPage County. As stated above, the primary strategic focus of TFSB is mortgage banking. The bank originates and sells mortgage loans, along with servicing rights, to various investors. During the evaluation period, TFSB sold 9,138 loans totaling \$2.6 billion.

As of September 30, 2013, the loan portfolio totaled \$103 million, and represented 65 percent of the bank's total assets. Composition of TFSB's loan portfolio is illustrated in the following table

The Federal Savings Bank				
Selected Loan Categories as of September 30, 2013				
TFSB			Peer Median % Loans	TFSB Percentile
Loan Category Description	Dollar Amount \$000 Omitted	Percent of Net Loans		
Real Estate Loans	\$102,641	99.5	92.1	86 th
Commercial and Industrial Loans	681	0.5	3.8	28 th
Consumer Loans	19	0.0	2.4	3 rd

Source: 9/30/13 Call Report

TFSB has the resources and financial strength to meet the credit needs of its communities. There are no legal or financial factors impeding the bank's ability to help meet the credit needs in its AAs. This is the bank's first CRA examination.

Conclusions with Respect to Performance Criteria

Loan-to-Deposit Ratio

TFSB's loan-to-deposit ratio is more than reasonable.

Since the fourth quarter of 2011 (the eight most recent quarters available), TFSB's loan-to-deposit ratio averaged 101.77 percent and exceeded the loan-to-deposit ratio of its peer group in six of the eight quarters. During the two year period ending December 31, 2013, FSB originated 8,175 HMDA reportable loans totaling \$2.3 billion.

Lending in Assessment Area

TFSB originated a majority of its loans outside of its AAs. As such, it does not meet the standard for satisfactory performance under this criterion. As pointed out in the Description of the Institution section of this report, TFSB's business strategy is to operate as a mortgage banking entity with a nationwide presence and market place. The bank currently has five, of its eight loan production offices (LPO) located outside of its assessment areas. This business strategy and LPO network explains why a majority of loans are outside the bank's assessment areas. Therefore, the effect of not meeting the standard for satisfactory performance under this performance criterion does not impact the overall CRA rating.

During the review period, TFSB originated 8,175 HMDA reportable loans totaling \$2.3 billion. Of these, 2,358 (28.9 percent) totaling \$565 million (24.6 percent of the total dollar amount) were secured by properties within its two assessment areas. The following table illustrates the breakdown of loans by AA.

Table C2 - Concentration of Loans Originated In and Outside of the Reviewed Assessment Areas		
Assessment Area	HMDA Reportable Loans The Federal Savings Bank	
	% of Loans	% of \$ Volume
Illinois AA	26.5%	22.7%
Kansas AA	2.4%	1.9%
Outside Area	71.1%	75.4%
Total # or \$	100%	100%

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or

in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

State Rating

State of Illinois

CRA Rating for Illinois: Satisfactory

TFSB’s lending performance in the state of Illinois is reasonable. The bank’s distribution of lending reflects reasonable penetration among individuals of different income levels in this assessment area and compares well with other financial institutions. The geographic distribution of loans reflects reasonable dispersion throughout this assessment area, especially in low- and moderate- income geographies. TFSB’s HMDA reportable loan origination/purchase performance in the LMI geographies is in line with the peer/aggregate comparisons during the review period.

Description of Assessment Area(s)

TFSB’s AA includes all of Cook, DuPage and Will Counties, in Illinois. The bank’s main office is located in an upper-income geography in Chicago (Cook County). All of these counties are part of the Chicago-Naperville-Joliet MD.

The following table combines data from these three contiguous counties and outlines demographic information about the bank’s AA using 2010 Census data. This AA received a full-scope review to assess the bank’s performance in the state of Illinois.

TFSB Illinois AA

Demographic Information for Full Scope Area: Illinois Counties of Cook, Dupage, and Will						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,686	14.41	24.02	30.90	30.37	0.30
Population by Geography	6,789,159	10.33	24.35	33.29	32.03	0.00
Owner-Occupied Housing by Geography	1,612,470	4.60	18.67	37.28	39.45	0.00
Business by Geography	487,113	5.43	16.53	31.85	46.06	0.13
Farms by Geography	6,023	3.35	14.86	35.56	46.17	0.05
Family Distribution by Income Level	1,611,867	23.70	16.94	19.13	40.23	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	655,040	17.86	34.48	32.00	15.66	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		72,747 73,400 12%	Median Housing Value Unemployment Rate (December 2013)		293,402 8.6%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 HUD updated MFI

Based on the most recent census data (2010) TFSB's Chicago AA includes 243 low-income and 405 moderate-income geographies or census tracts (CTs). This AA does not arbitrarily exclude any LMI geographies and conforms to the regulatory requirements for assessment areas.

