



PUBLIC DISCLOSURE

September 30, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

RiverWood Bank
Charter Number 700566

214 Fifth Street, NW
Bemidji, MN 56601-3005

Office of the Comptroller of the Currency

Minneapolis Field Office
222 South Ninth Street Suite 800
Minneapolis, MN 55402

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 bank’s net loan-to-deposit (LTD) ratio is reasonable given the bank’s size, financial condition, and credit needs of its assessment areas (AA).
- The bank originated a substantial majority of its loans inside its AAs.
- Distribution of loans reflects reasonable penetration among borrowers of different income levels and businesses of different sizes.
- Geographic distribution of loans reflects a reasonable dispersion throughout the bank’s AAs.

SCOPE OF EXAMINATION

We evaluated RiverWood Bank’s (RWB) Community Reinvestment Act (CRA) performance under the lending test from October 26, 2010 through September 30, 2014 (evaluation period). The evaluation consisted of a full scope review of the bank’s AAs utilizing small bank performance standards. RWB has two AAs; one in the Minneapolis-St. Paul Metropolitan Statistical Area (Minneapolis MSA AA) and one located in a non-Metropolitan Statistical Area (MN Non-MSA AA). The makeup of both AAs is more fully described below.

In order to determine the bank’s lending performance, we selected primary products based on the number and dollar amount of loans originated or purchased for the period beginning January 1, 2012 through December 31, 2013 (sample period). Residential real estate, commercial (business), and consumer loans were identified as primary products for the bank’s MN Non-MSA AA. Residential real estate and business loans were identified as the bank’s primary products for the Minneapolis MSA AA.

We selected a random sample of 20 loans from each primary product type in each AA to evaluate the banks’ lending performance within these AAs. Additional loans were sampled as necessary for analysis purposes. The table below illustrates the number and dollar volume of loans originated/purchased during the sample period.

MN Non-MSA AA Loan Originations/Purchases in 2012 and 2013		
<i>Loan Type</i>	<i>Volume by #</i>	<i>Volume by \$</i>
Residential Real Estate	33.13%	32.37%
Consumer	44.69%	16.00%
Commercial	13.96%	38.39%
Agricultural	8.22%	13.24%

Source: Bank loan origination reports for 2012 and 2013

Minneapolis MSA AA Loan Originations/Purchases in 2012 and 2013		
<i>Loan Type</i>	<i>Volume by #</i>	<i>Volume by \$</i>
Residential Real Estate	49.25%	42.57%
Commercial	16.42%	36.76%
Consumer	31.34%	6.40%
Agricultural	2.99%	14.27%

Source: Bank loan origination reports for 2012 and 2013

We placed more weight on the bank's performance in the MN Non-MSA AA as it represents the bank's primary market in terms of deposits, loan activity, and branches. Specifically, the MN Non-MSA AA has 88.82 percent of the bank's total deposits, 89.50 percent of the bank's total loan volume, and 81.82 percent of the bank's offices.

Within the MN Non-MSA AA, we placed more weight on residential real estate loans when assessing lending performance as the bank had more originations and purchases in this category for number and dollar amount combined than any other category.

We placed more weight on residential real estate loans when assessing lending performance in the Minneapolis MSA AA given the bank had more originations and purchases in this category by both number and dollar amount than the other categories.

DESCRIPTION OF INSTITUTION

RWB is a \$317 million intrastate bank headquartered at 214 Fifth Street NW in Bemidji, Minnesota (MN). RWB is wholly owned by Great River Holding Company, a one-bank holding company headquartered in Baxter, MN. RWB also has three wholly owned operating subsidiaries including RiverWood Financial, Inc. which offers investment and brokerage services; First Federal Service Corporation which manages certain foreclosed properties of RWB; and Homeland Mortgage, LLC, which specializes in the origination and processing of residential real estate mortgages for RWB and non-affiliated community banks. None of the activities engaged in by Great River Holding Company and RWB's operating subsidiaries are considered material relative to the RWB's CRA performance.

