



PUBLIC DISCLOSURE

April 14, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community National Bank
Charter Number 1368

4811 US Route 5, Derby, VT 05829

Office of the Comptroller of the Currency

99 Summer Street, Suite 1400, Boston, MA 02110

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: Outstanding.

The Community Development Test is rated: Outstanding

The major factors supporting the Bank's ratings are:

- Community National Bank's (CNB or Bank) level of lending, as reflected in its loan-to-deposit ratio, is more than reasonable.
- A substantial majority of originated loans are made inside the Bank's assessment areas (AAs).
- The distribution of loans reflects excellent penetration among borrowers of different income levels and reasonable penetration to businesses/farms of different sizes.
- The geographic distribution of loans reflects excellent dispersion in the moderate-income census tracts.
- The Bank's community development performance demonstrates excellent responsiveness to community development needs within its AAs, through community development loans, investments, and services.

Scope of Examination

Community National Bank was evaluated using 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 AAs through its lending activities. The CD test evaluates the Bank's responsiveness to CD needs in its AAs through CD lending, qualified investments, and community development services.

The evaluation period for the lending test covers the Bank's performance from January 1, 2012 through December 31, 2013. The evaluation period for the CD test is from April 1, 2011, the date of the last CRA evaluation, through April 14, 2014. Community development loans, investments, and services submitted by management were verified to ensure they met the regulatory definition for community development.

The Bank's primary loan products, based on loan originations during the evaluation period, are: residential mortgage loans including home purchase, refinance, and home improvement loans; and commercial loans including commercial real estate loans, and commercial and industrial loans. Residential mortgages represent 38% and commercial loans comprise 25% of the Bank's loan originations by number and 45% and 52% by dollar amount, respectively.

The Bank reports data under the requirements of the Home Mortgage Disclosure Act (HMDA). As part of our evaluation, we reviewed the testing results of the Bank's HMDA data for residential real estate loans originated and found the data was reliable. All residential real estate loans originated during the evaluation period were included in our analysis of the Bank's lending. We also used Bank data to select a random sample of 40 commercial loans originated (20 in each AA) during the evaluation period to evaluate the Bank's lending to businesses.

Description of Institution

Community National Bank is a \$573 million institution headquartered in Derby, Vermont (VT). As of December 31, 2013, CNB had tier 1 capital of \$46 million. The Bank is a wholly-owned subsidiary of Community Bancorp, a one-bank holding company. The Bank has no subsidiaries; however it has an ownership interest of one-third in a nondepository trust company, Community Financial Services Group LLC (CFSG), based in Newport, Vermont. CFSG is held indirectly through Community Financial Services Partners, LLC, a Vermont limited liability company that owns 100% of the limited liability equity interests of CFSG. Trust activities were not considered in this evaluation.

The Bank has its main office in Derby and 13 additional branches throughout the AAs. The branches are located in the cities and towns of Barre, Barton, Derby Line, Enosburg Falls, Island Pond, Lyndonville, Montpelier, Morrisville, Newport, St. Johnsbury, and Troy. All branches are open Monday through Friday with many offering Saturday morning hours, and all branches have automated teller machines (ATMs). No branches were opened or closed during the evaluation period.

Community National Bank is a full service institution, offering a wide range of loan and deposit products to meet consumer and business banking needs. Retail loan products include residential mortgages including first time homebuyer programs, home equity loans/lines of credit, construction loans, auto loans, and personal loans. Standard deposit products for consumers and businesses are offered. Free telephone banking

and internet banking services are offered to all customers. The Bank also provides financial services and loan products to the municipalities in its AAs. The Bank's website, www.communitynationalbank.com, provides a listing and description of its deposit and loan services, as well as on-line banking services.