The Chicago area has a highly diversified economy. The Business and Professional Services sector provides 17.2 percent of employment in the area. Education and Health Services provides 15.3 percent, Government provides 12.7 percent (regional offices of many federal agencies are located in Chicago), Retail trade provides 9.9 percent, and Leisure and Hospitality provides 9.2 percent. Large employers in the AA include Wal-Mart, Advocate Health Care, Chase Bank, and Walgreen Company. This AA is among the most competitive and fragmented in the US. Competition is strong with 171 banks gathering deposits in the AA.

The unemployment rate in the State of Illinois is 8.6 percent and is higher than the national unemployment rate of 6.7 percent for December 2013. High levels of unemployment have had a negative impact on the AA's economy and the demand for home financing. Foreclosure activity has been high throughout the region since 2007, but it has had an especially devastating impact on LMI neighborhoods on the south and west side of Chicago. Completed foreclosures spiked in 2012, increasing by more than 70 percent over the volume in 2011. Foreclosures have displaced many families and has impaired the credit of many residents.

We utilized two community contacts with a community development institution and a realtor located in the AA. Identified credit needs include:

- Loans for redevelopment of foreclosed homes;
- More flexible lending programs; and
- Investments in Community Development Financial Institutions that make affordable housing loans.

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

The bank's distribution of loans to borrowers of different income levels reflects reasonable penetration in the AA.

The following table reflects TFSB's distribution of loans in its Illinois AA by borrower income, by year, and compares performance to demographic and peer group measurements. We did not include loans where the applicant's income was not available.

Distribution of The Federal Savings Bank HMDA-Reportable Loans By Borrower Income Level in its Illinois Assessment Area (Dollars in thousands)									
Borrower Income Level	2012		2013(Through 9/30/2013		Review Period		Aggregate/Peer 2012		Families Per 2010 Census Data
	#	%	#	%	#	%	#	%	% by #
By Number (Home Purchase):									
Low	92	8.8	92	8.8	184	8.8	15,160	8.2	19.3
Moderate	191	18.2	201	19.3	392	18.8	31,044	16.8	17.7
Middle	211	20.2	217	20.9	428	20.5	42,160	22.7	24.0
Upper	552	52.8	531	15.0	1,083	51.9	97,029	52.3	39.0
Total	1,046	100.0	1,041	100.0	2,087	100.0	402	100.0	100.0
Income NA	54		22		76		28,261		
By \$ Amt:	\$	%	\$	%	\$	%	\$	%	
Low	\$10,974	4.2	\$9,313	3.9	\$20,287	7.6	\$1,686,416	3.9	
Moderate	30,698	11.6	28,719	12.0	59,417	9.7	4,329,597	10.1	
Middle	44,271	16.8	42,462	17.7	86,733	22.5	7,584,641	17.6	
Upper	178,042	67.4	158,849	66.4	336,891	60.2	29,391,298	68.4	
Total	\$263,985	100.0	\$239,343	100.0	\$503,328	100.0	\$42,991,952	100.0	
Income NA	12,806		6,147		18,953		7,846,626		

The bank’s performance compared to aggregate peer data is reasonable. TFSB’s distribution of HMDA loans to both low- and moderate-income borrowers is above the aggregate peer group performance by number. Additionally, the institution’s dollar lending performance during the evaluation period was above the aggregate peer group for low-income borrowers and slightly below the aggregate peer group for moderate-income borrowers.

The bank’s performance compared to demographics is reasonable. TFSB’s HMDA loan penetration to low-income borrowers is below the percentage of low-income families residing in the AA. However, performance is reasonable considering 9.9 percent of families in the assessment area have income below the poverty level. Economic conditions are also challenging with high levels of unemployment in the AA. Lending, by number of loans, to moderate-income families is excellent. The percentage of bank loans exceeds demographics.

Geographic Distribution of Loans

The geographic distribution of loans reflects reasonable dispersion throughout this assessment area.

The following table reports TFSB’s distribution of loans by income level of geography, by year, and compares performance to demographic and peer group measurements.

Distribution of The Federal Savings Bank HMDA-Reportable Loans By Geography/CT Income Level in its Illinois Assessment Area (Dollars in thousands)									
CT Income Level	2012		2013 (Through 9/30/2013)		Review Period		Aggregate/Peer 2012		OOHUs*
	#	%	#	%	#	%	#	%	Per 2010 Census Data % by #
Low	23	2.1	39	3.7	62	2.9	5,932	2.8	4.6
Moderate	123	11.2	178	16.7	301	13.9	25,518	11.9	18.7
Middle	336	30.5	340	32.0	676	31.2	69,434	32.5	37.3
Upper	618	56.2	506	47.6	1,124	52.0	112,770	52.8	39.4
Total	1,100	100.0	1,041	100.0	2,087	100.0	402	100.0	100.0
By \$ Amt:	\$	%	\$	%	\$	%	\$	%	
Low	\$4,390	1.6	\$6,390	2.6	\$10,780	2.1	\$1,130,128	2.2	
Moderate	21,610	7.5	28,103	11.5	49,713	9.5	4,239,982	8.3	
Middle	66,513	23.3	66,169	26.9	132,682	25.4	12,970,195	25.5	
Upper	184,278	67.6	144,828	59.0	329,106	63.0	32,498,273	64.0	
Total	276,791	100.0	245,490	100.0	18,953	100.0	7,846,626	100.0	

