



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

December 17, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Oba Bank
Charter Number 700489

20300 Seneca Meadows Parkway
Germantown, MD 20876

Office of the Comptroller of the Currency

400 7th Street, SW
Washington, DC 20219

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 Outstanding.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The major factors supporting the institution's rating include:

- The loan-to-deposit (LTD) ratio is outstanding. The LTD is more than reasonable given the bank's size, financial condition, assessment area (AA), credit needs, and relevant competitive factors;
- A majority of the residential real estate loans originated are in the bank's AA;
- The bank's record of lending to borrowers of different incomes is satisfactory and the performance reflects reasonable penetration;
- The bank's record of lending to borrowers in geographies of different income levels is satisfactory and the performance reflects reasonable dispersion; and
- The bank's community development (CD) activities demonstrate an overall excellent responsiveness to the CD needs of its AA.

Scope of Examination

OBA Bank (OBA) was evaluated under the Intermediate Small Bank examination procedures, which include a lending test and a CD test. The lending test evaluates the institutions record of meeting the credit needs of its AA through its lending activities. The CD test evaluates the institution's responsiveness to CD needs in its AA through CD lending, qualified investments, and CD services.

CRA activities at OBA were completed using full-scope review procedures for its AA. Our review covered the bank's performance from January 1, 2009 through December 31, 2011. Residential mortgage loans were determined to be the bank's primary loan product and were reviewed as part of this examination.

In order to evaluate OBA's record of originating residential mortgage loans, we analyzed loan data OBA collected and reported in accordance with the Home Mortgage Disclosure Act (HMDA) requirements. In order to ensure the reliability of HMDA loan data, we performed a Data Integrity examination during the second quarter of 2012. In conjunction with the Data Integrity examination, we evaluated OBA's processes to ensure the accuracy of collected HMDA data and tested a sample of OBA's reported HMDA loans. Specifically, we tested the accuracy of OBA's HMDA loan data by comparing it against OBA's loan file documentation. The Data Integrity examination revealed that OBA's publicly available HMDA loan data could be relied on for the purposes of this CRA evaluation.

Description of Institution

Founded in 1861, OBA is a federally-chartered mutual savings bank headquartered in Germantown, Maryland. Total assets have increased since the previous evaluation by approximately \$36 million. As of June 30, 2012, OBA's total assets equaled \$392 million and Net Tier 1 Capital was \$59.7 million. As of June 30, 2012, OBA reported \$293.2 million in net loans and \$282.6 million in total deposits. Net loans represented 75% of average assets. The bank's loan portfolio consists of total real estate loans at 87% that includes 55% one to four family loans with first or second liens and commercial loans at 13%.

OBA operates seven offices in the state of Maryland. The main office and four branches are located in Montgomery County, MD, representing the core of OBA's business. One of the Montgomery County branches was opened on September 20, 2010 and another branch located in Anne Arundel County was opened December 19, 2011. The branch located in the District of Columbia was closed January 21, 2011. Of the seven offices, two are located in moderate income tracts.

The bank offers deposit and loan products and services typical of a traditional thrift; OBA has primarily concentrated on one to four family mortgage loans and nonresidential mortgage lending. Consumer deposit accounts remain the primary funding source.

The bank's offices offer a similar range of consumer and business credit and deposit products and services. The bank offices have hours of operation typical for the market and three offices have extended hours to 6:00pm, one day per week. Three branches have Saturday hours, and all branches have 24 hour, full service ATMs with broad access geographically through the Star ATM network.

Residential mortgage loans are originated primarily for sale, while construction, non-residential, and commercial loans are typically held in portfolio. The bank applies flexible underwriting standards and offers loans to facilitate lending and, where possible, reduce lending costs. OBA also offers loan products for not for profit organizations and small businesses, and engages in participation lending with other financial institutions on loans over \$7.0 million.

According to the June 30, 2012 FDIC Summary of Deposits Market Share Report, OBA was ranked 22nd out of 58 institutions in their AA with .61% of deposits. Capital One, National Association is ranked first with 80 offices and 18.53% of the deposits. Other financial institutions include Bank of America with 60 offices and 16.64% of the deposits, and Sun Trust Bank with 55 offices and 10.37% of the deposits.

There are no legal or financial factors impeding the bank's ability to help meet the credit needs in its AA. At the prior CRA examination dated June 29, 2009, OBA was rated "Outstanding."

