



SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

November 30, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Grand Bank, National Association
Charter Number 24268

One Edinburg Road
Hamilton, NJ 08619

Office of the Comptroller of the Currency

NEW YORK METRO Field Office
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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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

- The bank's quarterly average loan-to-deposit ratio is more than reasonable given the bank's size, financial condition, lending related activities, and AA credit needs.
- The distribution of loans reflects reasonable penetration among borrowers of different incomes and businesses of different sizes.
- The bank's geographic distribution of loans within its AAs reflects reasonable dispersion throughout its AAs.
- The bank has received no Community Reinvestment Act complaints about performance in helping to meet the credit needs of its AAs.

SCOPE OF EXAMINATION

The evaluation period for the lending test covers the bank's performance from January 1, 2007 through September 30, 2009. Grand Bank, NA (GBNA) was evaluated under the Small Bank examination procedures, which include a lending test and an optional community development (CD) test. The lending test evaluates the bank's record of meeting the credit needs of its assessment areas (AAs). Conclusions on GBNA's lending performance are based on home mortgage lending and loans to businesses because these are considered the bank's primary lending products.

Data Integrity

The conclusions of this report are based on GBNA's HMDA data. During an OCC Data Integrity exam, examiners noted errors in the HMDA Loan Application Register (LAR) in excess of acceptable tolerances. A second evaluation of the data conducted by a third party also identified errors in excess of acceptable tolerances. The bank corrected the data and the updated LAR was independently tested and verified by a third party. We relied on the third party's assessment of the data's integrity which identified no issues.

DESCRIPTION OF INSTITUTION

Grand Bank, N.A. (GBNA) is an intrastate community bank headquartered in Hamilton Township, New Jersey. The bank has two branches located in Hamilton and Hamilton Square. Grand Bank began its operations in March of 2002 and operates as a banking entity for local individuals, offering a range of services tailored to meet the needs of small businesses and professionals. The bank does not have a holding company. The only subsidiary of the bank is Carnegie Mortgage. Carnegie's lending activity was considered under the lending test, with the exception of the Lending In the Assessment Area portion.

GBNA is a full service community bank offering a standard range of retail and commercial banking services. Retail services include checking accounts, savings

accounts, money-market accounts, consumer loan programs, residential mortgages, and home equity loans. The bank's commercial services include business checking, sweep accounts, commercial loans, and commercial mortgages.

The bank operates in a very competitive market. Located within Grand Bank's assessment areas are several community banks, thrift institutions, and large regional and multinational financial institutions. According to the June 30, 2009 FDIC Summary of Deposit data, Merrill Lynch Bank and Trust holds 56% of the market share, followed by Wachovia at 8.5% and PNC at 8%. Grand Bank achieved 1.34% market share and ranks 10 out of 28 institutions in the Trenton-Ewing MSA.

As of June 30, 2009, GBNA had total assets of \$378 million that consist primarily of \$321 million in loans and \$47 million in investments. Total risk based capital was \$37 million.

The previous CRA examination for GBNA, dated March 14, 2005, concluded that the bank was overall satisfactory. There are no financial or legal impediments to hinder GBNA's ability to help meet the credit needs of the communities it services.

DESCRIPTION OF ASSESSMENT AREA(S)

The bank has two AAs, the Trenton-Ewing Metropolitan Statistical Area (MSA) and the Edison Metropolitan Division (MD), for the purposes of the CRA. An adjustment to the bank's designated AA was necessary to ensure it met the requirements of the regulation. The AA's do not arbitrarily exclude low- or moderate- income areas.