Bank management has identified affordable housing, job and wage improvement, development, and small business lending as primary credit needs in the AA. CNB offers affordable home mortgage products including, but not limited to, Equity Builder Grant and the USDA Rural Development Guarantee program. The Bank was one of the top three US Small Business Administration (SBA) lenders in Vermont in 2012 and 2013. CNB is an SBA preferred lender; enabling the Bank to provide loans to new or existing small businesses that they might otherwise not be able to make. CNB also partners with Northern Communities Investment Corporation to make small business loans.

As of December 31, 2013, the loan portfolio totaled \$440 million, or 77% of total assets. The distribution of the Bank's loan portfolio is shown below.

Loan Portfolio Summary by Loan Product as of December 31, 2013	
Loan Category	% of Gross Loans and Leases
1-4 Family Residential Mortgage	42.1%
Commercial Real Estate	31.3%
Commercial & Industrial	12.6%
Home Equity	7.7%
Construction and Development	4.3%
Consumer	2.0%
Total	100%

Source: Federal Deposit Insurance Corporation (FDIC) Call Report

The Bank has no financial or legal impediments to meeting the credit needs of the community. Community National Bank was rated "Outstanding," using intermediate small bank procedures at the last CRA examination dated April 1, 2011.

Description of Assessment Area(S)

The CRA requires a bank to define the AA in which it will be evaluated. Community National Bank has two AAs that include all branches and deposit-taking ATMs, as well as the contiguous towns/cities around these offices. The Bank's AAs meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income tracts.

The Bank's operations are located in northeastern Vermont. AA1 is not part of a Metropolitan Statistical Area (MSA) and includes all tracts in the county of Orleans, where the Bank is headquartered, and all tracts in Caledonia, Essex, Lamoille, and Washington counties. AA2 consists of four contiguous census tracts in a portion of

Franklin County, part of the Burlington-South Burlington MSA, and borders AA1 to the northwest. This is consistent with the requirements of the regulation as the Bank has included the portion of the Franklin county MSA that it reasonably can be expected to serve.

A full scope review was performed on AA1. Thirteen of the 14 (93%) branches/offices are located in AA1 and 96% (by number) of residential mortgage loans were originated in AA1. A limited scope review was performed on AA2.

Full Scope AA1

AA1 includes all tracts in Orleans, Caledonia, Essex, Lamoille, and Washington counties. The AA contains 49 census tracts and 13 of the Bank's 14 branches. There are no low-income tracts, 14 moderate-income tracts (29%), 27 middle-income tracts (55%), and eight upper-income tracts (16%). Of the middle-income tracts, 11, or 41%, are designated as underserved nonmetropolitan middle-income geographies by the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation. Population size, density, and dispersion indicate the area's population is sufficiently small, thin, and distant from a population center that the tracts are likely to have difficulty financing the fixed costs of meeting essential community needs. Six tracts in Lamoille county and five tracts in Orleans county are underserved middle-income tracts. Refer to the tables below for additional information.

Demographic Information for Community National Bank AA1 2012 & 2013					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts)	49	0%	29%	55%	16%
Population by Geography	148,773	0%	29%	58%	13%
Owner Occupied Housing by Geography	44,643	0%	27%	59%	14%
Business/Farm by Geography	16,987	0%	25%	58%	17%
Family Distribution by Income Level	38,755	20%	19%	24%	37%
2010 Census Median Family Income (MFI)		\$60,519	Median Housing Value		\$187,269
HUD Updated MFI: 2013		\$62,900	Households Below Poverty Level		13%
		Unemployment Rate*			4.7%

Source: 2010 U.S. Census data and 2013 HUD updated MFI

* FDIC RECON as of 12/31/2013; not seasonally adjusted rate is an average of all five counties in the AA.

The Federal Deposit Insurance Corporation's (FDIC) Deposit Share Report for June 30, 2013, indicates that nine financial institutions operate within AA1. At June 30, 2013, Community National Bank ranks third with 15% of the deposits market share in AA1. The Bank is the market share leader in Orleans County, where the Bank is headquartered and five branch locations, with 62% of the deposit market share. This well exceeds the second ranked bank with a 19% market share.

