



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

July 25, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Peoples National Bank
Charter Number: 21037

1800 East Main Street
Easley, SC 29640-0000

Office of the Comptroller of the Currency

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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 Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

Major factors supporting the institution's ratings include:

- The bank's loan-to-deposit ratio is reasonable.
- A substantial majority of the bank's loans were originated in the assessment area.
- The bank's distribution of loans to business of different sizes, particularly to small businesses, is excellent.
- There have been no complaints with respect to the bank's CRA performance.
- The bank's community development performance demonstrates adequate responsiveness to the community development needs of its assessment area.

Scope of Examination

The Peoples National Bank (PNB) was evaluated under the Intermediate Small Bank examination procedures, which include a lending test and community development (CD) test. The lending test evaluates the bank's record of meeting the credit needs of its assessment areas (AAs) through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AA through CD lending, qualified investments, and community development services.

The lending test for PNB covers its performance from January 1, 2009 through March 31, 2011, as this is representative of the bank's lending strategy since the last CRA examination. The evaluation period for the CD test is from November 10, 2008 through July 25, 2011.

PNB's primary loan products are residential (home purchase and home refinance) and business loans. The bank reports data under the requirements of the Home Mortgage Disclosure Act (HMDA). The HMDA data was tested and found to be reliable.

Therefore, HMDA data was used to evaluate the bank's home loan performance. To evaluate the bank's business lending performance, we selected a sample of business loans originated between January 1, 2009 and March 31, 2011.

Description of Institution

PNB is an intrastate banking institution headquartered in Easley, South Carolina. PNB is wholly-owned by People's Bancorporation, Inc., a three bank holding company also headquartered in Easley, South Carolina. The bank commenced operations in August 1986 and currently operates five full-service banking locations. The Pendleton Street, East Main Street and Hampton Avenue branches are all located in Pickens County, within middle-income census tracts. The Hood Road branch is the only office located in Anderson County, and is the only branch located within an upper-income census tract. The last branch at Antrim Drive is located in Greenville County, residing in a middle-income census tract. During this evaluation period, PNB has not been involved in any merger or acquisition activity.

Some of the major services which the bank provides include checking accounts, NOW accounts, savings accounts, and other time deposits of various types; daily repurchase agreements; 3rd party investment services; business checking; loans for business, agriculture, real estate, personal use, home improvement and automobiles; residential mortgage loan origination; credit cards; letters of credit; home equity lines of credit; safe deposit boxes; wire transfer services; internet banking; and the use of ATM facilities. The bank does not have trust powers. Additional information about branch locations, products, services and a schedule of fees is available at the bank's website: <http://www.bankpnb.com>.

As of March 31, 2011, assets totaled \$325 million. Loans represented the largest portion of assets at 65 percent and consisted of 18 percent construction and land development, 40 percent non-farm and non-residential, 23 percent residential real estate, 14 percent commercial and industrial, and 3 percent consumer loans/other. Agriculture loans represent zero percent of the total loan portfolio. PNB offers a variety of lending programs with a primary focus on commercial and residential real estate lending.

There are no financial circumstances or legal impediments, other than legal lending limits, which would adversely impact the bank's ability to meet the credit needs of its' AA. PNB's rating at the preceding CRA examination, dated November 10, 2008, was "Satisfactory."

Description of Assessment Areas

The People's National Bank has two AAs that include all census tracts in Greenville, Pickens, and Anderson counties for a total of 150 census tracts. The AAs are contiguous; however, they represent two different Metropolitan Statistical Areas (MSAs), 11340 and 24860. Since the Greenville AA and Pickens AA are located in the same MSA, we will combine them for analytical purposes. However, the Anderson County AA cannot be combined for analytical purposes. Four of the five bank branches are located in Greenville and Pickens County. The remaining branch is located in the northwest corner of Anderson County which makes up the entire Anderson MSA and constitutes the remaining AA. The Anderson County branch mainly serves the Greenville and Pickens area and does not receive many deposits from the majority of Anderson County.