Trenton – Ewing MSA AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	73	17.81	16.44	34.25	30.14	1.37
Population by Geography	350,761	11.94	14.87	35.29	37.37	0.52
Owner-Occupied Housing by Geography	84,325	6.07	12.82	38.98	42.12	0.00
Business by Geography	26,473	10.79	10.29	33.11	45.80	0.00
Farms by Geography	535	4.30	8.04	32.71	54.95	0.00
Family Distribution by Income Level	86,757	20.71	17.30	21.40	40.58	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	32,980	21.92	22.47	35.32	20.29	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below Poverty Level		68,261 90,100 9%	Median Housing Value Unemployment Rate (2000 US Census)	164,050 3.86%		

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2009 HUD updated MFI

Grand Bank's first AA is the Trenton - Ewing MSA and consists of 73 census tracts in Mercer County. Of the 73 census tracts, 17.81% are located in low- income geographies, 16.44% are located in moderate- income geographies, 34.25% are located in middle income geographies, 30.14% are located in upper income geographies, and 1.37% census tracts designated as N/A. Mercer County has 13 municipalities and encompasses 226 square miles.

According to the 2000 US Census, the median family income was \$68,261 and the 2009 HUD adjusted median family income was \$90,100. The AA's population is comprised of 86,757 family households with the following family income distribution: 20.71% are low- income, 17.30% are moderate- income, 21.40% are middle income, and 40.58% are upper income. Family households living below the poverty level are 9%. According to the 2000 US census, the median cost of housing in the AA is \$164,050. Approximately, 6.07% and 12.82% of owner-occupied housing are located in low- income geographies and moderate- income geographies, respectively.

According to Moody's, Trenton's economy started to stabilize early in 2009; however, it took a significant decline due to a drop in education and healthcare payrolls. Government and professional/business services remain fairly stable. The metro area's credit conditions remain stronger than state averages. According to the Bureau of Labor Statistics, the unemployment rate for the MSA as of October 2009 was 7.7%, which is below the state unemployment rate of 9.7%. Within the AA, a majority of individuals are employed by the service industry, which includes: state and local governments, education, health, and financial. Some of the AA's major employers include: Princeton University, Bristol-Myers Squibb, Capital Health System, and New Jersey Manufacturers Insurance.

This AA is very competitive, with several financial institutions that compete for banking services and products. According to the June 2009 FDIC Summary of Deposits Market Share Report, Grand Bank ranked 10th out of 28 institutions in the Trenton-Ewing MSA with 1.34% of the deposit market share. Merrill Lynch ranked 1st with 55.78% of the deposit market share. Wachovia Bank ranked 2nd place with 8.52% of the deposit market share and PNC ranked 3rd with 8% of the deposit market share.

As of this report, the bank has two branches located in this AA. During the evaluation period, the bank opened one branch in an upper income tract. The branches offer traditional banking products and services.

As part of our examination, we reviewed a community contact conducted during other local CRA exams in order to establish the lending needs of the communities and financial institutions' participation in the local communities. The community contact for this AA was a nonprofit organization that helps community development corporations create affordable housing and economic opportunities for low-to moderate- income individuals. The contact noted that banking needs are centered in homeownership, small business lending, and economic revitalization programs.

The contact noted that financial institutions are actively involved in their organizations

and have participated in several of their projects. Overall, the contacts felt that financial institutions are responsive to meeting the needs of the local communities.

Edison MD AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	496	4.64	18.35	51.61	24.80	0.60
Population by Geography	2,173,869	3.91	17.20	51.81	26.93	0.15
Owner-Occupied Housing by Geography	595,582	3.50	14.87	51.71	29.93	0.00
Business by Geography	176,343	3.20	13.29	51.27	32.12	0.12
Farms by Geography	3,912	1.15	9.41	52.89	36.55	0.00
Family Distribution by Income Level	570,961	19.11	18.58	22.73	39.58	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	215,185	7.80	25.84	52.10	14.26	0.00
Median Family Income		69,978	Median Housing Value	182,418		
HUD Adjusted Median Family Income for 2009		92,700	Unemployment Rate (2000	2.34%		
Households Below Poverty Level		6%	US Census)			

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2009 HUD updated MFI

Grand Bank’s second AA is located within the Edison MD of the New York – Northern New Jersey – Long Island MSA. There are 496 census tracts within the AA, which are located in Middlesex, Monmouth, Somerset, and Ocean counties. Of the 496 census tracts, 4.64% are located in low- income geographies, 18.35% are located in moderate-income geographies, 51.61% are located in middle income geographies, 24.80% are located in the upper income geographies, and 0.8% are located in census tracts designated as N/A.

