



**PUBLIC DISCLOSURE**

September 30, 2014

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

First Federal Savings Bank  
Charter Number 707101

301 E 9th St Rochester, IN 46975-1617

Office of the Comptroller of the Currency

Indianapolis Field Office 8777 Purdue Road, Suite 105 Indianapolis, IN 46268

**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 Needs to Improve.**

**The Lending Test is rated: Satisfactory.**

**The Community Development Test is rated: Needs to Improve.**

The major factors that support this rating include:

- First Federal Savings Bank's (FFSB) community development (CD) performance demonstrates a poor responsiveness to the needs of its assessment area (AA) through CD loans and qualified investments. The bank's performance in CD services was adequate, but it was not sufficient to offset deficiencies in community development loans and investments.
- FFSB's loan-to-deposit (LTD) ratio is more than reasonable.
- A substantial majority of FFSB's primary loan products (home purchase and home mortgage refinance) are originated inside the bank's AA.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels.
- FFSB's record of lending in low- and moderate-income areas is reasonable.

## **Scope of Examination**

We utilized the Intermediate Small Bank (ISB) examination procedures to evaluate the bank's record of meeting the credit needs of its community. ISB procedures include a Lending Test and a Community Development Test. The Lending Test focused on the bank's primary lending products, which we determined to be home purchase and home mortgage refinance loans reported under the Home Mortgage Disclosure Act (HMDA). Home mortgage refinance loans were given more weight in the analysis, due to the larger volume of loans. We tested HMDA data to verify the accuracy of the data and determined it to be reliable. We used HMDA loans reported in 2012 and 2013 in our lending test analysis. Demographic data is from the 2010 Census unless otherwise noted.

The Community Development Test considered all activities since the last CRA evaluation, dated April 11, 2011. The Community Development Test evaluates an ISB's performance based on its responsiveness to the needs of its AAs through eligible community development loans, qualified investments, and community development services. The adequacy of a bank's responsiveness depends on its capacity for community development activities, AA needs, and the availability of opportunities within the AAs.

## Description of Institution

FFSB is a federally chartered stock savings bank, wholly owned by American Midwest Financial Corporation, a unitary, non-diversified savings and loan holding company. FFSB is an intrastate bank headquartered in Rochester, IN. The bank has five branches, in addition to the main office, and seven deposit taking automated teller machines (ATMs) in their assessment areas, detailed below. As of June 30, 2014 FFSB had \$373.4 million in total assets. The bank offers a variety of credit and deposit products to its community. Lending products are mainly focused on residential purpose loans in keeping with the bank's business plan, to originate and sell residential loans in the secondary market. Other consumer- and commercial-purpose lending is limited.

As of June 30, 2014, the bank reported \$279.3 million in outstanding loans, reflecting loans and leases to total assets of 74.8 percent. The table below shows a summary of FFSB's loan portfolio, as of June 30, 2014.

<b>FFSB's Investment in Loans (6/30/14 Uniform Bank Performance Report)</b>			
<b>Loan Category</b>	<b>Amount (\$000's)</b>	<b>Percent of Total Loans</b>	<b>Percent of Total Assets</b>
Real Estate	\$277,995	99.5%	74.5%
Commercial Loans	508	0.2%	0.1%
Consumer and Other Loans	773	0.3%	0.2%
Total	\$279,276	100%	74.8%

The bank's ability to meet the credit needs of its AAs is not impaired by its financial condition or other impediments. FFSB was assigned a rating of "Satisfactory" in its prior CRA performance evaluation, dated April 11, 2011.

## Description of Assessment Areas

The bank has three AAs, all receiving full-scope reviews. The AAs consist of two metropolitan statistical areas (MSAs) and one non-MSA in Indiana. The AAs include St. Joseph county in the South Bend-Mishawaka IN-MI MSA, all of the Elkhart-Goshen IN MSA, and a non-MSA AA made up of five Indiana counties in their entirety (Fulton, Kosciusko, Marshall, Pulaski, and Starke counties). The non-MSA AA carried the most weight, since the largest number and dollar volume of loans were made in this AA, then the Elkhart-Goshen MSA AA, and lastly the South Bend-Mishawaka IN-MI MSA AA.