Both AAs meet the technical requirements of the CRA and do not arbitrarily exclude low- or moderate-income census tracts. There are no natural boundaries within the AA that hinder accessibility.

Greenville-Pickens County AA

The Greenville-Pickens County AA is located in the northwestern region of SC, approximately halfway between Atlanta, Columbia, and Charlotte along the I-85 corridor. The 2010 census data for Greenville County (451,225) and Pickens County (119,224) combine for a total population of 570,449. There are 5 low and 24 moderate level census tracts in Greenville County which represent 2.85 percent and 19.55 percent of the population in Greenville County. There are 0 low and 4 moderate level census tracts in Pickens County which represent 0 percent and 19.90 percent of the population in Pickens County.

Nearly 50 percent of employment in both counties consists of services; the other large industries are retail trade and construction. The five largest employers in Greenville County are School District of Greenville County, Greenville Hospital System, Michelin North America Inc, General Electric Co, and Fluor Corporation. The five largest employers in Pickens County are the SC State Government, Clemson University, Pickens County School District, Palmetto Baptist Medical Center, and Confluence Water Sports. Unemployment in Greenville and Pickens Counties are 8.5 percent and 9.0 percent respectively. Refer to the table below for demographic and economic characteristics.

Demographic and Economic Characteristics of Greenville and Pickens Counties	
Population	
Total Population	490,373
Number of Families	131,280
Number of Households	191,041
% Owner-Occupied	63.37%
% Occupied Rentals	28.02%
% Vacant	8.61%
Geographies	
Number of Census Tracts	116
% Low-Income Census Tracts (5)	4.31%
% Moderate-Income Census Tracts (28)	24.14%
% Middle-Income Census Tracts (57)	49.13%
% Upper-Income Census Tracts (26)	22.41%
Median Family Income (MFI)	
2010 MFI for Assessment Area	\$52,648
2010 HUD Adjusted MFI for MSA	\$58,000
Economic Indicators	
Unemployment Rate- Greenville County	8.5%
Unemployment Rate- Pickens County	9.0%
2010 Median Housing Value	\$108,078
% of Households Below Poverty Level	11.67%

Source: 2000 Census Data, Activity Year 2010

Competition in the Greenville-Pickens County AA is strong and includes numerous financial services options. As of June 30, 2010, the Federal Deposit Insurance Corporation reported 35 financial institutions, with 222 offices, operating within the AA. PNB ranks 15th in deposit market share with 1.79 percent of the AAs \$12.719 million in deposits. Competition includes offices/branches of large, regional, and local community banks.

A community contact characterized the business environment by stating that banking needs of the community were generally being met. Small businesses that qualified for different banking needs were typically able to acquire loans and lines of credit.

Anderson County AA

Anderson County is located approximately halfway between Atlanta, Georgia and Charlotte, North Carolina, along U.S. Interstate 85 in South Carolina. The county is part of the Anderson MSA, which is formerly a part of the Greenville-Spartanburg-Anderson MSA. The change in the metropolitan area designation occurred as a result of the 2000 Census. The city of Anderson is the largest township in the county and in the number of county seats. The Census Bureau estimates the Anderson County population to be 187,126, based on 2010 Census data. Approximately 17.65 percent of families within the AA reside in a moderate-income Census tract. There are no low-income census tracts within the AA.

The major industries in Anderson County include manufacturers of automotive parts, metal products, industrial machinery, plastics, publishing, and textiles. The five largest

employers in Anderson County are the Anderson County School District, AnMed Health, State of South Carolina, Electrolux Home Products, and Robert Bosch Corporation. As of May 2011, according to the U.S. Bureau of Labor Statistics, the unemployment rate for Anderson County was 9.8 percent. Refer to the table below for demographic and economic characteristics.

