



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

PUBLIC DISCLOSURE

July 10, 2006

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Town North Bank, National Association
Charter Number 15980**

**4455 LBJ Freeway
Farmers Branch, TX 75381**

**Comptroller of the Currency
Dallas Field Office
500 North Akard St., Suite 1600
Dallas, TX 75201**

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 Outstanding.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

TNB's overall CRA performance is being rating "Outstanding" due to the **excellent** performance in community development lending and activities, combined with the bank's **excellent** geographic dispersion of residential real estate and commercial loans within the assessment area. The following factors further support this rating:

- TNB's quarterly average loan-to-deposit ratio of 80% **exceeds** the standards for satisfactory performance given the bank's size, financial condition, and assessment area credit needs.
- Loan originations **exceed** the standards for satisfactory performance. Of the loan originations from 2001 to 2006, 81% of the number and 76% of the dollar volume were within the bank's assessment area.
- There is no evidence of illegal discrimination.

SCOPE OF EXAMINATION

The evaluation period is March 1, 2001, to June 30, 2006. Town North Bank, N.A.'s (TNB) management is focused on commercial lending, primarily small business ventures. Since TNB is in a market where residential real estate loans must be reported, we also reviewed all of the residential real estate loans originated during this same period. Nevertheless, more weight was given to the bank's performance in commercial lending since this is its primary focus.

The March 31, 2006 Call Report confirms management's assertion of being a commercial lender with the majority of the loan portfolio consisting of commercial/commercial real estate loans, resulting in our analysis of commercial loans. For our analysis, we randomly selected 80 commercial loans originated within the evaluation period. We also analyzed all residential real estate loans segmenting home purchase, home improvement, refinancing, and multi family loans.

Moreover, we performed three different analyses. We analyzed originated loans using 1990 and 2000 Census data. For the 2001 to 2002 years, we used 1990 Census data. For 2003, we used the 2000 Census data; however, in 2004 the demographics for geographies changed thus the third analysis for the remaining years.

Data Integrity Review

We randomly selected loans from TNB's publicly filed home mortgage data (HMDA). We did not identify any errors with the data. Procedures and processes have not changed in recent years and as such, we will be using HMDA data from March 1, 2001, to June 30, 2006. In addition, we reviewed all of the community development information presented by management.

DESCRIPTION OF INSTITUTION

TNB is a commercial bank located in Farmers Branch, Texas and is a wholly owned subsidiary of CU Bank Shares, Inc., a Texas one-bank holding company. There are no financial or legal obstacles affecting its ability to meet community credit needs. TNB operates out of one office location, serving counties within the Dallas metropolitan statistical area (MSA). TNB received a "Satisfactory" rating in the previous CRA public evaluation dated February 28, 2001.

There is only one office located at 4455 LBJ Freeway. TNB designed its hours and services to provide a high level of convenient and reliable access to the local community. Extended lobby hours are provided on Fridays in addition to extended weekday and Saturday hours in the drive-up facility. An on-site ATM features 24-hour deposit taking and cash dispensing services. Alternative banking services available include, 24-hour online banking through PASSPORT Online Banking, PASSPORT Bill Payment, direct deposit/ACH, direct deposit/Social Security, lock bags, night deposit services, Select Plan, and EZ Pay. Management also operates a mobile branch that provides depository services and loan payment capabilities once a week to residents of the Preston Place Retirement Living Center located in Plano, Texas. TNB's strategic focus centers on providing financial services to individuals and businesses while continuing to handle credit card services and processing for a group of credit unions and other issuers.

As of March 31, 2006, TNB had approximately \$784 million in total assets. TNB is a full service institution providing various banking products and services to the communities that are in close proximity to the bank. In addition to providing standard products such as checking, savings, safe deposit boxes, and a variety of loan products, the bank also offers insurance/investment products, credit cards, and cash management services. In 2004, TNB began a mortgage warehousing operation. TNB Card Services, a division of the bank, provides electronic payment services to credit unions and services over 1.1 million credit and debit card accounts across 28 states. In October 2005, TNB was granted a separate charter, (Town North Bank Nevada), under the Competitive Equality Banking Act (CEBA) and subsequently transferred the credit card assets to this wholly owned bank subsidiary.

