



# MORGANTON SAVINGS BANK

Since 1903

## Community Reinvestment Act Statement

Morganton Savings Bank was chartered in 1903 to serve the various savings and credit needs of individuals, businesses and organizations in our community.

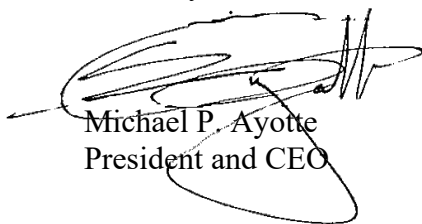
This pamphlet has been prepared for our depositors, loan customers and members of the community, pursuant to the Community Reinvestment Act of 1977. Part I is entitled “Delineation of Community.” It contains a map and description of the approximate area which we regard as our basic community, and within which we strive to serve people of all income levels and races. Designation of our community does not mean that we make no loans outside of our community, we sometimes do. Also, there may be parts of our community, for various reasons, where we have been more active than in other areas. The delineation of community merely sets forth the general area of operation of our institution. The concept of our basic lending community is subject to change over various periods of time, as patterns of commercial development change and populations shift. We will regularly adjust our delineation of community to reflect these changes.

Part II of this pamphlet consists of a list of the general types of credit which we offer, and an explanation of how the availability of certain types of credit can vary. Due to limitations of space, this listing cannot contain all of the terms and conditions which affect our ability to grant credit. A loan officer will be pleased to provide you with detailed information, upon request.

Part III of this pamphlet is important notices about the operation and administration of the Community Reinvestment Act.

We hope that the information contained in this pamphlet is useful to you. If you have any questions do not hesitate to contact me or speak with one of our loan officers.

Sincerely,



Michael P. Ayotte  
President and CEO

## **Part I. Delineating the Local Community**

The boundaries of our community coincide with the boundaries of Burke County. Our office is located in Morganton, the county seat. Morganton Savings Bank was chartered by residents of Burke County to serve the needs of this community. Since our founding in 1903, the Institution has considered Burke County as its principal community. Occasionally, loans are made outside this area, but such lending is minimal. Accordingly, the county boundaries are our most appropriate community.

## **Part II. Listing the Specific Types of Loans Offered in the Local Community**

Listed below are the types of loans which Morganton Savings Bank makes in the community. The kinds of credit we can make available are limited by law and government regulations. Since these can change from time to time, we may be temporarily “out of the market” for certain types of loans at certain times. Also, changes in economic conditions sometimes make it impossible or impractical to make a certain type of loan.

The availability and the terms and conditions of credit in a specific instance are always decided on a case-by-case basis, after the creditworthiness of the borrower and the value of collateral have been carefully evaluated. At Morganton Savings Bank, you always have a right to file a written loan application.

We generally offer the following types of credit:

- 1-4 family, owner occupied, residential property, including construction permanent lending and home equity lines of credit (HELOCs);
- Commercial real estate lending, to include multi-family residential properties, residential rental properties, warehouse, factories, office buildings, retail, etc.;
- Church properties;
- Land, including residential lots, improved and unimproved, and raw land;
- Loans secured by savings and certificates of deposit (share loans).

## **Part III. Operation and Administration Notices**

### **Assessment Area**

Morganton Savings Bank’s management and Board of Directors have determined that the bank’s assessment area is comprised of Burke County. In the event of bank expansion, the Board and Management will reconsider this assessment area to determine if it continues to be appropriate.

A map of the bank’s current assessment area and corresponding census tracts is attached.

### **Branch Locations**

Morganton Savings Bank currently operates one full-service location:

Main Office

100 South King Street

Morganton, NC 28655

Census Tract: 0205.00

MSA: 25860

State Code: 37

### **Branch Opening/Closing**

This institution has not opened or closed any branches in the last two years.

### **Public Comments**

Morganton Savings Bank has not received any public comments concerning the bank's CRA performance since Morganton Savings Bank opened.

