

# **PUBLIC DISCLOSURE**

July 8, 2008

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Atwater State Bank  
Certificate Number 1396

222 Atlantic Avenue  
Atwater, Minnesota 56209

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

**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.

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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 **Atwater State Bank, Atwater, Minnesota**, prepared by the **Federal Deposit Insurance Corporation**, the institution's supervisory agency, as of **July 8, 2008**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.*

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

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

- A majority of the small business, residential real estate, and small farm loans originated by the bank are within the bank's assessment area, reflecting a reasonable commitment to meeting the credit needs of the assessment area.
- An analysis of small business, residential real estate, and small farm loans revealed a reasonable distribution of loans among businesses and farms of different sizes, and borrowers of different incomes.
- The bank's average net loan-to-deposit ratio reflects an outstanding willingness to provide credit given the institution's size, financial condition, and community credit needs.
- The bank has not received any CRA-related complaints since the last evaluation; therefore, this performance criterion was not evaluated.

## **SCOPE OF EXAMINATION**

This CRA evaluation was conducted using Small Bank Performance Evaluation procedures. The evaluation covers the bank's CRA performance since the bank's previous CRA evaluation dated September 15, 2003, through July 8, 2008, the date of this evaluation.

A sample of small business and small farm loans originated between June 30, 2007 and June 30, 2008, were evaluated. A small business loan is included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate, or are classified as commercial and industrial loans. A small farm loan is included in 'loans to small farms' as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers. Additionally, a sample of residential real estate loans originated between June 30, 2007, and June 30, 2008, were evaluated. The small farm, small business, and residential real estate loans are equally considered in the evaluation based on the composition of the loan portfolio.

The sample of small farm loans reviewed consisted of 30 loans totaling \$1,928,710, from a universe of 84 loans totaling \$5,752,901. The sample of residential real estate loans reviewed consisted of 22 loans totaling \$1,420,986, from a universe of 28 loans totaling \$1,720,370. The sample of small business loans reviewed consisted of 28 loans totaling \$996,605, from a universe of 70 loans totaling \$2,946,239.

## **DESCRIPTION OF INSTITUTION**

Atwater State Bank's main office is located in Atwater, Minnesota. The bank operates one full-service branch office located in Kandiyohi, Minnesota, which was added since the previous CRA evaluation. The bank offers a full array of deposit products, including checking, savings, certificates of deposit, and IRA accounts. The institution also offers a variety of loan products, including commercial, agricultural, residential real estate, and consumer installment loans. The bank also offers 24-hour telephone banking.

As of March 31, 2008, the institution's total assets equaled \$31,084,000 of which total loans represented \$23,964,000. The bank's largest loan products by dollar volume are agricultural loans (including Secured by Farmland and Agricultural Production), residential real estate loans (including 1 - 4 Family Residential Real Estate and Multifamily Residential loans), and commercial loans (including Commercial Real Estate and Commercial and Industrial loans), which represent 38, 29, and 23 percent of total loans, respectively. The primary business focus of the institution is agricultural lending, residential real estate lending, and commercial lending, which is commensurate with the credit needs of the local area. A distribution of the bank's entire loan portfolio is reflected in Table 1 on the following page.

<i>Table 1 – Loan Distribution as of March 31, 2008</i>		
<i>Loan Type</i>	<i>Dollar Amount (000s)</i>	<i>Percent of Total Loans (%)</i>
<i>Construction and Land Development</i>	\$437	2%
<i>Secured by Farmland</i>	\$4,698	20%
<i>1-4 Family Residential Real Estate</i>	\$6,425	27%
<i>Multifamily (5 or more) Residential</i>	\$415	2%
<i>Commercial Real Estate</i>	\$1,055	4%
<i>Agricultural Production</i>	\$4,433	18%
<i>Commercial and Industrial</i>	\$4,467	19%
<i>Consumer</i>	\$1935	8%
<i>Other</i>	\$99	0%
<i>Total Loans Net of Unearned Income</i>	\$23,964	100%

Source: March 31, 2008 Report of Condition.