TNB's competitors consist of branches of larger national banks, state banks, and area credit unions. Competition is intense in this market with 176 financial institutions operating 1,494 branches within the bank's assessment area. As of March 31, 2006, net loans to total assets totaled 48%. The following table portrays the principal loan mix of TNB:

Loan Category	\$ (000)	%
Commercial, including Real Estate	162,799	42
Consumer	112,986	29
Residential Real Estate	57,238	15
Construction & Development	39,385	10
Farmland	10,197	3
Other Loans	47	< 1%
Total	382,652	100%

DESCRIPTION OF DALLAS COUNTY – SOUTHWEST COLLIN COUNTY – SOUTHEAST DENTON COUNTY

TNB's assessment area includes all of Dallas County, Southwest Collin County, and Southeast Denton County. All of these areas are within the Dallas MSA, meet regulatory guidelines, and do not arbitrarily exclude any low- or moderate-income areas. The demographics of this assessment area changed between 2001 and 2006.

The following table reflects the demographics for each year:

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF AA			
Year	2001-2002	2003	2004-2006
Census Year	(1990 Census)	(2000 Census)	(2000 Census)
<i>Population</i>			
Number of Families	582,765	744,951	
Number of Households	859,798	1,094,029	
<i>Geographies</i>			
Number of Census Tracts	490	603	
# - % Low-Income Census Tracts	56 – 11.43%	60 – 9.95%	60 – 9.95%
# - % Moderate-Income Census Tracts	120 – 24.49%	177 – 29.35%	179 – 29.68%
# - % Middle-Income Census Tracts	151 – 30.82%	169 – 28.03%	173 – 28.69%
# - % Upper-Income Census Tracts	155 – 31.63%	193 – 32.01%	187 – 31.01%
# - % NA Census Tracts	8 – 1.63%	4 – 0.66%	4 – 0.66%
<i>Median Family Income (MFI)</i>			
1990 MFI for AA	\$42,894		
2000 MFI for AA		\$62,635	
HUD-Adjusted MFI	\$66,500	\$65,000	
<i>Economic Indicators</i>			
Unemployment Rate	3.23%	2.53%	
Median Housing Value	\$93,804	\$124,711	
% of Households on Retirement	9%	10%	
% of Households Below Poverty Level	10%	10%	
% of Households on Social Security	16%	15%	
<i>Housing Type</i>			
Owner-occupied	48%	53%	
Rental	41%	41%	
Vacant	11%	6%	

Large industries in the assessment area include retail trade, insurance, banking services, transportation, electronics, and manufacturing. Large employers in the area include the following: Lockheed Martin Aeronautics, Baylor Health Care System, Brinker International, SBC Communications, Chase Financial, American Airlines, Texas Instruments, University of Texas Southwestern, HCA Healthcare, Texas Health Resources, Wal-Mart Stores, and Citigroup, Inc.

We determined the credit needs of the community through discussions with management and community contacts. Management stated that the community credit needs are small- to medium-sized business loans. A member of the Carrollton-Farmers Branch Independent School District stated that local banks are actively involved in providing financial literacy and funding to promote school programs. These programs benefit both the children and the communities involved (51% of the students are classified as low- and moderate-income families/households).

CONCLUSIONS ABOUT PERFORMANCE CRITERIA

LENDING TEST

Overall, TNB meets the standard of satisfactory performance. The bank's strengths are its lending within its assessment area. TNB originated 1,480 loans totaling \$270 million during this evaluation period. Of these loans, 846 totaling \$232 million were for commercial purposes while the remaining 634 totaling \$38 million were for personal purposes. Focusing on those personal purpose loans, TNB's lending penetration to low-income borrowers is poor in comparison to the percentage of low-income families within the assessment area. However, as detailed later in this Evaluation, the level of community development lending and qualified investments benefiting low-income families in the assessment area is strong.

Loan-to-Deposit Ratio

TNB average loan-to-deposit (LTD) ratio is 80%. Given the bank's size, financial condition, and assessment area credit needs, this ratio exceeds the standard for satisfactory performance. When compared to other financial institutions, of varying asset size, within the assessment area, the 20-quarter average LTD ratio is good. Information for these financial institutions is detailed in the following table:

Institution	Assets (000's) As of 3/31/06	Average LTD Ratio
North Dallas Bank & Trust Co	923,267	38%
The American National Bank of Texas	1,307,099	62%
Town North Bank, N.A.	783,518	80%
Legacy Bank of Texas	1,071,488	81%
<i>National Peer Group</i>	<i>300,000 to 1,000,000</i>	82%
Inwood National Bank	1,142,127	83%
Northern Trust Bank of Texas, NA	1,035,115	121%

Lending in Assessment Area

Based on our review, TNB's lending patterns exceed the standards of satisfactory performance. The pattern revealed 81% of the number of loans we sampled were within the assessment area, totaling \$3.1 million or 76% of the total dollar volume.