Demographic and Economic Characteristics of Anderson County	
Population	
Total Population	165,740
Number of Families	47,518
Number of Households	65,690
% Owner-Occupied	68.39%
% Occupied Rentals	21.28%
% Vacant	10.33%
Geographies	
Number of Census Tracts	34
% Low-Income Census Tracts	0.00%
% Moderate-Income Census Tracts	17.65%
% Middle-Income Census Tracts	67.65%
% Upper-Income Census Tracts	11.76%
Median Family Income (MFI)	
2010 MFI for Assessment Area	\$44,322
2010 HUD Adjusted MFI for MSA	\$54,600
Economic Indicators	
Unemployment Rate- Anderson County	9.8%
2010 Median Housing Value	\$82,839
% of Households Below Poverty Level	13.02%

Source: 2000 Census Data, Activity Year 2010

Competition in the Anderson County AA is strong and includes numerous financial services options. As of June 30, 2010, the Federal Deposit Insurance Corporation reported 21 financial institutions, with 63 offices, operating within the AA. People’s National Bank ranks fifth in deposit market share with 7.5 percent of the AAs \$2.5 billion in deposits. Competition within the AA includes offices/branches of large, regional, and local community banks.

A community contact indicated that there is an overall credit need for affordable housing for low- to moderate-income individuals and families. Affordable housing is lacking in the AA primarily due to a high unemployment rate and depressed economy. The contact indicated a need for local lenders to donate home sites for the development/rehabilitation of affordable housing, and to provide financing for affordable housing development and rehabilitation projects.

Conclusions with Respect to Performance Tests

The bank’s overall CRA performance is “Satisfactory.” The Lending Test and Community Development Test are rated “Satisfactory.” The loan-to-deposit ratio is more than reasonable, a substantial majority of loans were made within the two defined

AAs, and the geographic distribution of loans exhibits reasonable dispersion. PNB's lending to borrowers of different incomes and businesses of different sizes needs improvement. Community development activities demonstrate adequate responsiveness to AA needs.

Greater emphasis was allocated to the bank's performance in the Greenville-Pickens County AA to determine a cumulative CRA performance rating. Pickens County is the bank's primary lending market and is home to three of the bank's six branches. The Anderson County AA did not generate enough lending activity during the evaluation period to merit a full scope review and was deemphasized as the bank's market is isolated to the northern-most region of the county. Relatively high local poverty rates and the downturn in the local economy were also considered, while determining the bank's performance context.

LENDING TEST

PNB's performance under the Lending Test is rated "Satisfactory". The bank's net loan-to-deposit ratio is reasonable, and a substantial majority of loans are originated in the AAs. The bank's lending to borrowers of different income levels and businesses of different sizes reflects poor penetration. The geographic distribution of loans reflects a reasonable dispersion throughout census tracts of different income levels. In determining the cumulative lending test rating, the Greenville-Pickens County AA was emphasized, as the majority of the lending volume analyzed was originated or purchased in the AA.

Loan-to-Deposit Ratio

The loan-to-deposit (LTD) ratio meets the standard for satisfactory performance. PNB's quarterly average LTD ratio since our last CRA examination in July 2008 is 87 percent. This percentage is reasonable considering the bank's asset size, financial condition, and lending opportunities in the AAs. PNB's LTD ratios have declined over the last three years. Given the high level of banking competition in the upstate area, combined with the weak economy, loan demand has been down and deposits have been increasing. The average LTD for the state of South Carolina as of June 30, 2009 was 91 percent. PNB's LTD ratio at that same period was 95 percent.

Lending in Assessment Area

A substantial majority of loans were made within the bank's two AAs, which meets the standard for outstanding performance. Performance in each category reviewed is detailed in the following table:

Assessment Area Lending (Evaluation Period January 1, 2009 to March 31, 2011)										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	43	76.79	13	23.21	56	5,070	71.28	2,043	28.72	7,113
Home Refinance	31	88.57	4	11.43	35	5,707	84.42	1,053	15.58	6,760
Small Business	53	92.98	4	7.02	57	5,297	93.10	393	6.90	5,689
Totals	127	85.81	21	14.19	148	16,074	82.17	3,489	17.83	19,563

Source: HMDA data; Loan Sample

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

PNB's lending to borrowers of different income levels and businesses of different sizes are satisfactory. The Greenville-Pickens County AA was given a greater emphasis in developing a cumulative performance rating.