The institution is owned by Cattail Bancshares, Inc., a two-bank holding company located in Atwater, Minnesota. The institution is not subject to any financial or legal impediments that would limit its ability to help meet the credit needs of its assessment area. The institution was rated Satisfactory at the previous CRA Performance Evaluation dated September 15, 2003.

## **DESCRIPTION OF ASSESSMENT AREA**

The bank has defined its assessment area as the western part of Meeker County, and the eastern part of Kandiyohi County, both in Minnesota. The bank’s assessment area includes 5 middle-income census tracts. Meeker and Kandiyohi Counties are not part of a metropolitan statistical area. According to the 2000 U.S. Census, the population of the assessment area is 16,058. Unless otherwise stated, all demographic information presented is from the 2000 U.S. Census.

Each census tract in the assessment area is classified as middle-income based on the 2000 U.S. Census Median Family Income (MFI) for the non-metropolitan areas of Minnesota, which is \$45,925. A breakdown of census tract income levels is presented in Table 2.

<i>Table 2 – Median Family Income Ranges</i>		
<i>Census Tract Income Level</i>	<i>Percent of MFI</i>	<i>Non-Metropolitan Minnesota MFI</i>
<i>Low</i>	<i>&lt; 50%</i>	<i>&lt; \$22,963</i>
<i>Moderate</i>	<i>50% to &lt; 80%</i>	<i>\$22,963 to &lt; \$36,740</i>
<i>Middle</i>	<i>80% to &lt;120%</i>	<i>\$36,740 to &lt; \$55,110</i>
<i>Upper</i>	<i>120% and over</i>	<i>\$55,110 and over</i>

Data Source: 2000 U.S. Census.

There are 4,564 families in the assessment area. Low-income families comprise 14 percent of all families residing in the assessment area, of which, 5 percent are below the poverty level. Moderate-income families comprise 19 percent of all families residing in the assessment area. Middle-income families comprise 25 percent of all families residing in the assessment area, and upper-income families represent 42 percent of the families in the assessment area. Of the 7,738 housing units in the assessment area, 68 percent are owner-occupied, 13 percent are occupied rental units, and 19 percent are vacant. The median housing value in the assessment area is \$98,446, which is higher than the non-metropolitan areas of Minnesota housing value of \$86,211, but lower than the state of Minnesota median housing value of \$118,100. The median housing age within the assessment area is 33 years, which is comparable to the non-metropolitan areas of Minnesota and state of Minnesota median housing ages of 37 and 31 years, respectively. The median gross rent in the assessment area is \$431, which is comparable to the median gross rent for the non-metropolitan areas of Minnesota of \$409, and less than the state of Minnesota median gross rent of \$566.

According to 2007 D&B business demographic information, there are 1,440 businesses in the assessment area. Of these, 57 percent had gross annual revenues of \$1,000,000 or less, 3 percent reported gross annual revenues greater than \$1,000,000, and 40 percent did not report revenue numbers.

According to 2007 D&B business demographic information, there are 311 total farms in the assessment area. Of these farms, 96 percent had gross annual revenues of less than \$500,000, 1 percent reported gross annual revenues greater than \$500,000, and 3 percent did not report revenues.

The United States Department of Agriculture (USDA) performs a Census of Agriculture every five years that provides important farming-related information for each state and includes individual county data. Specifically, the Census helps provide a local perspective for Meeker and Kandiyohi Counties as compared to the overall State of Minnesota information. The most recent data available for the USDA Census of Agriculture is from 2002. Selected agricultural data from the 2002 Census for Meeker and Kandiyohi Counties as compared to the State of Minnesota is provided in Table 3.

