



PUBLIC DISCLOSURE

January 27, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Hancock County Savings Bank, F.S.B.
Charter Number 702808

351 Carolina Ave
Chester, WV 26034-1127

Office of the Comptroller of the Currency

Corporate One Office Park, Bldg 2
4075 Monroeville Blvd, Suite 300
Monroeville, PA 15146-2529

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: Outstanding.

The Community Development Test is rated: Outstanding.

The major factors supporting the institution's rating include:

- The bank's loan to deposit ratio is outstanding when compared to similarly situated banks.
- The majority of the bank's loans originated during the evaluation period were within the bank's assessment area (AA).
- The geographic distribution of loans reflects an excellent dispersion and outstanding performance.
- The borrower distribution reflects reasonable dispersion and satisfactory performance.
- The bank's community development activities demonstrate excellent responsiveness to the community development needs of its AA.

Scope of Examination

Hancock County Savings Bank (HCSB) was evaluated under the Intermediate Small Bank evaluation procedures, which include a lending test and a community development (CD) test. The lending test evaluates the institution's record of meeting the credit needs of its assessment area (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 HCSB were completed using the full-scope review procedures for its one (1) AA. Our review covered the bank's lending performance from January 1, 2012 through December 31, 2013. Our review covered the bank's community development performance from September 1, 2009 through January 31, 2014. Residential mortgage loans are the bank's primary loan product and our focus as part of this examination.

In order to evaluate HCSB's record of originating residential mortgage loans, we analyzed loan data HCSB 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 2013. We evaluated HCSB's processes to ensure the accuracy of collected HMDA data and tested a sample of HCSB's reported HMDA loans. Specifically, we tested the accuracy of HCSB's HMDA loan data by comparing it against HCSB's loan file documentation. The data integrity examination revealed that HCSB's publicly available HMDA loan data could be relied on for the purposes of this CRA evaluation.

Description of Institution

Established in 1899, HCSB is a federally chartered mutual savings bank located in Chester, Hancock County, West Virginia. Hancock and Brooke Counties are the two (2) most northern counties in the West Virginia Northern Panhandle. The bank operates as a community-oriented

financial institution offering residential mortgages, multi-family and commercial mortgages, consumer loans, and commercial business loans, as well as a range of deposit products for individuals and businesses. There are no affiliated or related organizations within the HCSB corporate structure.

HCSB operates three (3) full service offices and one (1) drive-through office. One office and the drive-through are located in Hancock County (New Cumberland and Penco Drive-through/Weirton), one (1) office in Brooke County (Three Springs/Weirton), and the home office in Chester, Hancock County. The bank did not close any offices during the evaluation period. The bank did not open any offices during the evaluation period.

Each full-service branch office offers traditional deposit and loan products and services. HCSB has customary banking hours Monday through Friday and all offices, including the drive-through only office, offer Saturday hours. Drive-up window and automated teller machine (ATM) services are available at all office locations. The bank also offers an informational internet website and on-line banking services. Table 1 lists the locations of the bank's offices and the income level of the geography (i.e., census tract) in which each is located.

Table 1 - HCSB Offices		
	Office Location	Geography Income Level
1	Chester, WV (Corp. Headquarters)	Middle
2	New Cumberland, WV	Middle
3	Weirton, WV (Three Springs Drive)	Middle
4	Weirton, WV (Penco Drive Through)	Middle

The institution is a mortgage portfolio lender. The bank's mortgage products include fixed-rate and adjustable-rate loans for the purchase, refinance and construction of one- to four-family and multi-family dwellings. Consumer loan offerings consist of home equity loans and lines of credit and personal secured and unsecured loans. Commercial loans secured by real estate and other collateral are offered to businesses. Table 2 shows the distribution of loans by lending category.