*Owner Occupied Housing Units

The bank’s performance compared to aggregate peer data is reasonable. The bank’s penetration percentages in LMI geographies, in terms of both loan volume (16.8 percent) and dollar amount (11.6 percent), during the review period was slightly more than that of the peer group. Performance based on percentage of LMI geography lending by volume and dollar amount was especially more robust in 2013 with more than 20 percent of loans originated in LMI geographies.

The bank’s performance compared to demographics is reasonable. The percentage of loans inside LMI geographies is lower than demographics.

For 2012, TFSB ranked 24th in lending in the LMI geographies of its AA (of 293 FDIC insured financial institutions) with a 0.48 percent market share, which is comparable to the bank’s overall 0.51 percent market share for HMDA lending in the AA.

Responses to Complaints

There were no written complaints about TFSB's performance in helping to meet the credit needs of this assessment area.

State Rating

State of Kansas

CRA Rating for Kansas: Satisfactory

TFSB's lending performance in the state of Kansas is reasonable. During our review period, the bank's lending volume in this AA accounted for only 8.3 percent of loans during the evaluation period. The bank's distribution of lending reflects reasonable penetration among LMI individuals and is comparable to its peers. The geographic distribution of loans also reflects reasonable dispersion to the LMI geographies in this AA.

Description of Assessment Area(s)

TFSB's AA includes counties in the Kansas City (KC), MO-KS multistate MSA. The AA encompasses all of Johnson, Wyandotte, Leavenworth, and Miami counties in Kansas, and Jackson, Platte, Clay, and Cass counties in Missouri. The bank's branch office (its former main office) is located in an upper-income geography in Overland Park, KS (Johnson County). As of June 30, 2013, TFSB ranked as the 43rd largest FDIC-insured Depository institution out of 114 institutions in this AA. The bank had \$155.8 million in deposits in this AA, with a 0.35 market share. During 2012, TFSB was ranked 56th (of 384 FDIC insured financial institutions) in HMDA loan originations/purchases with a 0.19 percent market share.

The following table combines the data from these eight contiguous counties. This AA received a full-scope review to assess the bank's performance. The following table outlines demographic information about the bank's AA using 2010 Census data.

Demographic Information for Full Scope Area: FSB Kansas City AA (Kansas Counties: Johnson, Wyandotte, Leavenworth, and Miami. Missouri Counties: Jackson, Platte, Clay, and Cass)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	507	13.21	23.27	32.35	28.01	3.16
Population by Geography	1,895,595	8.41	21.68	36.65	33.25	0.01
Owner-Occupied Housing by Geography	501,368	5.40	18.50	38.60	37.50	0.00
Business by Geography	173,283	6.90	18.52	33.85	39.26	1.47
Farms by Geography	4,799	2.81	12.75	46.88	37.24	0.31
Family Distribution by Income Level	484,488	16.74	18.98	27.00	37.27	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	173,081	7.25	21.51	37.38	33.85	0.00
Median Family Income	69,313	Median Housing Value		162,563		
HUD Adjusted Median Family Income for 2012	73,300	Unemployment Rate (Dec 2013)		4.7%		
HUD Adjusted Median Family Income for 2013	71,200					
Households Below Poverty Level	10%					

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2010 US Census and 2012 & 2013 HUD updated MFI

Based on the most recent census data (2010) TFSB’s KC AA includes 67 low-income and 118 moderate-income geographies or census tracts (CTs). This AA does not arbitrarily exclude any LMI geographies and conforms to the regulatory requirements for assessment areas.

Industries providing the most employment in the KC MA are Trade, Transportation, and Utilities; Professional & Business Services; and Government. Large employers in the AA include AT&T, BNSF Railway, Asurion, and Citigroup. Competition is strong in the AA with 114 banks gathering deposits.

As shown on the table above, the unemployment rate for the KC MA was 4.7 percent. This unemployment rate is less than the State of Kansas’ 4.9 percent and the US’s 6.7 percent for December 2013.

We utilized two community contacts in this AA during our examination, one representative of an economic development corporation and a Community Development Coordinator of a local municipality. Some of the identified credit needs mentioned by these contacts include:

- Financial literacy training;
- Financial institution participation in community development projects and affordable housing programs.

