



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

May 20, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Bank of Greene County
Charter Number 718028

302 Main Street, Catskill, NY 12414

Office of the Comptroller of the Currency
340 Madison Avenue, New York, NY 10173

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Satisfactory.

The following are the major factors supporting the institution's rating:

- The bank's loan-to-deposit ratio is more than reasonable based on the institution's size, financial condition, and the assessment area's credit needs;
- The bank originated a substantial majority of its loans to borrowers within its assessment area;
- The bank's distribution of home loans to borrowers reflects excellent penetration among moderate-income borrowers and a reasonable penetration among low-income borrowers;
- The bank's distribution of home loans to borrowers reflects reasonable dispersion among moderate-income geographies; and
- The bank demonstrated adequate responsiveness to the community development needs in its assessment area.

Scope of Examination

The Bank of Greene County ("TBGC" or "the bank") was evaluated under the Intermediate Small Bank (ISB) examination procedures, which include a lending test and a community development (CD) test. The lending test evaluates the bank's record of meeting the credit needs of its assessment area (AA) through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AA through CD lending, qualified investments, and community development services.

The evaluation period under the lending test covers the bank's performance from January 1, 2009 through December 31, 2011, as this is representative of its strategy since the last CRA Examination and is consistent with 2000 Census Demographic Data. The evaluation period for the CD test is from January 1, 2009 through December 31, 2011.

BGC's primary loan product is home mortgage loans. The bank reports data under the requirements of the Home Mortgage Disclosure Act (HMDA). Prior to this evaluation, we tested the accuracy of BGC's HMDA data and found it to be reliable. Therefore,

HMDA data from January 1, 2009 to December 31, 2011 was used to evaluate the bank’s lending performance. CD loans, investments, and services submitted by management were verified to ensure that they met the regulatory definition for community development.

Table 1 depicts the maximum income amount for each income range in the bank’s AA. The income ranges below were used during our lending test analysis to determine the borrower’s income level for each sampled loan.

Table 1 - Definition of Income Ranges Used in the Evaluation					
Income Category	Maximum Income in for Income Range				2011 Median Family Income (MFI)
	Low	Moderate	Middle	Upper	
% Range of MFI	<50%	50%-<80%	80%-<120%	≥120%	
Greene and Columbia Counties (non-MSA)	\$23,664	\$37,862	\$56,794	\$56,795	\$47,329
Albany County (MSA)	\$27,987	\$44,779	\$67,169	\$67,170	\$55,975

Source: 2000 US Census; 2011 HUD updated MFI

Description of Institution

BGC is a federally chartered stock thrift institution headquartered in Catskill, New York. The bank is located approximately 33 miles south of Albany, NY. As of December 31, 2012, BGC had total assets of \$625 million and total capital of \$52 million.

As of June 30, 2012, BGC operates twelve full-service offices in Greene, Columbia, and Albany Counties. The main office is located in Catskill, Greene County, as are six other branches. Four branches are in Columbia County and two branches are in Albany County. All branches have on-site automated-teller machines (ATMs). Nine of twelve branches offer extended hours on Thursdays and/or Fridays. Ten of twelve branches offer Saturday hours. Three branches opened – one in Chatham, NY, in January, 2008; one in Ravena, NY, in January 2009, and one in Germantown, NY, in October 2010. No branches closed. No mergers or acquisitions occurred during this period as well. The Ghent and Germantown branches are located in upper-income census tracts (CT). The main office in Catskill is located in a middle-income CT. One branch in Hudson is located in a moderate-income CT.

Table 2 represents the branch and deposit distribution by CT income category.

