

PUBLIC DISCLOSURE

September 8, 2003

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Westside State Savings Bank
00238**

**401 First Street
Westside, Iowa 51467**

**Federal Deposit Insurance Corporation
2345 Grand Boulevard, Suite 1200
Kansas City, Missouri 64108**

NOTE: 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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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act (CRA) performance of Westside State Savings Bank, Westside, Iowa, prepared by the Federal Deposit Insurance Corporation, the institution's supervisory agency, as of September 8, 2003. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.

INSTITUTION RATING

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

The following information illustrates Westside State Savings Bank's satisfactory record of meeting the credit needs of its assessment area.

- The institution's level of lending, as evidenced by its average net loan-to-deposit ratio and continued loan growth, reflects favorably on management's willingness to extend credit and compares reasonably to similarly situated banks.
- A substantial percentage of loans reviewed were extended to borrowers within the bank's designated assessment area, further demonstrating a willingness to lend within the local community.
- Loan sampling reflects an adequate distribution of lending among agricultural and commercial operations of varying sizes and residential real estate borrowers of different income levels. These findings illustrate the bank's commitment to meeting credit needs within these areas, regardless of revenue or income level.
- The geographic distribution of loans reviewed reflects satisfactory dispersion among selected geographies, demonstrating the bank's willingness to extend credit throughout its assessment area.

Senior management has not received any CRA-related complaints since the bank's prior FDIC evaluation. Finally, no violations of the substantive provisions of anti-discrimination laws and regulations were identified during the evaluation.

DESCRIPTION OF INSTITUTION

Westside State Savings Bank is a commercial bank headquartered in Westside, Iowa. As of March 2003, bank officials reported total assets of \$23,685,000. The institution is a subsidiary of Halbur Bancshares, Inc., Halbur, Iowa. Through common ownership, Westside State Savings Bank is affiliated with Farmers Savings Bank, Halbur, Iowa. The bank has a branch office in Vail, Iowa.

The institution offers a variety of products and services including agricultural, commercial, consumer, and residential real estate credits. As evidenced by its June 2003 Report of Condition, agricultural lending is a primary component of the institution's loan portfolio. As reflected in Table 1, agricultural lending (comprised of *Secured by Farmland* and *Agricultural*) accounts for 44 percent of the bank's portfolio. Residential real estate lending (comprised of *1-4 Family Residential*) accounts for 26 percent of the portfolio and commercial lending (comprised of *Construction and Land Development*, *Multi-Family (5 or more) Residential*, *Nonfarm Nonresidential Properties*, and *Commercial and Industrial*) accounts for an additional 23 percent. Examining personnel did not detect any legal impediments or other factors that might inhibit the bank's ability to meet the credit needs of its assessment area. Detailed loan information appears below in Table 1.

Table 1 – Loan Portfolio Distribution as of June 30, 2003		
Loan Category	Dollar Amount (000s)	Percent of Total Loans
Construction and Land Development	96	0
Secured by Farmland	2,255	13
1-4 Family Residential	4,620	26
Multi-Family (5 or more) Residential	0	0
Nonfarm Nonresidential Properties	1,862	12
Total Real Estate Loans	8,833	51
Agricultural	5,510	31
Commercial and Industrial	2,183	12
Consumer	1,098	6
Obligations of States and Political Subdivisions	76	0
Other	10	0
Total Loans	17,710	100

Source: Report of Condition

DESCRIPTION OF WESTSIDE STATE SAVINGS BANK'S ASSESSMENT AREA

The Community Reinvestment Act (CRA) of 1977 (12 U.S.C. 2901) requires financial institutions to identify one or more assessment areas within which its regulating agency will evaluate the bank's performance. An institution delineates its assessment area to include the geographies in which the bank has its main office, branches, and other deposit taking remote service facilities, as well as the surrounding geographies in which the bank has originated or purchased a substantial portion of its loans. Assessment areas must consist of one or more census tracts (CTs), which are subdivisions of a county designated by the United States Bureau of the Census.

