



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

September 8, 2008

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

CenterState Bank, National Association
Charter Number: 21842

6930 Gall Boulevard
Zephyrhills, FL 33541-2513

Office of the Comptroller of the Currency

NORTH FLORIDA FIELD OFFICE
8375 Dix Ellis Trail, Suite 403
Jacksonville, FL 32256

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: Satisfactory

The Community Development Test is rated: Satisfactory

- CenterState Bank's average loan-to-deposit ratio is *reasonable* in comparison to similar-sized institutions.
- The bank makes a *substantial majority* of its loans within the assessment area.
- The bank's record of lending reflects a *reasonable* penetration among individuals of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects a *reasonable* dispersion throughout the assessment area.
- The bank's community development performance demonstrates *satisfactory responsiveness* to the needs of its assessment area.

DESCRIPTION OF INSTITUTION

CenterState Bank, N.A. (CSBNA) is wholly-owned by CenterState Banks of Florida, Inc., a multi-bank holding company headquartered in Davenport, Florida. Under its charter, the bank previously operated as Community National Bank of Pasco County. In June 2000, the bank was acquired by CenterState Banks of Florida, Inc. In February 2005, the bank's name was changed to CenterState Bank West Florida, N.A. In November 2007, the bank acquired state-chartered affiliate CenterState Bank of Mid-Florida and subsequently changed the name to CenterState Bank, N.A.

The main office is located in Zephyrhills, Florida, in Polk County. The bank operates thirteen offices in Pasco, Hernando, Lake, Citrus and Sumter Counties in cities that include Zephyrhills, Brooksville, Leesburg, Crystal River and Bushnell. The acquisition in 2007 resulted in the addition of four offices located in Groveland, Clermont, Leesburg, and Eustis. The bank offers automated teller machine (ATM) access at most of its branches excluding those in Eustis and Clermont. Other banking services include drive-up facilities at all offices, telephone banking and online banking. As of year-end 2007, the bank had total assets of approximately \$366 million. CSBNA offers a variety of lending programs but the primary lending focus is commercial loans. As of June 30, 2008, commercial real estate loans represented 61 percent of the loan portfolio with an additional 13 percent in commercial loans not related to real estate. There are no financial, legal or regulatory constraints that would prevent the bank from meeting the credit needs of the community.

DESCRIPTION OF THE ASSESSMENT AREA

CSBNA's assessment areas (AAs) encompass the five aforementioned counties—Pasco, Hernando, Lake, Citrus and Sumter; however, only the eastern portion of Pasco County, east of Interstate 75, is included in the bank's AAs. In aggregate, the AAs contain a total of 100 census tracts and have a total population of 597,087 persons. The AAs meet the legal requirements of

CRA and do not arbitrarily exclude low- or moderate-income geographies. For this evaluation, there are three assessment areas. Data on each AA is detailed below.

Pasco-Hernando AA

Tampa-St Pete-Clearwater MSA	2000 Census	2008 Estimated¹
Median Family Income	\$45,339	\$56,500

Census Tract Category	# of Census Tracts	% of Total
Low-income	0	0.00%
Moderate-income	21	52.50%
Middle-income	16	40.00%
Upper-income	3	7.50%
Total	40	100.00%

Income Category	Families in the AA
Low-income Families	22.60%
Moderate-income Families	24.71%
Middle-income Families	23.40%
Upper-income Families	29.29%
Total	100.00%

Tract Category	Families residing in tracts
Low-income Tracts	N/A
Moderate-income Tracts	48.86%
Middle-income Tracts	43.39%
Upper-income Tracts	7.74%
Total	100.00%

