



## **PUBLIC DISCLOSURE**

February 17, 2015

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Hiawatha National Bank  
Charter Number 15698

220 East Oak Street  
Glenwood City, WI

Office of the Comptroller of the Currency

Campbell Mithun Tower  
222 South Ninth Street  
Suite 800  
Minneapolis, MN 55402-3393

**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 loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition and the credit needs of the assessment areas (AAs).
- The bank originated a majority of its loans inside the bank's AAs.
- Lending to borrowers of different income levels, and business of different sizes reflects reasonable penetration.
- The distribution of loans reflects reasonable dispersion throughout the bank's AAs.

**SCOPE OF EXAMINATION**

We evaluated Hiawatha National Bank's (HNB's) Community Reinvestment Act (CRA) performance for the period beginning October 21, 2008 through February 17, 2015 (the evaluation period). We reviewed LTD and consumer complaint data for the evaluation period. We used the sample period for the review of lending within the AA, borrower distribution test, and geographic distribution test. The sample period is January 1, 2013 through December 31, 2014.

HNB has two designated AAs. The first AA is the Minneapolis-St. Paul, MN-WI Multistate Metropolitan Statistical Area (MMSA) which includes Dakota, Hennepin, Ramsey, Washington, Pierce, and St. Croix counties. The bank's WI Non-MSA AA is comprised of Dunn, Pepin, and Polk Counties. Revisions in MSA boundaries and geographic definitions took effect in 2014. These changes impacted the CRA evaluation and the manner in which HNB's lending performance was evaluated in 2013 and 2014. As such, for the MMSA AA we determined primary products for each year, and evaluated lending performance separately for 2013 and 2014. The boundary changes did not affect the WI Non-MSA AA, and 2013-2014 lending activity was combined for analysis purposes.

In order to determine the bank's lending performance in each AA, we selected primary products based on number and dollar volume of loan originations during the sample period. Our analysis of HNB's loan originations in the MMSA AA found residential real estate refinances and commercial loans to be the primary products for 2013. For 2014, we determined residential real estate purchases, commercial loans, and consumer loans were the bank's primary products for the MMSA AA. In the WI Non-MSA AA, residential real estate loan purchases and refinances were the primary products for both 2013 and 2014.

The tables below show loan origination and purchase details for HNBs AAs:

<b>MMSA Loan Originations and Purchases in 2013</b>		
<i>Loan Type</i>	<i>Volume by #</i>	<i>Volume by \$</i>
Residential RE		
Purchase	18%	20%
Home Improvement	2%	2%
Refinance	36%	40%
Commercial	16%	30%
Agricultural	20%	6%
Consumer	20%	2%

Source: Bank loan origination reports for 2013 and 2014

<b>MMSA Loan Originations and Purchases in 2014</b>		
<i>Loan Type</i>	<i>Volume by #</i>	<i>Volume by \$</i>
Residential RE		
Purchase	20%	27%
Home Improvement	2%	1%
Refinance	17%	15%
Commercial	27%	43%
Agricultural	10%	12%
Consumer	25%	2%

Source: Bank loan origination report for 2013 and 2014

<b>WI Non-MSA Loan Originations and Purchases in 2013 &amp; 2014</b>		
<i>Loan Type</i>	<i>Volume by #</i>	<i>Volume by \$</i>
Residential RE		
Purchase	28%	38%
Home Improvement	3%	3%
Refinance	42%	51%
Commercial	6%	4%
Agricultural	0%	0%
Consumer	20%	5%

Source: Bank loan origination report for 2013 and 2014

We selected a random sample of 20 loans from each primary product type in each AA to evaluate the banks' lending performance within the AAs. We sampled additional loans as necessary for analysis purposes. We selected the primary products to determine HNB's lending activity within the MSA and Non-MSA AAs.

For the residential real estate loans, we utilized the bank's Home Mortgage Disclosure Act (HMDA) data for 2013 and 2014 in order to evaluate the bank's lending performance.

## **DESCRIPTION OF INSTITUTION**

HNB is a \$143 million intrastate community bank chartered in Hager City, WI. Hager City is located in west-central WI near the MN border. The bank has four full-service branches in addition to its main office located in Hager City. The branch facilities are located in Glenwood City, Maiden Rock, Osceola, and Hudson, all in WI. The Osceola branch opened in 2012, and the Hudson branch opened in 2013. The bank operates three cash-dispensing automated teller machines (ATMs). The ATMs are located onsite in Hager City and Maiden Rock, and the third ATM is located inside Orman's SuperValu grocery store in Glenwood City.

