



PUBLIC DISCLOSURE

June 17, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Peshtigo National Bank
Charter Number 5658

250 French Street
Peshtigo, WI 54157

Office of the Comptroller of the Currency

Milwaukee Field Office
1200 North Mayfair Road, Suite 200
Wauwatosa, WI 53226

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

Summarize the major factors supporting the institution's rating.

- The loan-to-deposit ratio is reasonable given the bank's size, financial condition, and credit needs of the assessment area (AA).
- A substantial majority of loan originations are made within the bank's assessment areas.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects excellent dispersion throughout the assessment areas.

SCOPE OF EXAMINATION

We evaluated Peshtigo National Bank's (PNB) Community Reinvestment Act (CRA) performance using the Small Bank Lending Test. Data from the bank's primary loan products, residential real estate loans and farm loans, were used to evaluate the bank's lending performance.

The evaluation period covered the date from the previous CRA examination, December 4, 2007 through June 17, 2013. The lending test evaluated home mortgage loans and farm loans originated between January 1, 2011 and December 31, 2012. Prior to conducting this evaluation, the accuracy of the bank's Home Mortgage Disclosure Act (HMDA) data for 2011 and 2012 was tested. The data was found to be accurate, therefore all reported HMDA data for both years was used in evaluating home mortgage lending. To evaluate agricultural lending, data from both the bank's loan trial balance as well as a random sample of farm loans was used. The most recent demographic data available was obtained.

PNB's Marinette/Shawano County, Wisconsin assessment area and the Oconto County (Green Bay Metropolitan Statistical Area), Wisconsin assessment area were selected for full scope reviews. The bank's Menominee, Michigan assessment area was selected for a limited scope review. The bank does not have a branch or automated teller machine located in this area but it is contiguous to the bank's Wisconsin Non-MSA assessment area.

DESCRIPTION OF INSTITUTION

Peshtigo National Bank has total assets of \$174 million with its main office located in Peshtigo, Wisconsin. The bank operates four full-service branches located in Marinette, Coleman, Gillett, and Oconto Falls, all in Wisconsin. Three of the bank's branches are located in middle-income census tracts (CT). The Oconto Falls branch is located in a

moderate-income census tract. All locations have similar hours of operation. The institution is wholly owned by Peshtigo Bancorporation; a one-bank holding company located in Peshtigo, Wisconsin.

The bank's business strategy is focused on agricultural and residential real estate lending. The bank offers traditional community bank products and services. As of March 31, 2013, the loan portfolio represented 65 percent of total assets. The bank's loan portfolio consists of (35 percent) residential real estate, (32 percent) agricultural, (27 percent) commercial, and (6 percent) other consumer loans by dollar volume.

The bank offers Farm Services Agency (FSA) and Wisconsin Housing and Economic Development Authority (WHEDA) loans. The bank has approximately \$7 million FSA loans and approximately \$500 thousand in WHEDA loans outstanding as of January 31, 2013.

There are no legal or financial impediments limiting the bank's ability to meet community credit needs of its assessment area. The previous CRA examination dated December 3, 2007 resulted in a Satisfactory rating.

DESCRIPTION OF ASSESSMENT AREA(S)

Peshtigo National Bank has three assessment areas, including one assessment area in a Metropolitan Statistical Area (MSA). The MSA assessment area (AA) consists of Oconto County, which is part of the Green Bay MSA. The non-MSA AA in Wisconsin includes all of Marinette and Shawano Counties. The non-MSA AA in Michigan includes a portion of Menominee County. The bank's AA has a total of 29 CTs; zero low-, nine moderate-, 19 middle-, and one upper-income census tract. The AA complies with regulatory requirements and does not arbitrarily exclude low or moderate-income geographies.

Marinette County Non-MSA AA

According to the 2010 census data, the total population of the bank's AA is 54,135 with 15,916 families in the AA. The median family income (MFI) is \$51,917. The HUD updated median family income is \$59,900. Family income levels in the AA show 22 percent for low-income families, 21 percent for moderate-income families, 23 percent for middle-income families, and 34 percent for upper-income families. The percent of families below the poverty level is 9 percent.

