



PUBLIC DISCLOSURE

November 27, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Family Bank
Charter Number **703330**

134 Hand Ave., West
Pelham, GA 31779

Office of the Comptroller of the Currency

Three Ravinia Drive
Suite 1950
Atlanta, GA 30346

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, and should not 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.

Table of Contents

| | |
|----------------------------------------------------------------------|------------|
| OVERALL CRA RATING | 3 |
| DEFINITIONS AND COMMON ABBREVIATIONS | 4 |
| DESCRIPTION OF INSTITUTION..... | 8 |
| SCOPE OF THE EVALUATION | 8 |
| DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW | 10 |
| CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS..... | 11 |
| LENDING TEST | 11 |
| APPENDIX A: SCOPE OF EXAMINATION..... | A-1 |
| APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS | B-1 |

Overall CRA Rating

The Lending Test is rated: Satisfactory.

- The average loan-to-deposit ratio is more than reasonable given the bank's size, financial condition, and assessment area (AA) credit needs and represents outstanding performance.
- The geographic distribution of loans reflects a reasonable dispersion within the AA and meets the standards for satisfactory performance.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes, given the demographics of the AA. This meets the standard for satisfactory performance.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC)

annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. 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.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (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.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

Family Bank (FB or “the bank”) is a federally chartered, mutual savings association organized in 1935, which operates three full-service locations within the AA. FB’s main office is located at 134 Hand Avenue in Pelham, GA, which falls in a middle- income census tract that is considered distressed or underserved. The bank has two other full-service branches. The branch in Camilla, GA, is located in a moderate-income census tract. The branch in Bainbridge, GA, is located in a middle-income census tract that is designated distressed or underserved. All locations have ATMs that only disburse cash. No branches were opened or closed during the review period. FB does not have any affiliates, subsidiaries, or a holding company.

As of September 30, 2017, the bank had total assets of \$91 million, total loans of \$73 million, and total deposits of \$80 million. As of June 30, 2017, FB ranked fifth in deposit market share in the AA with 11 percent of deposits. The bank offers a variety of traditional deposit and loan products. As of September 30, 2017, 1-4 family residential loans were just over sixty percent of total assets. Consumer loans to individuals were an additional 9.6 percent of total assets. The current business plan reflects a continued commitment to offer residential mortgage and consumer loan products. There are no financial conditions, legal constraints, or other factors that hinder the bank’s ability to help meet the credit needs of its AA. There has been no merger, acquisition, or expansion activity since the prior CRA evaluation. The previous CRA evaluation dated March 12, 2012, rated the bank’s performance as “Satisfactory”.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This CRA Performance Evaluation is an assessment of FB’s ability to meet the credit needs of its community. The evaluation covered the period from January 1, 2015, to October 31, 2017. The bank’s two primary loan products are home and consumer loans. The CRA evaluation was primarily based on the analysis of these loan types. Additionally, business loans were reviewed to determine the distribution of loans made to businesses of different sizes. Lending data was evaluated using the 2010 Census.

Data Integrity

FB is not subject to the Home Mortgage Disclosure Act (HMDA) because the bank does not have an office or a deposit taking ATM located within a Metropolitan Statistical Area (MSA). Examiners relied on loan sampling to evaluate the bank’s CRA performance which was compared to 2016 demographic data.

Selection of Areas for Full-Scope Review

Examiners conducted a full-scope review of the bank's combined assessment area (AA), which includes Mitchell and Decatur Counties. Refer to Appendix A for more information.

Ratings

The bank's overall rating is based on the full-scope review of the AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Conclusions with Respect to Performance Tests

Family Bank’s performance under the small bank test is satisfactory.

This conclusion is based on the following: a more than reasonable loan-to-deposit ratio; a substantial majority of loans being in the institution’s AA, lending to borrowers and businesses of different incomes and sizes, respectively, reflects a reasonable penetration, and a reasonable dispersion of loans within the AA. Details regarding these findings are addressed below.

LENDING TEST

Lending test is rated satisfactory.

Loan-to-Deposit Ratio

FB’s loan-to-deposit (LTD) ratio is more than reasonable. The bank’s quarterly LTD ratio averaged 84.8 percent over the 23 quarters since the last CRA evaluation. This ratio exceeds those of four similarly situated banks that serve in the AA. The institutions analyzed for comparison purposes reported a similar level of deposits, assets, branches, and all were headquartered in either Mitchell or Decatur County. The LTD ratio for these four banks averaged 45.8 percent with a high average of 64.3 percent.