According to the 2000 US Census, the median family income was \$69, 978 and the 2009 HUD adjusted median family income was \$92,700. Within this assessment area, there are 570,961 family households. Of the family households, 19.11% are low-income, 18.58% are moderate- income, 22.73% are middle income, and 39.58% are upper income. Family households living below the poverty level are 6%. According to the 2000 US Census Date, the median housing value was \$182,418. Approximately, 3.5% and 14.87% of owner-occupied housing are located in low- income geographies and moderate- income geographies, respectively.

According to the Bureau of Labor Statistics, unemployment rates in the Edison – New Brunswick Metropolitan Division increased from 3.7% in 2007 to 9% in 2009. Unemployment rates in Middlesex, Monmouth, Ocean, and Somerset counties for 2009 are 9.2%, 8.7%, 9.6%, and 7.9%, respectively. According to Moody’s, Monmouth and Ocean counties’ labor market is overall strong and improving. Within the AA, a majority of individuals are employed by employment services, restaurants, technology, health, and financial industries. Some of the AA major employers include: Meridian Health

System, AT&T Corporation, U.S ARMY, and Aventis Pharmaceuticals.

The New York–Northern New Jersey–Long Island, NY-NJ-PA MSA market is very competitive. According to the June 2007 FDIC Summary of Deposits Market Share Report, Grand Bank ranked 170 out of 243 institutions in this MSA with 0.01% of the deposit market share. JPMorgan Chase ranked 1st with 28.5% of the deposit market share. Citibank ranked 2nd place with 7.44% of the deposit market share and Bank of America ranked 3rd with 7.18% of the deposit market share.

As of this report, the bank does not have any branches located in this AA. During the evaluation period, the bank closed one branch in an upper income tract.

As part of our examination, we reviewed a community contact conducted during other local CRA exams in order to establish the lending needs of the communities and financial institutions' participation in the local communities. The community contact for this AA is a nonprofit organization that provides housing to low- income individuals. The contact noted that banking needs are centered in homeownership, small business lending, and economic revitalization programs. For the purposes of this evaluation, we also contacted a nonprofit organization which focuses on poverty and affordable housing. The organization has a national presence, but maintains local operations within the AA. This organization mirrored the comments of the previous community contact.

The contact noted that financial institutions are actively involved in their organizations and have participated in several of their projects. Overall, the contact felt that financial institutions are responsive to meeting the needs of the local communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank's overall performance is "satisfactory." This conclusion is based upon the results of the following lending test used to determine if the bank is meeting the credit needs of its AAs. The rating is a blend of the bank's performance in both the Trenton-Ewing AA and the Edison MD AA. The criteria used in the lending tests are outlined below.

Loan-to-Deposit Ratio

GBNA's loan-to-deposit ratio (LTD) is more than reasonable given the bank's size, capacity to lend, and the credit needs in the assessment area. The quarterly average loan-to-deposit ratio for the 18 quarters reviewed (March 31, 2006 - June 30, 2009) was 94.70%. The LTD reached a high of 116.94% on December 31, 2008 and a low of 82.22% on June 30, 2005. GBNA's LTD was above its peer group's average of 70.75%. The peer group consists of established national and state chartered institutions similarly sized and located. LTD ratios within the peer group ranged from 50.64% to 87.41%.

