



SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

November 5, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Elmer
Charter Number 6707

10 S. Main Street
Elmer, NJ 08318

Office of the Comptroller of the Currency

1150 Northbrook Drive
Suite 303
Trevese, PA 19053

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 First National Bank of Elmer (FNBE) has a **SATISFACTORY** record of meeting community credit needs.

- The quarterly average net loan-to-deposit ratio is more than reasonable at 93.02% based on the bank's size, financial condition, and routine sale of home mortgage loans to the secondary market.
- A substantial majority of the bank's loans (90.86%) are made within its assessment areas (AAs).
- The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration among individuals of different income levels.
- The bank's geographic distribution of loans within its AAs reflects reasonable dispersion throughout the assessment areas.

SCOPE OF EXAMINATION

The evaluation period is from January 1, 2009 through December 31, 2011. In order to determine if FNBE met the credit needs of its assessment areas, we reviewed home mortgage loans (home purchase, home improvement, and mortgage refinance.) These are considered to be primary loan products. A review was performed on the bank's three assessment areas (AAs), which included a separate performance analysis for each Metropolitan Statistical Area (MSA)/Metropolitan Division (MD).

Borrower income distribution of home mortgage loans was weighted most heavily in determining conclusions for the lending test. Little weight was given to the geographic distribution of loans since the bank has limited opportunities to lend in the low- and moderate-income tracts. Our conclusions are based on information contained within the bank's Home Mortgage Disclosure Act Loan Application Registers (HMDA-LARs), from US Census reports, and the Uniform Bank Performance Report. The HMDA-LARs were tested for accuracy and found to be appropriate for the purposes of this analysis.

DESCRIPTION OF INSTITUTION

FNBE is a locally owned \$217 million institution headquartered in the Borough of Elmer, Salem County, New Jersey. The bank received its national charter on April 2, 1903, and remains a full service, intrastate community bank offering standard traditional loan and deposit products. The bank's website, www.elmerbank.com, provides a listing and description of all deposit and loan services. FNBE is a wholly owned subsidiary of Elmer Bancorp, Inc., a one-bank holding company established in January 2001. FNBE has one subsidiary, First Elmer Investment Corporation, a Delaware Corporation established for the sole purpose of owning and managing the bank's investment portfolio. This subsidiary was not considered in this evaluation.

The bank operates a network of six branch offices. Four branches, including the main office, are located in Salem County. One branch is located in Gloucester County, and another in Cumberland County. The bank has not opened or closed any branches since the last evaluation. All offices have 24-hour accessible ATMs, and all offices have drive-in facilities which offer extended evening hours every day, plus Saturday morning hours. All branch lobbies have extended evening hours on Friday evening, plus Saturday morning hours. All bank products are available at every branch.

FNBE's philosophy is to continue to meet the financial needs of its customers, based on the bank's long established reputation as "The Bank of Friendly Service." The goal is to combine old fashioned service with modern technology.

The bank's primary business is granting loans, secured by first and junior mortgages, on 1-4 family residential properties. Most of the first lien home mortgage loans are sold in the secondary market. In the time period for this review, the bank sold \$63.3 million to the secondary market.

Table 1. below reflects the bank's loan portfolio mix.

Table 1. FNB of Elmer Loan Portfolio Mix as of June 30, 2012		
Loan Category:	\$ Outstanding (000s)	% of Loan Portfolio
Secured by 1-4 family residences*	71,957	43.86%
Non-farm, non-residential	60,302	36.75%
Construction & Land Development	10,228	6.23%
Commercial & Industrial & Agricultural	14,346	8.74%
OD checking & other consumer loans	2,229	1.36%
Other & Multi-family	5,013	3.06%
Total Gross Loans	164,075	100.00%
<i>Source: June 30, 2012 Call Report</i>		
<i>* Includes closed end loans secured by first and junior liens, and revolving open-end loans.</i>		

As of June 30, 2012, the bank had \$162 million in net loans, which was 74.3% of total assets. Deposits were \$195 million. Reported Net Tier One Capital was \$21.3 million. The bank faces no legal or other impediments that hinder its ability to help meet the credit needs of the AAs. Competition for loans and deposits in this marketplace is extremely robust, with offices of interstate regional banking companies, local community banks, and mortgage companies present. Regional competitors include Bank of America, N.A., Wells Fargo, N.A., JP Morgan Chase Bank, N.A., and Ally Bank/GMAC Bank. Major national mortgage companies such as GMAC, Gateway Funding, and Quicken Loans have a strong market share of home mortgage loans in the AAs.