Lending in Assessment Area

A substantial majority of FB’s lending activities are within the AA. This represents outstanding performance given 86 percent of the number of loans in the sample were made to borrowers within the AA.

| Lending in Mitchell-Decatur County AA | | | | | | | | | | |
|----------------------------------------------|-----------------|-------|---------|-------|-------|------------------|-------|---------|-------|-----------|
| Loan Type | Number of Loans | | | | | Dollars of Loans | | | | |
| | Inside | | Outside | | Total | Inside | | Outside | | Total |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Loans | 18 | 81.82 | 4 | 18.18 | 22 | 1,031,063 | 77.73 | 295,486 | 22.27 | 1,326,549 |
| Consumer | 25 | 89.29 | 3 | 10.71 | 28 | 175,021 | 5.79 | 10,751 | 5.79 | 185,772 |
| Totals | 43 | 86.00 | 7 | 14.00 | 50 | 1,206,084 | 79.75 | 306,237 | 20.25 | 1,512,321 |

Source: Loan sample.

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

Overall, FB’s lending to borrowers of different incomes and businesses of different sizes, given the demographics of the AA, represents reasonable penetration. This meets the standards for satisfactory performance.

The table below shows the percentage of home loans the bank originated to borrowers in the AA compared to the percentage of families by income level that reside in the area. The level of home loans made to low- and moderate-income borrowers was less than the percent of low- and moderate-income families the AA. This is mitigated by the fact that only 57 percent of housing units in the AA are owner occupied.

| Borrower Distribution of Residential Real Estate Loans in Mitchell-Decatur County AA | | | | | | | | |
|---------------------------------------------------------------------------------------------|------------------|----------------------|------------------|----------------------|------------------|----------------------|------------------|----------------------|
| Borrower Income Level | Low | | Moderate | | Middle | | Upper | |
| Loan Type | % of AA Families | % of Number of Loans | % of AA Families | % of Number of Loans | % of AA Families | % of Number of Loans | % of AA Families | % of Number of Loans |
| Home Loans | 25.32 | 15.00 | 15.12 | 12.50 | 19.05 | 17.50 | 40.51 | 55.00 |

Source: Loan sample and 2010 U. S. Census data.

The percentage of consumer loans made to low- and moderate-income borrowers reflects reasonable penetration. As shown in the table below, 43 percent of households report low- or moderate-income levels, while 45 percent of the bank's consumer loans were originated to low- or moderate-income individuals.

| Borrower Distribution of Consumer Loans in Mitchell-Decatur County AA | | | | | | | | |
|------------------------------------------------------------------------------|--------------------|----------------------|--------------------|----------------------|--------------------|----------------------|--------------------|----------------------|
| Borrower Income Level | Low | | Moderate | | Middle | | Upper | |
| | % of AA Households | % of Number of Loans | % of AA Households | % of Number of Loans | % of AA Households | % of Number of Loans | % of AA Households | % of Number of Loans |
| Consumer Loans | 27.14 | 16.13 | 16.00 | 29.03 | 15.85 | 29.03 | 41.01 | 25.81 |

Source: Loan sample and 2010 U. S. Census data.

Lending to businesses of different sizes reflects a reasonable penetration. Data in the following tables reflect the bank's lending to businesses of different sizes within the AA, as well as the sizes of business loan originations. The percentage of business loans by number is higher than the percentage of businesses in the AA with annual revenues less than \$1 million. The data also shows a substantial majority of business loans made in the AA were for amounts less than \$100,000. These percentages reflect a commitment to serving the small business lending needs of the Mitchell-Decatur County AA.

| Borrower Distribution of Loans to Businesses in Mitchell-Decatur County AA | | | | |
|-----------------------------------------------------------------------------------|--------------|--------------|---------------------|-------|
| Business Revenues (or Sales) | ≤\$1,000,000 | >\$1,000,000 | Unavailable/Unknown | Total |
| % of AA Businesses | 81.62 | 5.00 | 13.38 | 100% |
| % of Bank Loans in AA by # | 95.00 | 5.00 | 0.00 | 100% |
| % of Bank Loans in AA by \$ | 85.63 | 14.37 | 0.00 | 100% |

Source: Loan sample and Dunn and Bradstreet data.

| Borrower Distribution of Loans to Businesses by Loan Size in Mitchell-Decatur County AA | | | | |
|------------------------------------------------------------------------------------------------|--------------------|----------------------|------------------------------|-----------------------------|
| Loan Size (000's) | Number of Loans | Percent of Number | Dollar Volume of Loans | Percent of Dollar Volume |
| \$0 - \$100,000 | 17 | 85.00 | \$338,260 | 37.22 |
| \$100,001 - \$250,000 | 3 | 15.00 | \$570,597 | 62.78 |
| \$250,001 - \$500,000 | 0 | 0.00 | \$0 | 0.00 |
| \$500,001 - \$1,000,000 | 0 | 0.00 | \$0 | 0.00 |
| Over \$1,000,000 | 0 | 0.00 | \$0 | 0.00 |

Source: Loan sample.

