



## PUBLIC DISCLOSURE

May 1, 2017

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Citizens National Bank of Somerset  
Charter Number 11544

44 Public Square, Somerset, Kentucky 42501

Office of the Comptroller of the Currency

10200 Forest Green Boulevard, Suite 501, Louisville, Kentucky 40223

**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: Satisfactory.**

**The Lending Test is rated Satisfactory.**

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

The Citizens National Bank of Somerset (CNB or Bank) had a satisfactory record of meeting its communities' credit needs during the evaluation period. These conclusions are based on the following.

- A substantial majority of the loans originated by CNB were to customers from within its assessment areas (AA).
- CNB's loan-to-deposit ratio (LTD) was reasonable given the Bank's size, financial condition, and its AAs' credit needs.
- CNB's distribution of loans to individuals of different income levels and businesses of different sizes reflected reasonable penetration.
- The geographic distribution of loans reflected reasonable dispersion throughout the AAs, including low- and moderate-income (LMI) census tracts (CT).
- CNB's community development (CD) performance demonstrated adequate responsiveness to the CD needs of its AAs.

## **Scope of the Examination**

We conducted an evaluation of CNB's Community Reinvestment Act (CRA) performance under the Office of the Comptroller of the Currency's (OCC) Intermediate Small Bank (ISB) procedures. The ISB procedures include a lending test and a CD test. The lending test evaluated the Bank's record of meeting the credit needs of its AAs through its lending activities from January 1, 2015 through December 31, 2016. The CD test evaluated the Bank's CD lending, qualified investments, and service activities since the last CRA examination. This period covered March 25, 2014 through May 1, 2017. We based the lending test on originations of CNB's primary loan products, residential and business loans. While there was a large number of consumer loans originated during the assessment period, these loans made up a smaller dollar volume.

The residential and business loan analyses were performed using a random sample of originations. The residential loan analysis included a comparison of the borrower and geographic distribution of loans originated during the evaluation period to the 2010 United States Census (2010 U.S. Census) demographic information. The income level designations used in this analysis were based on the Federal Financial Institutions Examination Council's (FFIEC) estimate of the 2015 and 2016 Kentucky Median Family Incomes for metropolitan statistical areas (MSA) and nonmetropolitan areas. The business loans sampled were compared to 2010 U.S. Census data and 2015 and 2016 Business Geodemographic Data.

## Description of the Institution

CNB is a \$388 million intrastate financial institution headquartered in Somerset, Kentucky. CNB is wholly by Citizens Bancshares, Inc., in Somerset, Kentucky. As of this evaluation, CNB had 10 locations which were accessible to all segments of its communities. All offices, except the Russell Springs, Kentucky branch, were equipped with drive-up facilities. There are automated teller machines at each location and seven other cash dispensers located throughout the AAs.

The Bank opened a branch in Jessamine County in 2014. The branch is located in a middle-income CT in the Lexington-Fayette, Kentucky MSA. No branches were closed since the last CRA examination.

CNB is a full-service lender offering traditional banking products and services. Its products include conventional home mortgage loans and government guaranteed home mortgage loans through the secondary market. CNB also offers home improvement, consumer, and a full range of business loans.

Deposit products include personal checking and savings, money market, business checking, NOW accounts, and certificates of deposit. The Bank offers a student savings account paying \$1 dollar for each "A" received per grading period. As of the evaluation date, CNB had 12 Interest on Lawyer Trust Accounts (IOLTA) with a balance of \$534,673. IOLTA is a method of raising money for charitable purposes, primarily the provision of civil legal services to indigent persons, through the use of interest earned on certain lawyer trust accounts.

As of December 31, 2016, the Bank reported \$245 million in outstanding loans. The loan portfolio consisted of the following loan mix.

<b>Loan Portfolio Summary by Loan Type</b>		
<b>December 31, 2016</b>		
<b>Loan Category</b>	<b>\$ (000)</b>	<b>%</b>
Construction and Development	20,625	8.41
One-to-Four Family Residential	90,023	36.72
Farmland	6,896	2.81
Multifamily	12,962	5.29
Commercial Real Estate	71,426	29.13
Commercial	12,850	5.24
Consumer	25,263	10.30
Other	5,149	2.10
<b>Total Loans</b>	<b>\$ 245,194</b>	<b>100.00%</b>

Source: December 31, 2016 Call Report

Based on community contacts familiar with the AAs, quality employment, affordable housing, transportation, and before/after childcare are AA needs. Contacts expressed the willingness of local banks to both lend and donate to community projects.