Greenville-Pickens County AA

The borrower distribution of loans in the Greenville-Pickens exhibits reasonable penetration. A relatively high proportion of households in the AA are classified below the poverty level, which contributed to the bank's lending performance. Approximately 13 percent of households in the AA are below the poverty level, which impedes their ability to qualify for residential loans.

Home Loans

The distribution of residential loans to borrowers of different income levels exhibits poor penetration. Despite the consideration given to the AA's poverty rate, the bank's level of lending to low- and moderate-income borrowers is significantly below the demographic comparator.

The following table shows the distribution of home loan products among borrowers of different income levels as compared to the percent of families in each income category, for the period of January 1, 2009 through March 31, 2011:

Borrower Distribution of Home Mortgage Loans in Greenville-Pickens AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% 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	19.07%	2.33%	17.88%	16.28%	21.74%	23.26%	41.32%	41.86%
Home Refinance	19.07%	9.68%	17.88%	6.45%	21.74%	32.26%	41.32%	35.48%

Business Loans

The distribution of loans to businesses of different sizes reflects excellent penetration. Approximately 90 percent of the bank's sampled loans to businesses during the evaluation period were made to small businesses. Small businesses are businesses with gross annual revenues of one million dollars or less. This is considered excellent compared to demographic data that show 76 percent of the area's businesses are considered small businesses. We also looked at the distribution of loans by dollar amount. Ninety-five (95) percent of the business loans in our sample were loans under \$250 thousand, which provides additional support for an excellent distribution of loans to small businesses.

The following tables show the distribution of commercial loans among different sized businesses in the AA:

Borrower Distribution of Loans to Businesses in Greenville-Pickens County AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable	Total
% of AA Businesses	76.10	5.09	18.82	100
% of Bank Loans in AA by #	89.74	10.26	0.00	100
% of Bank Loans in AA by \$	80.19	19.81	0.00	100

Source: Loan Sample; Dunn and Bradstreet data

Borrower Distribution of Loans to Businesses by Loan Size in Greenville-Pickens County AA				
Loan Size (000's)	Number of Loans	Percent of Number	Dollar Volume of Loans	Percent of Dollar Volume
\$0 - \$100,000	30	77	1,181,965	40
\$100,001 - \$250,000	7	18	1,060,822	36
\$250,001 - \$500,000	2	5	685,401	23
\$500,001 - \$1,000,000	0	0	0	0
Over \$1,000,000	0	0	0	0
Total	39	100	2,928,189	100

Source: Loan Sample

Anderson County AA

The borrower distribution of loans in the Anderson County AA exhibits reasonable penetration. A relatively high proportion of households in the AA are classified below the poverty level, which contributed to the bank's lending performance. Approximately 13 percent of households in the AA are below the poverty level, which impedes their ability to qualify for residential loans.

Home Loans

The distribution of residential loans to borrowers of different income levels exhibits reasonable penetration. Consideration was given to the AA's poverty rate; therefore, more emphasis was placed on the moderate-income level.

The following table shows the distribution of home loan products among borrowers of different income levels as compared to the percent of families in each income category, for the period of January 1, 2009 through March 31, 2011:

Borrower Distribution of Home Mortgage Loans in Anderson 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	19.55%	0.00%	17.96%	33.33%	22.67%	0.00	39.82%	66.67%
Home Refinance	19.55%	0.00%	17.96%	20.00%	22.67%	0.00%	39.82%	60.00%

Business Loans

The distribution of loans to businesses of different sizes reflects excellent penetration. Approximately 93 percent of the bank's sampled loans to businesses during the evaluation period were made to small businesses. Small businesses are businesses with gross annual revenues of one million dollars or less. This is considered excellent compared to demographic data that show 79 percent of the area's businesses are considered small businesses. We also looked at the distribution of loans by dollar amount. Eighty-six (86) percent of the business loans in our sample were loans under \$250 thousand, which provides additional support for an excellent distribution of loans to small businesses.