FNBE's previous CRA examination was conducted as of June 7, 2007, and the bank was assigned an overall rating of Satisfactory.

DESCRIPTION OF FNBE's AAs

The bank's AAs meet the requirements of 12 CFR 25.41 and do not arbitrarily exclude any low- or moderate-income areas. The bank has three AAs which includes a metropolitan statistical area (MSA) and portions of two metropolitan divisions (MD). They are MD #15804 — Camden, Gloucester, and Burlington Counties, NJ (Gloucester); MSA #47220 — Vineland, Millville, Bridgeton, NJ (Cumberland); and MD #48864 — Wilmington, DE, MD, NJ (Salem). The Gloucester AA consists of all the census tracts (CTs) in Gloucester County. The Cumberland AA consists of all the CTs in Cumberland County, while the Salem AA consists of all the CTs in Salem County, NJ. The three AAs are contiguous and are located in southern New Jersey.

The number of census tracts in the bank's AAs has remained the same since the last CRA evaluation in 2007, at 117. The number of low-income census tracts within the AAs has remained at 4 (3.42%), and the number of moderate-income tracts has remained at 18 (15.38%). There are 77 (65.81%) middle-income tracts, 15 (12.82%) upper-income tracts, and 3 (2.56%) are non-determinable income tracts. The bank has one branch in Gloucester County (MD# 15804), one in Cumberland County (MSA# 47220), and four in Salem County (MD# 48864). Five of the six branches are located in middle-income census tracts. One branch, the Woodstown office, is located in an upper-income census tract.

A comparative demographic breakdown of each portion of the bank's AAs is located within **Table 2** on page 5.

Table 2. Demographic/Economic Characteristics of FNB of Elmer's AAs				
	MD # 48864	MSA # 47220	MD # 15804	Combined AA
Population / Family Information				
Population	64,285	146,438	254,673	465,396
Households That are Families	17,494	35,373	67,528	120,395
Geographies				
Total Number of Census Tracts	24	34	59	117
Number / Percent of Low-Income Tracts	2 / 8.33%	2 / 5.88%	0 / 0.00%	4 / 3.42%
Number / Percent of Moderate-Income Tracts	5 / 20.83%	7 / 20.59	6 / 10.17%	18 / 15.38%
Number / Percent of Middle-Income Tracts	17 / 70.83%	15 / 44.12	45 / 76.27%	77 / 65.81%
Number / Percent of Upper-Income Tracts	0 / 0.00%	7 / 20.59	8 / 13.56%	15 / 12.82%
N/A	0 / 0.00%	3 / 8.82%	0 / 0.00%	3 / 2.56%
Percentage of Families in AA by Income Level				
Number / Percent of Low-Income Families	3,963 / 22.65%	7,704 / 21.78%	11,943 / 17.69%	23,610 / 19.61%
Number / Percent of Moderate-Income Families	3,656 / 20.90%	6,211 / 17.56	12,442 / 18.42	22,309 / 18.53%
Number / Percent of Middle-Income Families	4,304 / 24.60%	7,198 / 20.35	17,470 / 25.87%	28,972 / 24.06%
Number / Percent of Upper-Income Families	5,571 / 31.85%	14,260 / 40.31	25,673 / 38.02	45,504 / 37.80%
Economic Indicators 2011				
HUD Adjusted Median Family Income	\$80,800	\$62,400	\$86,000	
Median Housing Value	\$104,401	\$87,791	\$120,887	
Number of Housing Units	26,158	52,863	95,054	174,075
Number of Owner Occupied Housing Units	17,734	33,392	72,482	123,608
Occupied Rental Units / Vacant Rental Units	6,561 / 735	15,751 / 1,327	18,235 / 1,999	40,547 / 9,920
Percent of Households Below Poverty-level	9.00%	14.00%	7.00%	
Unemployment Information as of September 30, 2012				
Counties: Gloucester, Salem, Cumberland *	10.20%	10.70%	10.00%	
State of New Jersey *	9.70%			
National *	7.90%			
<i>* NJ Dept. of Labor & Workforce Development</i>				