Pasco and Hernando Counties are part of the Tampa-St. Pete-Clearwater Metropolitan Statistical Area (MSA) # 45300. According to data from the 2000 census, the assessment area has a total population of 215,129 persons. Housing units in the AA total 106,367, with the substantial majority (97%) classified as 1-4 family units. Multifamily housing represents less than 3% of total housing units in the AA. The AA has a significant number of manufactured housing units at 31%. A majority of housing units in the AA (72%) are owner-occupied. 2000 Census data indicates that the median housing value is \$73,540 and the median age of the housing stock is 24 years. Home price escalation has been a significant issue in some portions of the MSA for 2005-2007. Data from Enterprise Florida indicates that the 2007 median single-family home price for the Tampa-St. Pete-Clearwater MSA is \$209,100. Home prices peaked in 2006 and have begun to decline. Through the 2nd quarter of 2008, home prices have declined 15.9% (source: National Association of Realtors). Home foreclosures have significantly impacted the economy of the MSA. Florida had the 2nd highest rate of home foreclosures in 2007. The Tampa MSA ranked 17th nationally for the rate of foreclosure filings during the 2nd quarter of 2008; this represents one of every 87 homes (source: Realtytrac).

As with much of the United States, unemployment has increased in the MSA. Data from the State of Florida shows the July 2008 unemployment rate was 7.5% for Pasco County and 8.4% for Hernando County². These figures compare less than favorably to the averages for the State

¹ Department of Housing and Urban Development

² U.S. Bureau of Labor Statistics, www.bls.gov (*Rates not seasonally adjusted*)

of Florida (6.8%) and the nation (6.1 %). The major industry sectors in Pasco County are trade and transportation, healthcare services and hospitality. Major private sector employers include HCA Health Services of Florida, Saddlebrook Resort and Regional Medical Center Bayonet Point³. Major private sector employers in Hernando County include Wal-Mart Distribution Center and Oak Hill Hospital⁴.

Banking competition in the AA is strong with community banks, regional banks, large banks and credit unions operating in the market. Data from the FDIC as of June 30, 2007 shows that there are 28 banks and savings institutions operating 155 offices in Pasco and Hernando counties. These institutions hold a total of \$8.2 billion in deposits. The top five banks hold approximately 73% of the deposits in the county. CSBNA ranks 10th with a deposit market share of 1.80%. Leading banks in the AA are SunTrust Bank, Bank of America and Wachovia. These institutions hold 60% of deposits.

Non-MSA AA

Non-Metropolitan Florida	2000 Census	2008 Estimated
Median Family Income	\$36,211	\$45,400

Census Tract Category	# of Census Tracts	% of Total
Low-income	0	0.00%
Moderate-income	0	0.00%
Middle-income	23	85.71%
Upper-income	3	10.71%
Data Not Available	1	3.57%
Total	27	100.00%

Income Category	Families in the AA
Low-income Families	16.68%
Moderate-income Families	20.52%
Middle-income Families	24.03%
Upper-income Families	38.78%
Total	100.00%

Tract Category	Families residing in tracts
Low-income Tracts	N/A
Moderate-income Tracts	N/A
Middle-income Tracts	88.67%
Upper-income Tracts	11.33%
Total	100.00%

The non-MSA assessment area consists of Citrus and Sumter Counties. These are adjacent counties in West Central Florida, and are not located in census-designated MSAs. The largest cities in Citrus County are Inverness and Crystal River. The largest cities in Sumter County are Wildwood and Bushnell. According to data from the 2000 census, the assessment area has a total population of 171,430 persons. Housing units in the AA total 87,399, with 98% classified as 1-4 family units. Multifamily housing represents less than 3% of total housing units in the AA. Like the Pasco-Hernando AA, the non-MSA AA has a significant number of manufactured

³ Pasco Economic Development Council - <http://www.pascoedc.com>

⁴ Hernando County Office of Business Development - <http://www.hernandobusiness.com/>

housing units at 31%. A majority of housing units in the AA (72%) are owner-occupied. Per 2000 Census data, the median housing value is \$74,321 and the median age of the housing stock is 24 years.

Unemployment is increasing in portions of the AA. Data from the State of Florida shows the August 2008 unemployment rate was 7.9% for Citrus County and 4.3% for Sumter County. Major private sector employers include Citrus Memorial Hospital and Progress Energy. Major private sector employers in Sumter County include The Villages (construction) and Villages Regional Medical Center.⁵

Banking competition in the AA is strong with community banks, regional banks, large banks and credit unions operating in the market. Data from the FDIC as of June 30, 2007 shows that there are 19 banks and savings institutions operating 71 offices in Pasco and Hernando counties. These institutions hold a total of \$2.9 billion in deposits. The top five banks hold approximately 64% of the deposits in the county. CSBNA ranks 10th with a deposit market share of 3.10%. Leading banks in the AA are SunTrust Bank, Bank of America and Regions. These institutions hold 48% of deposits.