Table 2 - Distribution of Branch Offices in the Assessment Areas				
Census Tract Income Category	Branch Distribution in Non-MSA		Branch Distribution in MSA	
	% of Branches	% of Deposits	% of Branches	% of Deposits
Low	0%	0%	0%	0%
Moderate	10%	6%	0%	0%
Middle	70%	90%	100%	100%
Upper	20%	4%	0%	0%
Total #	10	\$ 487,132	2	\$ 30,513

Source: FDIC Deposit Market Share Report

The bank attracts retail depositors and offers a number of loan products and deposit services through its branch network. BGC offers several residential loan products including loans for the purchase and refinance of a home, home equity installment loans, and home equity lines of credit. Deposit products include personal checking accounts, personal savings and certificates of deposit accounts, and retirement savings accounts. BGC provides ATM/debit card services with an ATM at each branch office.

As of December 31, 2012, BGC reported net loans and leases of \$354 million or 57% of total assets. Table 3 depicts the bank's balance sheet composition as of December 31, 2012.

Table 3 - Major Components of Assets, Liabilities, and Capital as of 31-Dec-12		
Balance Sheet Component	Balance Sheet \$ Amount (000)'s	% of Total Assets/LC
Loans	\$354,465	56.68%
Residential Mortgage Loans	\$260,985	41.73%
Non-Residential Mortgage Loans	\$69,553	11.12%
Commercial Nonmortgage loans	\$16,235	2.60%
Consumer Loans	\$7,692	1.23%
Investments	\$245,436	39.24%
US Agencies	\$71,903	11.50%
Mortgage backed Securities	\$149,843	23.96%
Cash	\$10,661	1.70%
Total Assets	\$625,405	100.00%
Deposits	\$549,349	87.84%
Total Liabilities	\$573,410	91.69%

Source: December 31, 2012 Call Report

There were no financial or legal impediments to hinder BGC's ability to help meet the community's credit needs. BGC was rated "Satisfactory" at its last CRA Performance Evaluation dated November 6, 2009.

Description of Assessment Areas

The Bank of Greene County has two assessment areas described below:

Albany County Assessment Area

The Albany County Assessment Area (AA) consists of four contiguous census tracts on the southern border of Albany County, north of Greene County -- Westerlo (148.03), Rensselaerville (148.02), Coeymans (144.01), and Ravena (144.02), NY. Albany County is located in the Albany-Schenectady-Troy MSA. This AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas.

All four CTs are middle-income. There are no low-income or moderate-income CTs in this AA.

The 2000 U.S. Census reported the total population of the AA at 13,532. Within the AA, there are 3,685 families and 5,218 households. There are 6,128 housing units, of which 3,897 are owner-occupied, 1,329 are rental-occupied, and 902 are vacant housing units. The median housing cost is \$97,913.

The 2000 median family income was \$54,944. The HUD updated median family income for 2011 is \$77,000. Approximately 15.74% of the families are low-income, 22.01% are moderate-income, 24.94% are middle-income, and 37.31% are upper income. Approximately 6% are below the poverty level.

BGC faces strong competition for assessment area deposits and loans. According to the June 30, 2012 FDIC Summary of Deposit Market Share Report, BGC’s deposit market share within the Albany-Schenectady-Troy MSA AA is 0.15%; ranking the bank 23rd out of 25 institutions in the AA. The primary competitors are KeyBank, NA (41 offices; 34.13% market share), TrustCo Bank (55 offices; 11.87% market share), and First Niagara Bank, NA (37 offices; 10.36% market share). Similar competition is The National Bank of Coxsackie (one office; 0.16% market share).

BGC ranks third out of 62 lenders in mortgage lending in the MSA, according to 2011 Peer Mortgage Data. BGC originated 30 mortgage loans in 2011 in the AA which accounted for a 8.72% market share. Competition comes primarily from larger banks; specifically, Wells Fargo Bank, NA (14.24% market share), Homestead Funding Corp. (9.88% market share), and SEFCU (5.52% market share).