### **Services Offered by the Bank**

Bank Hours:

Monday – Friday: 9:00 AM to 5:00 PM

Morganton Savings Bank offers the following deposit products and services:

- Interest Checking
- Non-Interest Checking
- Commercial Checking
- IOLTA Accounts
- Money Market Deposit Accounts
- Savings Accounts
- Certificates of Deposit
- IRA Accounts
- Merchant Services
- Debit Cards
- Electronic Banking
- Safe Deposit Boxes

Morganton Savings Bank has the following Service and Transaction Fees:

Monthly Service Fee for Consumer Checking Accounts	\$ 8.00
Monthly Service Fee for Commercial and Sole Proprietor Checking Accounts	\$20.00
NSF/Overdraft Fees and Returned Check Fees	\$30.00
Returned Deposited Item Fee	\$ 8.00
Stop Payment Request Fee	\$20.00
Wire Transfer Fee	\$12.00
Debit Card Replacement Fee	\$15.00
Cashier's Check Fee	\$ 6.00
Early Closure Fee	\$ 5.00
Copy of a Monthly Statement or Computer Printout of Accounts	\$ 5.00
Copy of a check (Paid Item)	\$ 4.00
Account Research – per hour – 1 hour minimum charge	\$25.00
On-line Bill Pay – First 15 payments per month are free – Each payment over 15 per month	\$ 0.45

Net Loans & Leases as a Percent of Total Deposits:

March 2023            94.35

June 2023            91.24

September 2023    91.80

December 2023     92.15

2010 CENSUS - CENSUS TRACT REFERENCE MAP - Wake County, NC



TRACT	POPULATION	POP. DENSITY
371801	22,000	1,200
371802	18,000	1,100
371803	15,000	1,000
371804	12,000	900
371805	10,000	800
371806	8,000	700
371807	6,000	600
371808	4,000	400
371809	3,000	300
371810	2,000	200
371811	1,500	150
371812	1,000	100
371813	800	80
371814	600	60
371815	400	40
371816	200	20
371817	100	10

1. This map was prepared by the Census Bureau for the 2010 Census. It is based on the 2010 Census of Population and Housing, Census Tracts, and Other Small Geographic Areas. The data for this map were derived from the 2010 Census of Population and Housing, Census Tracts, and Other Small Geographic Areas. The data for this map were derived from the 2010 Census of Population and Housing, Census Tracts, and Other Small Geographic Areas. The data for this map were derived from the 2010 Census of Population and Housing, Census Tracts, and Other Small Geographic Areas.

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# **PUBLIC DISCLOSURE**

July 16, 2018

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**Morganton Savings Bank, S.S.B.  
Certificate Number: 30434**

**100 South King Street  
Morganton, North Carolina 28655**

**Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Atlanta Regional Office**

**10 Tenth Street, Northwest, Suite 800  
Atlanta, Georgia 30309**

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.

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## INSTITUTION RATING

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

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Morganton Savings Bank, S.S.B's satisfactory Community Reinvestment Act (CRA) performance under the Lending Test supports the overall rating. Examiners did not identify any evidence of discriminatory or other illegal credit practices. The following points summarize the bank's performance.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- The bank made a substantial majority of its home mortgage and small business loans in the assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects reasonable penetration of loans among businesses of different sizes and individuals of different income levels.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.



## SCOPE OF EVALUATION

### General Information

This evaluation covers the period from the prior evaluation dated January 7, 2013, to the current evaluation dated July 16, 2018. Examiners used the Interagency Small Institution Examination Procedures to evaluate the CRA performance of Morganton Savings Bank, S.S.B. in the bank's assessment area of Burke County. These procedures consist of a Lending Test that considers the following performance criteria:

- Loan-to-deposit ratio
- Assessment area concentration
- Geographic distribution
- Borrower profile
- Response to CRA-related complaints

The evaluation does not include any lending activity performed by affiliates.

### Loan Products Reviewed

CRA regulation requires examiners to review lending performance with respect to home mortgage, small business, and small farm loans, if significant. Examiners determined that the bank's major products lines are home mortgage and small business loans. This determination considered the bank's business strategy and the number and dollar volume of loans originated during the evaluation period. Although located in the Hickory-Lenoir-Morganton Metropolitan Statistical Area (MSA), the bank is exempt from Home Mortgage Disclosure Act data reporting based upon the number of applicable loans originated annually. Examiners reviewed all single family residence home mortgage loans originated in 2017, which totaled 25 loans for \$4,363,820. Examiners reviewed all of the small business loans originated in 2017 which totaled 10 loans for \$3,729,347. The bank has not originated any small farm loans. The bank's record of originating home mortgage loans contributed more weight to overall conclusions. The following table shows the bank's originations and purchases in 2017 by loan type.

Loans Originated or Purchased				
Loan Category	\$(000s)	%	#	%
Construction and Land Development	2,649	18.5	12	18.7
Secured by 1-4 Family Residential Properties	5,297	36.9	33	51.5
Multi-Family (5 or more) Residential Properties	1,220	8.5	4	6.3
Commercial Real Estate Loans	4,631	32.3	10	15.6
Commercial and Industrial Loans	353	2.4	1	1.6
Consumer Loans	195	1.4	4	6.3
<b>Total Loans</b>	<b>14,345</b>	<b>100.0</b>	<b>64</b>	<b>100.0</b>

*Source: Bank Records.*

Examiners reviewed the number and dollar volume of small business and home mortgage loans. The Geographic Distribution and Borrower Profile tables present the loans by number only as the dollar volume distributions did not add or detract from the analysis.