Lake County AA

Orlando-Kissimmee MSA	2000 Census	2008 Estimated
Median Family Income	\$47,851	\$59,200

Census Tract Category	# of Census Tracts	% of Total
Low-income	0	0.00%
Moderate-income	9	28.13%
Middle-income	22	68.75%
Upper-income	1	3.12%
Total	110	100.00%

Income Category	Families in the AA
Low-income Families	20.55%
Moderate-income Families	22.98%
Middle-income Families	24.46%
Upper-income Families	32.01%
Total	100.00%

Tract Category	Families residing in tracts
Low-income Tracts	N/A
Moderate-income Tracts	26.26%
Middle-income Tracts	71.12%
Upper-income Tracts	2.62%
Total	100.00%

Lake County is located in Central Florida, and it is part of the Orlando-Kissimmee MSA (#36740). The largest cities in Lake County are Leesburg and Eustis. According to data from the 2000 Census, the assessment area has a total population of 210,528 persons. Housing units in the AA total 102,830 with 95% classified as 1-4 family units. Multifamily housing represents 5% of total housing units in the AA. Like the other AAs, there are a significant number of

⁵ Enterprise Florida – www.eflorida.com

manufactured housing units at 30%. A majority of housing units in the AA (70%) are owner-occupied. Per 2000 Census data, the median housing value is \$82,611 and the median age of the housing stock is 25 years. Like the Tampa MSA, home price escalation has impacted affordability for families in the Orlando MSA. Data from Enterprise Florida indicates that the 2007 median single-family home price for the Orlando-Kissimmee MSA is \$248,900. Home prices peaked in 2006 and have begun to decline. Through the 2nd quarter of 2008, home prices have declined 14.4% from 2007 (source: National Association of Realtors). Home foreclosures have significantly impacted the economy of the MSA. The Orlando MSA ranked 13th nationally for the rate of foreclosure filings for the 2nd quarter of 2008; this represents one of every 72 homes.

The August 2008 unemployment rate was 6.5% for Lake County. Major private sector employers include Leesburg Regional Medical Center and Village of Lake Sumter, Inc. The Villages is a middle-income retirement community that occupies portions of Lake and Sumter counties.

Banking competition in the AA is strong with community banks, regional banks, large banks and credit unions operating in the market. Data from the FDIC as of June 30, 2007 shows that there are 22 banks and savings institutions operating 102 offices in Lake County. These institutions hold a total of \$4.7 billion in deposits. The top five banks hold approximately 70% of the deposits in the county. CenterState Bank, N.A. ranked 9th with a deposit market share of 1.81%. Leading banks in the AA are SunTrust Bank, Colonial Bank and Wachovia. These institutions hold 47% of deposits.

COMMUNITY CONTACTS

During 2008, we met with organizations in the Pasco-Hernando and Lake County AAs to discuss credit needs of the community and the responsiveness of financial institutions. Both organizations are primarily involved in providing homeownership assistance to low- and moderate-income persons residing in the AAs. The organizations indicated that most banks have been responsive to participating in the housing programs they offer. However, there remains a growing need for financial institutions to provide first-time homebuyer financing and other means of support for area non-profit organizations through grants, lines of credit and technical assistance.

SCOPE OF THE EXAMINATION

CenterState Bank, N.A. was evaluated based on an analysis of residential mortgage products and loans to businesses. The lending test did not include an evaluation of the Lake County AA. Lake County became part of the CSBNA AA in November 2007 after the aforementioned acquisition, and there was not sufficient lending activity to render a conclusion. Community development activities for the Lake County AA were considered in the overall Community Development Test rating. The time period for this evaluation is July 2003 through September 2008. This is the first CRA evaluation for CenterState Bank, N.A. Under its prior structure as Community National Bank of Pasco County, the bank received a "Satisfactory" rating in a

Performance Evaluation dated April 21, 2003. Refer to the comments within each performance criteria for a discussion of the loan sampling methodology used for this evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

- **Loan-to-Deposit Ratio- Meets the Standard for Satisfactory Performance**

The bank’s average loan-to-deposit (LTD) ratio is reasonable given the bank’s size, financial condition and AA credit needs. The bank’s quarterly average LTD ratio was calculated from the third quarter of 2003 through the second quarter of 2008. The resulting average LTD ratio is 86%. The national average LTD ratio for peer banks is 85%. Peer banks are those of similar asset size operating in metropolitan areas. The average LTD ratio for peer banks headquartered in Hernando and Pasco County is 87%.