### Non-MSA

The non-MSA AA consists of five counties in Indiana: Fulton, Kosciusko, Marshall, Pulaski, and Starke. The bank's main office and one ATM are located in Fulton County, in a moderate-income census tract. Two full service branches and three ATMs are located in Marshall County, with one branch and two ATMs in a moderate-income tract and one branch and ATM in a middle-income census tract. One branch and ATM are located in Pulaski County, in a middle-income census tract. There are no low-income census tracts, four moderate-income, 35 middle-income, and nine upper-income census tracts in this AA. The FFIEC estimated median family income for 2012 was \$53,600 and \$52,700 for 2013. The average June 2014 unemployment rate for the five counties is down to 5.6 percent according to the Bureau of Labor Statistics. Despite improvements in the economy, a community contact from this assessment

area noted a need for more small business lending. The community contact noted that local financial institutions do a good job with residential lending in the area. He also stated that the community is in need of affordable housing for senior citizens.

Demographic Information for Full Scope Area: <b>FFSB's NonMSA</b>						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	48	0.00	8.33	72.92	18.75	0.00
Population by Geography	182,010	0.00	8.87	71.84	19.29	0.00
Owner-Occupied Housing by Geography	54,813	0.00	6.57	73.61	19.82	0.00
Business by Geography	0	0.00	0.00	0.00	0.00	0.00
Farms by Geography	0	0.00	0.00	0.00	0.00	0.00
Family Distribution by Income Level	51,112	17.42	18.60	23.69	40.29	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	18,412	0.00	13.34	74.34	12.32	0.00
Median Family Income FFIEC Estimated Median Family Income for 2013 Households Below Poverty Level		52,796 52,700 11%	Median Housing Value Unemployment Rate (2010 BLS)	121,433 10.8%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census; Bureau of Labor Statistics (BLS) and 2013 FFIEC Estimated MFI

**Elkhart-Goshen IN MSA**

The Elkhart-Goshen IN MSA is made up of one county, Elkhart County. The bank has one full service branch and ATM in this AA, located in a moderate-income census tract. There are no low-income census tracts, eight moderate-income, 19 middle-income, and nine upper-income census tracts in this AA. The FFIEC estimated median family income for 2012 was \$51,800 and \$51,900 for 2013. The June 2014 unemployment rate for the Elkhart-Goshen IN MSA is down to 5.6 percent according to the Bureau of Labor Statistics. This is an improvement from 2010, when they had one of the highest unemployment rates in the country.

Demographic Information for Full Scope Area: <b>FFSB's Elkhart-Goshen MSA</b>						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	36	0.00	22.22	52.78	25.00	0.00
Population by Geography	197,559	0.00	17.02	53.84	29.14	0.00
Owner-Occupied Housing by Geography	50,922	0.00	13.11	55.62	31.27	0.00
Business by Geography	0	0.00	0.00	0.00	0.00	0.00
Farms by Geography	0	0.00	0.00	0.00	0.00	0.00
Family Distribution by Income Level	50,376	17.81	19.19	22.78	40.22	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	18,638	0.00	25.12	56.68	18.20	0.00
Median Family Income FFIEC Estimated Median Family Income for 2013 Households Below Poverty Level		53,742 51,900 12%	Median Housing Value Unemployment Rate (2010 BLS)	124,510 13.4%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census; Bureau of Labor Statistics (BLS) and 2013 FFIEC Estimated MFI

**South Bend-Mishawaka IN-MI MSA**

The South Bend-Mishawaka IN-MI MSA is made up of two counties, St. Joseph County in Indiana and Cass County in Michigan. The bank's AA includes only St. Joseph County. The bank has one full service branch and ATM in this AA, located in a moderate-income census tract. There are eight low-income, 24 moderate-income, 24 middle-income, and 19 upper-income census tracts in this AA. The FFIEC estimated median family income for 2012 was \$60,300 and \$58,400 for 2013. The June 2014 unemployment rate for the South Bend-Mishawaka IN-MI MSA is down to 6.9 percent according to the Bureau of Labor Statistics. A community contact from this assessment area expressed the need for rental property financing, for purchase and rehabilitation of rental properties. The community contact also noted a need for more affordable housing for senior citizens and identified this as a potential area for community development lending. She also stated that the local homeless shelters were in need of financial help as well as volunteers.