Description of OBA Assessment Area

OBA has defined the AA based on the location of the main and branch offices. The current AA includes areas within two contiguous Metropolitan Statistical Areas (MSAs):

- Washington-Arlington-Alexandria, DC-VA-MD-WV MSA(#47900):
 - Bethesda-Gaithersburg-Frederick, MD metropolitan district (#13644):
 - Montgomery County, Maryland;
- Baltimore-Towson, MD MSA (#12580):
 - Howard County, Maryland;
 - Anne Arundel County, Maryland.

The AA previously included Washington DC, in the Washington, DC Metropolitan Division, but was removed when the branch was closed. Anne Arundel County was added pursuant to opening a branch in Hanover in 2011. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies.

The AA extends across the full spectrum of economic environments, from poor inner city neighborhoods to wealthy suburban communities; rural farm towns; industrial areas, and commercial parks; educational, medical and research facilities; centers of government; major transit systems and international airports. Major sources of employment include financial and retail services, real estate, military, and state, county and federal government.

The total population in the AA was 904,061 as of the 2000 U.S. Census. The average unemployment rate as of December 2012 in the AA was 5.2%. This unemployment rate is lower than the Maryland state unemployment rate at 6.6% for the same period.

The average median cost of housing in the AA is \$207,249. The average Updated Median Family Income for 2011 is \$98,200. This means that a low income family would earn \$49,100 and the average median cost of housing in the AA would often remain unattainable for many lower-income residents. The average percentage of households below the poverty level is 4.5%. The average AA's family income distribution is: 1.13% are low-income, 26.52% are moderate-income, 75.14% are middle-income, and 97.18% are upper-income. The owner occupancy rate in low- to moderate-income (LMI) tracts is significantly lower than the homeownership rate in middle- and upper-income census tracts.

Although the branch offices are primarily in suburban commercial locations, the assessment area ranges from urban to suburban areas. While more than one-third of the area's population resides in LMI areas, 46% of families are LMI. However, a relatively small proportion of families earn incomes below the poverty level.

The following tables highlight significant AA population and housing characteristics by CT income level based on 2000 census data compiled by the U.S. Census Bureau.

Table 1- Demographic Information for Full Scope Area: OBA Bank, MD #13644						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	177	1.13	23.16	39.55	36.16	0.00
Population by Geography	873,341	0.97	23.03	42.00	34.00	0.00
Owner-Occupied Housing by Geography	223,008	0.38	14.09	44.17	41.36	0.00
Business by Geography	123,662	0.40	20.50	40.79	38.30	0.00
Farms by Geography	1,751	0.29	15.19	45.00	39.52	0.00
Family Distribution by Income Level	226,024	17.70	17.89	22.34	42.07	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	80,440	1.76	35.50	44.64	18.11	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		79,252 111,900 5%	Median Housing Value Unemployment Rate (Dec. 2012 Bureau of Labor Statistics)	230.387 5.40%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

Table 2 - Demographic Information for Full Scope Area: OBA Bank, MSA #12580						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	59	0.00	3.39	35.59	61.02	0.00
Population by Geography	330,720	0.00	4.43	32.93	62.64	0.00
Owner-Occupied Housing by Geography	87,313	0.00	1.95	30.37	67.68	0.00
Business by Geography	46,509	0.00	1.60	34.73	63.67	0.00
Farms by Geography	743	0.00	1.75	20.73	77.52	0.00
Family Distribution by Income Level	88,535	10.63	13.19	20.81	55.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	21,089	0.00	8.78	48.11	43.12	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		59,301 84,500 4%	Median Housing Value Unemployment Rate (Dec. 2012 Bureau of Labor Statistics)	184,112 4.7%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

We completed one community contact to an economic development agency focusing to attract new business to one of the counties within the AA. The agency is also a Small Business Lender with its own lending program to provide financing to a consortium of

lenders. The contact stated specific responsibility for improving older commercial districts that are county- designated as underserved. The contact also stated that the agency has specific lending programs for businesses that include a façade improvement program and a five year tax credit on the value of additional improvements.

The contact stated that the community is very diverse between strong areas and very needy areas. The majority of the LMI are located in the areas with the greatest credit needs and businesses are in need of financing in those areas as well. There are specific projects that institutions can provide financing through a consortium of lenders and additional financing opportunities exist where the agency provides funding in conjunction with banks in the areas. There are also opportunities for banks in the area to provide financing for revitalization. The contact stated that some banks are opening branches in the areas that are revitalizing. The contact specifically named OBA Bank as one of the banks that reached out to the agency to join the consortium of lenders.