Tables 4 and 5 summarize the AA’s demographics:

Table 4: Demographic Information for Albany County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	4	0	0	100.00	0	0
Population by Geography	13,532	0	0	100.00	0	0
Owner-Occupied Housing by Geography	3,897	0	0	100.00	0	0
Business by Geography	951	0	0	100.00	0	0
Farms by Geography	54	0	0	100.00	0	0
Family Distribution by Income Level	3,685	15.74	22.01	24.94	37.31	0
Distribution of Low and Moderate Income Families throughout AA Geographies	1,391	0	0	100.00	0	0
Median Family Income		54,944	Median Housing Value			97,913
HUD Adjusted Median Family Income for 2011		77,000	Unemployment Rate			7.20%
Households Below Poverty Level		6%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census; 2011 HUD updated MFI; The U.S. Bureau of Labor Statistics September, 2012.

Table 5 - Assessment Area Demographic Information								
Income Category	% Family Distribution	Census Tract Data Distributions						
		# Tracts	% Housing Units	% Owner Occupied Units	% Rental Occupied Units	% Single Family Units	Median Housing Value	Median Housing Age
Low	0.00%	0	0.00%	0.00%	0.00%	0.00%	N/A	N/A
Moderate	0.00%	0	0.00%	0.00%	0.00%	0.00%	N/A	N/A
Middle	100.00%	4	100.00%	100.00%	100.00%	100.00%	\$97,913	29
Upper	0.00%	0	0.00%	0.00%	0.00%	0.00%	N/A	N/A
Total #	100%	4	100%	100%	100%	100%	\$97,913	29

Source: 2000 U.S. Census Data

The current local economy for the AA is characterized as relatively stable. The AA fared better than national averages during the recent economic crisis. Home prices, unemployment rates, and poverty levels were not affected as drastically as national averages. Economic activity in the area is relatively diverse with education and health care, retail trade, services, and public administration being the primary activities. The September 2012 unemployment rate is 7.2% in the MSA. The national average is 7.8%, and the NY state average is 8.5%.

During the examination, we contacted a community organization whose primary purpose is to promote affordable housing. The contact stated that they do see banking institutions involved in community development lending. The contact specified that there are adequate opportunities for community development for the institutions from both a community involvement and a lending perspective.

Greene/Columbia Assessment Area

The Greene/Columbia Assessment Area (AA) consists of all villages and townships located within the physical boundaries of Greene County and Columbia County, NY. The counties are located in a non-Metropolitan Statistical Area (non-MSA). The contiguous area contains 31 census tracts (CTs). This AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas.

Of the 31 CTs, 2 or 6.45% are moderate-income, 16 or 51.61% are middle-income, and 12 or 38.71% are upper-income. One CT has no reported data. There are no low-income CTs in the bank's AA.

The 2000 U.S. Census reported the total population of the AA at 111,289. Within the AA, there are 28,754 families and 43,128 households. There are 56,751 housing units, of which 30,671 are owner-occupied, 12,381 are rental-occupied, and 13,699 are vacant housing units. Approximately 3.24% of owner-occupied housing is located in the moderate-income geographies, 57.23% is located in middle-income geographies, and 39.52% is located in upper-income geographies. The median housing cost is \$103,842.

The 2000 median family income was \$41,761. The HUD updated median family income for 2011 is \$56,100. Approximately 14.99% of the families are low-income, 17.46% are moderate-income, 21.68% are middle-income, and 45.87% are upper income. Approximately 10% are below the poverty level.

BGC faces strong competition for assessment area deposits and loans. According to the June 30, 2012 FDIC Summary of Deposit Market Share Report, BGC’s deposit market share within the Greene/Columbia AA is 25.16%; ranking the bank 1st out of 11 institutions in the AA. BGC’s primary competitors are First Niagara Bank, NA (11 offices; 23.43% market share), National Union Bank of Kinderhook (4 offices; 11.32% market share), and KeyBank, NA (5 offices; 8.35% market share).

BGC ranks 2nd out of 160 lenders in mortgage lending in the non-MSA, according to 2011 Peer Mortgage Data. BGC originated 218 mortgage loans in 2011 in the AA which accounted for a 9.36% market share. Competition comes primarily from larger banks; specifically, Wells Fargo Bank, NA (14.26% market share), Homestead Funding Corp. (9.23% market share), and First Niagara Bank, NA (7.08% market share).