RWB is the resulting bank of a merger on February 22, 2013 of RWB Bemidji with its affiliate bank, RWB Baxter, chartered in Baxter, MN. RWB has its main office in Bemidji, MN, which is in Beltrami county, in addition to operating nine branches. Two branches are located in the Minneapolis MSA in the counties of Sherburne and Wright counties, while the remaining seven are located in the counties of Crow Wing, Swift, Stevens, Beltrami, Cass, Clearwater, Hubbard, and Lake of the Woods. Two branches have closed since the last evaluation in 2010. Specifically, RWB closed its Walker, MN branch in July of 2011, and its Breckenridge, MN branch in November of 2012. During

the evaluation period, RWB’s Bemidji, MN branch was relocated from 2025 Paul Bunyan Drive Northwest (NW) to 1620 Paul Bunyan Drive NW.

RWB operates eight automated teller machines (ATMs), seven of which accept deposits. RWB also offers online banking to both retail consumers and business entities. All ATMs are located within the bank’s AAs.

RWB is a full-service financial institution, offering a wide variety of commercial and retail banking products and services. Mortgage loan products include 15-, 20-, and 30-year fixed rate mortgages, adjustable rate mortgages, government guaranteed loans, jumbo loans, interest-only loans, balloon loans, constructions loans, and low-to-no down payment home loans. These loans are made available to meet the needs of the bank’s AAs. Other types of loans include home equity lines of credit, automobile loans and other personal loans.

As of September 30, 2014, RWB’s gross loans and leases totaled \$243 million representing 77 percent of total assets. The loan portfolio is comprised of commercial and commercial real estate (51 percent), residential mortgages (21 percent), agricultural (14 percent), and consumer (14 percent). The investment portfolio totals \$40 million or 13 percent of total assets. Investment holdings include U.S. Treasury and Agency securities (\$11 million) and interest-bearing bank balances (\$29 million). Tier 1 capital totaled \$29 million.

The following table illustrates the bank’s loan portfolio composition as of September 30, 2014:

Loan Portfolio Composition	\$000	%
Commercial and Commercial Real Estate	\$124,074	50.79%
Residential Real Estate	\$52,046	21.30%
Agricultural	\$34,342	14.06%
Consumer	\$33,840	13.85%
Total Loans	\$244,302	100%

Source: September 30, 2014 Call Report Data

We did not identify any legal, financial, or other factors impeding RWB’s ability to help meet the credit needs in its assessment area. RWB received an “Outstanding” rating at its prior CRA examination on October 25, 2010.

DESCRIPTION OF ASSESSMENT AREAS

MN Non-MSA AA

The MN Non-MSA AA has 55 census tracts which include non-adjacent, non-MSA areas of Northern and Western Minnesota. RWB operates its main office and seven branches in this AA. The Northern Minnesota portion of the AA is comprised of 48 contiguous census tracts located in the counties of Crow Wing, Beltrami, Cass,

Clearwater, Hubbard, and Lake of the Woods. The Western Minnesota portion is comprised of seven contiguous census tracts located in the counties of Swift and Stevens. The AA consists of the census tracts where the bank’s branches are located, as well as the surrounding census tracts where the bank has originated a majority of its loans. RWB’s eight office locations are dispersed throughout the AA with the main office and seven branches located in middle-income census tracts and one branch in a moderate-income census tract. The AA includes areas designated as distressed or underserved by the Federal Financial Institutions Examination Council (FFIEC). Namely, these are census tracts in the counties of Swift, Stevens, Beltrami, Clearwater, and Lake of the Woods. In addition, the Federal Emergency Management Agency (FEMA) has issued major disaster declarations each year of this evaluation period in the state of Minnesota which included all of the bank’s Non-MSA AA counties.

The MN Non-MSA AA is comprised of primarily middle-income census tracts. Forty census tracts are middle-income, 14 are moderate-income, and one is upper-income. There are no low-income census tracts. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income census tracts. The following table shows demographic information for RWB’s MN Non-MSA AA.