## DESCRIPTION OF INSTITUTION

### Background

Morganton Savings Bank, S.S.B. is a state chartered savings bank that began operations in 1903. The bank is headquartered in Morganton, North Carolina. The bank is not held by a holding company, nor does it have any subsidiaries or affiliates. The bank received a Satisfactory rating at its previous FDIC performance evaluation, dated January 7, 2013, based on Interagency Small Institution Examination Procedures.

### Operations

The bank operates one office located in a middle-income census tract. Morganton Savings Bank, SSB does not operate any automatic teller machines loan production offices. A functional website is available that includes fund transfer services and online banking. The bank offers various deposit accounts, including checking, money market checking, savings, certificates of deposit, and individual retirement accounts. Morganton Savings Bank, S.S.B. also offers various loan products, including home mortgages, home equity lines of credit, construction loans, and commercial real estate loans. No branches have been opened or closed since the last evaluation.

### Ability and Capacity

The Call Report dated March 30, 2018, reflects total assets of \$80,627,000 and total loans of \$46,442,000. One-to-four family residential loans represent the largest segment of the bank's loan portfolio at approximately 47.2 percent, followed by commercial loans at 31.2 percent.

Loan Portfolio Distribution as of 03/31/18		
Loan Category	\$(000s)	%
Construction and Land Development	4,992	10.8
Secured by 1-4 Family Residential Properties	21,927	47.2
Secured by Multifamily (5 or more) Residential Properties	4,777	10.3
Secured by Nonfarm Nonresidential Properties	14,171	30.5
<b>Total Real Estate Loans</b>	<b>45,867</b>	<b>98.8</b>
Commercial and Industrial Loans	342	0.7
Consumer Loans	224	0.5
Other Loans	9	0.0
<b>Total Loans</b>	<b>46,442</b>	<b>100.0</b>

*Source: Reports of Condition and Income.*

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet assessment area credit needs.

## DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. Morganton Savings Bank, S.S.B. designated Burke County in the Hickory-Lenoir-Morganton Metropolitan Statistical Area (MSA). The following sections discuss demographic and economic information for Burke County

### *Economic and Demographic Data*

Burke County is comprised of 2 moderate-income, 14 middle-income, and 2 upper-income census tracts. There are no low-income census tracts in the assessment area. The following table provides additional demographic information regarding the assessment area.

Demographic Information for the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	11.1	77.8	11.1	0.0
Population by Geography	89,548	0.0	11.8	73.4	14.8	0.0
Housing Units by Geography	40,711	0.0	11.3	72.4	16.3	0.0
Owner-Occupied Units by Geography	24,366	0.0	11.1	72.1	16.8	0.0
Occupied Rental Units by Geography	9,814	0.0	13.2	74.6	12.2	0.0
Vacant Units by Geography	6,531	0.0	9.2	69.9	20.8	0.0
Businesses by Geography (2017)	3,766	0.0	10.1	74.5	15.4	0.0
Farms by Geography (2017)	133	0.0	12.8	73.7	13.5	0.0
Family Distribution by Income Level	22,824	23.0	16.4	21.9	38.6	0.0
Median Family Income (2015)		\$51,281	Median Housing Value			\$114,226
Adjusted FFIEC Median Family Income (2017)		\$52,000	Median Gross Rent			\$603
			Families Below Poverty Level			14.8%

*Source: 2015 ACS Census and 2017 D&B Data  
Due to rounding, totals may not equal 100.0  
(\* The NA category consists of geographies that have not been assigned an income classification.*

The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units and compares small business loans to the percentage of businesses located in moderate-, middle-, and upper-income census tracts. The vast majority of businesses and owner-occupied housing units are in middle-income tracts. There are 24,366 owner-occupied housing units in the assessment area. Of these, 11.1 percent is in moderate-income tracts, 72.1 percent in middle-income tracts, and 16.8 percent in upper-income tracts. In 2017, 10.1 percent of businesses were in moderate-income tracts, with 74.5 percent in middle-income, and 15.4 percent in upper-income. The demographics reflect significantly less opportunity in the moderate-income tracts given the level of owner-occupied housing units and businesses. Additionally, there are only two moderate-income tracts and neither are located in the immediate vicinity of the bank's one office. One of the moderate-income census tracts is a residential suburb for the Hickory, North Carolina metropolitan area and thus residents tend to bank in

Hickory. Likewise, the other moderate-income census tract is a suburb area for neighboring Catawba County.