Lending in Dallas, SW Collin, and SE Denton Counties 2001-2006										
Loan Type	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Residential RE	787	81	179	19	966	84,775	83	16,854	17	101,629
Commercial	61	76	19	24	80	3,002,742	76	958,964	24	3,961,706
Totals	848	81	198	19	1,046	3,087,517	76	975,818	24	4,063,335

All HMDA data reported; sample of 80 commercial loans

Geographic Distribution of Loans

TNB has a very reasonable dispersion of residential real estate (mortgage) loans in its assessment area. The number of mortgage loans made in the low-income geographies is good. By comparison, the commercial loan penetration to moderate-income geographies is excellent in relation to the percentage of businesses in the assessment area, as shown in the following table:

Geographic Distribution of Residential Real Estate Loans in Dallas, SW Collin, and SE Denton Counties 2001-2002								
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	4	5	18	21	37	23	41	51
Home Improvement	4	2	18	5	37	21	41	72
Refinancing	4	7	18	0	37	28	41	65
Multi Family	4	45	18	27	37	9	41	19

Source: 1990 U.S. Census data; data reported under HMDA.

Geographic Distribution of Residential Real Estate Loans in Dallas, SW Collin, and SE Denton Counties 2003								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupie d 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	3	2	20	9	31	34	46	55
Home Improvement	3	0	20	7	31	13	46	80
Refinancing	3	0	20	9	31	22	46	69
Multi Family	3	0	20	80	31	0	46	20

Source: 2000 U.S. Census data; data reported under HMDA.

Geographic Distribution of Residential Real Estate Loans in Dallas, SW Collin, and SE Denton Counties 2004- June 30, 2006								
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	3	7	21	16	31	32	45	45
Home Improvement	3	2	21	8	31	23	45	67
Refinancing	3	3	21	14	31	31	45	52
Multi Family	3	33	21	33	31	33	45	0

Source: 2000 U.S. Census data; data reported under HMDA.

TNB has an excellent dispersion of commercial loans in its assessment area. The number of business loans made in the low-income geographies is good and significantly improved from 2001 to 2006. Furthermore, the commercial loan penetration to moderate-income geographies is excellent in comparison to the percentage of businesses in the assessment area, as shown in the following tables:

Geographic Distribution of Loans to Businesses/Farms in Dallas, SW Collin, and SE Denton Counties 2001-2002								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans
Commercial	4	0	23	25	31	45	41	30

Source: 20 commercial loan sample; D and B data. 1% of the AA businesses/farms operate in an area classified as NA.

Geographic Distribution of Loans to Businesses/Farms in Dallas, SW Collin, and SE Denton Counties 2003								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans
	5	5	25	35	30	20	39	40

Source: 20 commercial loan sample; D and B data. 1% of the AA businesses/farms operate in an area classified as NA.

Geographic Distribution of Loans to Businesses/Farms in Dallas, SW Collin, and SE Denton Counties 2004-2005								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans
	4	15	25	35	31	15	39	35

Source: 20 commercial loan sample; D and B data. 1% of the AA businesses/farms operate in an area classified as NA.

Geographic Distribution of Loans to Businesses/Farms in Dallas, SW Collin, and SE Denton Counties June 30, 2006								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans	% of AA Businesses /Farms	% of Number of Loans
	5	0	24	60	31	10	39	30

Source: 20 commercial loan sample; D and B data. 1% of the AA businesses/farms operate in an area classified as NA.

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

TNB meets the standards for satisfactory performance regarding lending to borrowers of different incomes and to businesses of different sizes. While residential real estate lending to low- and moderate-income borrowers needs improvement, more weight was given to performance in commercial lending since this is TNB's primary lending focus.