Under the prior 2000 census data, the total population of the bank's AA is 55,175 with 15,309 families in the AA. The median family income (MFI) is \$44,209. The HUD updated median family income is \$59,100. Family income levels in the AA show 18 percent for low-income families, 22 percent for moderate-income families, 26 percent for middle-income families, and 34 percent for upper-income families. The percent of families below the poverty level is 5 percent.

The local economy is characterized as being stable to improving. Small manufacturing companies, farms, and agricultural support services make up the major employers in the area. A local ship builder was awarded a large government contract which has helped the local economy significantly. The annual unemployment rate in 2012 for Marinette County was 8.0 percent and Shawano County was 7.7 percent, which is slightly less than the State unemployment rate. The annual unemployment rate for the state of Wisconsin in 2012 was 9 percent.

Oconto County MSA AA

According to the 2010 census data, the total population of the bank's AA is 34,904 with 10,579 families in the AA. The median family income (MFI) is \$57,734. The HUD updated median family income is \$68,500. Family income levels in the AA show 24 percent for low-income families, 20 percent for moderate-income families, 25 percent for middle-income families, and 31 percent for upper-income families. The percent of families below the poverty level is 9 percent.

Under the prior 2000 census data, the total population of the bank's AA is 27,512 with 7,652 families in the AA. The median family income (MFI) is \$49,803. The HUD updated median family income is \$67,600. Family income levels in the AA show 18 percent for low-income families, 23 percent for moderate-income families, 30 percent for middle-income families, and 29 percent for upper-income families. The percent of families below the poverty level is 5 percent.

Competition from other financial institutions is strong in the local market. The bank's competitors include multi-state banks, branches of state banks, and several credit unions. As of June 30, 2012, PNB's market share for total deposits is 8 percent and ranks fourth out of 23 institutions.

In assessing the bank's CRA performance, we contacted two local community representatives to determine the community's profile and performance of local financial institutions. The contacts stated that local financial institutions are meeting the credit needs of the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Loan-to-Deposit Ratio

PNB's loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. The bank's quarterly LTD ratio averaged 76 percent over the 22 quarters from December 31, 2007 to March 31, 2013, which ranks fourth in a peer group of nine other similarly situated banks. The other banks had average assets from \$23 million to \$304 million. The average loan-to-deposit ratio for all the banks ranged from 42 percent to 85 percent over the same time period.

Lending in Assessment Area

The bank originates a substantial majority of its loans to borrowers within its AA. The random sample of the bank’s primary loan products shows 93 percent by number and 93 percent by dollar volume of loans were originated within the bank’s AA.

| Lending in the Assessment Area | | | | | | | | | | |
|---------------------------------------|-----------------|-------|---------|------|-------|-------------------------|-------|---------|-------|--------|
| Loan Type | Number of Loans | | | | | Dollars of Loans (000s) | | | | |
| | Inside | | Outside | | Total | Inside | | Outside | | Total |
| | # | % | # | % | | \$ | % | \$ | % | |
| 2011 Home Mortgages | 108 | 93.10 | 8 | 6.90 | 116 | 7,891 | 93.84 | 518 | 6.16 | 8,409 |
| 2012 Home Mortgages | 93 | 93.00 | 7 | 7.00 | 100 | 7,769 | 93.03 | 582 | 6.97 | 8,351 |
| Farm Loans | 35 | 92.11 | 3 | 7.89 | 38 | 2,136 | 89.41 | 253 | 10.59 | 2,389 |
| Totals | 236 | 92.92 | 18 | 7.08 | 254 | 17,769 | 92.92 | 1,353 | 7.08 | 19,122 |

Source: 2011 & 2012 HMDA data and Bank records (verified by examiners)

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

The overall distribution of borrowers reflects reasonable penetration among individuals of different income levels and farms of different sizes. The bank’s primary loan products, residential real estate and agriculture loans, were used in our sample. More weight will be given to the Oconto County AA since the bank has seen the most loan growth over the past year in this area.

Marinette County Non-MSA AA

The borrower distribution of home mortgage loans in 2011 within the AA is reasonable. The bank is slightly lower than the area demographic for low-income borrowers, and the bank exceeds the demographics for moderate-income borrowers. The bank made 14 percent of home mortgage loans to low-income borrowers and 27 percent to moderate-income borrowers.

| 2011 Borrower Distribution of Home Mortgage Loans in the NonMSA 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 Mortgage | 18.21% | 14.29% | 21.54% | 26.98% | 25.94% | 17.46% | 34.31% | 41.27% |

Source: 2011 HMDA data and U.S. Census Demographic Data.