Conclusions with Respect to Performance Criteria

Lending Test

OBA's performance under the lending test is Satisfactory. OBA's loan-to-deposit ratio is outstanding. A majority of OBA's home mortgage loans were originated within the AA. OBA's record of lending to borrowers of different incomes is reasonable performance and considered satisfactory. The geographic distribution of loans in the AA is reasonable performance and also considered satisfactory.

Loan-to-Deposit Ratio

OBA's loan-to-deposit ratio is outstanding. The bank's loan-to-deposit ratio is more than reasonable for satisfactory performance. The bank's average loan-to-deposit ratio for the prior twelve quarters is 106%. This is well above the 90% average loan-to-deposit ratio for similarly situated banks during the same period.

Lending in Assessment Area

OBA's lending in their AA is satisfactory performance. A majority of the home mortgage loans originated during the evaluation period were within the AA. An analysis of the loan sample data disclosed that 68% of these loans were originated in the bank's AA.

Lending to Borrowers of Different Incomes

OBA's lending performance to borrowers of different incomes is satisfactory. Borrower distribution reflects reasonable penetration among residential real estate loans.

Washington-Arlington-Alexandria, DC-VA-MD-WV MSA

The level of home mortgage loans originated to low- and moderate-income borrowers is lower than the percentage of low- and moderate income families in the AA. This is mitigated by the fact that competition is strong within the AA. The market share by the top three lenders is garnered by Wells Fargo, Bank of America, and JPMorgan Chase at market shares of 16.20%, 6.80%, and 5.63% respectively. Also, when considering the affordability of housing in the AA, this performance is excellent. The median cost of housing in the AA is \$230,387, based on 2000 census data. The HUD updated median family income for 2011 is \$79,252. This means that a low-income person earns less than \$39 thousand. Households below the poverty level are 5%. Based on these statistics, it would be difficult for a low-income individual to purchase housing in the AA. In 2011, of the 435 lenders in the AA, OBA was ranked 106, with a market share of 0.08%.

Our review of the aggregate lender data for home mortgage loans confirms that OBA's percentage of lending to both low- and moderate-income borrowers within the AA during the review period was below the performance of other federally-regulated lenders. Since the results of the demographic and peer comparisons were the same, the performance in this category is considered reasonable penetration.

The level of home improvement loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The level of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. This performance is excellent penetration.

Our review of the aggregate lender data for home improvement loans confirms that OBA's percentage of lending to both low- and moderate-income borrowers within the AA during the review period was below the performance of other federally-regulated lenders. Since the results of the demographic and peer comparisons were mixed, the performance in this category is considered reasonable penetration.

The level of home mortgage refinance loans made to low-income borrowers is lower than the percentage of low-income families in the AA. The level of home mortgage refinance loans made to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. This overall home mortgage refinance performance is excellent penetration.

Our review of the aggregate lender data for home mortgage refinance loans confirms that OBA's percentage of lending to both low- and moderate-income borrowers within the AA during the review period exceeds the performance of other federally-regulated lenders. Since the results of the demographic and peer comparisons were similar, the performance in this category is considered excellent penetration.

Table 3 - Borrower Distribution of Residential Real Estate Loans in 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	17.70	9.09	17.89	9.09	22.34	9.09	42.07	72.73
Home Improvement	17.70	0.00	17.89	18.18	22.34	18.18	42.07	63.64
Home Mortgage Refinance	17.70	7.25	17.89	23.19	22.34	13.04	42.07	56.52

Source: 2009-2011 HMDA LAR.

Baltimore-Towson, MD MSA

The level of home mortgage loans originated to low- and moderate-income borrowers is lower than the percentage of low- and moderate income families in the AA. This is mitigated by the fact that competition is strong within the AA and the limited market presence by OBA. Also, when considering the affordability of housing in the AA, this performance is excellent. The median cost of housing in the AA is \$184,112, based on 2000 census data. The HUD updated median family income for 2011 is \$59,301. This means that a low-income person earns less than \$29 thousand. Households below the poverty level are 4%. Based on these statistics, it would be difficult for a low-income individual to purchase housing in the AA. In 2011, of the 517 lenders in the AA, OBA was ranked 126, with a market share of 0.06%.

Our review of the aggregate lender data for home mortgage loans confirms that OBA's percentage of lending to both low- and moderate-income borrowers within the AA during the review period was below the performance of other federally-regulated lenders. Since the results of the demographic and peer comparisons were similar, the performance in this category is considered reasonable penetration.