Demographic Information for Full Scope Area: FFSB's South Bend – Mishawaka MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	75	10.67	32.00	32.00	25.33	0.00
Population by Geography	266,931	4.59	27.75	36.27	31.40	0.00
Owner-Occupied Housing by Geography	71,879	2.22	21.95	37.41	38.43	0.00
Business by Geography	0	0.00	0.00	0.00	0.00	0.00
Farms by Geography	0	0.00	0.00	0.00	0.00	0.00
Family Distribution by Income Level	64,970	20.35	18.06	20.94	40.65	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	24,957	7.07	41.63	34.32	16.99	0.00
Median Family Income		57,040	Median Housing Value		115,494	
FFIEC Estimated Median Family Income for 2013		58,400	Unemployment Rate (2010 BLS)		11.3%	
Households Below Poverty Level		13%				

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

Source: 2010 US Census; Bureau of Labor Statistics (BLS) and 2013 FFIEC Estimated MFI

**Conclusions with Respect to Performance Tests**

**LENDING TEST**

FFSB's performance in helping meet the needs of its AAs through lending is satisfactory.

**Loan-to-Deposit Ratio**

FFSB's average LTD ratio is considered more than reasonable. The bank's average quarterly loan-to-deposit (LTD) ratio since the last evaluation is 102.67 percent. This represents 14 quarters from January 1, 2011 through June 30, 2014. During the review period, the LTD ratio ranged from a high of 117.69 percent to a low of 89.23 percent. The FFSB's LTD ratio is well above that of similarly situated banks. When compared to other banks in the same geography with similar asset sizes, FFSB has the highest LTD ratio. The other similarly situated banks have LTD ratios ranging from 53.16 percent to 86.38 percent.

**Lending in Assessment Area**

A substantial majority of the bank's loans are made inside their AAs. For the evaluation period, the bank made 89.34 percent of loans in their AAs by number and 87.71 percent by dollar.

Lending in Assessment Areas										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Mortgage Refinance	3,619	89.56	422	10.44	4,041	\$429,168	87.83	\$59,462	12.17	\$488,630
Home Purchase	1,509	88.82	190	11.18	1,699	\$185,095	87.44	\$26,597	12.56	\$211,692
Totals	5,128	89.34	612	10.66	5,740	\$614,263	87.71	\$86,059	12.29	\$700,322

Source: Data reported under 2012-2013 HMDA

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

The overall distribution of FFSB's home purchase and home mortgage refinance loans to low- and moderate-income borrowers reflects reasonable penetration.

Non-MSA

The bank's overall distribution to borrowers of low- and moderate-income in the non-MSA AA is reasonable. The bank's percentage of home purchase and home mortgage refinance loans made to low-income borrowers is similar to that of other lenders in the AA. Home purchase loans and home mortgage refinance loans to moderate-income borrowers is also comparable to the percentage of loans made by other lenders in the area and is reasonable.

Borrower Distribution of Residential Real Estate Loans in Non-MSA Assessment Area					
Borrower Income Level	% Total FFSB Loans		% of Loans by AA Lenders		% of AA Families by Income Level
Loan Type	Purchase	Refinance	Purchase	Refinance	
Low	10.90	5.42	11.21	5.32	17.42
Moderate	26.64	18.35	28.23	17.24	18.60
Middle	19.45	25.10	24.08	25.83	23.69
Upper	43.00	51.14	36.48	51.61	40.29

Source: Data reported under 2012-2013 HMDA; 2012 Peer Mortgage Data; and 2010 U.S. Census Data.