Table 2 - Hancock County Savings Bank's Investment in Loans (12/31/2013 Uniform Bank Performance Report)			
Loan Category	Amount (\$000's)	Percent of Total Loans	Percent of Total Assets
Real Estate Loans	\$254,039	97.3%	76.6%
Commercial & Other Loans	866	.3%	.3%
Consumer Loans	6,072	2.4%	1.8%
Total Loans	\$260,977	100.00%	78.7%

HCSB's total assets as of December 31, 2013, were \$331.7 million. As of the same date, HCSB's total deposits were \$266.4 million and Net Tier 1 Capital was \$54.2 million.

According to the June 30, 2013 FDIC Summary of Deposits Market Share Report, HCSB was ranked 2 out of 9 institutions in their AA with 32.3 percent of total deposits. WesBanco is ranked first with four (4) offices and 33.4 percent of the deposits. Other financial institutions

include United Bank with two (2) offices and 8.5 percent of the deposits, FNB of PA with two (2) offices and 8.3 percent of the deposits, and Huntington National Bank with two (2) offices and 6.3 percent 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 August 31, 2009, HCSB was rated "Outstanding."

Description of HCSB Assessment Area

Table 3 - Demographic Information for Full Scope Area: HCSB						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	16	0.00	12.50	81.25	6.25	0.00
Population by Geography	60,120	0.00	10.45	83.37	6.18	0.00
Owner-Occupied Housing by Geography	28,026	0.00	8.54	84.40	7.07	0.00
Business by Geography	4,630	0.00	11.14	83.97	4.88	0.00
Farms by Geography	118	0.00	5.08	90.68	4.24	0.00
Family Distribution by Income Level	17,381	0.00	10.24	82.49	7.27	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	6,754	0.00	14.46	79.75	5.79	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		52,739 54,925 12.0%	Median Housing Value Unemployment Rate WV Unemployment PA Unemployment Hancock Co (WV) Brooke Co (WV) Beaver Co (PA) Washington Co (PA) (Dec. 2013 Bureau of Labor Statistics)		\$95,913 6.7% 5.9% 6.9% 7.1% 6.7% 7.0% 6.3%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2013 HUD updated MFI

HCSB's AA consists of all of Hancock County WV and the northern portion of Brooke County WV, which are located within the Steubenville/Weirton, OH/WV (44600) Metropolitan Statistical Area (MSA). The AA also includes portions of Beaver and Washington County, which are located in Western Pennsylvania, within the Pittsburgh MSA (38300). HUD changed the MSA between 2010 and 2014 for the WV portion of the AA resulting in a reduction in the number of census tracts within the AA. The bank has not added any new census tracts since 2000.

The AA complies with all regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. HCSB's AA was delineated by including whole geographies in which the bank has its branch locations. There are sixteen (16) census tracts within the AA. There are no low-income census tracts. There are two (2) moderate-income census tracts, and fourteen (14) middle- and upper-income census tracts within the AA.

The total population in the AA was 60,120, as of the 2010 U.S. Census. The December 2013 unemployment rate varies between the states within the AA. The WV rates and the Beaver County, PA rate are just slightly higher than the national unemployment rate of 6.7 percent. Washington County PA was lower at 6.3 percent. The unemployment rates for the WV region of the AA are at the same rate or slightly higher when comparing these rates to the WV state unemployment rate for the same period. The unemployment rates for the PA region of the AA are at the same rate or slightly lower when comparing these rates to the PA state unemployment rate for the same period. According to the WV Economic Outlook 2014 (produced by WVU College of Business and Economics), the area's future job growth over the next ten years in the AA is predicted to be low, if not continue with the negative growth trend of the past ten (10) years.

Major employers in the AA for Hancock County WV include the Mountaineer Racetrack and Casino, Arcelormittal of Weirton, Homer Laughlin China Company and the Hancock County Board of Education. The major employers in Brooke County WV include the Weirton Medical Center, Brooke County Board of Education and Ball Metal Food Container Corporation. The AA demonstrates slow growth and local economic forecasts call for continued weak growth and continued underperformance compared to other counties in WV. Hancock County, along with one other WV county, has faced the largest job losses in the state of West Virginia over the last ten (10) years, with an average annual decline of 1.7 percent. In addition, the counties of Hancock and Brooke also are predicted to face no or negative population growth rates over the next four years. On the annual per capita income forecast, the region could see between 2 percent and 2.5 percent annual growth rate over the next four years due to continued need for specialized labor relating to the energy industry.