The average LTD ratio for peer banks headquartered in Lake County is 78%. CSBNA’s ratios ranged from 81% to 91% during the evaluation period while the Hernando, Pasco and Lake County peer banks’ ratios ranged from 73% to 107% for the same time period.

- **Lending in Assessment Area – Exceeds the Standard for Satisfactory Performance**

The bank makes a substantial majority of its loans within the assessment area. We based our conclusion on a sample of the bank’s two primary loan products—residential mortgages and business loans. First, we performed an analysis using all residential mortgage loans originated from January 2004 to June 30, 2008. This included loans to purchase or refinance home mortgages as well as home improvement loans. We also obtained a random sample of 28 loans to businesses made within this same time frame. Our results for both loan types are summarized below. The number and dollar volume of residential mortgages originated declined over the evaluation period from 198 loans made in 2004 to 43 loans made in 2007.

Table 1 - Lending in CSBNA Assessment Areas										
Loan Type	Number of Loans					Dollar Volume of Loans (\$000)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Residential Mortgages	345	91.51%	32	8.49%	377	\$25,854	87.78%	\$3,600	12.22%	\$29,454
Business Loans	24	85.71%	4	14.29%	28	\$4,357	85.97%	\$711	14.03%	\$5,068

- **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes – Meets the Standard for Satisfactory Performance**

The bank's record of lending reflects a reasonable penetration among borrowers of different income levels. This analysis used the sample of residential mortgage loans originated within the assessment area that is discussed above. We compared the income distribution of the bank's borrowers in our sample to the income distribution of families within the assessment area. The borrowers were categorized into income groups based on the 2006-2008 HUD median family income categories. The distribution of families in the assessment area ("% of Families in the AA") is based on 2000 U.S. Census Bureau data. The results are detailed in Table 2A (1) and Table 2A (2). The bank's record of lending is considered reasonable given the level of banking competition in the area and the challenges of making home mortgage loans discussed within the "Description of the Assessment Area" section of this evaluation. Lending to moderate-income borrowers in the Pasco-Hernando AA was particularly good in 2005-2006.

Table 2A (1) - Borrower Distribution of CSBNA Residential Real Estate Loans									
Borrower Income Level	Low-income		Moderate-income		Middle-income		Upper-income		Data Not Available
<u>Pasco Hernando AA</u>	% of Families In the AA	% of CSBNA Loans (by #)	% of Families In the AA	% of CSBNA Loans (by #)	% of Families In the AA	% of CSBNA Loans (by #)	% of Families In the AA	% of CSBNA Loans (by #)	
2004	22.60%	14.52%	24.71%	30.65%	23.40%	22.58%	29.29%	29.84%	2.42%
2005	22.60%	13.04%	24.71%	26.09%	23.40%	26.09%	29.29%	28.26%	6.52%
2006	22.60%	7.41%	24.71%	33.33%	23.40%	11.11%	29.29%	29.63%	18.52%
2007	22.60%	18.75%	24.71%	6.25%	23.40%	43.75%	29.29%	25.00%	6.25%
Jan-Jun 2008	22.60%	0.00%	24.71%	25.00%	23.40%	25.00%	29.29%	50.00%	0.00%