*Each census tract is designated as low-, moderate-, middle-, or upper-income by comparing the 2000 U.S. Census Bureau median family income (MFI) of the geography to the appropriate MFI for the area. The applicable figure used to determine the income categories for **Westside State Savings Bank's** assessment area is \$44,599 for the non-metropolitan areas of the State of Iowa. Table 2 provides the income category definitions used in this evaluation.*

Table 2 – Designation of Income Categories	
Income Category	Definition
Low-Income	Income of less than 50 percent of the area MFI
Moderate-Income	Income of at least 50 percent and less than 80 percent of the area MFI
Middle-Income	Income of at least 80 percent and less than 120 percent of the area MFI
Upper-Income	Income of 120 percent or more of the area MFI

Geographic Configuration

Westside State Savings Bank defines its assessment area as Carroll County CTs 9601-9604 and Crawford County CT 9701. According to 2000 U.S. Census Bureau data, this area encompasses 19,055 residents disbursed among 15 towns. The institution's main office and branch facility are located within Crawford County CT 9701. Management also operates one automated teller machine within this census tract. As currently defined, the institution's assessment area satisfies all technical requirements of the regulation.

Income Demographics and Housing Characteristics

Regulatory personnel determined the income distribution of the bank's assessment area by reviewing the median family income of each geography in comparison to its respective percentage of the area's 2000 median family income level. Using the figures and definitions detailed previously, the institution's assessment area includes five middle-income census tracts. The classification of these geographies as middle-income has remained unchanged since the 1990 U.S. Census.

According to 2000 U.S. Census data, Westside State Savings Bank's assessment area includes 7,487 households, of which 5,099 are considered families. Regarding the income status of these families, 15 percent qualify as low-income, 19 percent qualify as moderate-income, 25 percent qualify as middle-income, and 41 percent qualify as upper-income. Approximately 4 percent of assessment area families are below the poverty level threshold¹ and less than 3 percent of households receive public assistance.

Further, based upon 2000 U.S. Census data, the assessment area contains 7,961 total housing units. Of these units, 70 percent are reported as owner-occupied, 24 percent as renter-occupied, and 6 percent as vacant. Housing stock within the defined area is comprised primarily of 1-4 single-family dwellings; census data reflects a concentration of 89 percent within this category. Multi-family units and mobile homes or trailers account for 9 percent and 2 percent of housing units, respectively.

The median value of housing within the assessment area is lower than the state average. Specifically, 2000 demographic data for Carroll and Crawford Counties reports median housing values of \$75,900 and \$58,200, respectively. In comparison, the median value for the State of Iowa was recorded at \$82,500 in 2000.

Economic Characteristics

The assessment area is dependent upon the commercial and retail sectors of nearby larger communities, as well as the strength of agricultural production and smaller commercial businesses within the immediate area. Census data includes a report of earnings by place of work. These results provide an enumeration of jobs located within the county, whether or not the position is filled by a resident of that county.² Carroll County Census data for 2000 states that 62 percent of county earnings are derived from employment categorized as manufacturing, services, or "other."³ These same industries account for 65 percent of Crawford County earnings; government positions account for an additional 16 percent of earnings within this county. Finally, the farming industry contributes 7 percent and 9 percent of Carroll and Crawford County earnings, respectively.

As of July 2003, Iowa Workforce Development reported unemployment rates of 2.3 percent and 3.2 percent for Carroll and Crawford Counties, respectively. In comparison, for the same period, the State of Iowa reported an unemployment rate of 4.6 percent. The City of Westside hosts the following major employers: AR-WE-VA Community School District, Iowa Coolers &

¹ Families or persons are classified as "below poverty" if their total family income or unrelated individual income is less than the poverty level threshold specified for the applicable family size, age of householder, and number of related children under 18 present. For example, the 2000 poverty level threshold for a family of four is \$17,029; therefore, such a family earning less than \$17,029 is considered to be below poverty level.

² Data derived from Iowa State University Extension – "*Data for Decision Makers.*"

³ The category of "other" includes agricultural services, mining, construction, transportation, public utilities, and wholesale trade.

Equipment, and Farmers Cooperative Elevator Company. Other major employers within the assessment area include: Pella Corporation, Farner-Bocken Company, St. Anthony Regional Hospital, and American Home Shield Corporation; all are located within Carroll, Iowa.