The median cost of housing in the AA is \$95,913. The updated HUD MSA Median Family Income for 2013 is \$54,925. The percentage of households below the poverty level is at 12 percent. The AA's population is comprised of 17,381 families with the following family income distribution: 21.38 percent are low-income, 19.63 percent are moderate-income, 19.23 percent are middle-income, and 39.51 percent are upper-income.

In 2013, 129 lenders originated HMDA loans in the AA, according to the HMDA Peer Mortgage Data report. Hancock County Savings Bank was ranked first within the combined AA report. The bank originated 559 loans, with a market share of 32.27 percent. This figure included both WV and PA lending originations. Competition in the AA was reasonable with Wells Fargo Bank, JP Morgan Chase Bank, and Huntington National Bank ranking as the second through fourth place lenders with market shares of 8.12 percent, 5.61 percent, and 4.40 percent respectively. Other competitors consisted of small banks and credit unions, larger regional banks, and mortgage brokers with nationwide sources of funding.

According to the June 30, 2013 FDIC Summary of Deposits Market Share Report, HCSB was ranked 2 out of 9 institutions in their AA with 32.3 percent of deposits. WesBanco is ranked first with 4 offices and 33.4 percent of the deposits. Other financial institutions include United Bank with 2 offices and 8.5 percent of the deposits, FNB of PA with 2 offices and 8.3 percent of the deposits, and Huntington National Bank with 2 offices and 6.3 percent of the deposits.

As part of the evaluation process, we completed two community contact interviews. We contacted a community-based, not for profit LMI agency, located in the City of Weirton. The organization's mission is to create opportunities that advance the health and welfare of LMI individuals and families, including housing opportunities in the city and in the region known as the Northern WV Panhandle. The growth in the energy industry associated with the Marcellus

Shale has resulted in the need for more affordable housing for the employees of these businesses and ancillary businesses. The contact stated that there are plenty of opportunities for financial institutions to participate in community and housing development projects and in credit-related projects. This agency contact stated that the performance of local financial institutions has been active over the last five years, even before the Marcellus Shale drilling. The contact hopes that the community banks in the AA will continue to be as generous, and creative, as they have been. They also hope that banks continue to develop partnerships to foster additional lending opportunities. The second contact indicated that the same banks listed within the first interview seem to be less active over the past two years or so. They felt that the bank's income margins are diminishing and thus they cannot invest as they did before the economic downturn. Both agencies acknowledged that the Weirton area is economically challenged with the exit of Weirton Steel as the primary employer. The region struggles to find a group of new businesses to stabilize the area.

Conclusions with Respect to Performance Criteria

Lending Test

HCSB's performance under the lending test is Outstanding. HCSB's loan-to-deposit ratio exceeds the standard for satisfactory performance. A majority of HCSB's home mortgage loans originated within the AA. HCSB's record of lending to borrowers of different incomes meets the standard for satisfactory performance. The geographic distribution of loans in the AA exceeds the standard for satisfactory performance.

Loan to Deposit Ratio

The bank has effectively utilized deposits to fund a substantial level of mortgage lending during the review period and exceeds the standard for satisfactory performance in this criterion.

HCSB's eight-quarter average loan to deposit (LTD) ratio was 92.9 percent for the period from January 1, 2012 through December 31, 2013. The LTD ratio ranged from a high of 96.5 percent, as of December 31, 2013, to a low of 90.1 percent as of March 31, 2012. During the same period, two (2) other institutions headquartered in the Pittsburgh MSA had an eight-quarter average LTD ratio of 64.0 percent, including two institutions in Washington County, PA. HCSB's 92.9 percent eight-quarter LTD ratio is consistent with the eight-quarter average LTD ratio of 92.3 percent reported during the prior CRA evaluation.

