



**SMALL BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **PUBLIC DISCLOSURE**

**July 18, 2011**

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Texas National Bank of Jacksonville  
Charter Number 18594

300 Neches Street  
Jacksonville, TX 75766-0000

Office of the Comptroller of the Currency

Longview Field Office  
1800 NW Loop 281 Suite 306  
Longview, TX. 75604-2516

**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.**

Texas National Bank (TNB) of Jacksonville, Texas has a satisfactory record of meeting community credit needs. This conclusion is based on the following factors:

- The bank's loan-to-deposit ratio exceeds the level of competition among financial institutions in the area.
- A substantial majority of loans originated since 2009 were extended to borrowers within the bank's assessment areas.
- The bank's performance in lending to borrowers of different incomes and businesses of different sizes is reasonable.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.

**SCOPE OF EXAMINATION**

This Performance Evaluation represents a focused review of TNB's lending activities since January 2009. Our intent is to quantify the bank's ability to meet the credit needs of the communities in which they do business. The bank was evaluated under the small bank performance criteria. As part of our review, we evaluated the bank's primary lending products in each assessment area. These products include residential real estate loans and commercial loans (including commercial real estate) in each assessment area. Our evaluation placed more emphasis on the performance in the Cherokee and Harrison Assessment Areas since the largest portion of loans are made in these assessment areas, specifically, residential loan products.

## DESCRIPTION OF INSTITUTION

Texas National Bank is a \$291 million bank which is wholly owned by Texas National Bancorporation. The bank is located at 300 Neches Street, Jacksonville, Texas. In addition to the main office, the bank has four full service branch locations, one each in Bullard, Rusk, Marshall, and Longview. The bank offers traditional products and services typically found in small, community banks. As of June 30, 2011, loans totaled \$250 million and represented 85% of the bank's total assets. The following chart reflects the distribution of the bank's loan portfolio.

<b>Loan Category</b>	<b>\$ (000)</b>	<b>%</b>
Commercial Real Estate Loans	135,215	54.01
Commercial Loans	43,063	17.20
Consumer Loans	13,076	5.22
Residential Real Estate Loans	58,998	23.57
<b>Total</b>	<b>250,352</b>	<b>100.00%</b>

As can be seen in the information presented above the bank's primary product line is commercial loans. In the past several years, the bank's strategic initiatives for this line of business have been hotel and convenience stores.

There are no legal impediments or other factors which inhibit the bank's ability to meet the credit needs of the community. The bank was rated satisfactory during the prior Community Reinvestment Act (CRA) Examination dated April 23, 2007.

## DESCRIPTION OF ASSESSMENT AREA(S)

The Board has designated four assessment areas (AA) for CRA purposes. These assessment areas include portions of Cherokee County (Jacksonville / Rusk); Smith County (Bullard); Harrison County (Marshall); and Gregg County (Longview). The Smith and Gregg AA's are part of a Metropolitan Statistical Area (MSA). Refer to the bank's public file for details regarding the specific census tracts included in each assessment area. The assessment areas as a whole meet the requirements of the CRA and do not arbitrarily exclude low and moderate-income geographies. Our review of the bank's performance under the CRA includes testing for all four assessment areas.

### Cherokee County

Cherokee County is located approximately 25 miles south of Tyler, Texas and encompasses the Jacksonville and Rusk locations. The assessment area has no low-income tracts, three moderate-income tracts, six middle-income tracts, and no upper-income tracts. The following table provides a description of the bank's assessment area.

<b>Demographic and Economic Characteristics of Cherokee County AA</b>	
<i>Population</i>	
Number of Families	10,866
Number of Households	14,751
<i>Geographies</i>	
Number of Census Tracts	9
% Low-Income Census Tracts	0%
% Moderate-Income Census Tracts	33.33%
% Middle-Income Census Tracts	66.67%
% Upper-Income Census Tracts	0%
<i>Median Family Income (MFI)</i>	
2000 MFI for AA	\$34,404
2010 HUD-Adjusted MFI	\$48,600
<i>Economic Indicators</i>	
Unemployment Rate (May 2011)	8.60%
2010 Median Housing Value	\$53,129
% of Households Below Poverty Level (2009)	22.50%