As of December 31, 2014, the loan portfolio totaled \$83 million, and consisted of commercial (55 percent), residential real estate (25 percent), agriculture (13 percent) and consumer (7 percent) loans.

HNB is a full-service financial institution, offering a wide variety of traditional commercial and retail banking products and services. Mortgage loan products include fixed mortgages, adjustable rate mortgages, government loans, jumbo loans and constructions loans. Other types of loans include automobile loans, and other personal loans such as overdraft lines of credit. HNB has also developed specific products to benefit deaf and hearing impaired individuals, and has focused on this demographic as part of its business strategy. Specifically, HNB is currently implementing its "Banking without Barriers" program to engage the underserved market for deaf and hearing impaired individuals, particularly in mortgage lending. President and CEO Jim Meisser is the first profoundly deaf bank president in the country.

HNB is 100 percent owned by Lake Shore III Corporation, a two-bank holding company headquartered in Glenwood City, WI.

The bank received an "Outstanding" rating at the October 20, 2008 CRA evaluation. There are no financial, legal, or other factors that impede the bank's ability to meet its CRA obligations.

## **DESCRIPTION OF ASSESSMENT AREAS**

### **Minneapolis-St. Paul, MN-WI MMSA**

HNB's MMSA AA consists of mostly middle-income census tracts (CTs), with a density of low- and moderate-income CTs within MN. The AA meets the requirements of the regulation and does not arbitrarily exclude any low or moderate-income CTs.

As previously stated, MSA boundary changes in 2014 affected the boundaries and demographic composition of the MMSA. As such, we analyzed lending activity for 2013 and 2014 separately. The following tables demonstrate the AA demographic and economic characteristics for both 2013 and 2014:

<b>2013 DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF the MMSA AA</b>	
<b>Population</b>	
Number of Families	594,531
Number of Households	961,316
% of Low-Income Families	21%
% of Moderate-Income Families	18%
% of Middle-Income Families	22%
% of Upper-Income Families	39%
<b>Geographies *</b>	
Number of Census Tracts	603
% Low-Income Census Tracts	11%
% Moderate-Income Census Tracts	22%
% Middle-Income Census Tracts	40%
% Upper-Income Census Tracts	27%
<b>Median Family Income (MFI)</b>	
2010 MFI for AA	\$80,925
2013 FFIEC Adjusted MFI	\$82,300
<b>Economic Indicators</b>	
2013 Average Unemployment Rate	4.78%
2010 Median Housing Value	\$258,488
% of Households Below Poverty Level	10%

*Source: 2010 U.S. Census data with updated information when available*

*\*For 0.66% of CTs income is NA*

<b>2014 DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF the MMSA AA</b>	
<b>Population</b>	
Number of Families	594,531
Number of Households	961,316
% of Low-Income Families	20%
% of Moderate-Income Families	17%
% of Middle-Income Families	22%
% of Upper-Income Families	41%
<b>Geographies*</b>	
Number of Census Tracts	603
% Low-Income Census Tracts	11%
% Moderate-Income Census Tracts	19%
% Middle-Income Census Tracts	41%
% Upper-Income Census Tracts*	29%
<b>Median Family Income (MFI)</b>	
2010 MFI for AA	\$79,301
2014 FFIEC-Adjusted MFI	\$83,900
<b>Economic Indicators</b>	
2014 Average Unemployment Rate	4.0%
2010 Median Housing Value	\$258,488
% of Households Below Poverty Level	10%

*Source: 2010 U.S. Census data with updated information when available*

*\*for 0.66% of CTs income is NA*

Economic conditions in the area strengthened during the evaluation period. According to the U.S. Bureau of Labor and Statistics, the annual unemployment rate for the AA averaged 4.0 percent in 2014. This compares favorably with both the MN and WI unemployment rates of 4.1 and 5.5 respectively.

The AA unemployment rate has been on a downward trend since the last CRA evaluation. Following the recession which began in 2008, the average unemployment rate for the AA counties dropped from a high of 7.7 percent in 2009 to the low in 2014.

Major employment industries include financial services, manufacturing, and education. The University of Wisconsin- River Falls and OEM Fabricators represent two of the largest employers in Pierce and St. Croix Counties, respectively.