According to 2002 D&B Corporation data, the institution's assessment area contains 1,637 businesses and 511 farms. A comparison of 1992 and 1997 Agricultural Census data reveals that Carroll and Crawford Counties have experienced a decrease in the number of full-time farms and an increase in the average size of farms. Specifically, in Carroll County, the number of full-time farms decreased by 16 percent during this period (from 914 farms to 765 farms) while the average farm size increased 6 percent from 301 acres in 1992 to 320 acres in 1997. Similarly, profile information for Crawford County reflects a 21 percent decrease in full-time farms (from 891 farms to 708 farms) and a 19 percent increase in the average size of farms (from 329 acres to 390 acres). In comparison, the State of Iowa reported a 16 percent decrease in the number of full-time farms and a 6 percent increase in the average size of farms.

Competition

Financial data submitted by banks, credit unions, savings and loan institutions, and savings banks for 2001 reports 9 entities operating 13 facilities within Westside State Savings Bank's assessment area. These institutions range from small community banks headquartered within the immediate area to larger institutions operating only branch locations within the area. As of the reporting period, these nine entities had combined total assets ranging from \$23 million to over \$12 billion. Overall, this environment is considered competitive, especially under the current interest rate environment.

Community Needs

CRA evaluation procedures include contacting area leaders to discuss the needs and development of the community, as well as the involvement of local financial institutions. Individuals interviewed provide information based upon their knowledge and expertise in the housing and/or economic sectors. According to a community representative consulted in conjunction with this evaluation, there has been continued expansion in industrial and retail business within the assessment area. Additionally, there has been some new home construction. The individual noted that credit needs exist for real estate loans and commercial loans. Finally, the contact noted that agriculture remains an essential component of the area's economy. Reports of Condition filed by local financial institutions reflect the area's need for agricultural-, commercial-, and real estate-related financing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Loan-to-Deposit Ratio

Examiners reviewed the bank's average quarterly net loan-to-deposit (LTD) ratio in order to evaluate its performance for this criterion. A small bank's net LTD ratio is calculated by dividing the institution's net loans and leases by its total deposits. The bank's net LTD ratio is then averaged for all quarter-ends since the last FDIC CRA evaluation. Each small institution's ratio is evaluated and analyzed using performance context, including the bank's capacity to lend, demographic and economic factors present within the assessment area, and available lending opportunities. Detailed below is an analysis of this performance criterion.

Westside State Savings Bank's level of lending, as evidenced by its average net loan-to-deposit ratio and continued loan growth, reflects favorably on management's willingness to extend credit.

To determine the bank's level of lending, regulatory personnel calculated the subject bank's average net loan-to-deposit ratio at 78 percent utilizing the quarterly Reports of Condition from December 31, 1998, through June 30, 2003. Examiners then compared the bank's ratio to those of five other financial institutions operating with similar market conditions and resources, ranging from \$18 million to \$64 million in total assets. Information pertaining to the subject institution and the selected comparables is listed in Table 3 alphabetically by location of the institution's main office.

Table 3 – Comparable Financial Institution Analysis		
Institution	Total Assets (000s)	Average Net LTD Ratio
Westside State Savings Bank, Westside, Iowa	23,685	78
Breda Savings Bank, Breda, Iowa	23,146	84
Defiance State Bank, Defiance, Iowa	18,403	91
Farmers Savings Bank, Halbur, Iowa	18,252	98
Citizens Bank, Sac City, Iowa	30,155	61
Iowa State Bank, Sac City, Iowa	63,758	60

Source: Reports of Condition for quarter-ends December 31, 1998, to June 30, 2003

As illustrated within Table 3, Westside State Savings Bank's average net loan-to-deposit ratio compares reasonably to those of selected competitors. Further review of the institution's activity reveals continued loan growth since the 1998 FDIC CRA evaluation. Throughout the 19 calendar quarters reviewed, the bank's net loan-to-deposit ratio has ranged from a low of 59 percent in December 1998 to a high of 98 percent in June 2003. Of the selected comparable institutions, only the net loan-to-deposit ratio of the bank's affiliate institution is higher as of June 2003. The net loan-to-deposit ratio of the remaining similarly situated banks range from 65

to 88 percent as of June 2003. Additionally, during the evaluation period, Westside State Savings Bank's net loans and total deposits increased by 69 percent and 2 percent, respectively. Changes in net loans for the five comparable institutions ranged from a 22 percent decrease to a 55 percent increase for the same period. The subject institution's continued loan growth is attributed to a change in lending philosophy due to new ownership in 1998.