Source: 2000 Census Data; 2010 Department of HUD information

The Cherokee County assessment area has a total population of 41,614. The distribution of families by income level, regardless of census tract location, consists of the following: 18.23% are low-income; 15.82% are moderate-income; 19.07% are middle-income; and 46.88% are upper-income. Major employers in the AA are Texas Department of Criminal Justice; Rusk State Hospital; Jacksonville Independent School District; Stream Global; Wal-Mart Super Center; and Stage Stores, Inc. Competition in Cherokee County is strong, with numerous local financial institutions and large regional banks vying for the same deposit and loan customers.

**Smith County**

Smith County is located approximately 100 miles east of Dallas, Texas and encompasses the Bullard Branch location. The assessment area has no low-income tracts, one moderate-income tract, five middle-income tracts, and five upper-income tracts. The following table provides a description of the bank's assessment area.

<b>Demographic and Economic Characteristics of the Smith County AA</b>	
<i>Population</i>	
Number of Families	18,483
Number of Households	25,734
<i>Geographies</i>	
Number of Census Tracts	11
% Low-Income Census Tracts	0%
% Moderate-Income Census Tracts	9.09%
% Middle-Income Census Tracts	45.45%
% Upper-Income Census Tracts	45.45%
<i>Median Family Income (MFI)</i>	
2000 MFI for AA	\$54,824
2010 HUD-Adjusted MFI	\$57,900
<i>Economic Indicators</i>	
Unemployment Rate (May 2011)	7.40%
2010 Median Housing Value	\$101,328
% of Households Below Poverty Level (2009)	16.20%

*Source: 2000 Census Data; 2010 Department of HUD information*

The Smith County assessment area has a total population of 64,604. The distribution of families by income level, regardless of census tract location, consists of the following: 20.18% are low-income, 20.99% are moderate-income, 22.08% are middle-income, and 36.75% are upper-income. The major employer in Bullard is the Bullard Independent School District. However, Bullard is considered a bedroom community of Tyler, Texas where most people commute to work. The major employers in Tyler are Trinity Mother Frances Hospital, East Texas Medical Center, Tyler Independent School District, and Brookshire Grocery Company. The local economy is considered stable. Competition in Smith County is strong, with local financial institutions and large regional banks vying for the same deposit and loan customers. Our community contact identified the need for residential mortgages in the area.

### Harrison County

Harrison County is located directly east of Longview, TX and encompasses the Marshall Branch location. There are no low-income tracts, two moderate-income tracts, four middle-income tracts, and three upper-income tracts in the assessment area. The following table provides a description of the bank's assessment area.

<b>Demographic and Economic Characteristics of the Harrison County AA</b>	
<i>Population</i>	
Number of Families	17,084
Number of Households	23,141
<i>Geographies</i>	
Number of Census Tracts	9
% Low-Income Census Tracts	0
% Moderate-Income Census Tracts	22.22%
% Middle-Income Census Tracts	44.44%
% Upper-Income Census Tracts	33.33%
<i>Median Family Income (MFI)</i>	
2000 MFI for AA	\$41,008
2010 HUD-Adjusted MFI	\$48,600
<i>Economic Indicators</i>	
Unemployment Rate (May 2011)	8.10%
2010 Median Housing Value	\$60,106
% of Households Below Poverty Level (2009)	15.40%

Source: 2000 Census Data; 2010 Department of HUD information

This assessment area has a total population of 62,110. The distribution of families by income level, regardless of census tract location, consists of the following: 18.23% are low-income, 15.82% are moderate-income, 19.07% are middle-income, and 46.88% are upper-income. Major employers in Harrison County are the Marshall Independent School District, East Texas Baptist University, Texas State Technical Collage, and Home Interiors. Competition in Harrison County is moderate, with mostly local institutions competing for customers. The local economy is considered stable. Our local community contact indicated that there is a good amount of housing stock available; however, affordable housing is very limited. Most available homes range from \$100 thousand and over.

**Gregg County**

Gregg County is an area located approximately 150 miles east of Dallas, TX and encompasses the Longview Branch location. There are no low-income tracts, two moderate-income tracts, three middle-income tracts, and four upper-income tracts in the assessment area. The following table provides a description of the bank's assessment area.