The level of home improvement loans to low- and moderate-income borrowers is lower than the percentage of low-income families in the AA. Our review of the aggregate lender data for home improvement loans confirms that OBA's percentage of lending to both low- and moderate-income borrowers within the AA during the review period was below the performance of other federally-regulated lenders. Since the results of the demographic and peer comparisons were similar, the performance in this category is considered reasonable penetration.

The level of home mortgage refinance loans made to low-income borrowers is lower than the percentage of low-income families in the AA. The level of home mortgage refinance loans made to moderate-income borrowers exceeds the percentage of

moderate-income families in the AA. This overall home mortgage refinance performance is excellent.

Our review of the aggregate lender data for home mortgage refinance loans confirms that OBA’s percentage of lending to low- income borrowers within the AA during the review period is near to the performance of other federally-regulated lenders and moderate-income borrowers within the AA during the review period exceeds the performance of other federally-regulated lenders. Since the results of the demographic and peer comparisons were the same, the performance in this category is considered excellent penetration.

Table 4 - Borrower Distribution of Residential Real Estate Loans in 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	10.63	0.00	13.19	0.00	20.81	0.00	55.37	100.00
Home Improvement	10.63	0.00	13.19	0.00	20.81	50.00	55.37	50.00
Home Mortgage Refinance	10.63	0.00	13.19	25.00	20.81	0.00	55.37	75.00

Source: 2009-2011 HMDA LAR.

Geographic Distribution of Loans

OBA’s lending to geographies of different income levels within its AAs reflects reasonable dispersion. There is one low- income geography and twenty-three (23) moderate-income geographies in OBA’s AA. The bank’s lending in both the low-and moderate-income geographies is proportionate to the population percentage within those geographies. We did not identify any apparent gaps of areas of low penetration in the bank’s lending pattern.

Washington-Arlington-Alexandria, DC-VA-MD-WV MSA

The distribution of home purchase loans to low-income geographies exceeds the percentage of low-income families and reflects excellent dispersion while the distribution of moderate-income geographies is significantly lower than the percentage of moderate-income families and reflects poor dispersion.

Our review of the aggregate lender data for home mortgage loans confirms that OBA’s percentage of lending to low- income borrowers within the AA during the review period exceeds the performance of other federally-regulated lenders. Moderate-income borrowers within the AA during the review period were significantly below the

performance of other federally-regulated lenders. Since the results of the demographic and peer comparisons were the same, the overall performance in this category is considered reasonable dispersion.

The distribution of home improvement loans to low- income geographies was near to the percentage of low-income families and reflects reasonable dispersion. The distribution of home improvement loans to moderate-income geographies exceeds the percentage of moderate-income families and reflects excellent dispersion.

Our review of the aggregate lender data for home improvement loans confirms that OBA’s percentage of lending to low- income borrowers within the AA during the review period is near to the performance of other federally-regulated lenders. Moderate-income borrowers within the AA during the review period exceed the performance of other federally-regulated lenders. Since the results of the demographic and peer comparisons were the same, the overall performance in this category is considered excellent dispersion.

The distribution of home mortgage refinance loans to low-income geographies is near the percentage of low-income families. This performance reflects reasonable dispersion. The distribution of home mortgage refinance loans to moderate-income geographies is somewhat lower than the moderate-income families and reflects reasonable dispersion.

Our review of the aggregate lender data for home improvement loans confirms that OBA’s percentage of lending to low- income borrowers within the AA during the review period is near to the performance of other federally-regulated lenders. Moderate-income borrowers within the AA during the review period exceed the performance of other federally-regulated lenders. Since the results of the demographic and peer comparisons were mixed, the overall performance in this category is considered reasonable dispersion.

Table 5 - Geographic Distribution of Residential Real Estate Loans in AA								
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
Home Purchase	0.38	5.88	14.09	5.88	44.17	47.06	41.36	41.18
Home Improvement	0.38	0.00	14.09	36.36	44.17	18.18	41.36	45.45
Home Mortgage Refinance	0.38	0.00	14.09	11.43	44.17	32.86	41.36	55.71

Source: 2009-2011 HMDA LAR.

Baltimore-Towson, MD MSA

There are a total of 59 census tracts in this AA; Howard County with 41 census tracts and Anne Arundel County with 18 census tracts. In Howard County there are no low- or moderate-income census tracts and in Anne Arundel County there are only two moderate-income census tracts. However, Anne Arundel County was added into the AA late November 2011 and was only in the review period for just over one month. Because of this short time period and because there are no low- or moderate-income tracts in Howard County, an analysis of this geography would not be meaningful.