Competition for loans is high, with savings banks, credit unions, mortgage companies, and nationwide lenders present in the Bank's lending market. Peer Mortgage 2012 Market Share data indicates that Community National Bank competes with 149 lenders within AA1, and the top 10 lenders dominate with a market share of 67%. The Bank ranks 2nd with a market share of 10%.

The Bank's local competitors include Union Bank, Passumpsic Savings Bank, Northfield Savings Bank, The Merchants Bank, and a growing number of credit unions. Large national and regional financial institutions, as well as non-bank entities, including mortgage brokerage firms, finance companies, insurance companies, mutual funds, and investment banking firms, provide further competition for deposit and loan products.

The local economy in northeastern Vermont has traditionally underperformed the rest of the state with higher unemployment and lower income levels. The primary industries in the area are dairy farming, logging/forestry, furniture making, government, health care, and tourism. Major employers in northeastern Vermont include Ethan Allen, North Country Hospital, Columbia Forest Products, Tivoly Inc., and the state and federal government. The United States Citizenship and Immigration Services Immigrant Investor Program, also known as EB-5, has increased investments in the area. Several projects in the Bank's AA funded by EB5 include \$170 million for upgrades at Jay Peak Resort, \$108 million at Burke Mountain Resort, and a new biomedical research campus in Newport, VT. These projects have the potential to create new jobs, attract business, and for indirect job creation.

Per Moody's Analytics, the economy in Vermont is nearing a full recovery from the recession. Based on FDIC RECON data, in December 2013, the not seasonally adjusted unemployment rate for the State of Vermont was 3.8%, well below the national unemployment rate of 6.7%. The unemployment rate for the five counties in AA1 averaged 4.6%. Unemployment rates were 4.6%, 5.2%, 4.4%, 5.4%, and 3.7% for Caledonia, Essex, Lamoille, Orleans, and Washington Counties, respectively.

Bank management identified the need for loans to small businesses and farms, to support affordable housing, and to support job improvement. In addition, we reviewed three community contacts made during the evaluation period; the organizations serve a greater area including some or all of the same geographies as the Bank's AA. The organizations are involved in community development, affordable housing, and community services. In summary, credit/banking needs identified include affordable housing, affordable rental housing, rehab and weatherization for older housing, hunger relief, job training, loan products/programs for low- and moderate-income first time homebuyers, homebuyer counseling programs, and micro loans, technical, and financial assistance for small businesses, farms, and start-ups. Opportunities for financial institution participation/involvement are largely centered on lending and grants/donations related to affordable housing, first time homebuyer mortgage products/education programs, and technical and financial assistance to small businesses and non-profits.

Limited Scope AA2

AA2 comprises a portion of Franklin County and is part of the Burlington-South Burlington MSA. The towns in AA2 are Highgate, Franklin, Sheldon, Berkshire, Enosburg, Richford, Montgomery, Fairfield, and Bakersfield.

AA 2 is comprised of four census tracts, with three moderate-income (75%) and one middle-income tract (25%). One of 14 (7%) of branches are located in AA2 and 4% (by number) of residential mortgage loans were originated in AA2. With only 4% of the deposit market, Community National Bank does not have a significant market share in the MSA AA.

Conclusions with Respect to Performance Tests

LENDING TEST

Community National Bank's performance under the lending test is Outstanding. The Bank's loan-to-deposit ratio is more than reasonable and a substantial majority of the Bank's primary loan products are within its AAs. The distribution of loans among borrowers of different income levels reflects excellent penetration. The distribution of loans reflects reasonable penetration to businesses/farms of different sizes. The geographic distribution of loans in moderate-income census tracts reflects excellent dispersion.

Loan-to-Deposit Ratio

Community National Bank's net loan-to-deposit ratio is more than reasonable given the Bank's size, financial condition, and AAs credit needs. The net loan-to-deposit ratio averaged 92% over the last 11 quarters since the previous CRA examination dated April 1, 2010. During the period since the last examination, the loan-to-deposit ratio ranged from a quarterly low of 85% to a high of 95%. CNB's average loan-to-deposit ratio of 89% is higher than national peer Bank's average of 75% over the same time period. The peer ratio ranged from a low of 73% to a quarterly high of 77% during the time period.