There were no legal or financial impediments to CNB's ability to meet the credit and CD needs of its AAs. The Bank was rated Satisfactory at its March 24, 2014 CRA examination.

## **Description of the Assessment Area(s)**

CNB's AAs meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income areas. CNB delineated two AAs for CRA purposes. AA1 is in a nonmetropolitan area located in south-central Kentucky. This AA consists of Pulaski, Russell, and Wayne Counties in Kentucky, consistent with the previous evaluation. The 2014 opening of the Jessamine County branch in the Lexington-Fayette, Kentucky MSA resulted in a second AA (AA2).

### **AA1: Nonmetropolitan AA of South-Central Kentucky (Pulaski, Russell, and Wayne Counties)**

**2010 U.S. Census Data:** The AA consisted of 24 CTs. There were no low-income CTs. Seven were moderate-income tracts, 15 were middle-income tracts, and two were upper-income tracts. All 15 of the middle-income CTs in the Bank's AA were designated distressed geographies by the Federal Financial Institutions Examination Council (FFIEC) due to elevated poverty levels. Three of these CTs were also designated as underserved.

**Economic Data:** According to the Bureau of Labor Statistics, the December 2016 unemployment rates for Pulaski, Russell, and Wayne Counties were 5.00 percent, 8.10 percent, and 7.10 percent, respectively. All counties exceeded the state and national unemployment rates of 4.50 percent and 4.70 percent, respectively.

Major employers for each county included the following:

- Pulaski County: Toyotetsu America, Inc. (800 employees); Blackboard Student Service (500 employees); and Armstrong Wood Products (434 employees).
- Russell County: Stephens Pipe & Supply (550 employees); and Bruss North American, Inc. (500 employees).
- Wayne County: American Woodmark Corporation (558 employees); Cobb Vantress Inc. (250 employees); and Belden, Inc. (233 employees).

Competition from other financial institutions was strong. The Bank's competitors included several local community banks and branches of large regional banks. According to the Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits as of June 30, 2016, 13 banks with 49 offices operated in the counties. These locations

held a combined total of \$1.8 billion in deposits with CNB ranking second with a 17.19 percent market share. CNB operated nine branches in the AA.

Demographic Information for Full-Scope Area Nonmetropolitan South-Central Kentucky AA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	0.00	29.17	62.50	8.33	0.00
Population by Geography	101,441	0.00	27.02	61.75	11.23	0.00
Owner-Occupied Housing by Geography	31,182	0.00	27.64	61.15	11.21	0.00
Businesses by Geography	5,556	0.00	19.13	69.24	11.63	0.00
Farms by Geography	382	0.00	21.47	70.16	8.37	0.00
Families by Income Level	28,588	25.12	18.87	20.15	35.86	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	12,576	0.00	37.17	54.95	7.88	0.00
Median Family Income 2016	\$46,400	Median Housing Value		\$88,963		
Households Below the Poverty Level	25.06%	Unemployment Rate		See above		

Source(s): 2010 U.S. Census and 2016 FFIEC estimated Median Family Income. U.S. Department of Labor, Bureau of Labor Statistics. (\*) The NA category consists of geographies that have not been assigned an income classification.

**AA2: Lexington-Fayette, Kentucky MSA (Jessamine County)**

**2010 U.S. Census Data:** The AA consisted of nine CTs. There were no low-income CTs. Three were moderate-income tracts, five were middle-income tracts, and one was an upper-income tract.

**Economic Data:** According to the Bureau of Labor Statistics, the December 2016 unemployment rate for Jessamine County was 3.30 percent, comparing favorably to the state and national unemployment rates of 4.50 percent and 4.70 percent, respectively. Major employers were McLane Cumberland (588 employees); Alltech, Inc. (450 employees); and McKechnie Vehicle Components (391 employees).

Competition from other financial institutions was strong. The Bank’s competitors included several local community banks and branches of large regional banks. According to the FDIC Summary of Deposits as of June 30, 2016, 13 banks with 22

offices operated in the AA. These branches held a combined total of \$.5 billion in deposits with CNB ranking 12th with a 0.98 percent market share.