Elkhart-Goshen IN MSA

The bank's overall distribution to borrowers of low- and moderate-income in the Elkhart-Goshen MSA AA is reasonable. The bank's percentage of home purchase and home mortgage refinance loans to low-income borrowers is similar to that of other lenders in the AA. Home purchase loans to moderate-income borrowers is below that of other lenders in the AA but exceeds the percentage of moderate-income families in the AA. The bank's home mortgage refinance loans made to moderate-income borrowers is just slightly below those made by other lenders in the AA and is reasonable.

Borrower Distribution of Residential Real Estate Loans in Elkhart-Goshen IN MSA Assessment Area					
Borrower Income Level	% Total FFSB Loans		% of Loans by AA Lenders		% of AA Families by Income Level
	Purchase	Refinance	Purchase	Refinance	
Low	10.00	5.22	11.86	7.16	17.81
Moderate	20.94	14.30	32.87	17.81	19.19
Middle	26.25	24.25	27.76	25.83	22.78
Upper	42.81	56.22	27.52	49.21	40.22

Source: Data reported under 2012-2013 HMDA; 2012 Peer Mortgage Data; and 2010 U.S. Census Data.

**South Bend-Mishawaka IN-MI MSA**

The bank’s overall distribution to low- and moderate-income borrowers in the South Bend-Mishawaka IN-MI MSA AA is reasonable. The bank’s lending to low-income borrowers is slightly below that of other lenders in the assessment area for home purchase loans, and is similar to other lenders for home mortgage refinance loans. The bank's home purchase lending to moderate-income borrowers is also slightly below that of other lenders; however, it exceeds the percentage of moderate-income families in the AA. Home mortgage refinance lending, by the bank, is similar to that of other lenders in the AA and exceeds the percentage of moderate-income families in the AA.

Borrower Distribution of Residential Real Estate Loans in South Bend-Mishawaka IN-MI MSA Assessment Area					
Borrower Income Level	% Total FFSB Loans		% of Loans by AA Lenders		% of AA Families by Income Level
	Purchase	Refinance	Purchase	Refinance	
Low	12.30	8.31	18.66	9.18	20.35
Moderate	21.73	18.73	29.69	19.50	18.06
Middle	24.61	24.65	22.93	25.95	20.94
Upper	41.36	48.31	28.72	45.36	40.65

Source: Data reported under 2012-2013 HMDA; 2012 Peer Mortgage Data; and 2010 U.S. Census Data.

**Geographic Distribution of Loans**

The overall geographic distribution of FFSB’s home purchase loans and home mortgage refinance loans in low- and moderate-income geographies reflects reasonable dispersion.

**Non-MSA**

There are no low-income census tracts in the AA. The bank's dispersion of loans to moderate-income census tracts is considered excellent. The bank's percentage of home purchase loans in moderate-income census tracts is well above the percentage made by other lenders in the AA and is also above the percentage of owner occupied housing units in the AA. The bank's percentage of home mortgage refinance loans is also above other lenders in the AA and similar to the percentage of owner-occupied housing units in the AA. The bank made loans in all census tracts in this assessment area.

Geographic Distribution of Residential Real Estate Loans in Non-MSA Assessment Area					
Census Tract Income Level	% Total FFSB Loans		% of Loans by AA Lenders		% of AA Owner Occupied Housing Units
	Purchase	Refinance	Purchase	Refinance	
Low	0.00	0.00	0.00	0.00	0.00
Moderate	10.16	6.03	6.19	4.34	6.57
Middle	64.31	66.13	69.74	69.75	73.61
Upper	25.53	27.84	24.07	25.90	19.82

Source: Data reported under 2012-2013 HMDA; 2012 Peer Mortgage Data; and 2010 U.S. Census Data.

Elkhart-Goshen IN MSA

There are no low-income census tracts in the Elkhart-Goshen IN MSA. The dispersion of loans to moderate-income census tracts is poor. The bank's percentage of home purchase and home mortgage refinance loans in moderate-income census tracts is below that of other lenders in the AA and is also considerably lower than the percentage of owner-occupied housing units in the AA. The bank made loans in 35 of the 36 census tracts in this area. While the bank's deposit market share is low in this AA, the bank originated 22 percent of its primary product loans in this AA. Dispersion of loans to moderate-income tracts is poor given the level of lending within the AA.