<b>Demographic and Economic Characteristics of the Gregg County AA</b>	
<i>Population</i>	
Number of Families	12,423
Number of Households	18,648
<i>Geographies</i>	
Number of Census Tracts	9
% Low-Income Census Tracts	0
% Moderate-Income Census Tracts	22.22%
% Middle-Income Census Tracts	33.33%
% Upper-Income Census Tracts	44.44%
<i>Median Family Income (MFI)</i>	
2000 MFI for AA	\$50,426
2010 HUD-Adjusted MFI	\$55,600
<i>Economic Indicators</i>	
Unemployment Rate (May 2011)	6.50%
2010 Median Housing Value	\$89,108
% of Households Below Poverty Level (2009)	15.00%

Source: 2000 Census Data; 2010 Department of HUD information

This assessment area has a total population of 45,309. The distribution of families by income level, regardless of census tract location, consists of the following: 14.57% are low-income, 15.04% are moderate-income, 19.77% are middle-income, and 50.62% are upper-income. Major employers in Gregg County are Good Shepherd Medical Center, Eastman Chemical, Longview Independent School District, and Wal-Mart. Competition in Gregg County is strong, with local financial institutions and large regional banks vying for the same deposit and loan customers. As with the Harrison County AA, our local community contact indicated that housing stock is available but affordable housing is limited.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank's lending performance is satisfactory. The loan-to-deposit ratio exceeds other banks in the bank's assessment area and a substantial majority of loans were originated within the bank's assessment area. Additionally, the distribution of loans within the assessment area reflects a reasonable penetration among borrowers of different income levels and businesses of different sizes. Lastly, the geographic distribution of loans reflects a reasonable dispersion throughout all assessment areas.

### Loan-to-Deposit Ratio

The loan-to-deposit ratio of Texas National Bank is more than reasonable. The bank's quarterly loan-to-deposit ratio has averaged 100.19% since the prior CRA examination in April 2007. The average loan-to-deposit ratio of banks within the assessment area, regardless of size, for the same time period, was 68.07%.

Institution	Assets (000s) (as of 3/31/11)	Average LTD Ratio
Texas National Bank of Jacksonville, Texas	291,121	100.19%
Southside Bank, Tyler Texas	3,093,829	57.03%
Citizens National Bank, Henderson Texas	884,463	57.67%
Community Bank, Longview, Texas	152,778	86.65%
The First State Bank, Hallsville, Texas	38,422	40.42%
Panola National Bank, Carthage Texas	124,066	54.95%
White Oak State Bank, White Oak Texas	82,492	90.76%
Kilgore National Bank, Kilgore, Texas	84,107	61.17%
Texana Bank, NA, Linden Texas	126,123	75.57%
Gladewater National Bank, Gladewater Texas	31,162	67.55%
Citizens 1 <sup>st</sup> Bank, Tyler Texas	740,371	68.22%
Texas Bank & Trust, Longview Texas	1,318,678	88.03%

### Lending in Assessment Area

A substantial majority of the bank's lending occurs within the designated assessment areas. We reviewed a sample of 113 commercial loans, and 384 residential real estate loans made since January of 2009. Commercial loans and residential real estate mortgages were found to be the primary product types in all four assessment areas. The breakdown by loan category is illustrated in the following table. As you can see, 79% of the loans we tested were within the bank's assessment area when reviewing the information by number. By dollar, approximately 81% percent of loans were within the bank's assessment areas.

<b>Lending in Assessment Areas</b>										
Loan Type	Number of Loans					Dollars of Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	182	75.83	58	24.17	240	18,476	74.97	6,170	25.03	24,646
Home Improvement	43	93.48	3	6.52	46	1,412	93.57	97	6.43	1,509
Refinance	74	75.51	24	24.49	98	11,080	74.39	3,814	25.61	14,894
Commercial	95	84.07	18	15.93	113	34,140	86.78	5,201	13.22	39,341
Totals	394	79.28	103	20.72	497	65,108	80.99	15,282	19.01	80,390

Source: Data reported under HMDA, sample of loans.