<b>Table 3– 2002 Census of Agriculture Data for Meeker and Kandiyohi Counties and the State of Minnesota</b>			
<b>Demographic Data</b>	<b>Meeker County</b>	<b>Kandiyohi County</b>	<b>State Of Minnesota</b>
Average Market Value of Agricultural Products Sold per Farm	\$113,120	\$179,546	\$106,083
Percent Change in Average Market Value of Products Sold (1997 – 2002)	(13%)	(3%)	(1%)
Government Payments, Average Per Farm Receiving	\$6,974	\$7,935	\$7,984
Percent Change in Average Per Farm Government Payments (1997 – 2002)	32%	8%	16%
Growth in Number of Farms Between 1997 and 2002	6%	5%	3%
Percent Change in Amount of Land in Farms Between 1997 and 2002	12%	3%	(0.2%)
Average Farm Size (Acres)	298	317	340
Percent Change in Average Farm Size Between 1997 and 2002	6%	(2%)	(3%)

Source: USDA Census of Agriculture

The Census of Agriculture information reveals that Meeker and Kandiyohi have a few notable differences as compared to the overall State of Minnesota. Specifically, the average market value of products in dollars that sold in Kandiyohi County is significantly larger than in both Meeker County and the State of Minnesota, while Meeker County has experienced an overall sharper percentage decline during the census period from 1997 to 2002. The average amount of government payments is approximately 13% less in Meeker County, as compared to Kandiyohi County and Statewide averages. However, although the average farm size is smaller in Meeker County than Kandiyohi County and Statewide, Meeker County farms grew in size by 6 percent during the Census period, while the average farm size in both Kandiyohi and Statewide declined over the same period.

Meeker County ranked 27<sup>th</sup> in the State of Minnesota, out of a universe of 87 counties, in total value of agricultural products sold, and 325<sup>th</sup> out of a universe of 3,078 counties in the United States. Kandiyohi County ranked 4<sup>th</sup> in the State of Minnesota, out of a universe of 87 counties, in total value of agricultural products sold, and 119<sup>th</sup> out of a universe of 3,078 counties in the United States. Minnesota ranked 6<sup>th</sup> out of the 50 United States in total value of agricultural products sold. In general, the Census of Agriculture information indicates that the area farms are typical for farming operations in the state overall.

Bank management stated that there is strong competition in the assessment area and that most area institutions are aggressive in both loan and deposit pricing. The competitiveness of the assessment area is confirmed by deposit market share information for Kandiyohi and Meeker counties from the FDIC/OTS Summary of Deposits. This information is compiled annually as of June 30 each year. The information can be accessed through the internet at:

<http://www2.fdic.gov/sod/sodMarketBank.asp?barItem=2>. There are 19 commercial banks located in Kandiyohi and Meeker counties, which includes the bank's assessment area. These financial institutions have 31 offices in the bank's area and hold \$1,170,071,000 in FDIC-insured deposits. Ranking by deposits, Atwater State Bank is the 16<sup>th</sup> largest financial institution in the

assessment area and holds 1.64 percent of the assessment area's total FDIC-insured deposits. Included in the bank's assessment area are larger banks such as Bremer Bank N.A., Heritage Bank N.A., Center National Bank, and Wells Fargo N.A. Together, these banks hold 48 percent of the total FDIC-insured deposits in the bank's assessment area.

The Minnesota Department of Employment and Economic Development reported that the unemployment rate for Kandiyohi and Meeker Counties was 4.4 percent and 6.1 percent in May 2008, respectively. The unemployment rates in Kandiyohi and Meeker Counties rose from 3.9 percent and 5.2 percent a year earlier, respectively. The May 2008 statewide unemployment rate for Minnesota was 5 percent, up from 4.1 percent a year earlier. The Minnesota Department of Employment and Economic Development also reports that large employers in the bank's assessment area, consist of Cosmos Healthcare Center, Jennie-O Turkey Store and Feed Mill, Marketing Concepts Inc., Melvins on the Lake, Uni-Hydro Inc., ACGC Schools, Jahnke Foods, and G. Michaels Bar & Grill.

During the evaluation, examiners reviewed information from a representative of the assessment area (community contact) to obtain profiles of the communities, identify community development opportunities and general credit needs, and assess opportunities for participation by local financial institutions.

The community contact discussed the general economic conditions of the area, describing the farm economy as strong, as a result of rising commodity prices. However, the contact indicated that there are no current activities that will result in any significantly new employment opportunities in the area, and that local economic development efforts are focused on smaller initiatives that may result in expansion of existing businesses.