Lending in Assessment Area

Community National Bank's lending inside its assessment areas meets the standard for outstanding performance. A substantial majority of the Bank's primary loan products were originated within its assessment areas, with 92% of the number and 87% of the dollar amount in the AAs.

The following table details the Bank's lending within its AAs by number and dollar amount of loans.

Lending in Community National Bank's AAs (000's)										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	266	91%	28	9%	294	\$35,087	79%	\$9,341	21%	\$44,428
Home Improvement	189	94%	13	6%	202	\$20,430	91%	\$2,055	9%	\$22,485
Home Refinance	584	93%	44	7%	628	\$79,531	90%	\$8,568	10%	\$88,099
Commercial	15	79%	4	21%	20	\$3,032	94%	\$204	6%	\$3,246
Totals	1054	92%	89	8%	1143	\$138,080	87%	\$20,168	13%	\$158,258

Source: HMDA -reported data and a sample of commercial loans from 1/1/2012-12/31/2013

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

The distribution of loans originated in the Bank's AAs reflects excellent penetration among individuals of different income levels and reasonable penetration to businesses/farms of different sizes.

Conclusion for Full Scope AA1

Home Loans

There is excellent distribution of home loans to borrowers of different income levels. While the percent of home purchase, refinance, and home improvement loans is lower than the percent of low-income families in the AA, this performance is considered outstanding given CNB's large market share coupled with the lack of affordable housing and high competition.

Demographic factors, including the high cost of housing and the competitive market for mortgage lending, further support the Bank's excellent performance. The cost of housing is an issue and it has become increasingly difficult for low- to moderate-income

(LMI) households to purchase homes as the down payment requirements are hard to meet. AA1's 2010 median home price was \$187 thousand in while the median family income is \$61 thousand, which means the maximum income a low-income and moderate-income borrower earns is \$31 and \$49 thousand, respectively. In addition, 13% of households are below the poverty level. The lack of affordability limits opportunities for home mortgage lending to low- and moderate-income individuals.

As discussed previously, there is strong market competition for mortgage lending. The 2012 peer mortgage market share data for AA 1 indicate that although CNB only has 10% of the market share for home purchase and refinance loans, CNB's market share in lending to low-income borrowers was 20% and 14%, respectively. For home improvement loans, CNB's market share of lending to low-income borrowers was 14%, which is near to CNB's total market share of 16%.

The percent of home purchase, refinance, and improvement loans made to low-income borrowers is significantly lower than the percent of low-income families in the AA. The percent of home purchase, refinance, and improvement loans significantly exceeds the percent of moderate-income families in AA.

The following table shows the distribution of home loan products among borrowers of different income levels compared to the percent of families in each income category.

Borrower Distribution of Residential Real Estate Loans in AA1								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of Families	% of Number of Loans	% of Families	% of Number of Loans	% of Families	% of Number of Loans	% of Families	% of Number of Loans
Home Purchase	20%	12%	19%	27%	24%	23%	37%	38%
Home Refinance	20%	10%	19%	24%	24%	26%	36%	40%
Home Improvement	20%	9%	19%	21%	24%	34%	36%	36%

Source: HMDA-reported data from 1/1/2012 to 12/31/2013; 2010 US Census

Business/Farm Loans

The distribution of loans to businesses/farms reflects reasonable penetration among businesses/farms of different sizes. CNB's lending to businesses/farms is near to the percent of businesses/farms with gross annual revenues of \$1 million or less.

The following table shows the distribution of commercial loans among businesses/farms of different sizes in the AA.