We reviewed all of the residential real estate loans originated and/or purchased by the bank. For the 2001-2002 evaluation period, home purchase lending to low- and moderate-income families is poor; however, the home improvement lending to moderate-income families is adequate. For the remaining years, overall residential real estate lending to both low- and moderate-income families is poor. However, as stated previously, commercial lending is TNB's primary lending focus, thus more weight is given to the commercial lending performance. The following tables illustrate the bank's lending penetration to borrowers of different incomes:

Borrower Distribution of Residential Real Estate Loans in Dallas, SW Collin, and SE Denton Counties 2001-2002								
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	4	17	2	22	11	41	50
Home Improvement	20	3	17	12	22	20	41	64
Refinancing	20	0	17	7	22	3	41	72

Source: 2000 U.S. Census data; data reported under HMDA. Of the total of residential real estate loans originated 22% were to individuals and/or businesses without financial information.

Borrower Distribution of Residential Real Estate Loans in Dallas, SW Collin, and SE Denton Counties 2003								
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	21	3	17	1	20	16	42	53
Home Improvement	21	1	17	4	20	9	42	81
Refinancing	21	4	17	0	20	9	42	87

Source: 2000 U.S. Census data; data reported under HMDA. Of the total of residential real estate loans originated 17% were to individuals and/or businesses without financial information.

Borrower Distribution of Residential Real Estate Loans in Dallas, SW Collin, and SE Denton Counties 2004- June 30, 2006								
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	21	0	18	2	20	14	41	56
Home Improvement	21	1	18	2	20	13	41	79
Refinancing	21	7	18	0	20	10	41	62

Source: 2000 U.S. Census data; data reported under HMDA. Of the total of residential real estate loans originated 19% were to individuals and/or businesses without financial information.

From March 1, 2001 to December 31, 2002, TNB originated a substantial number of loans to businesses with revenues of less than \$1.0 million within its assessment area. We reviewed a sample of 20 commercial loans totaling \$8.8 million originating within the assessment area. Of our loans sampled, 16 were made to businesses with revenues of less than \$1.0 million, totaling \$4.2 million. The following table illustrates the lending penetration to businesses of different sizes:

Borrower Distribution of Loans to Businesses/Farms in Dallas, SW Collin, and SE Denton Counties 2001-2002		
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000
% of AA Businesses*	91	7
% of Bank Loans in AA by #	80	20
% of Bank Loans in AA by \$	47	53

Source: 20 commercial loan sample; Dunn and Bradstreet data. *2% of AA businesses did not report revenue data

From January 1, 2003 to December 31, 2003, TNB originated an adequate number of loans to businesses with revenues of less than \$1.0 million within its assessment area. We reviewed a sample of 20 commercial loans totaling \$11.8 million originating within the assessment area. Ten loans were made to businesses with revenues of less than \$1.0 million, totaling \$3.2 million. The following table illustrates the penetration to businesses of different sizes:

Borrower Distribution of Loans to Businesses/Farms in Dallas, SW Collin, and SE Denton Counties 2003		
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000
% of AA Businesses*	87	6
% of Bank Loans in AA by #	50	50
% of Bank Loans in AA by \$	27	73

Source: 20 commercial loan sample; Dunn and Bradstreet data. *7% of AA businesses did not report revenue data

From January 1, 2004 to December 31, 2005, TNB originated an adequate number of loans to businesses with revenues of less than \$1.0 million within its assessment area. Again, we reviewed a sample of 20 commercial loans totaling \$2.5 million. Ten of these loans, totaling 1.5 million were made to businesses with revenues of less than \$1.0 million. The following table illustrates the lending penetration to businesses of different sizes:

Borrower Distribution of Loans to Businesses/Farms in Dallas, SW Collin, and SE Denton Counties 2004-2005		
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000
% of AA Businesses*	85	6
% of Bank Loans in AA by #	50	50
% of Bank Loans in AA by \$	61	39

*Source: 20 commercial loan sample; Dunn and Bradstreet data. * 9% of AA businesses did not report*

From January 1, 2006 to June 2006, TNB originated an adequate number of loans to businesses with revenues of less than \$1.0 million within its assessment area. We reviewed a sample of 20 commercial totaling \$3.1 million originating within the assessment area. Of the loans sampled, 13 were made to businesses with revenues of less than \$1.0 million. These loans totaled \$2.9 million. The following table illustrates the bank's lending penetration to businesses of different sizes:

Borrower Distribution of Loans to Businesses/Farms in Dallas, SW Collin, and SE Denton Counties June 30, 2006		
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000
% of AA Businesses*	90	6
% of Bank Loans in AA by #	65	35
% of Bank Loans in AA by \$	92	8

*Source: 20 commercial loan sample; Dunn and Bradstreet data. * 4% of AA businesses did not report*

Responses to Complaints

TNB did not receive any CRA related complaints during this evaluation period.