Overall, the institution's average net loan-to-deposit ratio is comparable to those of similarly-situated financial institutions. The institution's current loan-to-deposit ratio and continued loan growth reflect favorably upon management's willingness to extend credit.

Selection of Loan Product Samples

To evaluate the institution's CRA performance, a sample of agricultural, commercial, and residential real estate loans was selected from the institution's current loan portfolio. Regulatory personnel derived this statistical sample⁴ from loans originated or purchased by the bank between August 6, 2002, and August 5, 2003. The CRA product samples selected included 47 agricultural loans totaling \$1,648,000, 35 commercial loans totaling \$1,460,000, and 25 residential real estate loans totaling \$1,966,000. As addressed within the "*Description of Institution*" section, agricultural lending is a primary component of the bank's loan portfolio. Due to this concentration, greater weight is given to this sample throughout the next three performance criteria.

Assessment Area Concentration

Examiners reviewed the bank's assessment area lending concentration in order to evaluate its performance under this small bank CRA criterion. Examiners typically sample loans and complete a comparative analysis that details loans extended inside and outside of the bank's assessment area. Detailed below is an analysis of this performance criterion.

Westside State Savings Bank exhibits a high level of lending within its assessment area, demonstrating management's willingness to extend credit within the local community. Specifically, based upon the loan sampling addressed within the preceding section, examiners determined the percentage of agricultural, commercial, and residential real estate loans granted inside and outside of the bank's defined assessment area. As illustrated in Table 4, a majority of credits sampled lie within the referenced area.

⁴ Regulatory personnel used a statistical sampling formula based upon a 90 percent confidence level and a precision level of plus or minus 15 points. The selected samples were derived from the following universes: 194 agricultural loans with current balances totaling \$5,461,801; 77 commercial loans with current balances totaling \$1,334,193; and 32 residential real estate loans with current balances totaling \$2,159,948.

Table 4 – Distribution of Loans Inside and Outside of the Assessment Area

Loan Category	Number of Loans					Dollar Volume of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$ (000s)	%	\$ (000s)	%	
Agricultural	44	94	3	6	47	1,518	92	130	8	1,648
Commercial	31	89	4	11	35	999	68	461	32	1,460
Real Estate	21	84	4	16	25	1,594	81	372	19	1,966
Total	96	90	11	10	107	4,111	81	963	19	5,074

Source: Examiner Sampling

In aggregate, examiner review revealed that 90 percent by number and 81 percent by dollar of total loans sampled lie within the bank’s assessment area. Based upon this analysis, the institution’s assessment area concentration performance is considered strong.

Borrower Profile

For this criterion, examiners determine the distribution of loans that the bank originated inside its assessment area by business gross annual revenues (agricultural and commercial) or borrower income (residential real estate), as applicable.

Loan sampling reflects a reasonable penetration of lending among agricultural and commercial operations of varying revenue levels and residential real estate borrowers of different income categories, given area demographics. These findings illustrate the bank’s commitment to meeting credit needs within these areas, regardless of revenue or income level. Table 5 illustrates the gross annual revenue distribution of the agricultural and commercial loans sampled within the bank’s defined assessment area.

Table 5 – Distribution of Agricultural and Commercial Loans by Gross Annual Revenues

Gross Annual Revenues	Farms and Businesses in the Assessment Area ⁵	Distribution of Agricultural and Commercial Loans Sampled			
	%	#	%	\$ (000s)	%
< \$100,000	52	27	36	690	28
\$100,000 - < \$250,000	29	24	32	487	19
\$250,000 - < \$500,000	10	17	23	678	27
\$500,000 - < \$1,000,000	4	1	1	32	1
≥ \$1,000,000	5	6	8	630	25
Total	100	75	100	2,517	100

Source: Examiner Sampling and 2002 D&B Corporation Data

As reflected in Table 5, a vast majority of loan customers sampled are classified as “small businesses” or “small farms” for CRA purposes as they report \$1,000,000 or less in gross annual revenues. Of the agricultural and commercial loans sampled within the assessment area, the institution granted 92 percent by number and 75 percent by dollar volume to operations reporting \$1,000,000 or less in gross revenue. For comparison, 2002 D&B Corporation data for farm and non-farm operations was reviewed. For those entities operating within the defined area and providing revenue information, 95 percent reported gross revenues of \$1,000,000 or less.