The borrower distribution of farm loans in 2011 within the AA is reasonable. As the following table shows, the number of loans originated to farms with revenues under \$1 million is slightly less than the demographic data. The percent of assessment area farms with revenues less than \$1 million is 99 percent. The bank made 89 percent of its

total farm loans by number and 96 percent by dollar to farms with revenues of less than \$1 million.

| 2011 Borrower Distribution of Loans to Farms in the NonMSA AA | | | | |
|--|--------------|--------------|-------------------------|-------|
| Farm Revenues (or Sales) | ≤\$1,000,000 | >\$1,000,000 | Unavailable/ Unknown | Total |
| % of AA Farms | 98.57 | 1.19 | 0.24 | 100% |
| % of Bank Loans in AA by # | 89.47 | 10.53 | 0 | 100% |
| % of Bank Loans in AA by \$ | 96.20 | 3.80 | 0 | 100% |

Source: Sample of 20 bank records from 2011 (verified by examiners) and Dun & Bradstreet Business Demographic Data.

The borrower distribution of home mortgage loans for 2012 within the AA is excellent. The bank is higher than the area demographic for both low- and moderate-income borrowers. The data shows that 22 percent of home mortgage loans were to low-income borrowers, while the number of low-income families in the AA is 22 percent. The bank made 26 percent of its loans to moderate-income borrowers, which exceeds the demographics of 21 percent of moderate-income families in the AA.

| 2012 Borrower Distribution of Home Mortgage Loans in the NonMSA AA | | | | | | | | |
|---|---------------------|----------------------------|---------------------|----------------------------|---------------------|----------------------------|---------------------|----------------------------|
| Borrower Income Level | Low | | Moderate | | Middle | | Upper | |
| | % of AA Families | % of Number of Loans |
| Home Mortgage | 21.83% | 22.00% | 21.00% | 26.00% | 23.06% | 26.00% | 34.10% | 24.00% |

Source: 2012 HMDA data and U.S. Census Demographic Data.

The borrower distribution of farm loans for 2012 within the AA is reasonable; although the number of loans originated to farms with revenues under \$1 million is less than the demographic data. This AA was not a major area of growth in agricultural loans during this timeframe. The percent of assessment area farms with revenues less than \$1 million is 99 percent. The bank made 86 percent of its total farm loans by number and 91 percent by dollar to farms with revenues of less than \$1 million.

| 2012 Borrower Distribution of Loans to Farms in the NonMSA AA | | | | |
|--|--------------|--------------|-------------------------|-------|
| Farm Revenues (or Sales) | ≤\$1,000,000 | >\$1,000,000 | Unavailable/ Unknown | Total |
| % of AA Farms | 98.56 | 1.20 | 0.24 | 100% |
| % of Bank Loans in AA by # | 86.36 | 13.64 | 0 | 100% |
| % of Bank Loans in AA by \$ | 91.41 | 8.59 | 0 | 100% |

Source: Sample of 22 bank records from 2012 (verified by examiners) and Dun & Bradstreet Business Demographic Data.

Oconto County MSA AA

The borrower distribution of home mortgage loans for 2011 within the AA is excellent. The bank exceeds the area demographic for low-income and moderate-income borrowers. The bank made 23 percent of home mortgage loans to low-income borrowers and 27 percent to moderate-income borrowers. The demographics show 18 percent of AA families are low-income and 23 percent of AA families are moderate-income.

| 2011 Borrower Distribution of Home Mortgage Loans in the Oconto Co 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 Mortgage | 17.72% | 22.73% | 23.03% | 27.27% | 29.64% | 25.00% | 29.61% | 25.00% |

Source: 2011 HMDA data and U.S. Census Demographic Data.