Tables 6 and 7 summarize the AA’s demographics:

Table 6: Demographic Information for Greene County and Columbia County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	0	6.45	51.61	38.71	3.23
Population by Geography	111,289	0	6.76	55.30	36.32	1.62
Owner-Occupied Housing by Geography	30,671	0	3.24	57.23	39.52	0
Business by Geography	10417	0	8.28	55.76	35.94	0.01
Farms by Geography	538	0	1.12	52.60	46.28	0
Family Distribution by Income Level	28,754	14.99	17.46	21.68	45.87	0
Distribution of Low and Moderate Income Families throughout AA Geographies	9,330	0	9.85	60.42	29.73	0
Median Family Income		41,761	Median Housing Value			103,842
HUD Adjusted Median Family Income for 2011		56,100	Unemployment Rate (Greene)			8.8%
Households Below Poverty Level		10%	Unemployment Rate (Columbia)			7.1%

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census; 2011 HUD updated MFI; The U.S. Bureau of Labor Statistics September, 2012.

Table 7 - Assessment Area Demographic Information								
Income Category	% Family Distribution	Census Tract Data Distributions						
		# Tracts	% Housing Units	% Owner Occupied Units	% Rental Occupied Units	% Single Family Units	Median Housing Value	Median Housing Age
Low	0.00%	0	0.00%	0.00%	0.00%	0.00%	N/A	N/A
Moderate	5.49%	2	5.90%	3.24%	15.80%	5.38%	\$75,929	51
Middle	56.40%	16	61.57%	57.23%	55.43%	61.56%	\$97,463	26
Upper	38.12%	12	32.53%	39.52%	28.77%	33.05%	\$120,977	30
NA	0.00%	1	0.00%	0.00%	0.00%	0.00%	N/A	N/A
Total #	100%	31	100%	100%	100%	100%	\$183,363	29

Source: 2000 U.S. Census Data

The current local economy for the AA is also characterized as relatively stable. The AA fared similarly compared to national and state averages during the recent economic crisis. Home prices, unemployment rates, and poverty levels were comparable to national averages. Economic activity in the area is relatively diverse with education and health care, retail trade, services, and construction being the primary activities. The September 2012 unemployment rate is 8.8% for Greene County and 7.1% for Columbia County. The national average is 7.8%, and the NY state average is 8.5%.

Conclusions with Respect to Performance Tests

LENDING TEST

The Bank of Greene County’s performance under the Lending Test is Outstanding. The bank’s quarterly average loan-to-deposit ratio is reasonable. A substantial majority of BGC’s home mortgage loans were made in the bank’s AA. The distribution of home loans to borrowers reflects excellent penetration among individuals of different income levels. The distribution of home loans to borrowers reflects reasonable dispersion among moderate-income geographies. Less weight was placed on distribution by geographies as only 2 of 36 total CTs were moderate-income. There are no low-income geographies. BGC has not received any CRA complaints during this evaluation period.

Loan-to-Deposit Ratio

BGC’s quarterly average net loan-to-deposit ratio is reasonable given the bank’s size, financial condition, and the credit needs of the AA. The bank’s loan-to-deposit ratio meets the standards for satisfactory performance. The bank’s quarterly average net loan-to-deposit ratio over the twelve quarters since the last CRA examination was 65.84%. During this time period, the ratio ranged from a quarterly low of 62.46% to a quarterly high of 71.07%. The bank’s quarterly average net loan-to-deposit ratio is comparable to other financial institutions of similar size. The quarterly average net loan-to-deposit ratio for financial institutions of similar size was 78.50% over the same twelve

quarters. The ratios ranged from a quarterly low of 74.28% to a quarterly high of 82.41% during that time period.

Lending in Assessment Areas

A substantial majority of The Bank of Greene County’s home mortgage loans were made within the bank’s AA, exceeding the standards for satisfactory performance. During the evaluation period, 92.74% of the number total home mortgage loans were made in the bank’s assessment area. Table 8 illustrates the bank’s lending within the AA.