Although lower than area demographics, the bank’s level of lending within the smallest revenue category is considered reasonable given further analysis of the data. Farms and non-farms within this category, due to their size of operation, typically have limited need for financing. For example, the 1997 Agricultural Census reveals that Carroll and Crawford County farms reporting less than \$100,000 in revenues had average annual market sales of \$22,172 and represented only 13 percent of total agricultural sales. Furthermore, the 1997 Census also reports that 34 percent of Carroll and Crawford County farm operations reported no interest paid, indicating little, if any, credit need. Finally, only 67 percent of operators reported farming as their principal occupation; therefore, approximately 33 percent of farms within these two counties are operated by “hobby farmers”, with less of a need for borrowing. As these statistics demonstrate, credit needs of smaller operations (farm or non-farm) are likely to be much less than those of larger operations.

⁵ Based upon 1,737 farm and non-farm operations within the bank’s assessment area that reported gross revenues; an additional 411 entities responded to D&B Corporation inquiries but did not provide revenue information.

In all other revenue categories, the institution’s lending to borrowers either compares reasonably to, or exceeds, corresponding D&B Corporation data. Overall, CRA sampling revealed a reasonable distribution of loans in all revenue levels reflecting management’s commitment to the local agricultural and commercial industries, including small operations.

Examiners also determined the borrower income level distribution of residential real estate loans sampled within the bank’s assessment area. Borrower income levels were determined by comparing reported applicant data to the respective area’s estimated median family income for the year of loan origination. As stated under “*Selection of Loan Product Samples*,” CRA samples included loans originated from August 5, 2002, through August 6, 2003; therefore, the income distribution was based upon the corresponding 2002 and 2003 non-metropolitan median family incomes for the State of Iowa. These figures, as estimated by the Department of Housing and Urban Development (HUD), equal \$49,400 and \$50,800, respectively. Table 6 provides the dollar amounts used to classify families or borrowers by income level; Table 7 depicts the results of the bank’s real estate sample.

Table 6 – Median Family Income Ranges		
Income Category	2002 Statewide Iowa Non-Metropolitan MFI (\$49,400)	2003 Statewide Iowa Non-Metropolitan MFI (\$50,800)
Low (< 50%)	< \$24,700	< \$25,400
Moderate (50 - < 80%)	\$24,700 - < \$39,520	\$25,400 - < \$40,640
Middle (80 - < 120%)	\$39,520 - < \$59,280	\$40,640 - < \$60,960
Upper (≥ 120%)	≥ \$59,280	≥ \$60,960

Source: Department of Housing and Urban Development

The sample of residential real estate loans originated to borrowers of different income levels by number and dollar volume is depicted in Table 7; this data includes only those loans involving property located within the bank’s assessment area.

Table 7 – Distribution of Residential Real Estate Loans by Borrower Income Level					
Median Family Income Level	Families in the Assessment Area	Distribution of Residential Real Estate Loans Sampled			
	%	#	%	\$ (000s)	%
Low (< 50%)	15	4	19	143	9
Moderate (50 - < 80%)	19	3	14	167	11
Middle (80 - < 120%)	24	6	29	383	24
Upper (≥ 120%)	42	8	38	901	56
Total	100	21	100	1,594	100

Source: Examiner Sampling and 2000 Census Data

As illustrated in Table 7, of the real estate loans sampled within the assessment area, the institution granted 19 percent by number and 9 percent by dollar to low-income borrowers. This level of lending exceeds corresponding census demographics. Specifically, 2000 Census data reports that 15 percent of families inside the bank’s defined assessment area are of low-income status. Further analysis of this data also reveals that 30 percent of these low-income families (220 of 740 families) are below poverty level and, therefore, likely unable to afford a home.

CRA sampling also reflects that 14 percent by number and 11 percent by dollar volume of real estate loans sampled were extended to moderate-income individuals. In comparison, census demographics report that 19 percent of families within the assessment area are of moderate-income status. Senior management expressed the opinion that residents in the immediate area likely qualify as low-income or middle-income, but that there are fewer individuals that fall in-between and qualify as moderate-income.

Overall, the residential real estate review reflects a reasonable distribution of lending among the various income categories, including the low- and moderate-income levels.