COMMUNITY DEVELOPMENT TEST

TNB's performance under the community development test is outstanding. TNB provides a more than satisfactory level of community development loans, investments, and services in its assessment area. The level and nature of TNB's community development performance demonstrates active responsiveness to community needs in relation to the overall need and opportunities within the assessment area.

The definition of community development includes the following: affordable housing for low- and moderate-income individuals; community services targeted toward low- and moderate-income individuals; activities that promote economic development by financing small businesses or farms; or activities that revitalize or stabilize low- and moderate-income geographies. As of September 1, 2005, the following activities were added to the definition: activities that revitalize or stabilize low-or-moderate-income areas; designated disaster areas; or distressed or underserved non- metropolitan middle-income geographies designated by the Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency (OCC).

Community Development Loans

TNB's performance in originating community development loans (CDLs) during the current evaluation period is outstanding. TNB originated 22 CDLs totaling \$14.7 million, which equates to approximately 26% of Tier One Capital. A substantial portion of CDL proceeds (approximately \$4.2 million) were used to fund the purchase of apartment complexes that provide affordable housing. The majority of the CDL total dollars, however, are centered in one \$8.8 million revolving line of credit to Lone Star New Markets Fund. The Lone Star New Markets Fund has the stated objective of providing investment funds to capitalize companies located in low- and moderate-income areas throughout Texas. The balance of the CDL disbursements funded construction of affordable one-to-four family housing units within the assessment area.

Qualified Investments

TNB provided a satisfactory level of qualified investments within the assessment area. Total qualified investments during the period were slightly over \$4.5 million, as well as an additional \$125,738 in CRA-related donations. This total represents 8.1% of Tier One capital.

Of the \$4.5 million in qualified investments, the vast majority consist of purchases of mortgage-backed security issues composed of loans to finance low-income housing. The investments are simple and traditional, but address an identified need within the community, as well as broader regional surroundings that includes the assessment area. Other investments include donations to local organizations that provide community services to low- and moderate-income families and individuals. Recipients who benefited include organizations that provide financial, educational, medical, housing, and other services to a wide and diverse range of families and individuals with demonstrated need.

Community Development Services

TNB bank serves its entire assessment area through its single location in Farmers Branch, which is designated as a moderate-income census tract. Products and services are provided using a variety of alternative delivery channels, including Internet and telephone banking. TNB also has a mobile branch that offers limited banking services to residents of Preston Place Retirement Community once a week. In addition, TNB employees at all levels devote their time to community development activities and services, including the following:

- A vice president at TNB developed a financial literacy program for Children's Financial Network, benefiting Carrollton Elementary, in which 75% of the students come from low- or moderate-income households. The program was conducted from 2001-2004.
- Executives and senior vice presidents either served or currently serve on the board of Carrollton/Farmers Branch ISD Educational Foundation. This foundation benefits a school district that is 51% low- and moderate-income (LMI). Its general scholarship fund awards scholarships to local high school seniors. In 2004, 2005, and 2006, 58% of those scholarship recipients fell within LMI guidelines. A representative of the bank served continuously from 1997 to the present.
- Two bank officers have served or currently serve as board members for Our Friend's Place. This organization provides therapeutic care and housing for abused, neglected or abandoned girls and young women, all of whom fall within LMI guidelines. These activities occurred in 2001-2002 and from January 2006 to the present.
- A vice president served as the Advisory Team Member & Banking Subcommittee Co-Chair for Vecinos Unidos, a Community Housing Development Corporation (CHDC). Primary service consisted of providing financial advice from 2001-2005.

In addition to the activities enumerated above, bank employees at all levels participated in a wide range of other community development services and activities in the assessment area. The time and effort volunteered in this area consisted mainly of providing financial and technical expertise to a variety of organizations in need. As evidenced by these community development service activities, the bank provides a satisfactory level of community services given existing resources, opportunities, and need within the assessment area.

TNB's level of responsiveness in meeting the needs of the assessment area, through community development activities, community development lending, investments, and services is considered outstanding. TNB actively pursues investments and lending relationships that directly benefit the citizens of the local community. Management of the bank, through various contributions of time, money, and resources, demonstrates a strong commitment to meeting the identified needs of its assessment area and surrounding geographies.

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.