Geographic Distribution of Residential Real Estate Loans in Elkhart-Goshen IN MSA Assessment Area					
Census Tract Income Level	% Total FFSB Loans		% of Loans by AA Lenders		% of AA Owner Occupied Housing Units
	Purchase	Refinance	Purchase	Refinance	
Low	0.00	0.00	0.00	0.00	0.00
Moderate	6.25	4.98	9.28	8.34	13.11
Middle	55.63	52.86	54.56	51.99	55.62
Upper	38.13	42.16	36.16	39.67	31.27

Source: Data reported under 2012-2013 HMDA; 2012 Peer Mortgage Data; and 2010 U.S. Census Data.

South Bend-Mishawaka IN-MI MSA

The dispersion of loans to low- and moderate-income census tracts is reasonable. The bank's percentage of home purchase and home mortgage refinance loans in low-income census tracts is similar to the percentage made by other lenders in the AA. The bank's percentage of home purchase and home mortgage refinance loans in moderate-income census tracts is below that of other AA lenders. The bank made loans in a majority of the census tracts in this AA; loans were made in 64 of the 75 census tracts.

Geographic Distribution of Residential Real Estate Loans in South Bend-Mishawaka IN-MI MSA Assessment Area					
Census Tract Income Level	% Total FFSB Loans		% of Loans by AA Lenders		% of AA Owner Occupied Housing Units
	Purchase	Refinance	Purchase	Refinance	
Low	0.26	0.56	0.79	0.52	2.22
Moderate	14.40	9.30	17.77	11.45	21.95
Middle	41.36	38.73	35.10	33.19	37.41
Upper	43.98	51.41	46.33	54.84	38.43

Source: Data reported under 2012-2013 HMDA; 2012 Peer Mortgage Data; and 2010 U.S. Census Data.

**Responses to Complaints**

There were no consumer complaints relating to the bank's CRA performance during the evaluation period.

**COMMUNITY DEVELOPMENT TEST**

FFSB's community development performance is rated needs to improve. FFSB demonstrates poor responsiveness to the community development needs of its assessment areas through its level of community development loans and qualified investments. FFSB demonstrates adequate responsiveness to community development needs of its assessment areas through community development services.



## **Number and Amount of Community Development Loans**

The bank's community development lending performance demonstrates poor responsiveness to the community development needs of its AAs through qualified loans considering the bank's capacity and the need and availability of such opportunities in the bank's AAs. FFSB made only seven loans totaling \$50,966 during the review period. Community development lending is also down significantly from the last performance evaluation when the bank made an \$80,000 loan in the non-MSA and 38 loans totaling \$186,000 in the Elkhart-Goshen IN MSA. No community development loans were made in the bank's non-MSA AA, which receives the most weight, during this review period.

### Non-MSA

FFSB did not make any community development loans in the non-MSA AA during the review period. As noted above, the community contact from this assessment area noted a need for more small business lending and the need for affordable housing for senior citizens. This is considered very poor responsiveness.

### Elkhart-Goshen IN MSA

FFSB participates in the Elkhart County Housing Fund administered by LaCasa, Inc., a Neighborworks America affiliate located in Goshen, Indiana. Through the fund, the agency provides first and second mortgages for home purchase and rehabilitation to low-and moderate-income borrowers who are not able to obtain financing elsewhere. FFSB participated in seven loans during the review period, for a total funded amount of \$50,966. This is down significantly from the 38 community development loans totaling \$186,000 that the bank participated in during the last performance evaluation. This is considered poor responsiveness.

### South Bend-Mishawaka IN-MI MSA

FFSB did not make any community development loans in the South Bend-Mishawaka IN-MI MSA AA during the review period. As noted above, the community contact expressed the need for rental property financing, for purchase and rehabilitation of rental properties, as well as the need for more affordable housing for senior citizens and identified this AA as a potential area for community development lending. This is considered very poor responsiveness.