Table 8 - Concentration of Mortgage Loans Originated In and Outside of the Assessment Areas					
Loan Type	# Inside Area MSA	# Inside Area Non-MSA	# Outside AAs	Total	% In AA
Mortgage Loans	63	755	64	882	92.74%

Source: The Bank of Greene County 1/1/2009 – 12/31/2011 HMDA Data

Lending to Borrowers of Different Incomes

The distribution of loans reflects excellent percentage among individuals of different income levels given the bank’s product offerings and local economic conditions. We put more weight on the bank’s performance in the Greene/Columbia AA as a significant majority of the bank’s lending is in that AA.

Performance in the Albany County AA

The distribution of home loans to borrowers reflects a reasonable percentage among individuals of different income levels. For home improvement loans, BGC exceeded the peer aggregate ratio for both low- and moderate-income borrowers. For refinance loans, BGC meets peer aggregate ratio for both low- and moderate-income borrowers. For home purchase loans, BGC does not meet the peer aggregate ratio for both low- and moderate-income borrowers. However, all of these figures are affected by the bank’s small footprint in the county. The bank originates less than 8% of all mortgage loans in the AA, which only includes the southern-most CTs that border Greene County.

Table 9 - Distribution of Home Mortgage Loans By Borrower Income Level in the MSA							
Borrower Income Category	% Family Distribution	Home Purchase Loans		Home Improvement Loans		Refinance loans	
		% of Loans	% of Aggregate (or Peers)	% of Loans	% of Aggregate (or Peers)	% of Loans	% of Aggregate (or Peers)
Low	15.74%	5.88%	10.66%	23.53%	6.06%	10.34%	11.04%
Moderate	22.01%	11.76%	36.07%	41.18%	39.39%	17.24%	21.43%
Middle	24.94%	29.41%	36.89%	11.76%	18.18%	41.38%	33.12%
Upper	37.31%	52.94%	16.39%	23.53%	36.36%	31.03%	34.42%
Total #	3,685	17		17		29	

Source: BGC 1/1/2009 – 12/31/2011 HMDA Data; 2000 U.S. Census Data; 2011 Peer Mortgage Data

Performance in Greene/Columbia County AA

The distribution of home loans to borrowers reflects an excellent percentage among individuals of different income levels. For refinance loans, BGC exceeded the peer aggregate ratio for both low- and moderate-income borrowers. For home purchase loans and home improvement loans, BGC exceeded the peer aggregate ratio for moderate-income borrowers and met the peer aggregate ratio for low-income borrowers.

Lending opportunities to the low-income group are limited given the median home price in the AA of \$103,842. Low-income borrowers would have difficulty affording a home in this AA as their income would be less than \$23,665. Table 10 shows the distribution of HMDA loans among borrowers of different income levels for the period of January 1, 2009 through December 31, 2011, as compared to the percent of families in each income category as well as the aggregate peer performance.

Table 10 - Distribution of Home Mortgage Loans By Borrower Income Level in the Non-MSA							
Borrower Income Category	% Family Distribution	Home Purchase Loans		Home Improvement Loans		Refinance loans	
		% of Loans	% of Aggregate (or Peers)	% of Loans	% of Aggregate (or Peers)	% of Loans	% of Aggregate (or Peers)
Low	14.99%	3.08%	3.28%	7.01%	9.55%	3.22%	2.17%
Moderate	17.46%	16.41%	15.41%	16.82%	15.29%	10.61%	8.70%
Middle	21.68%	20.00%	29.49%	21.50%	29.30%	24.44%	24.46%
Upper	45.87%	60.51%	51.82%	54.67%	45.86%	61.74%	64.67%
Total #	28,754	212		216		324	

Source: BGC 1/1/2009 – 12/31/2011 HMDA Data; 2000 U.S. Census Data; 2011 Peer Mortgage Data

Geographic Distribution of Loans

The geographic distribution of loans reflects reasonable dispersion throughout the bank’s AAs. We put more weight on the bank’s performance in Greene/Columbia County AA – there are no low- or moderate-income CTs in Albany County AA. We did not identify any conspicuous gaps in lending throughout the bank’s AA.