The contact stated that affordable housing development is not a business priority in the area; however, there is sufficient affordable housing available at this time to meet present demand.

The community contact stated that, in general, area banks have taken advantage of the opportunity to share the risk of economic development initiatives by participating in lending programs with local Economic Development Authorities and the Mid-Minnesota Development Commission. These entities provide gap financing and incentives that enhance loan proposals to better meet the requirements of financial institution.

Overall, the contact indicated that the lending environment is competitive, credit is readily available, and area financial institutions are community-minded. The examiners ascertained the credit needs of the assessment area from the community contact, interviews with bank personnel, and demographic information. The credit needs of the assessment area include lending to small businesses, small farms, and consumers for residential real estate.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Conclusions with respect to the following three performance criteria, *Lending in Assessment Area, Lending Among Businesses and Farms of Different Sizes and to Borrowers of Different Incomes, and Geographic Distribution of Loans*, are based on review of the institution’s loan portfolio. Examiners reviewed small farm loans (including Secured by Farmland and Agricultural Production loans), residential loans, and small business loans (including Commercial Real Estate and Commercial and Industrial loans). The agricultural, residential real estate, and commercial loans comprise 90 percent of the loan portfolio.

### Lending in Assessment Area

The bank’s level of lending within the assessment area is reasonable considering the size of the area, lending opportunities, and competition from other financial institutions. The sampling of small business, small farm, and residential real estate loans revealed that the bank originates a majority of its loans by number and dollar volume, within the assessment area. The specific findings are provided in Table 4.

<i>Table 4 – Distribution of Loans Inside and Outside of the Assessment Area</i>										
<i>Loan Sample</i>	<i>Number of Loans</i>					<i>Dollars in Loans</i>				
	<i>Inside</i>		<i>Outside</i>		<i>Total</i>	<i>Inside</i>		<i>Outside</i>		<i>Total</i>
	<i>#</i>	<i>%</i>	<i>#</i>	<i>%</i>		<i>\$</i>	<i>%</i>	<i>\$</i>	<i>%</i>	
<i>Small Farm</i>	28	93%	2	7%	30	\$1,874,504	97%	\$54,206	3%	\$1,928,710
<i>Residential</i>	19	86%	3	14%	22	\$1,082,613	76%	\$338,373	24%	\$1,420,986
<i>Small Business</i>	26	93%	2	7%	28	\$933,374	94%	\$63,231	6%	\$996,605
<i>Total</i>	73	91%	7	9%	80	\$3,890,491	90%	\$455,810	10%	\$4,346,301

*Source – Bank Records.*

Overall, a majority of the small farm, residential real estate, and small business loans originated by the bank are within the bank’s assessment area, reflecting a reasonable commitment to meeting the credit needs of the assessment area.

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

An analysis of small farm, residential real estate and small business loans revealed a reasonable distribution of loans among businesses and farms of different sizes, and to borrowers of different incomes. Only loans originated within the assessment area are included in the analysis.

## Lending Among Farms of Different Sizes – Small Farm Loans

Table 5 shows the distribution of small farm loans among farms of varying sizes in the assessment area based on gross annual revenue. The table also shows the percentage of farms by gross annual revenue located in the assessment area, based on D&B business demographic data.

<i>Table 5 – Distribution of Small Farm Loans by Gross Annual Revenue</i>					
<i>Gross Annual Revenue of the Borrower</i>	<i>Percentage of Farms in Assessment Area</i>	<i>Number of Loans</i>	<i>Percent of Total Number of Loans</i>	<i>Dollar Amount of Loans</i>	<i>Percent of Dollar Amount of Loans</i>
<i>&lt; \$100,000</i>	<i>57%</i>	<i>14</i>	<i>50%</i>	<i>\$619,092</i>	<i>33%</i>
<i>\$100,000 to &lt; \$250,000</i>	<i>35%</i>	<i>9</i>	<i>32%</i>	<i>\$807,112</i>	<i>43%</i>
<i>\$250,000 to &lt; \$500,000</i>	<i>7%</i>	<i>5</i>	<i>18%</i>	<i>\$448,300</i>	<i>24%</i>
<i>≥ \$500,000</i>	<i>1%</i>	<i>0</i>	<i>0%</i>	<i>\$0</i>	<i>0%</i>
<i>TOTALS</i>	<i>100%*</i>	<i>28</i>	<i>100%</i>	<i>\$1,874,504</i>	<i>100%</i>