Table 2A (2) - Borrower Distribution of CSBNA Residential Real Estate Loans									
Borrower Income Level	Low-income		Moderate-income		Middle-income		Upper-income		Data Not Available
<u>Non-MSA AA</u>	% of Families In the AA	% of CSBNA Loans (by #)	% of Families In the AA	% of CSBNA Loans (by #)	% of Families In the AA	% of CSBNA Loans (by #)	% of Families In the AA	% of CSBNA Loans (by #)	
2004	16.68%	3.57%	20.52%	14.29%	24.02%	28.57%	38.78%	53.57%	0.00%
2005	16.68%	0.00%	20.52%	7.69%	24.02%	30.77%	38.78%	61.54%	0.00%
2006	16.68%	4.00%	20.52%	4.00%	24.02%	8.00%	38.78%	68.00%	16.00%
2007	16.68%	8.33%	20.52%	16.67%	24.02%	8.33%	38.78%	66.67%	0.00%
Jan-Jun 2008	16.68%	0.00%	20.52%	0.00%	24.02%	0.00%	38.78%	100.00%	0.00%

The bank's record of lending reflects a reasonable penetration among businesses of different sizes. This was based on an analysis of the sampled 24 business loans originated within the assessment area during the evaluation period. We determined that the bank makes loans to businesses of varying sizes, but primarily to small businesses. The analysis showed 46% of the total number of business loans sampled (28% based on business loan amounts), were to small businesses (those with total revenues less than \$1 million). In comparison, economic data indicates that 67% and 66% of all businesses operating within the Pasco-Hernando and non-MSA AAs, respectively, are considered small businesses (revenue data was not available for some of the businesses in the assessment areas).

Table 2B - Borrower Distribution of CSBNA Loans to Businesses				
Business Revenues (or Sales)	<\$1,000,000	>\$1,000,000	Data Not Available	Total
% of Bank Loans in AA by #	45.83%	54.17%	0.00%	100.00%
% of Bank Loans in AA by \$	27.87%	72.13%	0.00%	100.00%
% of Pasco-Hernando AA Businesses by #	67.01%	2.13%	30.86%	100.00%
% of Non-MSA AA Businesses by #	66.42%	2.70%	30.88%	100.00%

CSBNA also makes a large portion of their business loans in smaller dollar amounts. Our sample included loans with original amounts ranging from \$12,000 to \$598,000. This is a favorable indicator that CSBNA makes loans in amounts that meet the needs of smaller businesses. A detailed breakdown by loan amount is presented below.

Table 2C - Borrower Distribution of CSBNA Loans to Businesses by Loan Size				
Loan Size (000's)	Number of Loans	Percent of Number	Dollar Volume of Loans (000)	Percent of Dollar Volume
\$0 - \$100,000	12	50.00%	\$702	15.98%
\$100,001 - \$250,000	6	25.00%	\$953	21.69%
\$250,001 - \$500,000	4	16.67%	\$1,440	32.78%
\$500,001 - \$1,000,000	2	8.33%	\$1,298	29.55%
Over \$1,000,000	0	0.00%	\$0	0.00%
Totals	24	100.00%	\$4,393	100.00%

- **Geographic Distribution of Loans – Meets the Standard for Satisfactory Performance**

The geographic distribution of loans reflects a more than reasonable dispersion throughout the assessment area. The distribution of CSBNA's loans reflects lending in most tracts. There were no conspicuous gaps noted in the bank's geographic lending distribution. For this analysis, we first compared the geographic distribution of the residential loans sampled within the assessment area to the level of owner-occupied housing within each geographic area. The level of owner-occupied housing is an indicator of the opportunities available for residential mortgage financing. The lower the level of owner-occupied housing, fewer opportunities are available for

home improvement, refinance or other mortgage loans. This factor is also evaluated in the context of the bank’s size and the level of banking competition in the area. It should also be noted that, as detailed in the performance context, there are no low-income geographies in the Pasco-Hernando or non-MSA assessment areas. There are also no moderate-income geographies in the non-MSA AA. Therefore the Pasco-Hernando AA was the only AA evaluated under this criterion. Based on our findings, the bank has a more than reasonable record of lending to individuals in different geographies. The results of our analysis are summarized in Table 3.