## **Number and Amount of Qualified Investments**

The bank's qualified investment performance demonstrates poor responsiveness to the community development needs of its AAs through qualified investments considering the bank's capacity and the need and availability of such opportunities in the bank's AAs. FFSB made a total of \$141,242 in qualified investments, during the review period, in the form of grants and donations. The bank made approximately \$101,000 in community development investments during the last performance evaluation; however, more than half of those investments were in the non-MSA and Elkhart-Goshen IN MSA AAs, which carry more weight. During this review period, less than a third of community development investments were made in those two AAs.

### Non-MSA

FFSB's community development investment performance demonstrates poor responsiveness to the community development needs of the non-MSA AA. The bank provided donations and grants totaling \$35,841 in this AA during the review period. The donations and grants were to various organizations in the assessment area that assist low-and moderate-income individuals

and support affordable housing. The organizations include homeless shelters, food pantries, Habitat for Humanity, and various organizations supporting low- and moderate-income youth.

Elkhart-Goshen IN MSA

FFSB's community development investment performance demonstrates poor responsiveness to the community development needs of the Elkhart-Goshen AA. The bank provided donations and grants totaling \$2,405 in the AA during the review period. The donations and grants were to various organizations in the assessment area that assist low-and moderate-income individuals and support affordable housing. The organizations provide services to the homeless, support affordable housing, and provide support to those living in poverty.

South Bend-Mishawaka IN-MI MSA

FFSB's community development investment performance demonstrates adequate responsiveness to the community development needs of the South Bend-Mishawaka AA. FFSB made a financial commitment to the Monroe Circle Community Center, donating \$98,996 during the review period, to run the financial literacy program. The bank also donated \$3,500 to the Center for the Homeless and \$500 to Entermision Son City Kids in St. Joseph County. Qualified investments in the South Bend-Mishawaka IN-MI MSA AA totaled \$102,996 during the review period.

**Extent to Which the Bank Provides Community Development Services**

The bank's community development service performance demonstrates adequate responsiveness to the community development needs of its AAs through community development services considering the bank's capacity and the need and availability of such opportunities in the bank's AAs. FFSB employees provided community development services to multiple organizations, prepared all loan-closing documents for the Fulton County Habitat for Humanity chapter, and modified 170 loans for struggling borrowers.

Non-MSA

FFSB's community development service performance demonstrates adequate responsiveness to the community development needs of its non-MSA AA.

Three employees provided ongoing community development services to three organizations during the review period. The services include serving on the Board of Directors for Habitat for Humanity and providing financial counseling to families, serving as the President of Kiwanis and overseeing the financial stability of the local chapter, and assisting the Pulaski County Revolving Loan Committee with small business lending.

In addition to the services above, multiple employees completed loan-closing documents for the Fulton County chapter of Habitat for Humanity and assisted with loan modifications in this AA.

Elkhart-Goshen IN MSA

FFSB's community development service performance demonstrates poor responsiveness to the community development needs of its Elkhart-Goshen AA through qualified services. Services in this AA were limited to employees who provided community development services by assisting with loan modifications in this AA.

South Bend-Mishawaka IN-MI MSA

FFSB's community development service performance demonstrates adequate responsiveness to the community development needs of its South Bend-Mishawaka AA through qualified services.

Ten employees provided community development services to two organizations during the review period. The services include organizing and teaching a financial management class to low- and moderate-income individuals at Bridges Out of Poverty and a partnership with Monroe Circle Community Center (MC3). FFSB partnered with MC3 to develop a program with the goal of providing financial literacy education to low-and moderate-income members of the community. The partnership includes an ongoing program to teach a six-week financial literacy course to adults, and twice-weekly classes to teens and children. The courses are based on the Dave Ramsey "Financial Peace University" program. Multiple employees also assisted with loan modifications in this AA.

### **Responsiveness to Community Development Needs**

The bank's community development performance demonstrates poor responsiveness to the community development needs of its AAs through community development loans and qualified investments. Community development services demonstrate adequate responsiveness, but are not sufficient to offset poor responsive through community development loans and investments.

### **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.