Gloucester County is an agricultural, industrial, and residential area, which is presently in a high growth and development stage - transforming this historically agricultural region. The three largest employers in Gloucester County are the Underwood Memorial Hospital System, Rowan University, and Kennedy Memorial Hospital. Other major employers are gas & oil producers, food packing services companies, wholesale distributors, municipal governments, and regional educational systems. The county's website claims Gloucester is the fastest growing county in the Southern region and third fastest in the State at 13.7%; it is positioned to add 14,250 new jobs by 2014. Gloucester County has the highest median housing value in the bank's AAs, at \$120,887. This is 15.8% higher than Salem County, and 37.7% higher than Cumberland County.

Salem County is located in the heart of the northeast corridor and contains rural farmland, inland, and industrial communities that are part of the Delaware Valley area. Farming, manufacturing, and warehousing are the top industries. Other industries providing employment include retail chain stores, health care, finance, county

government, individual municipal governments, and boards of education. The major employers in Salem County are Public Service Electric & Gas (Salem Nuclear Plant), E.I. DuPont (Chemical Manufacturer), Mannington Mills (carpet and flooring), and Salem County Memorial Hospital. The retail store presence is also strong with leading employers including Wal-Mart and Wawa. Salem County has the smallest population and number of households in the bank's AAs. Nine percent of the households are below the poverty level.

Cumberland County is largely agricultural, with 70,000 acres devoted to farming. Other industry includes light manufacturing, retail stores, and service industry. The three largest employers in the county are the South Jersey Hospital System, Vineland Board of Education, and the Training School at Vineland. Other major employers are Wawa Stores, Wal-Mart, and Wheaton Scientific Products. In 1999, portions of Vineland, Millville, Bridgeton, and Commercial Township were designated as a Federal Empowerment Zone and two Urban Enterprise zones. The rate of unemployment for Cumberland County has historically been the highest in the State of New Jersey. Fourteen percent of its households live below the poverty level.

One community contact was used for this examination, located in the Gloucester AA. The mission of this organization is to improve the economic and civic life in the Gloucester County region by providing services, information, and representation to its members and to the public. The Gloucester County organization indicated there was a need for business and home ownership funding. The community contact indicated that all the banks within the serviced area are lending; however, there has been a tightening of underwriting parameters/criteria since the 2008 financial downturn. Regarding households and housing, the community contact discussed that there are several large rental complexes within the county that are not currently 100% rented.

CONCLUSIONS ABOUT PERFORMANCE CRITERIA

The bank's overall CRA performance is satisfactory. This conclusion is based on the results of the specific lending tests described below, which were used to determine if the bank is meeting the credit needs of its AAs. Loan performance in the bank's AAs was compared to 2000 Census demographic data. This comparison enabled an assessment of the bank's CRA lending performance to low- and moderate-income borrowers and low- and moderate-income census tracts.

Loan-to-Deposit Ratio

FNBE's loan-to-deposit ratio is more than reasonable and shows excellent responsiveness to the credit needs within the bank's AAs. The bank's net quarterly average loan-to-deposit ratio over the twenty-one-quarter period ended June 30, 2012 is 93.02%, and has decreased just slightly over the net-average loan-to-deposit ratio of 93.32% at the prior evaluation. This exceeds the combined average loan-to-deposit ratio of 67.33% for three community peer banks within FNBE's AAs during the review period. FNBE is also an originator and seller of home mortgage loans. The bank sold

\$63.3 million of home mortgage loans to the secondary market during the evaluation period, which, if retained, would have further increased the loan-to-deposit ratio.

Lending in Assessment Area

A substantial majority of the bank's home mortgage loans were originated within the bank's AAs. Both the number and dollar amount of reported loans originated within the AAs for home mortgage loans are demonstrated in **Table 3**.