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF THE MN NON-MSA AA	
Population	
Number of Families	52,497
Number of Households	78,629
% of Low-Income Families	21.39
% of Moderate-Income Families	20.08
% of Middle-Income Families	23.16
% of Upper-Income Families	35.37
Geographies	
Number of Census Tracts	55
% Low-Income Census Tracts	0
% Moderate-Income Census Tracts	25.45
% Middle-Income Census Tracts	72.73
% Upper-Income Census Tracts	1.82
Median Family Income (MFI)	
2010 MFI for AA	\$58,135
2012 FFIEC Estimated MFI	\$60,000
2013 FFIEC Estimated MFI	\$61,700
Economic Indicators	
2013 Average Unemployment Rate %	6.84
2010 Median Housing Value	\$179,421
% of Households Below Poverty Level	13.81

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

Major industries in the MN Non-MSA AA are healthcare, education, and manufacturing. The average unemployment rate in the AA is high at 6.84 percent and exceeds the state unemployment rate of 5.1 percent.

Based upon 2013 Business Geodemographic Data, economic activity in the AA is centered in the services industry followed by retail trade. Services comprise 42 percent of the AA's activity, followed by retail trade at 12 percent.

Competition from other financial institutions is strong. Based upon the June 30, 2014, FDIC market share data, there are 39 different deposit-taking financial institutions with offices in the AA. RWB ranks fourth in deposit market share, with 6.70 percent of the market share or \$236 million. RWB's primary banking competitors are The First National Bank of Bemidji, The First National Bank of Walker, and Wells Fargo Bank National Association, along with a host of smaller banks.

In order to gather current information on the community and potential lending opportunities in the area, we contacted a community leader. The contact noted there are a number of economic challenges due to high poverty levels and unemployment rates. In addition, as the primary industry in the AA is seasonal tourism, financial challenges become more evident for local retail businesses during the off-season. Lastly, the contact noted that public infrastructure is underdeveloped, hindering economic development and the creation of new jobs and formation of new businesses.

Minneapolis MSA AA

RWB's Minneapolis MSA AA consists of 28 contiguous census tracts in Central Minnesota. Specifically, the AA consists of all of Wright and all of Sherburne Counties. RWB's two branches in this AA are located in middle-income census tracts. The AA is not designated as distressed or underserved by the FFIEC. However, as in the bank's Non-MSA AA, FEMA has issued major disaster declarations each year of this evaluation period in the state of Minnesota which included counties in this AA.

The Minneapolis MSA AA is comprised primarily of middle-income census tracts. In addition to 24 middle-income tracts, the AA has three moderate-income census tracts and one upper-income census tract. There are no low-income census tracts in this AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income census tracts.

The table on the following page shows demographic information for RWB's Minneapolis MSA AA.

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF THE MINNEAPOLIS MSA AA	
Population	
Number of Families	55,228
Number of Households	73,637
% of Low-Income Families	16.94
% of Moderate-Income Families	20.53
% of Middle-Income Families	29.73
% of Upper-Income Families	32.80
Geographies	
Number of Census Tracts	28
% Low-Income Census Tracts	0
% Moderate-Income Census Tracts	10.71
% Middle-Income Census Tracts	85.71
% Upper-Income Census Tracts	3.57
Median Family Income (MFI)	
2010 MFI for AA	\$80,925
2012 FFIEC Estimated MFI	\$83,900
2013 FFIEC Estimated MFI	\$82,300
Economic Indicators	
2013 Average Unemployment Rate %	5.50
2010 Median Housing Value	\$223,400
% of Households Below Poverty Level	6.20

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

Major industries in the Minneapolis MSA AA are manufacturing, retail, healthcare, education, and construction. The average unemployment rate in this AA slightly exceeds the state unemployment rate of 5.1 percent in 2013.

Based upon 2013 Business Geodemographic Data, economic activity in the AA is centered in the services industry followed by construction. Services comprise 41 percent of the AA's activity, followed by construction at 14 percent.

Competition from other financial institutions is moderate. Based upon the June 30, 2014, FDIC market share data, there are 27 different deposit-taking financial institutions with offices in the AA. RWB ranks twenty-fourth in the deposit market share, which equates to 1.30 percent or \$30 million. RWB's primary banking competitors are Wells Fargo Bank National Association and The Bank of Elk River which together comprise 29 percent of the market share.