According to 2017 D&B data, there were 3,766 businesses in Burke County. Gross annual revenues for these businesses are below.

- 81.1 percent have \$1 million or less.
- 6.4 percent have more than \$1 million.
- 12.5 percent have unknown revenues.

The analysis of small business loans under the Borrower Profile criterion compares the distribution of businesses by gross annual revenues level. Service industries represent the largest portion of businesses at 49.0 percent, followed by retail trade at 17.0 percent, construction at 10.0 percent, and finance, insurance, and real estate at 8.0 percent. In addition, 44.0 percent of area businesses have four or fewer employees, and 56.0 percent operate from a single location.

The 2017 FFIEC-updated median family income level for the Hickory-Lenoir-Morganton, NC MSA is used to analyze home mortgage loans under the Borrower Profile criterion. The low-, moderate-, middle- and upper-income categories are presented in the following table. These categories are based on the 2017 FFIEC-updated median family income of \$52,000.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2017 (\$52,000)	<\$26,000	\$26,000 to <\$41,600	\$41,600 to <\$62,400	≥\$62,400

*Source: FFIEC*

As reflected in the demographic table above, of the assessment area's families, 23.0 percent is low-income with 16.4 percent noted as moderate-income income, 21.9 percent as middle-income, and 38.6 percent as upper-income. Families below the poverty level stood at 14.8 percent. Given the median housing value of \$114,226, a low-income individual which earns less than \$26,000 per year may have difficulty qualifying for a mortgage loan.

Unemployment rates over the evaluation period are shown in the following table. The assessment area's unemployment rates, Burke County, are in line with the Hickory MSA, state, and National levels.

Unemployment Rates					
	2013	2014	2015	2016	2017
Burke County	8.3	6.2	5.6	4.8	4.3
Hickory MSA	8.5	6.4	5.6	4.9	4.2
NC State	8.0	6.3	5.7	5.1	4.6
National	7.4	6.2	5.3	4.9	4.4

*Source: Bureau of Labor and Statistics*

The major employers in the area are NC Department of Health and Human Services, Burke County Public Schools, Blue Ridge Healthcare Hospitals, Turning Point Services, Case Farms Processing,

Inc., and Valdese Weavers.

### **Competition**

The assessment area is moderately competitive in the market for financial services. According to the FDIC Deposit Market Share data as of July 30, 2018, there were 9 financial institutions that operated 15 full-service branches within the bank's assessment area. Of these institutions, Morganton Savings Bank, S.S.B. ranked 5<sup>th</sup> with a 6.7 percent deposit market share. The three prominent institutions with branches in Burke County accounted for 63.8 percent of total deposit market share.

There is a high level of competition for home mortgage loans among several banks, credit unions, and non-depository mortgage lenders. In 2017, 189 lenders reported 2,694 residential mortgage loans originated or purchased. The State Employees Credit Union has the largest market share at 16.8 percent. Since Morganton Savings Bank is not a HMDA reporter, the bank's market exact market share is not available. However, given that the bank originated 25 residential mortgage loans in 2017, this represents approximately 0.9 percent of the total market share for home mortgage loans.

The bank is not required to collect or report its small business loan data, and it has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. Aggregate data for 2017 shows that 47 institutions reported 938 small business loans totaling \$40.5 million in Burke County. The top three lenders by dollar volume include First-Citizens Bank & Trust Co.; Branch Banking and Trust Co.; and Wells Fargo, N.A. with a total of 59.9 percent of the market, indicating a high degree of competition for this product.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community development needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit opportunities are available.

Examiners contacted a representative of a community development organization in the assessment area. The organization provides homeownership counseling, financial literacy, mortgage lending education, and work force training services. The contact identified a significant level of opportunity for partnering between the organization and financial institutions in order to provide financial education training. The contact noted that economic conditions have improved within Burke County and surrounding areas. The contact indicated that employers within the area are looking for people to hire; however, there is a shortage of qualified work force. As a result, the organization recently started a work force training initiative with the NC Department of Transportation. In addition, the contact cited a lack of affordable housing and opportunities for local financial institutions to provide financing to develop affordable units. Overall, the contact indicated that financial institutions have been responsive to the credit needs.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### Loan-to-Deposit Ratio