Lending in Assessment Area

A majority of the bank's lending during the evaluation period occurred outside of the bank's AA's. The bank does not meet the standard for satisfactory performance under this test. By dollar volume, 31.59% of GBNA's lending activity occurred within its AA. The percentage of lending within the AA by number of loans is 31.17%. The bank's current strategy, however, involves originating mortgages on a national level through its subsidiary, Carnegie Mortgage.

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

The distribution of loans reflects reasonable penetration among borrowers of different incomes and Grand Bank's record of lending meets the standard for satisfactory performance. GBNA's distribution of small business loans also reflects reasonable penetration among businesses of different sizes and meets the standard for satisfactory performance.

Trenton-Ewing MSA AA

Home Mortgage Lending

Lending in the Trenton-Ewing MSA by borrower income exhibits reasonable penetration. The bank's record of lending in the AA meets the standard for satisfactory performance. In the course of our analysis, we considered how affordable it was for low-income individuals to purchase a home and we further considered the poverty rate. The average median value in this AA, per the Census Bureau, as of 2008 was \$325,000. The 2008 HUD updated median family income was \$90,100. This means that low-income individuals earn less than \$45,050. Additionally 9% of households were below the poverty level. Based on the average median housing value and what low-income individuals earn, the opportunities for home purchase (and therefore home improvement and home refinancing) lending to low-income individuals would be limited. Therefore, we placed more emphasis on lending to moderate-income individuals.

The bank originated or purchased 135 home purchase loans within the Trenton-Ewing MSA during the evaluation period. The percentage of home purchase loans made to low-income borrowers is lower than the percentage of low-income families in the assessment area. However, the percentage of home purchase loans made to moderate-income borrowers exceeds the percentage of moderate-income borrowers within the assessment area.

The percentage of home refinance loans made to low-income families is lower than the percentage of low-income families within the assessment area. The percentage of home refinance loans made to moderate-income families exceeds the percentage of moderate-income families within the assessment area.

There were only six home improvement loans made in the Trenton-Ewing MSA. Therefore an analysis of this product is not meaningful and was not performed.

The data cited above is summarized in the table below.

Borrower Distribution of Residential Real Estate Loans in the Trenton-Ewing MSA									
	Total Loans	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	Number	% of AA Families	% of Bank Loans	% of AA Families	% of Bank Loans	% of AA Families	% of Bank Loans	% of AA Families	% of Bank Loans
Home Purchase	132	20.71	9.92%	17.3	26.72%	21.4	25.19%	40.58	38.17%
Home Improvement	6	20.71	0.00%	17.3	0.00%	21.4	50.00%	40.58	50.00%
Home Refinance	107	20.71	2.13%	17.3	25.53%	21.4	35.11%	40.58	37.23%

Source: GNB's HMDA Data 01-01-2007 - 09/30/2009; 2000 US Census Data

Business Lending

The bank meets the standard for satisfactory performance. The percentage of loans made to small businesses is lower than the percentage of small businesses within the assessment area. Lending to small business within the assessment area is highly competitive and GBNA competes with a number of large national financial institutions as well as regional and local lenders.

Borrower Distribution of Small Loans to Businesses						
Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less*		Loans by Original Amount Regardless of Business Size		
#	% of Total	% of Businesses	% BANK Loans	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000
97	100	74.32	59.79	73.2	15.46	11.34

Sources: Bank provided data; 2008 peer data; 2000 US Census data

Performance in the Edison MD AA

Home Mortgage Lending

Lending in the Edison MD AA by borrower income exhibits reasonable penetration. The bank's record of lending in the AA meets the standard for satisfactory performance. In the course of our analysis, we considered how affordable it was for low-income individuals to purchase a home and we further considered the poverty rate. The average median value in this AA, per the Census Bureau, as of 2008 was \$369,700. The 2008 HUD updated median family income was \$92,700. This means that low-income individuals earn less than \$46,350. Based on the average median housing value and what low-income individuals earn, the opportunities for home purchase (and therefore home improvement and home refinancing) lending to low-income individuals would be limited. Therefore, we placed more emphasis on lending to moderate-income individuals.