Table 3. Lending in/out FNB of Elmer Assessment Areas										
(January 1, 2004 through December 31, 2006)										
	Number of Loans					Dollar of Loans (\$000)				
	Inside		Outside		Total #	Inside		Outside		Total \$
	#	%	#	%		\$	%	\$	%	
Home Mortgage Loans	159	90.86%	16	9.14%	175	\$14,559	73.32%	\$5,298	26.68%	\$19,857
<i>Source: 2009, 2010 & 2011 HMDA Data</i>										

Lending to Borrowers of Different Incomes

FNBE meets the standard for satisfactory performance under this criterion. Overall lending to borrowers of different income levels reflects reasonable penetration given the bank's performance context, and consistency with safe and sound banking operations.

Table 4. Borrower Distribution of Mortgage Loans in FNBE's AAs								
(January 1, 2009 through December 31, 2011)								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA	% of Bank						
	Families	Loans	Families	Loans	Families	Loans	Families	Loans
MD# 48864 - Wilmington, DE, MD, NJ (Salem County)								
Home Purchase	22.65	10.00	20.90	30.00	24.60	0.00	31.85	60.00
Home Improvement	22.65	7.41	20.90	25.93	24.60	48.15	31.85	18.52
Home Mortgage Refinance	22.65	13.33	20.90	13.33	24.60	43.33	31.85	30.00
MSA# 47220 - Vineland, Millville, Bridgeton, NJ (Cumberland County)								
Home Purchase	21.78	14.29	17.56	0.00	20.35	14.29	40.31	71.43
Home Improvement	21.78	42.86	17.56	0.00	20.35	0.00	40.31	57.14
Home Mortgage Refinance	21.78	0.00	17.56	10.53	20.35	15.79	40.31	73.68
MD# 15804 - Camden, NJ (Gloucester County)								
Home Purchase	17.69	0.00	18.42	30.00	25.87	10.00	38.02	60.00
Home Improvement	17.69	16.00	18.42	40.00	25.87	8.00	38.02	36.00
Home Mortgage Refinance	17.69	20.00	18.42	0.00	25.87	20.00	38.02	60.00
Combined AA								
Home Purchase	19.61	8.18	18.53	19.09	24.06	8.49	37.80	64.30
Home Improvement	19.61	14.92	18.53	28.60	24.06	26.23	37.80	30.16
Home Mortgage Refinance	19.61	10.31	18.53	9.69	24.06	29.85	37.80	50.15
<i>Source: Percentage of Families based on US 2000 Census Data.</i>								

MD 48864 – Wilmington, DE, MD, NJ

The penetration of loans to low-and moderate-income families in this MD is reasonable.

The percentage of home purchase loans originated to low-income families is lower than the percent of low-income families in the MD. The percentage of home improvement and home mortgage refinance loans to low-income families is lower than the percentage of low-income families in the MD. Several factors contribute to the low level of penetration to low-income families in this MD. Nine percent (9%) of the households in this MD live below the poverty level; which accounts for 29% of the total of low-income households. These low-income families may not meet the credit criteria for home mortgage loans, and therefore would not require or need home improvement loans or refinancing options. Also, 32% of the housing units in the MD are rental units with only 10% percent of the rental units being vacant. This provides more competition among landlords and results in lower rental costs for tenants, which could possibly reduce the desire for home ownership among low-income families.

The percentage of home purchase loans to moderate-income families exceeds the percentage of moderate-income families in the MD; the percentage of home improvement loans exceeds the percentage of moderate-income families in the MD; and the percentage of home mortgage refinance loans is lower than the percentage of moderate-income families in the MD.

MSA 47220 – Vineland, Millville, Bridgeton, NJ

The penetration of loans to low- and moderate-income families in this MSA is reasonable.