Lending in the Assessment Area

HCSB has a reasonable percentage of loans originated within the AA. The bank's ranking as the top lender indicated an adequate level of commitment to the assessment area, which exceeds the standard for satisfactory performance in this criterion.

HCSB's primary loan products consist of residential mortgage loans. HCSB's record of originating residential mortgages was evaluated over the period between January 1, 2012 and December 31, 2013. Residential mortgage lending includes home purchase, home improvement, and home mortgage refinance loans. Table 4 illustrates the total number and dollar amount of HMDA-reportable loans originated in and outside the AA during the 24-month review period ending December 31, 2013. For comparison purposes, the table reflects lending activity by number and dollar amount during the review period.

Table 4 - Concentration of HMDA-Reportable Loans *					
1/1/2012 – 12/31/2013					
(Dollars in thousands)					
Period By Year.	Inside Assessment Area		Outside Assessment Area		Total HMDA Loans
By Number:	#	%	#	%	#
1/1/12 – 12/31/13	887	64.3	493	35.7	1,380
By \$ Amt.:	\$	%	\$	%	\$
1/1/12 – 12/31/13	\$81,496	57.8	\$59,399	42.2	\$140,895

* Percent based on total HMDA-reportable loans originated during applicable year.

Loans originated by the bank in the AA decreased 5.4 percent from the previous evaluation period to 64.3 percent in the current evaluation period. The dollar amount of loans originated in the AA was \$81.5 million during the current evaluation period, or 57.8 percent. This is a 5.2 percent decrease in the percentage of loan volume made inside the AA from the prior period, when the bank's dollar amount of loan originations inside their AA was 61 percent. Management attributes the decrease from the prior evaluation period to an increase in the loan origination opportunities available just outside of the AA in calendar years 2012 and 2013.

Per the HMDA Peer Mortgage Data report, HCSB improved its prior period AA market share from 18 percent to a current period market share of 33.7 percent in the AA, for a total of 559 loans originated. The increase was 87.2 percent over the prior period. HCSB originated nearly five (5) times more loans than the next closest competitor. We partially attributed the increase to a previous competitor being acquired by another institution.

Lending to Borrowers of Different Incomes

As part of our lending analysis, we reviewed the bank's distribution of loans among borrowers of different income levels within the AA. Table 5 illustrates loan originations, categorized by borrower income level, reported by HCSB during the review period, and compares this activity to 2012 aggregate lenders (most recent data available) HCSB's record of lending to borrowers of different incomes meets the standard for reasonable performance.

The percentage of home purchase loans and home-mortgage refinance loans originated to low-income families is lower than the percent of low-income loans made by the peer aggregate in the AA. The percentage of home improvement loans to low-income families is nearly equal to the percentage of low-income loans made by the peer aggregate in the AA. Several factors contribute to the lower level of distribution to low-income families in the AA. None of the bank's sixteen (16) census tracts is low-income. In addition, 19.9 percent of the housing units in the AA are rental units with only 9.1 percent of the rental units being vacant.

The growing Marcellus Shale industry, whose employees are demanding better quality homes and rentals, coupled with the loss of a major employer in the AA has increased the availability of lower rent properties in the AA. These two factors result in a downward pressure on rents and subsequently provide more competition among landlords resulting in lower rental costs for low to moderate income tenants. Lower rental costs could possibly abate a desire for home

ownership among low-income families in all census tracts of the AA. The average median cost of housing is \$95,913 for the AA. The low-income AA families, by definition, are families with annual incomes below \$27,147. This income may prevent a low-income, even a moderate-income family, from purchasing a home. There are banks in the AA, and just outside of the AA, that are experienced LMI lenders and provide financing opportunities through their long standing first time homebuyer programs.

The percentage of home purchase loans and the home improvement loans to moderate-income families is lower than the percentage of moderate-income loans made by the peer aggregate in the AA; the percentage of home-mortgage refinance loans is near to the percentage of aggregate lending to moderate-income families within the AA. There are two (2) moderate-income census tracts within the bank's AA. Moderate-income AA families are families with annual incomes between \$27,147 and \$43,940.