In order to gather current information on the community and potential lending opportunities in the area, we contacted a community leader. We discussed with the community contact whether financial institutions in the area were meeting the credit

needs of the community. The contact indicated that financial institutions are meeting the credit needs of the community and are engaged in the communities in which they live and work. The main credit needs in the AA consist primarily of small business lending and affordable home lending for first-time home buyers.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Loan-to-Deposit Ratio

RWB's net Loan-to-Deposit (LTD) ratio is reasonable given the bank's size, financial condition, AA credit needs, and local economic conditions. RWB's quarterly LTD ratio averaged 84 percent over the 17 quarters from June 1, 2010, to June 30, 2014. This ratio ranged from a quarterly low of 76 percent in the fourth quarter of 2011 to a quarterly high of 90 percent in the third quarter of 2013.

RWB's average LTD ratio ranks second among five similarly situated banks. The following table depicts the average LTD ratios of similarly situated banks compared to RWB. Similarly situated banks are defined as financial institutions located in the bank's AAs with similar asset sizes, product offerings, and services.

LOAN-TO-DEPOSIT RATIO		
Institution (Headquarters)	Assets as of 6/30/14 (\$000s)	Average LTD Ratio (3Q10-3Q14)
Blackridge Bank (Fargo, ND)	\$367,000	90.80%
RiverWood Bank (Bemidji, MN)	\$315,000	83.64%
American National Bank of Minnesota (Baxter, MN)	\$245,000	81.05%
The Bank of Elk River (Elk River, MN)	\$350,000	73.72%
The First National Bank of Walker (Walker, MN)	\$364,000	69.28%
The First National Bank of Elk River (Elk River, MN)	\$298,000	67.14%

Source: Call Report data as of June 30, 2014.

Lending in the Assessment Areas

RWB originates a substantial majority of its loans inside its AAs. As depicted on the table on the following page, based on combined lending in the AAs, RWB originated 86 percent by number and 97 percent by dollar volume of loans within its AAs during the sample period.

Lending in the AAs										
Loan Type	Number of Loans					Dollars of Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Business	34	85.00	6	15.00	40	10,919	83.67	2,131	16.33	13,050
Residential Real Estate	32	80.00	8	20.00	40	3,956	76.55	1,212	23.45	5,168
Consumer	20	100.00	0	0.00	20	83,904	100.00	0	0.00	83,904
Totals	86	86.00	14	14.00	100	98,779	96.73	3,343	3.27	102,122

Source: Loan Samples

Lending to Borrowers of Different Incomes

Overall, RWB’s lending to borrowers of different incomes and to businesses of different sizes reflects reasonable penetration in the AAs.

Performance in the MN Non-MSA AA

Residential Real Estate Loans

RWB has reasonable penetration among borrowers of different income levels. RWB’s residential real estate lending to low-income borrowers is below the demographics but higher than its peer group. Despite being lower than the demographic comparator, lending to low-income families is reasonable given 13.81 percent of households in the AA are below poverty level and may not qualify for credit. RWB’s lending to moderate-income borrowers reflects reasonable penetration and exceeds both the demographic and peer comparators. The following table compares the bank’s residential real estate lending activities by the borrower income level to the local and peer demographic data.

Borrower Distribution of Residential Real Estate Loans in the MN Non-MSA AA			
Borrower Income Level	% of Number of Loans	% Aggregate Lenders*	% of AA Families
Low	10.00	5.73	21.39
Moderate	25.00	13.72	20.08
Middle	15.00	18.98	23.16
Upper	50.00	48.84	35.37

Source: Loan Sample; 2012 Peer Lending Data; 2010 U.S. Census Data

*For 12.73% of borrowers, income was not available

Business Loans

RWB’s borrower distribution of loans reflects reasonable penetration among businesses of different sizes. Seventy-five percent of the bank’s business loans, by number, and 79 percent by dollar were originated to businesses with gross annual revenues of \$1 million

or less. Demographic data contains a high level of businesses of unknown size, as they chose not to report the information. Although this 19 percent could potentially be additional small businesses, we have no reason to believe that the non-reporters are a disproportionate amount of small businesses. The following table shows the distribution of business loans among businesses of different sizes in the MN Non-MSA AA.