Bank competition in the MMSA AA is strong. According to the June 30, 2014 FDIC Deposit Market Share report, there are 16 deposit-taking institutions in Pierce and St. Croix counties. HNB ranks sixth in market share with a six percent share of deposits. There is no clear leader in the market as none of the institutions hold more than 17 percent of the market share. The bank also competes with credit unions in the area, which are not included on the FDIC report.

We contacted a community leader to discuss the local credit needs of the community. Our contact indicated that financial institutions are meeting the credit needs of the local community. The contact did identify that there is an opportunity for the financial institutions to provide more funding for small businesses.

**WI Non-MSA Assessment Area**

The WI Non-MSA AA consists of 20 CTs, all of which are middle-income. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income CTs. The following table demonstrates the demographic and economic characteristics of the WI Non-MSA AA:

<b>2014 DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF THE WI NON-MSA AA</b>	
Population	
Number of Families	24,993
Number of Households	37,124
% of Low-Income Families	17%
% of Moderate-Income Families	18%
% of Middle-Income Families	24%
% of Upper-Income Families	41%
Geographies	
Number of Census Tracts	20
% Low-Income Census Tracts	0%
% Moderate-Income Census Tracts	0%
% Middle-Income Census Tracts	100%
% Upper-Income Census Tracts	0%
<i>Median Family Income (MFI)</i>	
2010 MFI for AA	\$57,005
2014 FFIEC-Adjusted MFI	\$60,600
Economic Indicators	
2014 Unemployment Rate	5.3%
2010 Median Housing Value	\$161,549
% of Households Below Poverty Level	12%

*Source: 2010 U.S. Census data with updated information when available*

The local economy improved over the evaluation period. This is evidenced by the area unemployment rate which has decreased steadily since the recession. Both Dunn and Pepin counties had an unemployment rate of 5.0 percent for 2014, which is down from 7.3 percent and 7.5 percent respectively in 2009. Polk County has a higher unemployment rate at 6.0 percent for 2014, down from 10.5 percent in 2009.

Primary industry sectors of the AA are manufacturing, educational, and health services. Prominent employers in the area include Amery Regional Medical Center, Unity School District, and Scientific Molding Corporation.

Competition from other financial institutions is strong. According to the June 30, 2014 FDIC Deposit Market Share report, there are 21 deposit-taking institutions in the WI Non-MSA AA. HNB ranks 18th in market share with just a one percent share of deposits. Bremer Bank, NA is the clear market leader in terms of deposit market share with 30 percent. The bank also competes with credit unions in the area, which are not included on the FDIC report.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### Loan-to-Deposit Ratio

HNB's LTD ratio is reasonable given the bank's size, financial condition, and credit needs of the AAs. The bank's LTD ratio averaged 65 percent over the 26 quarters since the previous evaluation, and ranged from a high of 72 percent in fourth quarter 2014, to a low of 58 percent in the fourth quarter of 2010.

HNB's LTD ratio ranks fourth among five similarly situated banks. Similarly situated banks include those operating in the bank's AAs and have similar asset sizes, product offerings, and services. During the evaluation period, the bank did sell a higher volume of residential real estate loans on the secondary market, which slightly reduced HNB's average LTD ratio.

Loan-To-Deposit Ratio		
Institution (Headquarters)	Assets as of 12/31/14 (\$000s)	Average LTD Ratio (3Q08-4Q14)
The First Bank of Baldwin ( <i>Baldwin, WI</i> )	157,840	82%
Eagle Valley Bank ( <i>St. Croix Falls, WI</i> )	135,635	79%
Citizens State Bank ( <i>Hudson, WI</i> )	144,059	72%
<b>Hiawatha National Bank (<i>Hager City, WI</i>)</b>	<b>135,591</b>	<b>65%</b>
River Falls State Bank ( <i>River Falls, WI</i> )	80,537	61%

Source: Call Report data as of December 31, 2014.

### Lending in the Assessment Areas

HNB originates a majority of its loans to borrowers located within its designated AAs. The bank originated 76 percent of loans by number and 74 percent by dollar amount to borrowers located within their AAs. The following table shows loans originated within the bank's AAs by number and dollar volume for each loan type:

<b>Aggregate Lending in both Assessment Areas</b>										
	Number of Loans					Dollars of Loans (000s)				
Loan Type	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Residential Real Estate	449	76%	145	24%	594	62,524	75%	21,260	25%	83,784
Commercial-MMSA-2013	14	70%	6	30%	20	1,117	42%	1,539	58%	2,656
Commercial-MMSA-2014	19	95%	1	5%	20	4,410	85%	750	15%	5,160
Consumer-MMSA-2014	13	65%	7	35%	20	74	61%	47	39%	121
<b>Totals</b>	<b>495</b>	<b>76%</b>	<b>159</b>	<b>24%</b>	<b>654</b>	<b>68,125</b>	<b>74%</b>	<b>23,596</b>	<b>26%</b>	<b>91,721</b>

Source: 2013-2014 HMDA data and loan samples

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

Lending to borrowers of different incomes and businesses of different sizes reflects overall reasonable penetration. We placed greater weight on the bank’s performance in the MMSA AA, given the AA’s significance to the bank in terms of deposit volume, lending activity, and branch locations.