Borrower Distribution of Loans to Businesses/Farms in AA1
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Business/Farm Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses/Farms	73%	4%	23%	100%
% of Bank Loans in AA by #	65%	35%	0%	100%
% of Bank Loans in AA by \$	18%	82%	0%	100%

Source: Sample of commercial loans from 1/1/2012 to 12/31/2013; 2010 US Census

Conclusion for Limited Scope AA2

Based on a limited scope review, the Bank's performance in AA2 is not inconsistent with performance in the full scope area.

Geographic Distribution of Loans

The geographic distribution of loans reflects excellent dispersion in the moderate-income tracts. The Bank's AAs have no low-income census tracts; therefore, we did not evaluate lending in these areas. We found no conspicuous gaps or areas of low penetration in the Bank's lending patterns.

Conclusion for Full Scope AA1

Home Loans

The Bank's geographic distribution of home loans in AA1 reflects excellent dispersion in the moderate-income census tracts. The percent of home purchase, refinance, and home improvement loans originated significantly exceeds the percent of owner occupied housing in these tracts.

Demographic factors and market share data further support the Bank's excellent performance. The percentage of individuals below poverty levels is 13%. As noted previously, the mortgage lending market is highly competitive, with many large nationwide lenders dominating the market.

Following is a table that details the Bank's performance as compared to the percent of owner occupied housing units in each census tract income level.

Geographic Distribution of Residential Real Estate Loans in AA1								
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	N/A	N/A	27%	45%	59%	51%	14%	4%
Home Refinance	N/A	N/A	27%	36%	59%	58%	14%	6%
Home Improvement	N/A	N/A	27%	37%	59%	57%	14%	6%

Source: HMDA-reported data from 1/1/2012 to 12/31/2013; 2010 US Census

Business/Farm Loans

The Bank's geographic distribution of business/farm loans reflects excellent dispersion in the moderate-income census tracts. CNB's lending to smaller businesses/farms in the moderate-income geographies exceeds the level of total businesses/farms with revenues less than \$1 million located there.

Following is a table that details the Bank's performance as compared to the percentage of businesses/farms in each census tract income level.

Geographic Distribution of Loans to Businesses/Farms in AA1								
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
Businesses	N/A	N/A	25%	26%	58%	68%	17%	5%

Source: Sample of commercial loans from 1/1/2012 to 12/31/2013; 2010 US Census

Conclusion for Limited Scope AA2

Based on a limited scope review, the Bank's performance in AA2 is not inconsistent with performance in the full scope area.

Responses to Complaints

There were no CRA complaints received by the Bank or the OCC during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The Bank's performance under the community development (CD) test is Outstanding. Community National Bank demonstrates excellent responsiveness to the community development needs in its assessment areas through CD loans, investments, and services. The following qualified loans, investments, and services reflect the Bank's efforts to meet community development needs within its AAs.

Number and Amount of Community Development Loans

Conclusion for Full Scope AA1

The volume of CD loans originated during the evaluation period and represents excellent responsiveness. The Bank originated 11 loans totaling approximately \$5 million during the evaluation period that qualified as CD loans. The CD loans provided financing to eight different organizations that provide affordable housing and job training and retention, which are identified needs in the AA.

The highlights of the Bank's CD loans are as follows:

- A \$1.35 million loan to a small business located in an LMI tract that provided three new jobs to individuals from LMI tracts.
- Three loans with a commitment totaling \$661 thousand to a new small business located in an underserved nonmetropolitan geography. The business will help revitalize the area by providing jobs.
- A \$200 thousand loan for a construction line of credit to expand the operating facilities of an organization that provides job training to displaced persons and at-risk youth, and creates a marketplace for reused goods at affordable prices.
- Two loans totaling \$150 thousand to fund the rehabilitation of a property for an organization which provides short-term transitional housing for individuals recently released from incarceration; all residents are low-income. The organization also helps residents find employment and other social services.
- A \$25 thousand bridge loan to a non-profit organization that works to advance and enhance the economic environment and development of an underserved geography.
- A \$2 million loan to a medical facility with revenues less than \$1 million that is located in, and helps support job retention in, a moderate income geography.
- A \$89 thousand loan to upgrade a housing facility that is used as transitional housing for LMI.
- A \$500 thousand loan to support a new facility that houses three small local business, created jobs, and new retail space for other local business in an underserved geography.