Table 5 Borrower Distribution of Residential Real Estate Loans in AA

Borrower Income Level	Low			Moderate			Middle			Upper		
	% of AA Families	% of Number of Loans*	Aggregate**	% of AA Families	% of Number of Loans*	Aggregate**	% of AA Families	% of Number of Loans*	Aggregate**	% of AA Families	% of Number of Loans*	Aggregate**
Home Purchase	19.63	5.60	7.96	19.23	18.53	29.65	21.63	29.31	26.33	39.51	46.55	36.06
Home Improvement	19.63	7.76	7.98	19.23	15.07	22.54	21.63	27.40	30.05	39.51	49.77	39.44
Home Mortgage Refinance	19.63	3.30	5.50	19.23	13.21	14.23	21.63	22.41	24.16	39.51	61.08	56.10

* Source 2012-2013 HMDA LAR

**Based on 2012 Peer Mortgage Data (USPR)

Geographic Distribution of Loans

The percentage of loan originations in moderate-income geographies in the AA during the review period exceeds the standard for satisfactory performance in this criterion. HCSB does not have any low-income geographies in the AA, therefore it would not be meaningful to perform an analysis.

There are two (2) moderate-income geographies in the AA. Less than 9 percent of owner-occupied housing in the AA is found within these low- and moderate-income geographies. The majority of owner-occupied housing (84.4 percent) is located in middle-income geographies.

Table 6 details the distribution of residential real estate loans originated by HCSB during the evaluation period in its AA geographies of different income levels.

Table 6 Geographic Distribution of Residential Real Estate Loans in AA

Borrower Income Level	Low			Moderate			Middle			Upper		
Loan Type	% of AA Families	% of Number of Loans*	Aggregate**	% of AA Families	% of Number of Loans*	Aggregate**	% of AA Families	% of Number of Loans*	Aggregate**	% of AA Families	% of Number of Loans*	Aggregate**
Home Purchase	0.00	0.00	0.00	8.54	10.78	8.97	84.40	82.33	84.60	7.07	6.90	6.43
Home Improvement	0.00	0.00	0.00	8.54	9.95	7.91	84.40	76.02	81.40	7.07	14.03	10.70
Home Mortgage Refinance	0.00	0.00	0.00	8.54	8.99	7.40	84.40	75.35	83.26	7.07	15.67	9.33

*Source 2012-2013 HMDA LAR

**Based on 2012 Peer Mortgage Data (USPR)

HCSB's record of originating home purchase, home improvement, and home-mortgage refinance loans within moderate-income AA geographies exceeds the standards for satisfactory performance with regards to loans made by the peer aggregate within moderate-income AA geographies.

Community Development Test

The bank's performance under the community development test is rated "Outstanding."

HCSB's community development activities demonstrate excellent responsiveness to the community development needs of the HCSB's AA when considering the bank's capacity, performance context, and the availability of community development opportunities in the AA. The evaluation period for these activities was from September 1, 2009 through January 31, 2014.

Number and Amount of Community Development Loans

HCSB has excellent responsiveness when identifying and addressing the needs and opportunities for community development loans in the bank's AA. We determined that competition originating from both large regional and area community financial institutions in HCSB's AA, and within the Steubenville-Weirton MSA, to originate CD loans is significant. Over the evaluation period, HCSB originated six (6) CD loans totaling just under \$444,000 within its AA. The CD loans were responsive to AA credit needs. Furthermore, CD loans served to meet area needs for social services and affordable housing in the AA. A few of the above-mentioned CD loans originated by HCSB are described below.

- In 2013 HCSB originated a \$280,000 loan to a local volunteer fire department located in a moderate-income census tract. The purpose of the loan was to finance the purchase of a new vehicle for the all-volunteer department. The purpose of the organization is to serve the emergency management needs of the city and its surrounding neighborhoods.
- In 2009 through 2013, the bank originated five (5) loans totaling \$163,663 to a local agency dedicated to addressing the many needs of the economically disadvantaged in the city of Weirton and surrounding areas. The purpose of these loans was to finance the purchase of homes for rehabilitation and resale to LMI families.