Census Tract Income Level	Low-income		Moderate-income		Middle-income		Upper-income	
	% of AA Owner Occupied Housing	% of Number of CSBNA Loans	% of AA Owner Occupied Housing	% of Number of CSBNA Loans	% of AA Owner Occupied Housing	% of Number of CSBNA Loans	% of AA Owner Occupied Housing	% of Number of CSBNA Loans
<u>Pasco Hernando AA</u>								
2004	0.00%	N/A	48.50%	68.55%	43.82%	29.84%	7.68%	1.61%
2005	0.00%	N/A	48.50%	56.52%	43.82%	41.30%	7.68%	2.17%
2006	0.00%	N/A	48.50%	59.26%	43.82%	37.04%	7.68%	3.70%
2007	0.00%	N/A	48.50%	43.75%	43.82%	50.00%	7.68%	6.25%
Jan-Jun 2008	0.00%	N/A	48.50%	75.00%	43.82%	25.00%	7.68%	0.00%

Next, we analyzed the geographic distribution of CSBNA’s business loans. For this analysis, we used the sample of business loans originated within the assessment area during the evaluation period. We noted the geographic location of the business or property purchased, depending on the nature of the loan. For comparison, we reviewed economic data that shows the geographic location of businesses in each assessment area. Based on our findings, the bank has a reasonable record of lending to businesses in different geographies. A significant percentage (**37.5%**) of loans sampled within the bank’s assessment areas were made to businesses located in moderate-income geographies in Pasco and Hernando counties. By comparison, **51%** of businesses in the Pasco-Hernando AA are located in moderate-income geographies. As previously discussed, there are no low-income geographies in the Pasco-Hernando or non-MSA assessment areas. There are also no moderate-income geographies in the non-MSA AA.

- **Responses to Complaints – Not Applicable**

We reviewed records of consumer complaint regarding CSBNA made to our agency and those maintained by the bank in the public file. There were no complaints made relative to the Community Reinvestment Act during this evaluation period.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

COMMUNITY DEVELOPMENT TEST

The bank’s performance under the Community Development Test is rated “Satisfactory”.

The bank’s community development (CD) performance demonstrates satisfactory responsiveness to the needs of its AA through community development loans, qualified investments (QI) and community development services, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AA.

We reviewed information provided by CSBNA for community development activities within the AA during the evaluation period. The information was reviewed to validate that the activities supported community development and were responsive to community needs.

- **Community Development Loans**

Number of Loans	\$ Volume of Loans
5	\$550,000

CSBNA has a satisfactory level of community development loans that showed responsiveness to community needs. Community development lending for CSBNA consists primarily of loans for multifamily affordable housing. These loans were originated through a multi-bank community development corporation (CDC) of which CSBNA is a member. Loans are funded on a shared, participation basis among the member banks. The dollar amount above represents CSBNA’s aggregate share of the loans. The housing projects are targeted towards low- and moderate-income persons through contractual agreements. For each project, 90% or more of the units must be occupied by low- or moderate-income persons. The projects are not located in the bank’s AAs. However, the CDC’s service area includes all five counties in CSBNA’s assessment areas. Under the CRA, the bank’s assessment areas need not receive an immediate or direct benefit from participation in a broader organization, *provided that* the purpose, mandate or function of the organization includes serving geographies or individuals located within the bank’s assessment areas.

- **Community Development Investments**

	Number of QI	\$ Volume of QI
In the AAs	5	\$54,190
Outside of the AAs	1	\$345,000

CSBNA has a low level of qualified investments in the AAs given its size and capacity to provide such investments. The level of CD investments in the AAs is supplemented by an investment made in neighboring Polk County to provide for an economic development project. Qualified investments made in the AA included monetary donations to community development organizations that provide for economic development, educational support and social services to low- or moderate-income persons in the assessment areas.

- **Community Development Services**

The extent to which the bank provides banking services and community development services is satisfactory given its size and capacity to provide such services. The types of services available at CSBNA are responsive to the needs of low- and moderate-income persons in the community. Banking services include a free checking account that has no monthly service charge, no minimum balance required and no per check charges. The bank’s branch network also provides availability to low- and moderate-income persons in the community. Four of the banks branches are located in moderate-income geographies. All four locations are full service branches with ATM and drive-through facilities.

Bank personnel have also engaged in community development services that are responsive to community needs. Senior bank managers serve on the boards for local organizations whose primary purpose is to provide opportunities for small business development, job creation, affordable housing or that provide services targeted towards low- and moderate-income persons. Bank personnel also provided technical assistance to not-for-profit organizations. Assistance included reviewing applications for grants and educational support.