The percentage of home purchase loans originated to low-income families is lower than the percent of low-income families in the MD. The percentage of home improvement loans to low-income families exceeds the percentage of low-income families in the MD. The percentage of home refinance loans to low-income families is significantly lower than the percentage of low-income families in the MD. Several factors contribute to the low level of penetration to low-income families in this MD. Fourteen percent (14%) of the households in this MD live below the poverty level; which accounts for almost 48% of the total of low-income households. These low-income families may not meet the credit criteria for home mortgage loans; and thus would not require or need home improvement loans or refinancing options. Also, 32% of the housing units in the MD are rental units with only 8% percent of the rental units being vacant. This provides more competition among landlords resulting in lower rental costs for tenants; which could possibly abate a desire for home ownership among low-income families.

The bank did not grant any home purchase or home improvement loans to moderate-income families. The percentage of home mortgage refinance loans made to moderate-income families is significantly lower than the percentage of moderate income families. Considering the high level of competition for home mortgage and home improvement

loans from large, national mortgage companies and out of state banks, this performance is considered reasonable.

MD 15804 – Camden, NJ

The penetration of loans to low- and moderate-income families in this MD is reasonable.

The bank did not grant any home purchase loans to low-income families in the MD. The percentage of home improvement loans to low-income families is near the percentage of low-income families in the MD. The percentage of home refinance loans to low-income families exceeds the percentage of low-income families in the MD. There are some additional factors to note in light of these observations. Seven percent (7%) of the households in this MD live below the poverty level, which accounts for almost 25% of the total of low-income households. These statistics are reasonably less than those mentioned in the previous two AAs. Also, since 21% of the housing units in the MD are rental units, with only 10% percent being vacant, there is less competition amongst landlords. This lack of competition could result in potentially higher rental costs for tenants.

The percentage of home purchase and home improvement loans made to moderate-income families exceeds the percentage of moderate-income families in the MD. The bank did not grant any home mortgage refinance loans to moderate-income families. Considering the high level of competition for home mortgage loans from large, national mortgage companies and out of state banks, the performance is considered reasonable.

Geographic Distribution of Loans

FNBE's geographic distribution of loans within its AAs reflects reasonable dispersion throughout the AAs. However, limited weight was given to this performance in this review because of FNBE's limited opportunity to lend in low- and moderate-income geographies, which is due to the limited number of low- and moderate-income census tracts. The AAs contain only four (4) low income tracts, which account for 3.42% of all the tracts within its AAs. These four tracts contain only 1,688 owner-occupied units. There are eighteen (18) moderate-income tracts within its AAs, which account for 15.38% of all the tracts within its AAs. These eighteen tracts contain 16,554 owner occupied units. FNBE's market share of home mortgage loans within its AAs is 47 of 19,659 mortgages (0.24%) originated in 2010 by 304 financial institutions. The top ten lending institutions in the AAs are large national mortgage companies that have a combined 58.54% market share. The limited number of owner-occupied units within these tracts, offset by the strong competition of the national mortgage companies, greatly curtails FNBE's home mortgage lending opportunities in these geographies.

See **Table 5**.

Table 5. Geographic Distribution of FNBE Home Mortgage Loans in AAs (January 1, 2009 through December 31, 2011)								
	Low-Income		Moderate-Income		Middle-Income		Upper-Income	
	Geographies		Geographies		Geographies		Geographies	
Loan Type	% Ownr	%	% Ownr	%	% Ownr	%	% Ownr	%
	Occ.	Bank	Occ.	Bank	Occ.	Bank	Occ.	Bank
	Units	Loans	Units	Loans	Units	Loans	Units	Loans
MD# 48864 - Wilmington, DE, MD, NJ (Salem County)								
Home Purchase	3.80	0.00	14.42	0.00	81.78	100.00	0.00	0.00
Home Improvement	3.80	0.00	14.42	6.90	81.78	93.10	0.00	0.00
Home Mortgage Refinance	3.80	3.23	14.42	6.45	81.78	90.32	0.00	0.00
MSA# 47220 - Vineland, Millville, Bridgeton, NJ (Cumberland County)								
Home Purchase	1.56	0.00	10.01	16.67	59.09	75.00	29.35	8.33
Home Improvement	1.56	0.00	10.01	0.00	59.09	71.43	29.35	28.57
Home Mortgage Refinance	1.56	4.76	10.01	4.76	59.09	57.14	29.35	33.33
MD# 15804 - Camden, NJ (Gloucester County)								
Home Purchase	0.00	0.00	8.08	0.00	76.68	90.91	15.24	9.09
Home Improvement	0.00	0.00	8.08	4.00	76.68	88.00	15.24	8.00
Home Mortgage Refinance	0.00	0.00	8.08	0.00	76.68	76.92	15.24	23.08
<i>Source: Percentage of Families based on US 2000 Census Data.</i>								