### Borrower Distribution of Loans in the MMSA AA

The borrower distribution of loans in the MMSA reflects reasonable penetration.

### 2013 MMSA AA

HNB had more than reasonable penetration among individuals of different income levels. The bank’s performance in lending to low- income individuals is below the demographic comparator, however, the area has a seven percent poverty rate, which can inhibit these individuals from achieving home ownership. Residential real estate lending to moderate-income borrowers exceeds the demographic comparator and is more than reasonable. The following table illustrates the bank’s lending performance based on 2013 HMDA reported data as compared to the area demographics:

<b>2013 Borrower Distribution of Residential Real Estate Loans in MMSA 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
Refinancing	20%	13%	18%	20%	22%	24%	40%	40%

\*For 3% of borrowers income not available

Source: 2013 HMDA data; 2010 US Census Data

HNB’s distribution of borrowers reflects more than reasonable penetration to business of different sizes given the demographics in the 2013 MMSA AA. The bank’s performance in lending to businesses with annual revenues of one million or less exceeds the demographics:

<b>2013 Borrower Distribution of Loans to Businesses in the MMSA AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	73%	5%	22%	100%
% of Bank Loans in AA by #	75%	25%	0%	100%
% of Bank Loans in AA by \$	29%	71%	0%	100%

Source: Loan sample; Dunn and Bradstreet Data 2013

**2014 MMSA AA**

The distribution of borrowers reflects poor penetration among individuals of different income levels given the demographics of the 2014 MMSA AA. The bank’s performance in lending to low-moderate income individuals fell below area demographics even considering a seven percent poverty rate which could be inhibiting some low income individuals from obtaining home loans. The following table illustrates the bank’s lending performance based on HMDA data for 2014 as compared to the demographics:

<b>2014 Borrower Distribution of Residential Real Estate Loans in MMSA 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	20%	8%	17%	8%	22%	48%	41%	32%

Source: 2014 HMDA data; 2010 US Census Data

\* For 4% of borrowers, income not available

As noted in the table below, the bank’s distribution of borrowers reflects poor penetration to businesses of different sizes given the demographics. The bank’s performance in lending to businesses with annual revenues of one million or less fell below the demographics:

<b>2014 Borrower Distribution of Loans to Businesses in the MMSA AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	72%	6%	22%	100%
% of Bank Loans in AA by #	56%	42%	2%	100%
% of Bank Loans in AA by \$	36%	63%	1%	100%

Source: Loan sample; Dunn and Bradstreet Data 2014

The distribution of consumer loans reflects excellent penetration. HNB’s performance in lending to both low- and moderate-income individuals exceeds the demographic. The following table illustrates the bank’s performance as compared to the area demographics:

2014 Borrower Distribution of Consumer Loans in MMSA AA								
Borrower Income Level*	Low		Moderate		Middle		Upper	
Loan Type	% of AA House holds	% of Number of Loans	% of AA House holds	% of Number of Loans	% of AA House holds	% of Number of Loans	% of AA House holds	% of Number of Loans
Consumer	24%	45%	17%	30%	19%	10%	40%	5%

Source: Loan Sample; 2010 US Census Data

\* For 10% of borrowers, income not available

### Borrower Distribution of Loans in the WI Non-MSA AA

The borrower distribution of loans reflects reasonable penetration in the WI Non-MSA AA. The bank’s lending to low-income individuals is below the comparable demographic, however the area has a seven percent poverty rate which may inhibit some low-income families from attaining home ownership. In lending to moderate-income borrowers, HNB’s performance is near the demographics and is reasonable. The following table illustrates the bank’s lending performance based on HMDA reported data in the WI Non- MSA AA compared to the area demographics:

2013-2014 Borrower Distribution of Residential Real Estate Loans in WI Non-MSA AA								
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	17%	10%	18%	20%	24%	19%	41%	50%
Refinancing	17%	6%	18%	20%	24%	28%	41%	45%

Source: 2013 HMDA data; 2010 US Census Data

### Geographic Distribution of Loans

Overall, the distribution of loans reflects reasonable dispersion throughout the bank’s AAs. More weight was given to the lending in 2013, as more loans were originated by both dollar amount and number of loans.