Lending to Borrowers of Different Incomes

The bank's distribution of borrowers reflects reasonable penetration among individuals of different income levels in this assessment area.

The following table reports TFSB's distribution of loans in its KC AA by borrower income, by year, and compares performance to demographic and peer group measurements. We did not include loans where the applicant's income was not available.

Distribution of The Federal Savings Bank HMDA-Reportable Loans By Borrower Income Level in its KC Assessment Area (Dollars in thousands)									
Borrower Income Level	2012		2013 (Through 9/30/2013)		Review Period		Aggregate/Peer 2012		Families Per 2010 Census Data
	#	%	#	%	#	%	#	%	% by #
By Number:									
Low	2	1.8	2	5.7	4	2.7	15,160	9.7	16.7
Moderate	22	19.3	9	25.7	31	20.8	31,044	20.1	19.0
Middle	20	17.5	7	20.0	27	18.1	42,160	24.3	27.0
Upper	70	61.4	17	48.6	87	58.4	97,029	45.9	37.3
Total	114	100.0	35	100.0	149	100.0	402	100.0	100.0
Income NA	33		13		46		28,261		
By \$ Amt:	\$	%	\$	%	\$	%	\$	%	
Low	\$232	0.9	\$227	3.5	\$459	1.5	\$1,686,416	5.0	
Moderate	3,206	12.9	1,270	19.9	4,476	14.3	4,329,597	14.1	
Middle	4,109	16.6	1,419	22.2	5,528	17.7	7,584,641	21.3	
Upper	17,267	69.6	3,474	54.4	20,741	66.5	29,391,298	59.6	
Total	\$24,814	100.0	\$6,390	100.0	\$31,204	100.0	\$42,991,952	100.0	
Income NA	8,119		2,985		11,104		7,846,626		

The bank's performance compared to aggregate peer data is reasonable. TFSB's HMDA combined LMI borrower lending penetration percentage during the review period was 23.5 percent compared to the available peer group performance of 29.8 percent. In 2012, the year used in the peer comparison, the bank originated/purchased 21.1 percent of its HMDA reportable loans to LMI individuals. Additionally, the dollar volume

of lending to LMI individuals during the review period is 15.8 percent compared to the available peer group of 19.1 percent.

The bank's performance compared to demographics is reasonable. TFSB originated 2.7 percent of HMDA loans (by number) to low-income borrowers. However, performance is reasonable given that 7.92 percent of families have income below the poverty level. TFSB's percentage of loans to moderate-income families is excellent. The percent of loans (by number) to moderate-income families is above demographics.

Geographic Distribution of Loans

The geographic distribution of loans reflects reasonable dispersion throughout this assessment area, especially in LMI geographies. Primary weight is placed on the bank's performance compared to aggregate peer data.

The following table reports TFSB's distribution of loans by income level of geography, by year, and compares performance to demographic and peer group measurements.

Distribution of The Federal Savings Bank HMDA-Reportable Loans By Geography/CT Income Level in its KC Assessment Area (Dollars in thousands)									
CT Income Level	2012		2013(Through 9/30/2013)		Review Period		Aggregate/Peer 2012		OOHUs*
	#	%	#	%	#	%	#	%	Per 2010 Census Data % by #
By Number:									
Low	1	0.7	2	4.2	3	1.5	1,209	1.5	5.4
Moderate	13	8.8	6	12.5	19	9.8	8,265	10.6	18.5
Middle	42	28.6	8	16.7	50	25.6	27,373	35.0	38.6
Upper	91	61.9	32	66.6	123	63.1	41,276	52.9	37.5
Total	147	100.0	48	100.0	195	100.0	78,123	100.0	100.0
NA	0	-	0	-	0	-	22		
By \$ Amt:	\$	%	\$	%	\$	%	\$	%	
Low	\$129	0.4	\$255	2.7	\$384	0.9	\$130,119	0.9	
Moderate	1,644	5.0	694	7.4	2,338	5.5	875,373	6.4	
Middle	7,594	23.1	1,382	14.7	8,976	21.2	3,883,458	28.5	
Upper	23,566	71.5	7,044	75.2	30,610	72.4	8,747,001	64.2	
Total	32,933	100.0	9,375	100.0	42,308	100.0	13,635,951	100.0	
NA	0	-	0	-	0	-	3,249	-	

*Owner Occupied Housing Units

The bank's performance compared to aggregate peer data is reasonable. Based on loan volume (11.3 percent) and dollar amount (6.4 percent), performance in LMI geographies is somewhat less than that of the peer group (12.1 percent and 7.3 percent respectively).

The bank's performance compared to demographics is poor. Performance in LMI geographies is poor based on both the number and dollar volume of loans.

Responses to Complaints

There were no written complaints about TFBSB's performance in helping to meet the credit needs of this assessment area.