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

### Cherokee County

The distribution of loans within the Cherokee County assessment area reflects a reasonable penetration among borrowers of different income levels and businesses of different sizes. While the distribution of home loans to low-income borrowers is lower than the AA’s demographics, loans to moderate income borrowers is near to the demographics. Furthermore the median housing value in Cherokee County equaled \$53 thousand while a low income family earned \$24 thousand making it difficult to qualify for a home mortgage.

<b>Borrower Distribution of Residential Real Estate Loans in Cherokee County AA</b>								
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 Purchase	20.18	5.08	20.99	13.56	22.08	13.56	36.75	64.41

Source: Data reported under HMDA; U.S. Census data.

The distribution of business loans reflects a reasonable penetration among businesses of different sizes. Based on U.S. Census information, there are 2,904 businesses in the assessment area, of which revenue information was available for all but 653 of the businesses. Our analysis was performed based on businesses with reported income. Our sample of commercial loans inside the assessment area revealed a majority that lending to small business was limited with a majority of the loans made were to businesses with revenues over 1 million. However, the bank has strategically targeted Hotel and Convenience stores which by the nature of their business generally produce significant revenues.

<b>Borrower Distribution of Loans to Businesses in Cherokee County AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	73.28	3.38	23.34	100.00
% of Bank Loans in AA by #	64.00	36.00	-0-	100.00
% of Bank Loans in AA by \$	39.20	60.80	-0-	100.00

**Smith County**

The distribution of loans within the Smith County assessment area reflects a poor penetration among borrowers of different income levels for residential real estate loans. However, lending to small businesses is reasonable. There were no residential loans made to low-to-moderate income individuals within the assessment area. Refer to the chart below.

<b>Borrower Distribution of Residential Real Estate Loans in Smith County AA</b>								
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 Purchase	14.14	0.00	14.32	0.00	21.09	10.00	50.45	90.00

*Source: Data reported under HMDA; U.S. Census data.*

The distribution of business loans reflects a reasonable penetration among businesses of different sizes. Based on U.S. Census information, there are 6,850 businesses in the assessment area, of which revenue information was available for all but 1,087 of the businesses. Our analysis was performed based on businesses with reported income. Testing of commercial loans that originated inside the assessment area revealed a substantial majority of the number of loans were to businesses with revenues less than one million as well as by dollar.

<b>Borrower Distribution of Loans to Businesses in Smith County AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	80.36	3.14	16.50	100.00
% of Bank Loans in AA by #	70.83	29.17	-0-	100.00
% of Bank Loans in AA by \$	74.90	25.10	-0-	100.00

*Source: Loan sample; Dun and Bradstreet data.*

## Harrison County

The distribution of loans within the Harrison County assessment area reflects a reasonable penetration among borrowers of different income levels and businesses of different sizes. While the distribution of home loans to low income borrowers is lower than the AA's demographics, loans to moderate income borrowers is nearer that of the AA's demographics. Refer to the chart below.

<b>Borrower Distribution of Residential Real Estate Loans in Harrison County AA</b>								
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 Purchase	18.23	3.18	15.82	6.35	19.07	9.52	46.88	76.19

Source: Data reported under HMDA; U.S. Census data.

The distribution of business loans reflects a reasonable penetration among businesses of different sizes. Based on U.S. Census information, there are 4,671 businesses in the assessment area, of which revenue information was available for all but 7,922 of the businesses. Our analysis was performed based on businesses with reported income. Our sample of commercial loans inside the assessment area revealed a substantial majority of the number of loans were to businesses with revenues less than one million. A majority of loans was made to businesses with revenues less than one million by the dollar amount as well.

<b>Borrower Distribution of Loans to Businesses in Harrison County AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	79.52	2.93	17.55	100.00
% of Bank Loans in AA by #	82.14	17.86	-0-	100.00
% of Bank Loans in AA by \$	74.33	25.67	-0-	100.00

Source: Loan sample; Dun and Bradstreet data.