Number and Amount of Qualified Investments

HCSB has an excellent responsiveness when identifying and addressing the needs and opportunities for community development investments, in and outside of the bank's AA. There were limited investments available inside the bank's AA, and available to all banks including HCSB, during the evaluation period. However, HCSB did choose to fund ten (10) LMI investments within its MSA (44600), on a statewide (WV) level and through investments in minority-owned financial institutions, totaling \$2.0 million during this evaluation period.

- The bank invested \$516 thousand in a local civic center/arena to support the renovations and improvements needed to keep this primary employer stabilized within a low-income census tract. The arena is located just outside the bank's AA, but within the MSA of Steubenville OH/Wheeling WV (44600).
- The bank invested \$490 thousand in two (2) minority-owned community development banks through the banks' CDFI programs. The banks are located in NY and IL. They are both outside of the AA, MSA and the state of WV.
- The bank invested \$412 thousand in a CRA Qualified Investment Fund to support the building of a senior affordable housing center. The housing center will be located in a moderate-income census tract and will be located just outside of the bank's AA.
- The bank invested \$250 thousand in a refunding and improvements revenue bond for a local university located within a low-income census tract. The funds will be utilized to expand living and education facilities that will support low- and moderate-income households and further stabilize the jobs found in this low-income census tract.

Over the evaluation period, and within its AA and surrounding communities, HCSB funded seventy-four (74) CD donations totaling \$153,109. Donations supported a variety of organizations that provide affordable housing programs and organizations that offer a wide-range of community services for low- and moderate-income individuals and their families.

T the CD investments originated within the AA, the MSA, and Statewide, totaled \$2.2 million and represent 4.0 percent of Net Tier One Capital of \$54.2 million, as of December 31, 2013.

Extent to Which the Bank Provides Community Development Services

The bank has an excellent responsiveness when identifying and addressing the CD services needs of the AA. HCSB participated in various CD services, which included board and committee meetings related to the financial needs of the organizations supported and financial-related committee work. A few of the CD services in which HCSB employees participated are described below.

- HCSB's President and an employee serve as a Board Member, Finance Committee Member, and Fundraising Committee member for a local charity. This charity has strategically placed over 80 percent of its fundraising dollars to LMI specific organizations.
- HCSB's employee serves as a Board Member for a local organization. This organization raises funds to support LMI projects within the AA.
- On an annual basis, the HCSB employees dedicate three days each holiday season to manning the kettle collection areas for a local charity. Within this evaluation period, the bank formulated a three-day schedule and provided personnel who have contributed time to raising funds that serve the LMI families in the Weirton area.
- HCSB's officers have served as Board Members, Finance Committee Members, and

Fundraising Committee members for a local organization. This organization supports the financial needs of LMI families in the area. The employees also provide financial education services to LMI families in moderate-income census tracts.

Accessibility of Services

HCSB'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 HCSB's delivery systems, we utilized information related to the population demographics, the bank's branches, and ATM locations.

HCSB operates all four offices within its AA. All four offices are located within middle-income census tracts. The majority of the AA population resides within middle-income AA geographies.

HCSB has not opened, nor closed, any branch offices during the evaluation period.

Additionally, the retail financial services offered are reasonable for the bank's size and AA. The bank's four branch offices have hours of operation typical for the market and have extended hours to 6:00 pm at least one day per week at all the branches. All branches have Saturday hours, and they all have 24-hour, full service ATMs. Other retail services include direct deposit, electronic payment, 24 hour telephone banking, and night depositories. HCSB has an informational website at <http://www.hcsbank.com>. The website provides access to 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 when identifying and addressing the CD needs of its AA. This takes into consideration the bank's capacity and the need and availability of such opportunities for development within the communities of the bank's AA. There were no unidentified, unmet CD needs during the evaluation period.

Responses to Complaints

HCSB did not receive any complaints about its performance in helping to meet credit needs in the AA during this evaluation period. This has a neutral impact on the overall CRA rating.

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 Bank'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.