Demographic Information for Full-Scope Area Lexington-Fayette, KY MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.00	33.33	55.56	11.11	0.00
Population by Geography	48,586	0.00	33.04	55.33	11.63	0.00
Owner-Occupied Housing by Geography	11,537	0.00	29.57	55.27	15.16	0.00
Businesses by Geography	3,174	0.00	20.95	56.33	22.72	0.00
Farms by Geography	181	0.00	19.34	51.93	28.73	0.00
Families by Income Level	13,137	26.33	19.12	22.81	31.74	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	5,971	0.00	42.67	51.78	5.55	0.00
Median Family Income 2016	\$66,100	Median Housing Value		\$171,657		
Households Below the Poverty Level	13.20%	Unemployment Rate		See above		

Source(s): 2010 U.S. Census and 2016 FFIEC estimated Median Family Income. U.S. Department of Labor, Bureau of Labor Statistics. (\*) The NA category consists of geographies that have not been assigned an income classification.

## Conclusions with Respect to Performance Tests

CNB’s performance under the lending test was Satisfactory.

- CNB’s average LTD ratio was reasonable given the Bank’s size, financial condition, and its AAs’ credit needs.
- A substantial majority of loan originations were to customers from within the AAs.
- CNB’s borrower distribution reflected reasonable penetration among borrowers of different income levels and businesses of different sizes.
- The geographic distribution of CNB’s residential and business loans reflected reasonable dispersion throughout the AAs, including moderate-income CTs.

The lending test rating is a consolidation of conclusions reached for each AA. More weight and consideration was given to the nonmetropolitan, south-central Kentucky AA. Nine of the Bank’s 10 offices were located in this AA, as were the vast majority of

primary loan product originations. The Jessamine County office, opened in 2014, had not established a market presence in the AA, as previously noted in the FDIC’s deposit share report. To increase the Bank’s profile in the AA, CNB advertised its products and services through local radio and newspapers.

## LENDING TEST

### Loan-to-Deposit Ratio

CNB’s average LTD ratio was reasonable given the Bank’s size, financial condition, funding makeup, and the credit needs of its AAs. The Bank’s LTD ratio averaged 69.19 percent over the 11 quarters since the last CRA examination, with a quarterly high of 75.79 percent and quarterly low of 64.45 percent. CNB ranked fourth among a total of seven similarly-situated banks serving its AAs. The other six banks had average LTD ratios of 68.71 percent, ranging from 47.65 percent to 87.88 percent over the same 11 quarters. Our conclusions considered the competitive environments of the AAs and CNB’s volume of secondary market activity. The Bank originated \$19.3 million in loans for sale on the secondary market during the evaluation period which were not captured in the LTD ratio.

### Lending in the Assessment Area

CNB originated a substantial majority of loans within the AAs. CNB originated 85 percent of residential loans, by number, in the AAs. One hundred percent of business loans, by number, were originated in the AAs. The following table details CNB’s lending within the AAs by number and dollar amount during the evaluation period.

<b>Lending in All Assessment Areas January 1, 2015 – December 31, 2016</b>										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Residential	17	85.00	3	15.00	20	2,576	88.62	331	11.38	2,907
Business	20	100.00	0	0.00	20	2,129	100.00	0	100.00	2,129

*Source(s): Random sample of 20 residential real estate and 20 business loans originated between January 1, 2015 and December 31, 2016 from the Bank’s loan records.*

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

The distribution of loans reflected reasonable penetration among low- and moderate-income individuals and business entities with annual revenues of less than \$1 million.

### Nonmetropolitan South-Central Kentucky AA

CNB had reasonable penetration among borrowers of different income levels and businesses of different sizes in the AA. The Bank originated 10 percent of residential

loans to low-income borrowers, below the demographic comparator of 25.11 percent. CNB originated 25 percent to moderate-income borrowers which was above the demographic comparator of 18.87 percent. Lending to low-income families in the AA was reasonable. The unemployment rate for the AA was well above the state and national rates. Over 25 percent of AA households were identified as below the poverty level. This impacts the ability of some individuals to afford or maintain a home. Rental units comprised 23.72 percent of total housing units in the AA. As low- and moderate-income persons turn to rental housing, opportunities for banks to originate home loans is reduced.

Borrower Distribution of Residential Real Estate Loans Nonmetropolitan South-Central Kentucky AA 2015-2016								
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
Residential Real Estate Loans	25.11	10.00	18.87	25.00	20.16	15.00	35.86	50.00

Source(s): Random sample of 40 residential loans originated between January 1, 2015 and December 31, 2016 and 2010 U.S. Census data.

The distribution of business loans reflected reasonable penetration among small businesses with revenues of less than \$1 million. Of the loans sampled, 82.50 percent were to small business, slightly higher than the demographic comparator of 81.82 percent. Since 12.26 percent of businesses had no revenue data, less reliance was placed on the comparison of the sample to the demographics regarding gross annual revenues.