**Gregg County**

The distribution of loans within the Gregg County assessment area reflects a poor penetration among borrowers of different income levels for residential real estate loans. However, lending to small businesses is reasonable. There were no residential loans made to low-to-moderate income individuals within the assessment area. Refer to the chart below

<b>Borrower Distribution of Residential Real Estate Loans in Gregg County AA</b>								
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 Purchase	14.57	0.00	15.04	3.92	19.77	5.88	50.62	17.65

*Source: Data reported under HMDA; U.S. Census data.*

The distribution of business loans reflects a reasonable penetration among businesses of different sizes. Based on U.S. Census information, there are 4,535 businesses in the assessment area, of which revenue information was available for all but 892 of the businesses. Our analysis was performed based on businesses with reported income. Testing of commercial loans that originated inside the assessment area revealed a substantial majority of the number of loans were to businesses with revenues less than one million. By dollar, this distribution of lending is less impressive, but still reasonable based on the demographic data.

<b>Borrower Distribution of Loans to Businesses in Gregg County AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	76.72	3.18	20.10	100.00
% of Bank Loans in AA by #	77.78	22.22	-0-	100.00
% of Bank Loans in AA by \$	66.01	33.99	-0-	100.00

*Source: Loan sample; Dun and Bradstreet data.*

**Geographic Distribution of Loans**

**Cherokee County**

The geographic distribution of loans within the Cherokee County assessment area represents a reasonable dispersion for both primary loan types. The percentage of residential loans originated in the moderate-income tracts is near to the demographics for the AA, while loans to businesses exceed the demographics. Refer to the charts below.

<b>Geographic Distribution of Residential Real Estate Loans in Cherokee County AA</b>								
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 Purchase	0.00	0.00	16.27	8.47	83.73	91.53	0.00	0.00

Source: Data reported under HMDA; U.S. Census data.

<b>Geographic Distribution of Loans to Businesses in Cherokee County AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Businesses	0.00		28.84	48.00	71.16	52.00	0.00	

Source: Loan sample; Dun and Bradstreet data.

### Smith Country

The geographic distribution of loans within the Smith County assessment area represents a reasonable dispersion for both primary loan types. While the bank has not made any loans in the moderate income tract only 2% of the homes are owner occupied which limits lending opportunities in that tract. The same situation exists for the commercial loan penetration. Refer to the following charts.

<b>Geographic Distribution of Residential Real Estate Loans in Smith County AA</b>								
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 Purchase	0.00	0.00	2.04	0.00	58.25	70.00	39.71	30.00

Source: Data reported under HMDA; U.S. Census data.

<b>Geographic Distribution of Loans to Businesses in Smith County AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Businesses	0.00		4.54	0.00	51.58	66.67	43.88	33.33

Source: Loan sample; Dun and Bradstreet data.

### Harrison County

The geographic distribution of loans in the Harrison County assessment area represents a reasonable dispersion for both primary loan types. The percentage of residential real estate loans originated within the moderate-income tracts exceeds the demographics for the AA, while loans to small businesses approximate the demographics for the AA. Refer to the following charts.

<b>Geographic Distribution of Residential Real Estate Loans in Harrison County AA</b>								
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 Purchase	0.00	0.00	10.25	17.46	47.59	49.21	42.16	33.33

Source: Data reported under HMDA; U.S. Census data.

<b>Geographic Distribution of Loans to Businesses in Harrison County AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Businesses	0.00		12.68	10.71	41.32	53.57	46.00	35.71

Source: Loan sample; Dun and Bradstreet data.

**Gregg County**

The geographic distribution of loans in the Gregg County assessment area represents a reasonable dispersion for both primary loan types. Residential Real Estate loans originated within the moderate-income tracts exceeds the demographics for the AA, while loans to small businesses approximate the demographics for the AA. Refer to the following charts.

<b>Geographic Distribution of Residential Real Estate Loans in Gregg County AA</b>								
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 Purchase	0.00	0.00	15.72	70.00	30.41	10.00	53.87	20.00

*Source: Data reported under HMDA; U.S. Census data.*

<b>Geographic Distribution of Loans to Businesses in Gregg County AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Businesses	0.00		14.31	11.11	37.37	50.00	48.32	38.89

*Source: Loan sample; Dun and Bradstreet data.*

**Responses to Complaints**

Management has not received any written complaints related to CRA performance since the prior CRA examination.

**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.