Source: 2007 D&B business demographic data and bank data. \* Excludes 9 farms not reporting revenue.

Overall, the bank originated 100 percent, by number and dollar, of its farm loans to businesses with gross annual revenues of less than \$500,000. According to the Department of Agriculture, 53 percent of Minnesota farmers did not report any interest expense indicating limited borrowing needs. Considering these facts, the bank's lending is considered reasonable.

## Lending to Borrowers of Different Incomes – Residential Real Estate Loans

To evaluate the residential real estate loans, examiners used the 2007 and 2008 Minnesota non-metropolitan area Department of Housing and Urban Development (HUD) adjusted MFI of \$54,700, and \$56,700, respectively. Table 6 defines each income category.

<i>Table 6 – Borrower Income Levels</i>			
<i>Borrower Income Level</i>	<i>Percent of MFI</i>	<i>2007 Minnesota non-metro MSA MFI</i>	<i>2008 Minnesota non-metro MFI</i>
<i>Low</i>	<i>&lt; 50%</i>	<i>&lt; \$27,350</i>	<i>&lt; \$28,350</i>
<i>Moderate</i>	<i>50% to &lt; 80%</i>	<i>\$27,350 to &lt; \$43,760</i>	<i>\$28,350 to &lt; \$45,360</i>
<i>Middle</i>	<i>80% to &lt; 120%</i>	<i>\$44,760 to &lt; \$65,640</i>	<i>\$45,360 to &lt; \$68,040</i>
<i>Upper</i>	<i>120% and over</i>	<i>\$65,640 and over</i>	<i>\$68,040 and over</i>

Source: Minnesota non-metropolitan HUD Estimated 2007 and 2008 MFI.

Table 7 shows the distribution of residential real estate loans for 2007 and 2008 among borrowers of different income levels. In addition, the tables include the percentage of assessment area families within each income level according to 2000 U.S. Census data.

<i>Table 7 - Distribution of Residential Real Estate Loans by Borrower Income</i>					
<i>Borrower Income Level</i>	<i>Number of Loans</i>		<i>Dollar Volume of Loans</i>		<i>Percent of Assessment Area Families</i>
	<i>#</i>	<i>%</i>	<i>\$</i>	<i>%</i>	
<i>Low</i>	2	11%	\$134,553	12%	14%
<i>Moderate</i>	4	21%	\$239,541	22%	18%
<i>Middle</i>	6	32%	\$279,352	26%	26%
<i>Upper</i>	7	36%	\$429,167	40%	42%
<i>Totals</i>	19	100%	\$1,082,613	100%	100%

Source: 2000 U.S. Census, Bank Records

The bank's lending to low-income borrowers by number and dollar volume is reasonably consistent with the demographic percentage for the assessment area, and lending to moderate-income borrowers slightly exceeds the demographic percentages by number and dollar volume for the assessment area.

#### Lending Among Businesses of Different Sizes – Small Business Loans

Table 8 shows the distribution of small business loans among businesses of varying sizes in the assessment area based on gross annual revenue. The table also shows the percentage of businesses by gross annual revenue located in the assessment area, based on D&B business demographic data.