The distribution of loans in the 2013 MMSA AA reflects more than reasonable dispersion, while the distribution in 2014 reflects poor dispersion. We considered the distance of HNB’s branches to the low- and moderate-income CTs, which are largely concentrated in the MN counties. The CTs are largely located in the urban core of the

MN portion of the MMSA where the bank has no branch presence. In addition, we considered the strong competition in the MN portion of the MMSA. As Minnesota consumers would need to travel into Wisconsin to find a brick and mortar branch, it is reasonable to deduce that consumers may choose banks closer in proximity for banking services.

**2013 MMSA AA**

The distribution of loans reflects more than reasonable dispersion throughout the bank’s 2013 MMSA AA. Both residential lending and business lending exceeds standards compared to demographics.

The geographic distribution of residential real estate loans reflects more than reasonable dispersion throughout the 2013 MMSA AA. The bank’s performance in the moderate-income CTs significantly exceeded the demographic, while performance in the low-income CTs, slightly exceeded the demographic. The following table shows the bank’s performance as compared to area demographics:

<b>2013 Geographic Distribution of Residential Real Estate Loans in MMSA AA</b>								
Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Owner Occupied Housing	% of # of Loans	% of AA Owner Occupied Housing	% of # of Loans	% of AA Owner Occupied Housing	% of # of Loans	% of AA Owner Occupied Housing	% of # of Loans
Refinancing	3%	5%	17%	35%	46%	53%	34%	7%

*Source: 2013 HMDA data; 2010 US Census Data*

The geographic distribution of business loans reflects more than reasonable dispersion throughout the 2013 MMSA AA. The bank’s performance in the low-income tracts is poor as it is lower than the demographic comparator. In the moderate-income CTs, HNB’s performance significantly exceeded the demographic comparator. The following table shows the bank’s performance as compared to area demographics:

<b>2013 Geographic Distribution of Loans to Businesses in MMSA AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans
Commercial	6%	0%	19%	50%	41%	45%	34%	5%

*Source: Loan Sample; 2010 US Census Data*

**2014 MMSA AA**

The geographic distribution of loans in 2014 reflects overall poor dispersion throughout the AA. Again, we considered both the distance of the low- and moderate-income CTs from HNB branches, as well as the strong competition in the area as mitigating factors.

The geographic distribution of residential real estate loans reflects poor dispersion throughout CTs of different income levels. HNB’s lending in low- and moderate-income CTs was below the demographics. The table below illustrates the bank’s performance based on HMDA reported data for 2014 as compared to the area demographics:

<b>2014 Geographic Distribution of Residential Real Estate Loans in MMSA AA</b>								
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	3%	0%	14%	4%	46%	92%	37%	4%

*Source: 2014 HMDA data; 2010 US Census Data*

The geographic distribution of commercial loans in the 2014 MMSA AA reflects poor dispersion throughout CTs of different income levels. Lending performance in both low- and moderate-income CTs was below the demographics. The following table illustrates the bank’s performance as compared to the demographics:

<b>2014 Geographic Distribution of Loans to Businesses in MMSA AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans
Commercial	6%	0%	16%	9%	41%	81%	37%	10%

*Source: Loan Sample; 2010 US Census Data*

The geographic distribution of consumer loans reflects poor dispersion throughout CTs of different income levels. Lending performance in both low- and moderate-income CTs was below the demographics. The following table illustrates the bank’s performance as compared to the demographics:

<b>2014 Geographic Distribution of Consumer Loans in MMSA AA</b>								
Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA House holds	% of Number of Loans	% of AA House holds	% of Number of Loans	% of AA House holds	% of Number of Loans	% of AA House holds	% of Number of Loans
Consumer	8%	0%	18%	2%	44%	95%	30%	3%

*Source: Loan Sample; 2010 US Census Data*

**2013-2014 WI Non-MSA AA**

As the WI Non-MSA AA consists entirely of middle-income CTs, the geographic distribution of loans did not provide a meaningful analysis.

**Responses to Complaints**

The bank has not received any CRA-related complaints since the last CRA evaluation.

**Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. 25.28(c), in determining a national bank’s (bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank’s lending performance.

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