Borrower Distribution of Loans to Businesses in the MN Non-MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	77.41%	3.70%	18.90%	100.00%
Aggregate Lending Data	36.33%	63.67%	0.00%	100.00%
% of Bank Loans in AA by #	75.00%	25.00%	0.00%	100.00%
% of Bank Loans in AA by \$	79.14%	20.86%	0.00%	100.00%

Source: Loan Sample; 2012 Peer Lending Data; 2013 Dunn and Bradstreet Data

Consumer Loans

RWB has reasonable penetration among borrowers of different income levels. RWB’s consumer lending to low-income borrowers is below the demographics; however, considering the high household poverty rate of 13.61 percent, as well as elevated unemployment levels, the bank’s ability to lend to low-income individuals may be reduced. RWB’s lending to moderate income borrowers significantly exceeds the demographic comparator. The following table compares the bank’s consumer lending activities to borrowers of different income levels.

Borrower Distribution of Consumer Loans in the MN Non-MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA House holds	% of Number of Loans*	% of AA House holds	% of Number of Loans*	% of AA House holds	% of Number of Loans*	% of AA House holds	% of Number of Loans*
Consumer	25.74%	20.00%	17.45%	35.00%	19.42%	20.00%	37.39%	23.33%

Source: Loan Sample; 2010 U.S. Census Data

*For 1.67% of borrowers, income information was not available

Performance in the Minneapolis MSA AA

Residential Real Estate Loans

RWB has reasonable penetration among borrowers of different income levels. RWB’s residential real estate lending to low-income borrowers is below the peer and demographic data and reflects poor penetration. However, the AA poverty rate of 6.20% may impede low-income families from obtaining home loans. RWB’s lending to moderate-income borrowers reflects reasonable penetration and exceeds both the

demographic and peer comparators. The following table compares the bank’s residential real estate lending activities to borrowers of different income levels.

Borrower Distribution of Residential Real Estate Loans in the Minneapolis MSA AA			
Borrower Income Level	% of Number of Loans*	% Aggregate Lenders**	% of AA Families
Low	6.52	12.68	16.94
Moderate	32.61	24.21	20.53
Middle	23.91	24.15	29.73
Upper	34.78	24.37	32.80

Source: Loan Sample; 2012 Peer Lending Data; 2010 U.S. Census Data

*For 2.17% of borrowers, income was not available

**For 14.59% of borrowers, income was not available

Business Loans

RWB’s borrower distribution of loans reflects reasonable penetration among businesses of different sizes. Seventy percent of the bank’s business loans, by number, and 69 percent by dollar amount were originated to businesses with gross annual revenues of \$1 million or less. While the figures by number and dollar are less than the demographic comparator, RWB is near to the comparator, which is reasonable. In addition, RWB’s figures significantly exceed their peers. Demographic data contains a high level of businesses of unknown size, as they chose not to report the information. Although this sixteen percent could potentially be additional small businesses, we have no reason to believe that the non-reporters are a disproportionate amount of small businesses. The following table shows the distribution of business loans among businesses of different sizes in the Minneapolis MSA AA.

Borrower Distribution of Loans to Businesses in the Minneapolis MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	80.15%	3.28%	16.56%	100%
Aggregate Lending Data	33.89%	66.11%	0.00%	100%
% of Bank Loans in AA by #	70.59%	29.41%	0.00%	100%
% of Bank Loans in AA by \$	69.06%	30.94%	0.00%	100%

Source: Loan sample; 2013 Peer Lending Data Dunn; and Bradstreet Data 2013

Geographic Distribution of Loans

RWB’s overall geographic distribution of loans in the AAs reflects reasonable dispersion throughout census tracts of different income levels. When arriving at this decision, we place more weight on lending performance in the MN Non-MSA AA. As noted

previously, this AA contains the substantial majority of the bank’s deposits, lending activity, and branches. There are no low-income census tracts in either AA.