Geographic Distribution of Lending

Examiners analyze the bank’s performance under this criterion to determine if the bank is lending throughout its assessment area, including low- and moderate-income areas or geographies within the assessment area as applicable. The composition of the bank’s assessment area by census tract income level is important to this evaluation process as it is compared to where the bank originates its sampled loans. Detailed below is an analysis of this performance criterion.

The institution’s geographic distribution of loans is reasonable given the location of its offices, the characteristics of the assessment area, and the availability of competing bank services. For the basis of this determination, examiners reviewed the geographic distribution of all loans sampled within the assessment area by individual geography. Table 8 depicts the results of the agricultural and commercial loan samples; Table 9 reflects the residential real estate analysis.

Table 8 – Distribution of Agricultural and Commercial Loans by Geography					
Geography	Farms and Businesses in the Assessment Area	Distribution of Agricultural and Commercial Loans Sampled			
	%	#	%	\$ (000s)	%
Carroll County CT 9601	15	1	1	14	1
Carroll County CT 9602	19	16	21	998	39
Carroll County CT 9603	22	4	5	125	5
Carroll County CT 9604	30	1	1	33	1
Crawford County CT 9701	14	53	72	1,347	54
Total	100	75	100	2,517	100

Source: Examiner Sampling and 2002 D&B Corporation Data

As addressed under “*Description of Westside State Savings Bank’s Assessment Area*,” the institution’s defined area includes five middle-income census tracts. As illustrated within Table 8, agricultural and commercial borrowers sampled are dispersed amongst these geographies. A higher concentration of loans and dollar volume is reflected within Crawford County CT 9701, which corresponds to the City of Westside and the bank’s office locations. Further, a small concentration is also noted within Carroll County CT 9602, the geography that borders the City of Westside. The bank’s level of lending within the remaining tracts is lower but still considered reasonable given the nature of the products sampled, the availability of competing services, and geographic distance. Carroll County CTs 9603 and 9604 encompass the City of Carroll, Iowa. Due to the commercial and residential development of this area, these geographies do not

provide agricultural lending opportunities. Furthermore, Westside State Savings Bank does not actively pursue commercial business from Carroll due to the availability of competing service providers located within the immediate area. At present, seven financial providers operate within the City of Carroll. Finally, CT 9601 comprises the northeastern portion of Carroll County and is not in close proximity to the subject institution.

Table 9 – Distribution of Residential Real Estate Loans by Geography					
Geography	Families in the Assessment Area	Distribution of Residential Real Estate Loans			
	%	#	%	\$ (000s)	%
Carroll County CT 9601	22	0	0	0	0
Carroll County CT 9602	13	3	14	246	15
Carroll County CT 9603	32	4	19	388	24
Carroll County CT 9604	19	6	29	636	40
Crawford County CT 9701	14	8	38	324	21
Total	100	21	100	1,594	100

Source: Examiner Sampling and 2000 U.S. Census data

Table 9 reflects the bank’s distribution of residential real estate loans sampled throughout Carroll County CTs 9602-9604 and Crawford County CT 9701. The highest concentration of lending is again reflected within the geography that encompasses the bank’s two office locations. The only geography in which no loans were identified is Carroll County CT 9601. As addressed with the agricultural and commercial sample, this geography is in northeast Carroll County. Thus, unless other relationships existed, it would be unlikely that residents of this area would travel to Westside State Savings Bank given their geographic distance and the availability of other financial services within the immediate area.

Overall, the geographic distribution of loans sampled reflects reasonable dispersion indicating the bank’s willingness to extend credit throughout its assessment area.

Response to CRA-Related Complaints

Examiners are required to review the bank's response to any substantiated complaints. If the bank receives any written comments from the public relating to its CRA performance, they will be found in its CRA public file along with the bank's response. Comments and responses for the preceding two calendar years will be maintained in the bank's CRA public file, except for those comments that reflect adversely on the good name or reputation of any persons other than the bank.

Senior management has not received any CRA-related complaints since the bank's October 1998 FDIC CRA evaluation.

Compliance with Anti-discrimination Laws and Regulations

Examiners are required to take into consideration the bank's compliance with fair lending laws when assigning a CRA rating.

No violations of the substantive provisions of anti-discrimination laws and regulations were identified during the evaluation