<i>Table 8 – Distribution of Small Business Loans by Gross Annual Revenue</i>					
<i>Gross Annual Revenue of the Borrower</i>	<i>Percentage of Businesses in Assessment Area</i>	<i>Number of Loans</i>	<i>Percent of Total Number of Loans</i>	<i>Dollar Amount of Loans</i>	<i>Percent of Dollar Amount of Loans</i>
<i>&lt; \$250,000</i>	78%	19	73%	\$491,685	53%
<i>\$250,000 to &lt; \$500,000</i>	10%	5	19%	\$223,117	24%
<i>\$500,000 to &lt; \$1,000,000</i>	6%	1	4%	\$18,784	2%
<i>≥ \$1,000,000</i>	6%	1	4%	\$199,788	21%
<i>TOTALS</i>	100%*	26	100%	\$933,374	100%

Source: 2007 D&B business demographic data and bank data. \* Excludes 571 businesses not reporting revenue.

Overall, the bank originated 96 percent by number, and 79 percent by dollar, of its small business loans to businesses with gross annual revenues of less than \$1,000,000, which is reasonably consistent with the percentage of businesses within the assessment area in those revenue categories. The bank's overall lending to smaller businesses is reasonable, especially considering

that there are several factors that limit a bank's opportunity to lend to these businesses. Specifically, many smaller businesses do not need financing, while credit needs for other smaller businesses often are met by home equity or other personal loans. Considering these facts, the bank's lending reflects good responsiveness to the business credit needs of the assessment area.

### **Loan-to-Deposit Ratio**

The bank's average net loan-to-deposit ratio (ratio) reflects an outstanding willingness to provide credit given the bank's size, financial condition, and community credit needs. The bank's average net loan-to-deposit ratio over the last 19 quarters since the previous evaluation is 94 percent. During that period, the bank's net loan-to-deposit ratio fluctuated from a low of 76 percent as of December 31, 2003, to a high of 108 percent as of September 30, 2006.

To evaluate the reasonableness of the bank's ratio, examiners compared it to the ratio of similarly situated banks (banks with similar asset size, structure, loan portfolio mix, and area served). Management concurred with the similarly situated banks listed in Table 9.

<i>Table 9 – Loan-to-Deposit Ratios</i>					
<i>Bank Name</i>	<i>Branches</i>	<i>Total Assets (000s)</i>	<i>Total Deposits (000s)</i>	<i>Net Loans (000s)</i>	<i>Average Net Loan to Deposit Ratio</i>
<i>Atwater State Bank Atwater, MN</i>	1	\$31,084	\$25,579	\$23,604	94%
<i>Concorde Bank Blomkest, MN</i>	1	\$44,932	\$40,849	\$33,010	78%
<i>Farmers State Bank of Darwin Darwin, MN</i>	0	\$23,453	\$20,890	\$11,573	59%
<i>State Bank in Eden Valley Eden Valley, MN</i>	0	\$29,203	\$24,788	\$19,374	70%
<i>First State Bank of Grove Grove City, MN</i>	0	\$18,538	\$14,579	\$11,892	79%
<i>Lake Region Bank New London, MN</i>	2	\$102,132	\$87,826	\$70,485	75%
<i>United Minnesota Bank New London, MN</i>	0	\$24,233	\$21,968	\$17,596	72%
<i>PrinsBank Prinsburg, MN</i>	0	\$49,488	\$41,149	\$33,602	82%
<i>Farmers State Bank of Watkins Watkins, MN</i>	0	\$31,838	\$26,840	\$18,857	59%

*Source: March 31 2008, Report of Condition and Report of Condition data over the previous 19 quarters. Banks are listed alphabetically by city.*

The table shows Atwater State Bank's ratio of 94 percent is higher than banks identified as similarly situated. The range of ratios for the similarly situated banks is 59 percent to 82 percent with an average ratio of 72 percent. Overall, the bank's net loan-to-deposit ratio performance is outstanding.

## **Geographic Distribution of Loans**

As noted previously, the bank's entire assessment area is comprised of middle-income census tracts. Therefore, a formal geographic distribution analysis would not be meaningful. Examiners performed a cursory analysis of the bank's lending dispersion within the assessment area and did not identify any anomalies that would indicate any specific area being considered underserved.

## **Response to CRA-Related Complaints**

Neither the bank, nor the Federal Deposit Insurance Corporation, has received any CRA-related complaints.

## **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community needs was identified.