Performance in the Albany County AA

The distribution of home loans to borrowers is not applicable as there are no low- or moderate-income geographies in the Albany County AA. All four CTs are middle-income. Table 11 details the bank’s performance as compared to the percentage of owner-occupied housing in each CT income category as well as the aggregate peer performance.

Table 11 - Distribution of Home Mortgage Loans By Geography in the MSA							
Geography Income Category	% Owner Occupied Units	Home Purchase Loans		Home Improvement Loans		Refinance loans	
		% of Loans	% of Aggregate (or Peers)	% of Loans	% of Aggregate (or Peers)	% of Loans	% of Aggregate (or Peers)
Low	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Moderate	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Middle	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Upper	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Total #		17		17		29	

Source: BGC 1/1/2009 – 12/31/2011 HMDA Data; 2000 U.S. Census Data; 2011 Peer Mortgage Data

Performance in the Greene/Columbia County AA

The distribution of home loans to borrowers reflects reasonable dispersion among moderate-income geographies. For home purchase loans, BGC exceeded the peer aggregate ratio. For home improvement loans and refinance loans, BGC met the peer aggregate ratio. Opportunities for lending in these areas are limited as only 2 of the bank’s 31 CTs (6.45%) are designated as moderate-income. There are no low-income geographies in this AA. Table 12 details the bank’s performance as compared to the percentage of owner-occupied housing in each CT income category as well as the aggregate peer performance.

Table 12 - Distribution of Home Mortgage Loans By Geography in the Non-MSA							
Geography Income Category	% Owner Occupied Units	Home Purchase Loans		Home Improvement Loans		Refinance loans	
		% of Loans	% of Aggregate (or Peers)	% of Loans	% of Aggregate (or Peers)	% of Loans	% of Aggregate (or Peers)
Low	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Moderate	3.24%	6.13%	3.56%	1.39%	2.42%	2.48%	2.70%
Middle	57.23%	71.70%	58.56%	82.41%	68.48%	82.66%	55.08%
Upper	39.52%	22.17%	37.89%	16.20%	29.09%	14.86%	42.22%
Total #		212		216		324	

Source: BGC 1/1/2009 – 12/31/2011 HMDA Data; 2000 U.S. Census Data; 2011 Peer Mortgage Data

Responses to Complaints

During the evaluation period there were no complaints related to the bank’s performance in meeting the credit needs of the AA.

COMMUNITY DEVELOPMENT TEST

The Community Development (CD) Test is rated Satisfactory. The bank’s level of CD activities is considered adequate given the size, capacity, and limited CD opportunities available in its AA. Qualified CD loans, investments, and donations total approximately \$402 thousand. Qualifying CD opportunities are limited given the bank’s AA which only includes two moderate-income CTs and no distressed middle-income CTs.

Number and Amount of Community Development Loans

During the evaluation period, BGC originated six community development loans to four organizations totaling of \$365 thousand. This includes \$160 thousand to two organizations committed to providing affordable housing for low-income qualified seniors and families; \$105 thousand to a mental health care facility serving an LMI

housing development; and \$100 thousand to a healthcare organization that provides primary care, dental, and vision care to low-income individuals.

Number and Amount of Qualified Investments

During the evaluation period, the bank maintained two qualifying investments totaling \$22.6 thousand to the a state business development corporation. BGC also made eight qualified donations and contributions totaling \$21.1 thousand to four organizations that help to provide economic development, affordable housing, or health and community services to low- or moderate-income individuals and families in the AAs.

Extent to Which the Bank Provides Community Development Services

During the evaluation period in the bank's AA, six officers and employees provided technical services and support to nine qualified community development organizations.

Responsiveness to Community Development Needs

Given the bank's capacity and availability of community development opportunities in the AA, BGC demonstrates adequate responsiveness to community development needs in its AA through community development loans, qualified donations, and community services.

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.