Borrower Distribution of Loans to Businesses Nonmetropolitan South-Central Kentucky AA 2015-2016				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	81.82	5.92	12.26	100.00
% of Bank Loans in AA by #	82.50	17.50	0.00	100.00
% of Bank Loans in AA by \$	76.52	23.48	0.00	100.00

Source(s): Random sample of 40 business loans originated between January 1, 2015 and December 31, 2016, 2010 U.S. Census data, and 2016 Dunn and Bradstreet business geodemographic data.

### Lexington-Fayette, Kentucky MSA AA

CNB had reasonable penetration among borrowers of different income levels and businesses of different sizes in the AA. Less reliance was placed on the AA's



performance, as the low volume of primary loan product originations prevents meaningful numerical analysis.

The Bank did not originate any residential loans to low-income borrowers. Originations of 11.77 percent to moderate-income borrowers was below the demographic comparator of 19.12 percent. A barrier to lending to low- and moderate-income borrowers was the AA's median housing value. At \$171,657, this value was well above the state average of \$123,200. This makes it difficult for some individuals to afford a home in the AA. Rental units comprised 34.21 percent of total housing units in the AA. As low- and moderate-income persons turn to rental housing, opportunities for banks to originate home loans is reduced.

Borrower Distribution of Residential Real Estate Loans Lexington-Fayette, KY MSA AA 2015-2016								
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
Residential Real Estate Loans	26.33	0.00	19.12	11.77	22.81	35.29	31.74	52.94

Source(s): All 17 residential loans originated between January 1, 2015 and December 31, 2016 and 2010 U.S. Census data.

The distribution of business loans reflected reasonable penetration among small businesses with revenues of less than \$1 million. Of the loans sampled, 78.57 percent were to small businesses, which was slightly less than the demographic comparator of 85.95 percent.

Borrower Distribution of Loans to Businesses Lexington-Fayette, KY MSA AA 2015-2016				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	85.95	5.17	8.88	100.00
% of Bank Loans in AA by #	78.57	21.43	0.00	100.00
% of Bank Loans in AA by \$	97.08	2.92	0.00	100.00

Source(s): All 14 business loans originated between January 1, 2015 and December 31, 2016 and 2010 U.S. Census data.

### Geographic Distribution of Loans

The overall geographic distribution of loans reflected reasonable dispersion into the moderate-income CTs.

### Nonmetropolitan South-Central Kentucky AA

Lending to geographies of different income levels in the AA reflected reasonable dispersion. There were no low-income CTs in the AA. The Bank originated 27.50 percent of residential loans to borrowers in the moderate-income census tracts, which was equal to the demographic comparator of 27.64 percent.

Geographic Distribution of Residential Real Estate Loans Nonmetropolitan South-Central Kentucky AA 2015-2016								
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
Residential Real Estate Loans	0.00	0.00	27.64	27.50	61.15	65.00	11.21	7.50

Source(s): Random sample of 40 residential loans originated between January 1, 2015 and December 31, 2016 and 2010 U.S. Census data.

CNB’s distribution of business loans in the AA reflected excellent dispersion into the moderate-income CTs. The Bank originated 35.00 percent of business loans to borrowers in the moderate-income census tracts, which was well above the demographic comparator of 19.13 percent.

Geographic Distribution of Loans to Businesses Nonmetropolitan South-Central Kentucky AA 2015-2016								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Business Entities	% of # of Loans	% of AA Business Entities	% of # of Loans	% of AA Business Entities	% of # of Loans	% of AA Business Entities	% of # of Loans
Business	0.00	0.00	19.13	35.00	69.24	57.50	11.63	7.50

Source(s): Random sample of business loans originated between January 1, 2015 and December 31, 2016 and 2010 U.S. Census data.

### Lexington-Fayette, Kentucky MSA AA

Lending to geographies of different income levels in the AA reflected reasonable dispersion. Less reliance was placed on these results as the low volume of primary loan product originations prevents meaningful numerical analysis.

There were no low-income CTs in the AA. The Bank originated 35.29 percent of residential loans to borrowers in the moderate-income census tracts, above the demographic comparator of 29.57 percent.

Geographic Distribution of Residential Real Estate Loans Lexington-Fayette, KY MSA AA 2015-2016								
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
Residential Real Estate Loans	0.00	0.00	29.57	35.29	55.27	52.94	15.16	11.76

Source(s): All 17 residential loans originated between January 1, 2015 and December 31, 2016 and 2010 U.S. Census data.