Performance in the MN Non-MSA AA

Residential Real Estate Loans

Geographic distribution of residential real estate loans reflects reasonable dispersion throughout the census tracts of different income levels. Residential real estate lending within the moderate-income census tracts is comparable to the aggregate lending performance and also to the percentage of owner-occupied housing within the AA census tracts. The following table shows the distribution of residential real estate loans among census tracts of different income levels.

Geographic Distribution of Residential Real Estate Loans in the MN Non-MSA AA			
Borrower Income Level	% of Number of Loans	% Aggregate Lenders	% of AA Owner-Occupied Housing
Low	0.00	0.00	0.00
Moderate	13.33	17.08	21.54
Middle	86.67	79.84	76.01
Upper	0.00	3.08	2.45

Source: Loan Sample; 2012 Peer Lending Data; 2010 U.S. Census Data

Business Loans

The geographic distribution of business loans reflects excellent dispersion throughout census tracts of different income levels. RWB’s distribution of business loans in moderate-income census tracts is almost double both the peer and demographic comparators. The following table shows the bank’s performance as compared to the percentage of businesses in each census tract by income level.

Geographic Distribution of Commercial Loans in the MN Non-MSA AA			
Census Tract Income Level	% of Number of Loans	% Aggregate Lenders	% of AA Businesses
Low	0.00	0.00	0.00
Moderate	40.00	21.50	24.52
Middle	55.00	75.66	73.90
Upper	5.00	2.84	1.59

Source: Loan Sample; 2012 Peer Lending Data; 2013 Dunn and Bradstreet Data

Consumer Loans

Geographic penetration of consumer loans reflects poor dispersion throughout the census tracts of different income levels. Consumer lending within the moderate-income census tracts is significantly lower in comparison to the percentage of households within the census tracts. The following table shows the distribution of consumer loans among census tracts of different income levels.

Geographic Distribution of Consumer Loans in the MN Non-MSA AA								
Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA House holds	% of Number of Loans	% of AA House holds	% of Number of Loans	% of AA House holds	% of Number of Loans	% of AA House holds	% of Number of Loans
Consumer	0.00%	0.00%	24.69%	8.33%	73.25%	91.67%	2.06%	0.00%

Source: Loan Sample; U.S. Census Data

Performance in the Minneapolis MSA AA

Residential Real Estate Loans

Geographic penetration of residential real estate loans reflects poor dispersion throughout the census tracts of different income levels. The bank made no loans in the moderate-income tracts based on loan sampling, compared to a small percentage of lending by the peer group. The bank's branches are a substantial distance from the three moderate-income tracts, which may impede the bank's ability to lend in those census tracts. The following table shows the distribution of residential real estate loans among census tracts of different income levels.

Geographic Distribution of Residential Real Estate Loans in the Minneapolis MSA AA			
Borrower Income Level	% of Number of Loans	% Aggregate Lenders	% of AA Owner-Occupied Housing
Low	0.00	0.00	0.00
Moderate	0.00	4.12	5.50
Middle	95.65	93.31	92.10
Upper	4.35	2.57	2.41

Source: Loan Sample; 2012 Peer Lending Data; 2010 U.S. Census Data

Business Loans

The geographic distribution of business loans reflects poor dispersion throughout census tracts of different income levels. RWB's distribution of business loans in moderate-income census tracts is at zero percent, below both the peer lending data and the demographics. Again, as the bank's branches are a substantial distance from the

three moderate-income tracts, this may impede the bank’s ability to lend in those census tracts. The following table shows the bank’s performance as compared to the percentage of businesses in each census tract by income level.

Geographic Distribution of Commercial Loans in the Minneapolis MSA AA			
Census Tract Income Level	% of Number of Loans	% Aggregate Lenders	% of AA Businesses
Low	0.00	0.00	0.00
Moderate	0.00	4.54	5.85
Middle	100.00	92.49	91.65
Upper	0.00	2.97	2.50

Source: Loan Sample; 2012 Peer Lending Data; 2013 Dunn and Bradstreet Data

Responses to Complaints

There have been no CRA-related complaints since the previous CRA evaluation.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 195.28(c), in determining a Federal savings association’s (FSA) CRA rating, 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.