The borrower distribution of farm loans for 2011 within the AA is excellent. Based on our sample, the bank made 100 percent of its loans to farms less than \$1 million in revenues. The area demographics show 99 percent of assessment area farms with revenues less than \$1 million.

| 2011 Borrower Distribution of Loans to Farms in the Oconto Co AA | | | | |
|--|--------------|--------------|---------------------|-------|
| Farm Revenues (or Sales) | ≤\$1,000,000 | >\$1,000,000 | Unavailable/Unknown | Total |
| % of AA Farms | 99.31 | 0.34 | 0.34 | 100% |
| % of Bank Loans in AA by # | 100 | 0 | 0 | 100% |
| % of Bank Loans in AA by \$ | 100 | 0 | 0 | 100% |

Source: Sample of 20 bank records from 2011 (verified by examiners) and Dun & Bradstreet Business Demographic Data.

The borrower distribution of home mortgage loans for 2012 within the AA is reasonable. The bank is less than the area demographic for low-income and exceeds the demographic for moderate-income borrowers. The bank made 13 percent of home mortgage loans to low-income borrowers and 36 percent to moderate-income borrowers. The demographics show 24 percent of AA families are low-income and 20 percent of AA families are moderate-income.

| 2012 Borrower Distribution of Home Mortgage Loans in the Oconto Co 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 Mortgage | 23.98% | 12.82% | 20.36% | 35.90% | 24.29% | 25.64% | 31.36% | 25.64% |

Source: 2012 HMDA data and U.S. Census Demographic Data.

The borrower distribution of farm loans for 2012 within the AA is reasonable. The number of loans originated to farms with revenues under \$1 million is slightly less than the demographic data. The percentage of AA farms with revenues less than \$1 million is 99 percent. The bank made 95 percent of its loans by number and 95 percent by dollar to farms with revenues less than \$1 million.

| 2012 Borrower Distribution of Loans to Farms in the Oconto Co AA | | | | |
|--|--------------|--------------|-------------------------|-------|
| Farms Revenues (or Sales) | ≤\$1,000,000 | >\$1,000,000 | Unavailable/ Unknown | Total |
| % of AA Farms | 98.86 | 0.85 | 0.28 | 100% |
| % of Bank Loans in AA by # | 95.45 | 4.55 | 0 | 100% |
| % of Bank Loans in AA by \$ | 94.94 | 5.06 | 0 | 100% |

Source: Sample of 22 bank records from 2012 (verified by examiners) and Dun & Bradstreet Business Demographic Data.

Geographic Distribution of Loans

The overall geographic distribution of loans reflects excellent dispersion throughout the Oconto County assessment area and poor dispersion throughout the Marinette County assessment area. More weight is given to the Oconto County AA since the most loan growth over the past year has been in this area. The bank has no low-income census tracts in the assessment areas.

Marinette County Non-MSA AA

In 2011, the geographic distribution of home mortgage loans in the bank's AA is poor. The demographic data shows 9 percent of assessment area owner occupied housing in moderate-income census tracts, and the bank made 2 percent of its loans in moderate-income census tracts.

| 2011 Geographic Distribution of Home Mortgage Loans in the NonMSA 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 Mortgage | 0.00% | 0.00% | 8.90% | 1.59% | 85.81% | 96.83% | 5.30% | 1.59% |

Source: 2011 HMDA data and U.S. Census Demographic Data

The geographic distribution of farms loans in the bank's AA is poor. The random loan sample used did not contain any farm loans located in the bank's moderate-income census tracts. The demographic data shows that 3 percent of the AA's farms are located in moderate-income census tracts.

| 2011 Geographic Distribution of Loans to Farms in the NonMSA AA | | | | | | | | |
|---|---------------|----------------------|---------------|----------------------|---------------|----------------------|---------------|----------------------|
| Census Tract Income Level | Low | | Moderate | | Middle | | Upper | |
| Loan Type | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans |
| Farms | 0.00% | 0.00% | 3.33% | 0.00% | 93.82% | 100% | 2.85% | 0.00% |

Source: Sample of 20 bank records from 2011 (verified by examiners) and Dun & Bradstreet Business Demographic Data

In 2012, the geographic distribution of home mortgage loans in the bank's AA is poor. The demographic data shows 32 percent of assessment area owner occupied housing in moderate-income census tracts, and the bank made 10 percent of its loans in moderate-income census tracts.