The Bank originated 7.14 percent of business loans to borrowers in the moderate-income census tracts, which was well below the demographic comparator of 20.95 percent. The AA’s moderate-income tracts are primarily rural. Agricultural loans were not one of the Bank’s primary products.

Geographic Distribution of Loans to Businesses Lexington-Fayette, KY MSA AA 2015-2016								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Business Entities	% of # of Loans	% of AA Business Entities	% of # of Loans	% of AA Business Entities	% of # of Loans	% of AA Business Entities	% of # of Loans
Business Loans	0.00	0.00	20.95	7.14	56.33	85.71	22.72	7.14

Source(s): All 14 business loans originated between January 1, 2015 and December 31, 2016, 2010 U.S. Census data, and 2016 Dunn and Bradstreet business geodemographic data.

### Responses to Complaints

CNB did not receive any written complaints regarding its CRA performance during the evaluation period.

### COMMUNITY DEVELOPMENT TEST

CNB’s performance under the community development test was Satisfactory.

During the evaluation period, CNB’s CD activities, as a whole, demonstrated adequate responsiveness to the needs and opportunities in the AAs.

## Number and Amount of Community Development Loans

CNB's lending reflected adequate responsiveness to CD needs within its AAs. CNB originated 34 CD loans (\$7.9 million) during the evaluation period. Of these loans, 23 (\$5.8 million) were originated in CTs designated as distressed, and six (\$235,325) were in both distressed and underserved CTs.

Community Development Lending						
AA	Total		Revitalization or Stabilization		Community Development Services	
	#	\$ (000)	#	\$ (000)	#	\$ (000)
1	34	7,919	29	4,026	5	3,893
2	0	0	0	0	0	0
Total	34	7,919	29	4,026	5	3,893

Source(s): Bank records from March 25, 2014 through May 1, 2017.

## Number and Amount of Qualified Investments

The Bank's amount of qualified CD investments demonstrated adequate responsiveness to the CD needs of the AAs.

During the evaluation period, CNB purchased the following qualified investments:

Community Development Investments						
AA	Total		KY School District Bonds		KY Public Works Bonds	
	#	\$ (000)	#	\$ (000)	#	\$ (000)
1	1	214	1	214	0	0
2	1	1,051	0	0	1	1,051
KY	19	8,510	11	4,926	8	3,584
Total	21	9,775	12	5,140	9	4,635

Source(s): Bank records from March 25, 2014 through May 1, 2017.

- 12 Kentucky school revenue bonds totaling \$5 million. Of these,
  - 1 bond (\$214,000) was located in AA1, in a county designated as distressed.
  - 11 bonds (\$4.9 million) were located within the broader statewide area.
  - 4 bonds (\$2.1 million) were to Kentucky counties where the majority of students qualify for free or reduced-price meals under the United States Department of Agriculture's School Lunch Program.
- 9 Kentucky public works bonds totaling \$4.6 million. Of these,
  - 1 bond (\$1 million) was located in AA2.
  - 8 bonds (\$3.6 million) were located within the broader statewide area.

CNB made \$45,440 in donations to qualified community organizations and various schools in the AAs.

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

CNB showed satisfactory responsiveness to meeting community needs through qualified community services.

CNB participated in the following programs designed to meet the needs of low- to moderate-income individuals within the AAs.

- The Federal Home Loan Mortgage Corporation, Federal Housing Administration, Kentucky Housing Corporation, Veterans administration, USDA Rural Housing Service, and the Federal Home Loan Bank's "Welcome Home Program."

CNB officers and employees were involved in a variety of CD services during the evaluation period. Memberships in organizations specific to each AA included:

#### AA1

- Somerset Pulaski, Russell, and Wayne County Chambers of Commerce.
- Downtown Somerset Development Corporation.
- Pulaski County Extension Service.
- Habitat for Humanity Resource Development Committee.
- Rotary Club of Somerset.
- Somerset Community College IT Advisory Board.
- God's Food Pantry, a nonprofit organization serving low-income individuals.
- Project 58:10, a local ministry dedicated to meeting the nutritional needs of children receiving free or reduced lunch in local schools.
- United Way.
- Over My Head Homeless Shelter.
- Lake Cumberland Home Builders.
- Somerset Business and Professional Women's Club
- AIM Pregnancy Center.
- Kiwanis Club

#### AA2

- Jessamine County Chamber of Commerce

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

Pursuant to 12 CFR 25.28(c), in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA 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.