MD 48864 – Wilmington, DE, MD, NJ

Based on US 2000 Census demographic data, there are only 674 owner-occupied units in the MD's two low-income geographies. This severely limits the bank's opportunity to lend in low-income tracts. An analysis of this performance would not result in a meaningful conclusion.

The percentage of home purchase, home improvement, and home mortgage refinance loans originated in the moderate-income geographies is lower than the percentage of owner-occupied units in the moderate-income geographies. The lending opportunity to originate loans in moderate-income tracts in this MD is also severely limited. Based upon US 2000 Census demographic data, there are only 2,557 owner-occupied housing units in this MD's five moderate-income tracts. Based on 2010 Peer Mortgage Data, FNBE's market share in this MD is .87% of 159 lending institutions competing for 2,196 loans. The bank did not make home purchase loans in the time period reviewed. The bank's percentage of home improvement loans (6.90%) and home mortgage refinance loans (6.45%) made in the moderate-income geographies in this MD exceeded the bank's market share of .87% for this MD. Since the bank's performance in the moderate-income tracts exceeds its market share, it is deemed to be reasonable.

MSA 47220 – Vineland, Millville, Bridgeton, NJ

Based on US 2000 Census demographic data, there are only 521 owner-occupied units in the MSA's two low-income geographies. This severely limits the bank's opportunity to lend in low-income tracts. An analysis of this performance would not result in any meaningful conclusion.

The percentage of home purchase loans originated in the moderate-income geographies exceeds the percentage of owner-occupied units. There were no home improvement loans made within the moderate-income geographies of this MSA. The home mortgage refinance loans originated in the moderate-income geographies is lower than the percentage of owner-occupied units in the moderate-income geographies. The lending opportunity to originate loans in moderate-income tracts in this MSA is also severely limited. Based upon US 2000 Census demographic data, there are only 3,342 owner-occupied housing units in this MD's seven moderate-income tracts. Based on 2010 Peer Mortgage Data, FNBE's market share in this MD is 0.25%, with 181 lending institutions competing for 3,958 loans. The bank's percentage of home purchase loans (16.67%), and home mortgage refinance loans (4.76%) made in the moderate-income geographies in this MD exceeded the bank's market share of 0.25% in this MD. The bank was unable to originate any home improvement loans in the moderate-income tracts. Since the bank's performance in the moderate-income tracts, for the most part, exceeds its market share, it is deemed to be reasonable.

MD 15804 – Camden, NJ

There are no low-income geographies within this MD.

The bank did not originate any home purchase or home mortgage refinance loans in the moderate-income tracts in this MD. As previously mentioned, based upon US 2000 Census demographic data, this MD has the highest median housing value in the bank's AAs at \$120,887. This is 13.6% higher than Salem County and 27.4% higher than Cumberland County. A moderate-income family may not readily meet the credit criteria necessary for home ownership.

There were no home purchase or home mortgage refinance loans originated in the moderate-income tracts within this MD. The percentage of home improvement loans originated in the moderate-income tracts of this MD is lower than the percentage of moderate-income tracts. Based on 2010 Peer Mortgage Data, FNBE's market share in this MD is 0.13%, with 273 lending institutions competing for 13,505 loans. The bank's percentage of home improvement loans (4.00%) made in the moderate-income geographies in this MD exceeded the bank's market share of 0.13% for this MD. Since the bank's performance in this MD's moderate-income tracts for originating home improvement loan exceeds its market share, it is deemed to be reasonable.

Responses to Complaints

FNBE has not received any written complaints regarding its performance meeting the credit needs of its AAs during the evaluation period.

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 national bank's (bank) or 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 federal savings association (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.