Conclusion for Limited Scope AA2

Based on a limited scope review, Community National Bank's CD services in AA2 is inconsistent with the Bank's overall performance in the full scope areas. The Bank has a limited presence in this AA, with only one branch location.

Number and Amount of Qualified Investments

Conclusion for Full Scope AA1

The level of CD investments is excellent considering the Bank's capacity and the volume of competition. During the evaluation period, Community National Bank made

three new investments totaling \$2.3 million. One investment of \$1.1 million supports the renovation of a historic building and provides affordable housing to seniors; 12 of the 14 units are available to those earning less than 60% of HUD adjusted median income. Two other new investments, totaling \$1.2 million, support two organizations that provide community services to LMI individuals in the AA. Prior period investments outstanding as of March 31, 2014, totaled \$698 thousand in four investments. Both new and prior period investments support affordable housing projects in the AA, an identified need, or support community services in the AA.

In addition, the level of qualifying donations is high, with 115 donations totaling approximately \$163 thousand, benefiting 68 different CD organizations in AA1. Many of the donations were to organizations that focus on food and basic needs, affordable housing, and job training, all identified needs in the AA. While the actual level of Bank donations made was higher, these donations met the definition of community development.

Conclusion for Limited Scope AA2

Based on a limited scope review, Community National Bank's investments and donations in AA2 is not inconsistent with the Bank's overall performance in the full scope AA1. Community National Bank made one new investment of \$733 thousand, which supports affordable housing in AA2. There is also one prior period investment, which supports affordable housing, with \$455 thousand outstanding as of March 31, 2014. In addition, the Bank made seven qualifying donations to four different CD organizations totaling approximately \$2.5 thousand.

Extent to Which the Bank Provides Community Development Services

Conclusion for Full Scope AA1

The Bank's level of CD services in AA1 is excellent. The Bank has thirteen full service branches located within AA1. Based on 2010 U.S. Census data, six branches, or 46% of the Bank's branches in this AA, are located in moderate income tracts. This exceeds the 29% of the moderate-income population in the AA living in moderate-income geographies. In addition, three of the seven branches in middle- and upper-income tracts, or 42%, are located in middle- income underserved tracts.

Community National Bank offers Individual Development Accounts which is a savings program intended to assist low-income individuals/families save for a home, start or expand a small business, or for education or job training. Free savings accounts with no minimum balances for minors and young adults help improve access to financial services.

The Bank provides a high level of community development services and demonstrates excellent responsiveness to the needs of the community. During the evaluation period, approximately 30 Bank officers/employees provided financial expertise and/or

leadership services to 32 different community development organizations serving AA1. Many of these services provided first time homebuyer seminars, job training, and technical and financial assistance for small businesses, all identified needs in the AA.

Highlights of CD services include:

- A Bank employee serves on the loan committee for an organization that provides loans and grants for home repair and/or home purchase to low- and moderate-income individuals and works to create affordable rental housing.
- Two individuals serve on the board of an organization whose objective is to stimulate economic development activity in a moderate-income geography by providing advisory, technical support, and education to local businesses.
- Numerous Bank employees provided information to first time homebuyers at homeownership workshops and assisted with financial literacy programs in schools located in moderate or underserved middle-income tracts.

Conclusion for Limited Scope AA2

Based on a limited scope review, Community National Bank's CD services in AA2 is not inconsistent with the Bank's overall performance in the full scope areas.

Responsiveness to Community Development Needs

Conclusion for Full Scope AA1

Considering the Bank's capacity, the need, and the availability of CD opportunities, Community National Bank's performance, through CD loans, investments, and services, demonstrates excellent responsiveness to the needs of AA1.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), in determining a National Bank's (Bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the Bank, or in any assessment area by an affiliate whose loans have been considered as part of the Bank's lending performance. We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.