The following tables show the distribution of commercial loans among different sized businesses in the AA:

Borrower Distribution of Loans to Businesses in Anderson County AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable	Total
% of AA Businesses	79.42%	4.25%	16.32%	100 %
% of Bank Loans in AA by #	92.86%	7.14%	0.00%	100 %
% of Bank Loans in AA by \$	99.16%	0.84%	0.00%	100%

Source: Loan Sample; Dunn and Bradstreet data

Borrower Distribution of Loans to Businesses by Loan Size in Anderson County AA				
Loan Size (000's)	Number of Loans	Percent of Number	Dollar Volume of Loans	Percent of Dollar Volume
\$0 - \$100,000	9	64	541,790	23
\$100,001 - \$250,000	3	21	334,650	14
\$250,001 - \$500,000	1	7	492,000	21
\$500,001 - \$1,000,000	1	7	1,000,000	42
Over \$1,000,000	0	0	0	0
Total	14	100	2,368,440	100

Source: Loan Sample

Geographic Distribution of Loans

PNB's geographic distribution of loans reflects a poor dispersion throughout census tracts of different income levels. The Anderson County AA was allotted a lesser weighting to determine the bank's performance, given it possessed no low-income census tracts and moderate-income tracts are located beyond the bank's marked area.

Greenville-Pickens County AA

The bank's geographic distribution of loans in the Greenville-Pickens County AA reflects a poor dispersion throughout census tracts of different income levels. Greater emphasis was allocated to lending in moderate-income census tracts, due to the limited number of owner-occupied housing and businesses located in the low-income census tracts.

Home Loans

The bank's geographic distribution of home loans in the AA reflects a poor dispersion throughout census tracts of different income levels, including low- and moderate-income census tracts. The percentage of owner-occupied housing in low-income census tracts was minimal; therefore, lending in low-income tracts was de-emphasized for evaluation purposes. The bank's lending to borrowers in moderate-income census tracts is significantly lower than the percentage of owner-occupied housing within.

The following table details the bank's performance as compared to the percentage of owner-occupied housing units in each census tract income level:

Geographic Distribution of Home Mortgage Loans in Greenville-Pickens County 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	1.25%	0.00%	15.78%	0.00%	53.67%	25.00%	29.30%	75.00%
Home Refinance	1.25%	0.00%	15.78%	0.00%	53.67%	100.00%	29.30%	0.00%

Source: HMDA Data; 2000 U.S. Census data

Business Loans

The bank's geographic distribution of business loans reflects poor dispersion throughout census tracts of different income levels. Lending to businesses located in low-income census tracts was de-emphasized, due to the minimal percentage of businesses residing within. The bank's lending to businesses of moderate-income census tracts is significantly lower than the percentage of businesses residing within.

The following table details the bank's performance as compared to the percentage of businesses in each census tract income level:

Geographic Distribution of Loans to Businesses in Greenville-Pickens County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business	2.94	0.00	14.76	2.56	50.73	71.79	31.05	25.64

Source: Loan sample; Dunn and Bradstreet

Anderson County AA

The bank's geographic distribution of loans in the Anderson County AA reflects a reasonable dispersion throughout census tracts of different income levels. There were no low-income census tracts located in the AA during the evaluation period.

Home Loans

The bank's geographic distribution of residential loans in the AA reflects a poor dispersion throughout census tracts of different income levels, including the moderate-income census tracts. The bank's lending to borrowers in moderate-income census tracts is significantly lower than the percentage of owner-occupied housing within.

The following table details the bank's performance as compared to the percentage of owner-occupied housing units in each census tract income level:

Geographic Distribution of Home Mortgage Loans in Anderson County 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	0.00%	0.00%	13.81%	0.00%	68.46%	25.00%	17.73%	75.00%
Home Refinance	0.00%	0.00%	13.81%	0.00%	68.46%	100.00%	17.73%	0.00%

Source: HMDA data; Dunn and Bradstreet

Business Loans

The bank's geographic distribution of business loans reflects excellent dispersion throughout census tracts of different income levels. There were no low-income census tracts located in the AA during the evaluation period.