Community Development Test

The bank's performance under the CD test is rated Outstanding. OBA's CD activities demonstrate excellent responsiveness to the CD needs of its AA when considering the bank's capacity, performance context, and the availability of CD opportunities in the AA. In addition, CD activities met area needs for job creation and small business development and expansion as identified through our contact with a local community organization as OBA was specifically named by the contact.

Number and Amount of Community Development Loans

We determined that competition to originate CD loans is considered to be significant, stemming from both large regional and other area community financial institutions in OBA's AA. Between the top six banks on the Deposit Share report, there are 342 locations for small- and medium-sized businesses to consider for their lending and development needs.

OBA, over the evaluation period, originated 13 CD loans totaling \$2,413,692 within its AA. The CD loans were responsive to AA credit needs. Furthermore, CD loans served to meet area needs for social services, provided affordable housing, and created jobs that helped stabilize geographies in the AA. A few of the above mentioned CD loans originated by OBA are described below.

- In 2010, 2011, and 2012, OBA funded four loans for a total of \$643,818, two loans for a total of \$250,843, and one loan for a total of \$221,600 respectively. The purpose of the loans was to finance the purchase of homes by LMI applicants. The loans were made in conjunction with an LMI, not-for-profit agency.
- From 2010 through 2012, OBA originated six loans for a total \$1,297,431. The purpose of the loan was to assist LMI borrowers with troubled debt restructuring modifications.

Number and Amount of Qualified Investments

We determined that competition stemming from both large regional and other area community financial institutions in OBA's AA for funding CD investments is considered to be significant.

OBA has committed a maximum of \$2 million for the Small Business Plus lending program in Montgomery County, Maryland. Montgomery County will deposit up to \$2 million into the bank and in return for the deposits, the bank agrees to lend twice the amount of the actual deposit into small businesses located in Montgomery County.

OBA over the evaluation period granted three donations totaling \$10,000 benefitting its AA. The CD donations funded by OBA, along with volunteer efforts, were responsive to the needs of the AA. OBA supported a local organization focusing LMI housing initiatives, which included serving the needs of LMI individuals and geographies within its AA.

Extent to Which the Bank Provides Community Development Services

OBA's representatives, over the evaluation period, participated in several CD services which were responsive to the needs of its AA. A few of the CD services in which OBA representatives participated are described below.

- An OBA officer serves on the finance committee of a foundation that distributes funds to various Howard County non-profit organizations. The organization's prime goal is to conduct activities to raise the money to be distributed to LMI.
- An OBA officer provides financial expertise for a non-profit Certified Development Company (CDC). The CDC is organized under the auspices of the SBA (Small Business Administration) to provide support for small business financing and job creation.
- An OBA officer serves on the Board of Directors providing financial expertise to a local domestic violence center. The organization's focus is to provide shelter and assistance for families affected by domestic violence.
- An OBA officer serves on the Board of Directors for a statewide association for expanding employment in Maryland. The organization's purpose is to expand employment and business ownership opportunities for persons with disabilities and other barriers to employment.
- An OBA employee serves on the Board of Directors providing financial expertise to a local children and youth services organization. The government organization's focus is to provide various assistance programs for LMI families and children in the community it serves.

Accessibility of Services

OBA's services are accessible to its AA residents through its branch offices and ATM network, as well as through its alternative delivery systems. In order to determine the extent of accessibility of OBA's delivery systems, population demographics, branches and ATM locations were considered.

OBA operates all seven of its main and branch offices within its AA. Of the seven offices, two branch offices (28.5%) are located within LMI geographies. In comparison of the total AA population, 1.13% reside in low-income AA geographies and 26.55% reside in moderate-income AA geographies. The majority of the AA population resides within middle-income and upper-income AA geographies (39.55% and 36.16%, respectively).

Additionally, the bank's seven offices have hours of operation typical for the market and three have extended hours to 6:00 pm, one day per week. Three branches have Saturday hours, and all seven offices have 24 hour, full service ATMs. A few of the retail services include direct deposit, electronic payment, 24 hour telephone banking, and night depositories. OBA has an informational website, <http://www.obabank.com>, that provides access to online mortgage applications, online banking, and contains a listing of loan and deposit products and rates.

Responsiveness to Community Development Needs

The bank's CD activities demonstrate excellent responsiveness to the CD needs of its AAs. This takes into consideration the bank's capacity and the need and availability of such opportunities for development within the communities in the bank's AAs. There were no identified, unmet CD needs during the evaluation period.

Responses to Complaints

OBA did not receive any complaints about its performance in helping to meet credit needs in the AA during this 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 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.