The loan-to-deposit ratio is reasonable given the institution's size and financial condition and assessment area credit needs. The loan-to-deposit ratio, calculated from Call Report data, averaged 83.4 percent over the past 21 calendar quarters from March 31, 2013, to March 31, 2018. The ratio ranged from a low of 75.6 percent as of September 30, 2016, to a high of 90.2 percent as of December 31, 2013. The loan-to-deposit ratio as of March 31, 2018, was 83.4 percent. Morganton Savings Bank, S.S.B. maintained a ratio in between those of comparable institutions, as shown in the following table. Examiners selected similarly-situated institutions based on their asset size and lending focus.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 03/31/2018 (\$000s)	Average Net LTD Ratio (%)
Morganton Savings Bank, S.S.B.	80,627	83.4
Wake Forest Federal Savings Bank	104,329	71.0
First Capital Bank	81,012	95.2
<i>Source: Reports of Condition and Income 03/31/13 through 03/31/18.</i>		

### Assessment Area Concentration

The bank made a substantial majority of its small business and home mortgage loans, by number and dollar volume, within its assessment area.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	24	96.0%	1	4.0%	25	4,096	93.9%	268	6.1%	4,364
Small Business	9	90.0%	1	10.0%	10	3,376	90.5%	353	9.5%	3,729
<i>Source: 2017 Bank Records</i>										

### Geographic Distribution

The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area given the bank's branch location and competition. For Geographic Distribution, the focus is on lending in the moderate-income tracts as compared to the available demographic data. Only loans within the assessment area are included.

### *Home Mortgage Loans*

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. The majority of the 2017 home mortgage loans were originated in the middle-income census tracts where the majority of owner-occupied housing units are located. The bank did not originate any loans in the moderate-income census tracts in 2017. The bank did originate one home mortgage loan each in a moderate-income census tract in 2014, 2016, and 2018. Most of the bank's loans were disbursed near and in the immediately surrounding census tracts adjacent to the banking office, which do not include either of the two moderate-income census tracts.

<b>Geographic Distribution of Home Mortgage Loans</b>			
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>#</b>	<b>%</b>
Moderate	11.1	0	0
Middle	72.1	23	95.8
Upper	16.8	1	4.2
<b>Total</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>

*Source: 2017 Census Data and Bank Records.*

### *Small Business Loans*

The geographic distribution of sampled small business loans reflects a reasonable dispersion throughout the assessment area given the bank's branch location and competition. All of the small business loans were originated in the middle-income census tracts. As with the home mortgage lending, most of the bank's loans were disbursed near and in the immediately surrounding census tracts adjacent to the banking office, which do not include either of the two moderate-income census tracts.

### **Borrower Profile**

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes in the assessment area. The distribution of home mortgage loans and small business loans is reasonable. Examiners focused on the percentage of small business loans to businesses with gross annual revenues of \$1 million and less and on the percentage of home mortgage loans to low- and moderate-income borrowers.

### *Home Mortgage Loans*

The distribution of home mortgage loans to individuals of different income levels, including low- and moderate-income borrowers, is reasonable. Home mortgage lending to low-income borrowers at 4.2 percent is significantly below the 23.1 demographic data. However, a low-income family in the assessment area, with an income of less than \$26,000 per year, would not likely qualify for a mortgage loan under conventional underwriting standards, especially with a median housing value of \$114,226. Additionally, 14.8 percent of the families in the assessment

area live below the poverty level. The bank's percentage of lending to moderate-income borrowers is at 12.5 percent is below the percent of moderate-income families.

<b>Borrower Distribution of Home Mortgage Loans</b>			
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>#</b>	<b>%</b>
Low	23.0	1	4.2
Moderate	16.4	3	12.5
Middle	21.9	4	16.6
Upper	38.6	16	66.7
<b>Total</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>

*Source: 2017 Census Data and Bank Records.  
Due to rounding, totals may not add to 100.0 percent.*

The bank also participates in a regional affordable housing consortium, Community Investment Corporation of the Carolinas. Since the last CRA examination, the bank originated \$625,000 in through the program. All were outside of Burke County.

### ***Small Business Loans***

The distribution of small business loans reflects reasonable penetration of loans to businesses with gross annual revenues of \$1 million or less. The following table shows that 88.9 percent of the loans were originated to businesses with GARs of \$1 million or less. This number compares favorably to the percent of businesses in this revenue category, 81.1 percent.

<b>Borrower Distribution of Small Business Loans</b>			
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>
≤ \$1,000,000	81.1	8	88.9
> \$1,000,000	6.4	1	11.1
Revenue Not Available	12.5	0	0
<b>Total</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>

*Source: 2017 D&B Data and Bank Records.*

### **Response to Complaints**

No CRA-related complaints have been received; therefore, this criterion did not affect the rating.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA rating.