The following table details the bank's performance as compared to the percentage of businesses in each census tract income level:

Geographic Distribution of Loans to Businesses in Anderson County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business	0.00	0.00	14.34	19.23	63.12	61.54	20.54	19.23

Source: Loan Sample; Dunn and Bradstreet

Responses to Complaints

PNB has not received any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

PNB's performance is rated "Satisfactory." The bank's community development performance in the Greenville-Pickens County AA continues to demonstrate adequate responsiveness to community development needs through qualified community development lending, investments, and services. The community development test considers both quantitative and qualitative aspects. There was no community development activity in the Anderson County AA as there is a sister bank located in that AA that services most of the area. Additionally, the bank only has one branch located in the northern portion of this AA.

Community Development Loans

The level of community development lending is satisfactory. PNB has demonstrated adequate responsiveness to the community development needs of its AAs considering the limited opportunities available during this evaluation period. During this period, the bank funded one community development loan totaling \$223 thousand. This loan was originated in the Greenville-Pickens County AA. The qualifying community development organization is described below:

- In 2010, the bank made a loan totaling \$223 thousand to finance the purchase and renovation of a building to house a family services business. The loan recipient provides in-home services to children and their families located in low-to moderate-income areas.

Qualified Investments

PNB's level of community development investments demonstrates a satisfactory level of responsiveness to the needs of the AA based on the opportunities for such investments. During the evaluation period, the bank made 15 qualified community development investments totaling \$23.6 thousand. The qualified investments included contributions to local community organizations supporting affordable housing, homeless centers, children education centers, and other community services. While these investments are

not considered innovative or complex in nature, they are responsive to the identified needs of the community.

Community Development Services

PNB's community development services demonstrate satisfactory responsiveness to the community development needs of its AA considering the institution's capacity and the available opportunities for providing such services.

PNB provides a satisfactory level of community development services through its branches, products, and activities that support qualified community development activities. The branch network is the primary delivery system for retail banking services and provides reasonable accessibility to banking services, including low- and moderate-income individuals. During the evaluation period, PNB closed one of its branches, which was located in a low-income census tract, leaving the remaining five branches located within middle- and upper-income census tracts. All of the branches operate under similar hours of operation and are located within the bank's AA.

All branches offer a full range of products and services, some of which are particularly beneficial to community development centered organizations. The bank offers a checking account for non-profit organizations that requires no minimum balance and no charge for deposits or items deposited.

During the evaluation period, a total of sixteen (16) bank officers and employees provided support to a number of community development organizations in its AAs. These organizations focus on affordable housing and community service. The types of services provided by employees include serving as Board members and trustees, chairpersons, instructors, and task force participants providing technical and financial related services to organizations that provide community services to low- and moderate-income individuals. The organizations are described below:

- Two bank employees serve as members of a team for a project that collected over \$60 thousand to support a local soup kitchen. This program provides meals to low-income individuals in the area.
- One bank employee served as a Board member for Meals on Wheels, a program that provides daily hot meals to residents 65 and older who are of low- and moderate-income means.
- One bank employee served as a Board member for Habitat for Humanity, an organization that eliminates substandard living conditions and provides for decent, affording housing.
- One employee participates on homeowner task forces with the Greenville Housing Authority, an organization that provides housing for low- to moderate-income families.

- One employee served as a trustee for The Rotary Club of Easley, a civic organization whose fund raising activities during the evaluation period have benefited Meals on Wheels and a free medical clinic for low- to moderate-income individuals.
- One employee served as Board President and event chairperson for AID Upstate, an organization that provides empowerment and support to all persons living with HIV/AIDS; however, their target is supporting low- to moderate-income individuals that cannot afford medication, food, and shelter.
- Nine employees participated in the Teach the Children to Save program, a program mostly targeted to Title One schools that advocates financial and economic literacy throughout education and civic institutions in the state of South Carolina.

Although none of the activities discussed above are considered innovative or complex in nature, they exhibit management's responsiveness to identified needs in the community.

Fair Lending or Other Illegal Credit Practices Review

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