Grand Bank originated or purchased 286 home purchase loans in the Edison MD AA during the evaluation period. The percentage of home purchase loans within low-income geographies is lower than the percentage of low-income families within the assessment area. The percentage of home purchase loans to moderate-income families is near to

the demographic comparator.

The bank also originated or purchased 320 home refinance loans within the Edison MD AA during the evaluation period. The percent of bank loans made to low-income families was lower than the percentage of low-income families within the AA. The number of bank loans made to moderate-income families was also lower than the percentage of moderate-income families within the AA.

There were only two home improvement loans made in the Edison MD AA. Therefore an analysis of this product is not meaningful and was not performed.

Borrower Distribution of Residential Real Estate Loans in the Edison MD AA									
	Total Loans	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	Number	% of AA Families	% of Bank Loans	% of AA Families	% of Bank Loans	% of AA Families	% of Bank Loans	% of AA Families	% of Bank Loans
Home Purchase	286	19.11	3.20%	18.58	18.51%	22.73	27.76%	39.58	50.53%
Home Improvement	2	19.11	0.00%	18.58	0.00%	22.73	0.00%	39.58	100.00%
Home Refinance	320	19.11	3.75%	18.58	12.29%	22.73	25.62%	39.58	57.34%

Source: GNB's HMDA Data 01-01-2007 - 09/30/2009; 2000 US Census Data

Business Lending

GBNA's distribution of small business loans reflects excellent penetration among businesses of different sizes within the Edison AA. GBNA's record of lending to small business exceeds the standard for satisfactory performance.

The percentage of loans made to small businesses exceeds the percentage of small businesses within the assessment area.

Borrower Distribution of Small Loans to Businesses						
Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less*		Loans by Original Amount Regardless of Business Size		
#	% of Total	% of Businesses	% BANK Loans	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000
43	30.71%	77.85%	86.05%	65.12%	18.60%	16.28%

Sources: Bank provided data; 2008 peer data; 2000 US Census data

Geographic Distribution of Loans

The geographic distribution of loans reflects reasonable dispersion throughout geographies of different income levels, and GBNA's performance meets the standard for satisfactory performance. The bank's geographic distribution of small business loans reflects reasonable dispersion throughout census tracts of different income levels and meets the standard for satisfactory performance.

Performance in the Trenton-Ewing MSA

Home Mortgage Lending

The geographic distribution of loans within the Trenton-Ewing MSA reflects reasonable dispersion through census tracts of different income levels. In our analysis we took into account that low- and moderate- income tracts are clustered around the city of Trenton, where the bank does not have a physical presence. The two branches in this MSA are not located in low- or moderate- income tracts.

The bank originated 132 home purchase loans within the Trenton-Ewing MSA AA within the evaluation period. The percentage of loans made within low-income tracts exceeds the percentage of owner-occupied housing units in these geographies. The percentage of loans within moderate- income geographies is lower than the percentage of owner-occupied housing units in these geographies.

Within in the evaluation period, the bank originated or purchased 107 home refinance mortgages. The percentage of these loans made within low-income tracts is lower than the percentage of owner-occupied housing units in these geographies. Additionally, the percentage of home refinance loans made within moderate-income geographies is lower than the percentage of owner-occupied housing units in these moderate-income geographies.

There were only six home improvement loans made in the Trenton-Ewing MSA. Therefore, an analysis of this product is not meaningful and was not performed. The data referenced above is summarized in the following table.