| 2012 Geographic Distribution of Home Mortgage Loans in the NonMSA 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 Mortgage | 0.00% | 0.00% | 31.54% | 10.00% | 62.37% | 88.00% | 6.09% | 2.00% |

Source: 2012 HMDA data and U.S. Census Demographic Data

The geographic distribution of farms loans in the bank's AA is excellent. The random loan sample shows that 41 percent of the bank's loans are located in the moderate-income census tracts. The demographic data shows that 16 percent of the AA's farms are located in moderate-income census tracts.

| 2012 Geographic Distribution of Loans to Farms in the NonMSA AA | | | | | | | | |
|---|---------------|----------------------|---------------|----------------------|---------------|----------------------|---------------|----------------------|
| Census Tract Income Level | Low | | Moderate | | Middle | | Upper | |
| Loan Type | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans |
| Farms | 0.00% | 0.00% | 16.03% | 40.91% | 80.86% | 59.09% | 3.11% | 0.00% |

Source: Sample of 22 bank records from 2012 (verified by examiners) and Dun & Bradstreet Business Demographic Data

Oconto County MSA AA

In 2011, the geographic distribution of home mortgage loans in the bank's AA is excellent. The demographic data shows 11 percent of assessment area owner-occupied housing in moderate-income census tracts, and the bank made 39 percent of its loans in moderate-income census tracts.

| 2011 Geographic Distribution of Home Mortgage Loans in the Oconto Co 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 Mortgage | 0.00% | 0.00% | 10.54% | 38.64% | 89.46% | 61.36% | 0.00% | 0.00% |

Source: 2011 HMDA data and U.S. Census Demographic Data

The geographic distribution of farms loans in the bank's AA is excellent. The random loan sample shows that 54 percent of the bank's loans are located in the moderate-income CTs. The demographic data shows that 18 percent of the AA's farms are located in moderate-income census tracts.

| 2011 Geographic Distribution of Loans to Farms in the Oconto Co AA | | | | | | | | |
|--|---------------|----------------------|---------------|----------------------|---------------|----------------------|---------------|----------------------|
| Census Tract Income Level | Low | | Moderate | | Middle | | Upper | |
| Loan Type | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans |
| Farms | 0.00% | 0.00% | 17.83% | 54.17% | 82.47% | 45.83% | 0.00% | 0.00% |

Source: Sample of 24 bank records from 2011 (verified by examiners) and Dun & Bradstreet Business Demographic Data

In 2012, the geographic distribution of home mortgage loans in the bank's AA is excellent. The demographic data shows 37 percent of assessment area owner occupied housing in moderate-income census tracts, and the bank made 49 percent of its loans in moderate-income census tracts.

| 2012 Geographic Distribution of Home Mortgage Loans in the Oconto Co 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 Mortgage | 0.00% | 0.00% | 36.99% | 48.72% | 63.01% | 51.28% | 0.00% | 0.00% |

Source: 2012 HMDA data and U.S. Census Demographic Data

The geographic distribution of farms loans in the bank's AA is excellent. The random loan sample shows that 50 percent of the bank's loans are located in the moderate-income CTs. The demographic data shows that 34 percent of the AA's farms are located in moderate-income census tracts.

| 2012 Geographic Distribution of Loans to Farms in the Oconto Co AA | | | | | | | | |
|--|---------------|----------------------|---------------|----------------------|---------------|----------------------|---------------|----------------------|
| Census Tract Income Level | Low | | Moderate | | Middle | | Upper | |
| Loan Type | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans | % of AA Farms | % of Number of Loans |
| Farms | 0.00% | 0.00% | 34.38% | 50.0% | 65.63% | 50.0% | 0.00% | 0.00% |

Source: Sample of 22 bank records from 2012 (verified by examiners) and Dun & Bradstreet Business Demographic Data

Conclusions for Areas Receiving Limited Scope Review

Based on a limited scope review, the bank's performance in the Menominee, Michigan assessment area is consistent with the bank's overall performance. The bank's lending performance in this area is comparable to the other assessment areas. Consideration was given to such factors as location of the branch in proximity of this area, competition, and the bank's business strategy.

Responses to Complaints

The bank has not received any CRA-related complaints since the last CRA examination.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment areas by an affiliate whose loans have been considered as part of the bank's lending performance.

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