Geographic Distribution of Residential Real Estate Loans in Trenton-Ewing MSA									
	Total Loans	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	Number	% Owner Occupied Units	% of Bank Loans	% Owner Occupied Units	% of Bank Loans	% Owner Occupied Units	% of Bank Loans	% Owner Occupied Units	% of Bank Loans
Home Purchase	132	6.07%	11.36%	12.82%	4.55%	38.98%	36.36%	42.12%	47.73%
Home Improvement	6	6.07%	0.00%	12.82%	33.33%	38.98%	33.33%	42.12%	33.33%
Home Refinance	107	6.07%	2.80%	12.82%	5.61%	38.98%	44.86%	42.12%	46.73%

Source: GBNA's HMDA Data 01-01-2007 - 09/30/2009; 2000 US Census Data

Business Lending

The bank's geographic distribution of business loans reflects reasonable dispersion throughout census tracts of different income levels.

The percentage of loans to businesses located within low-income geographies is lower than the percentage of businesses that are located in these geographies. However, the percentage of GBNA's loans made to borrowers within moderate- income tracts exceeds the percentage of businesses located within these geographies.

Geographic Distribution of Small Loans to Businesses in Trenton-Ewing MSA								
Total Loans	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
#	% of Businesses** *	% BANK Loans	% of Businesses** *	% BANK Loans	% of Businesses** *	% BANK Loans	% of Businesses** *	% BANK Loans
97	10.79	5.15	10.29	13.4	33.11	34.02	45.8	47.42

Sources: Bank provided data; 2008 peer data; 2000 US Census data

Performance in the Edison MD

Home Mortgage Lending

The bank’s pattern of lending within the Edison MD AA demonstrates reasonable dispersion. In our analysis, we took into consideration that only 3.5% of owner occupied homes within low- income geographies, limiting the bank’s ability to lend within those geographies.

The bank originated or purchased 286 home purchase loans during the evaluation period. The number of these loans which were made within low- income tracts was lower than the percentage of owner-occupied housing units in these geographies. However, there are only 3.5% of owner occupied homes within low- income geographies, limiting the bank’s ability to lend within those geographies. The number of loans made within moderate- tracts was below the percentage of owner-occupied housing units in these geographies.

Within the evaluation period, the bank originated or purchased 320 home refinance loans. The percentage of those loans made within low- income geographies was lower than the percentage of owner-occupied housing units in these geographies. The percentage of home mortgage refinance loans made within moderate-income tracts was also lower than the percentage of owner-occupied housing units in these geographies.

There were only two home improvement loans made in the Edison MD AA. Therefore an analysis of this product is not meaningful and was not performed.

Table 2 - Geographic Distribution of Residential Real Estate Loans in Edison MD AA									
	Total Loans	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	Number	% Owner Occupied Units	% of Bank Loans	% Owner Occupied Units	% of Bank Loans	% Owner Occupied Units	% of Bank Loans	% Owner Occupied Units	% of Bank Loans
Home Purchase	286	3.50%	0.35%	14.87%	7.34%	51.71%	48.60%	29.93%	43.71%
Home Improvement	2	3.50%	0.00%	14.87%	0.00%	51.71%	50.00%	29.93%	50.00%
Home Refinance	320	3.50%	0.31%	14.87%	7.19%	51.71%	36.56%	29.93%	55.94%

Source: GBNAs HMDA Data 01-01-2007 - 09/30/2009; 2000 US Census Data

Business Lending

The bank’s geographic distribution of business loans reflects reasonable dispersion throughout census tracts of different income levels.

The percentage of loans to businesses located within low-income geographies is near to the percentage of businesses that are located in these geographies. The percentage of GBNA's loans made to borrowers within moderate- income tracts is lower than percentage of businesses located within these geographies.

Geographic Distribution of Small Loans to Businesses								
Total Loans	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
#	% of Businesses** *	% BANK Loans	% of Businesses** *	% BANK Loans	% of Businesses** *	% BANK Loans	% of Businesses** *	% BANK Loans
43	3.20%	2.33%	13.29%	6.98%	51.27%	44.19%	32.12%	46.51%

Sources: Bank provided data; 2008 peer data; 2000 US Census data

Responses to Complaints

No Community Reinvestment Act-related complaints were received by the bank during the evaluation period.

Fair Lending or Other Illegal Credit Practices Review

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