Geographic Distribution of Loans

FB's geographic distribution of loans reflects reasonable dispersion and meets the standards for satisfactory performance.

Geographic distribution for home loans reflects reasonable dispersion. The bank's record of originating home loans in moderate-income census tracts within the AA is slightly below the AA demographics. However, FB's home loan originations in the middle-income census tracts exceeds the demographics. This supports reasonable dispersion given all middle-income census tracts in the bank's AA are designated distressed or underserved. Additionally, 32 percent of families located in moderate-income census tracts are below the poverty level. This impacts the bank's ability to penetrate the moderate-income census tracts.

| Geographic Distribution of Residential Real Estate Loans in Mitchell-Decatur County AA | | | | | | | | |
|-----------------------------------------------------------------------------------------------|-----------------------------------------|----------------------------|-----------------------------------------|----------------------------|-----------------------------------------|----------------------------|-----------------------------------------|----------------------------|
| Census Tract Income Level | Low | | Moderate | | Middle | | Upper | |
| | % of AA Owner Occupied Housing | % of Number of Loans | % of AA Owner Occupied Housing | % of Number of Loans | % of AA Owner Occupied Housing | % of Number of Loans | % of AA Owner Occupied Housing | % of Number of Loans |
| Home Loans | 0.00 | 0.00 | 10.87 | 7.50 | 79.46 | 87.50 | 9.67 | 5.00 |

Source: Loan sample and 2010 U.S. Census data.

Geographic distribution for consumer loans reflects reasonable dispersion. The bank's record of originating consumer loans in moderate-income census tracts within the AA exceeds the AA demographics. Consumer lending is centered in middle-income census tracts that are designated distressed or underserved. This is reasonable considering the AA demographics and considering 32 percent of households in moderate-income census tracts are below the poverty level.

| Geographic Distribution of Consumer Loans in Mitchell-Decatur County AA | | | | | | | | |
|--------------------------------------------------------------------------------|-----------------------|----------------------------|-----------------------|----------------------------|-----------------------|----------------------------|-----------------------|----------------------------|
| Census Tract Income Level | Low | | Moderate | | Middle | | Upper | |
| | % of AA Households | % of Number of Loans | % of AA Households | % of Number of Loans | % of AA Households | % of Number of Loans | % of AA Households | % of Number of Loans |
| Consumer Loans | 0.00 | 0.00 | 14.85 | 16.13 | 77.99 | 83.87 | 7.16 | 0.00 |

Source: Loan sample and 2010 U.S. Census data.

Responses to Complaints

There were no complaints related to FB's CRA performance communicated to the institution or its supervisory agency since the prior CRA examination.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

| | | |
|---------------------------------------------------------|-----------------------------------------------------------------------------------------|-----------------------------|
| Time Period Reviewed | Lending Test: 01/01/2015 to 10/31/2017 Investment and Service Tests and CD Loans: NA | |
| Financial Institution | Products Reviewed | |
| Family Bank (FB) Pelham, Georgia | Home, consumer, and business loans. | |
| Affiliate(s) NA | Affiliate Relationship NA | Products Reviewed NA |
| List of Assessment Areas and Type of Examination | | |
| Assessment Area | Type of Exam | Other Information |
| Mitchell and Decatur Counties, Georgia | Full-Scope | None |

Appendix B: Community Profiles for Full-Scope Areas

Mitchell-Decatur County Assessment Area

| Demographic Information for Full-Scope Area | | | | | | |
|----------------------------------------------------------------------------------------------------------------------------------------|----|------------|--------------------------------------------------------------|---------------|--------------|------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs) | 12 | 0.00 | 16.67 | 75.00 | 8.33 | 0.00 |
| Population by Geography | | 0.00 | 14.28 | 79.07 | 6.65 | 0.00 |
| Owner-Occupied Housing by Geography | | 0.00 | 10.87 | 79.46 | 9.67 | 0.00 |
| Businesses by Geography | | 0.00 | 19.23 | 74.75 | 6.02 | 0.00 |
| Farms by Geography | | 0.00 | 11.41 | 76.63 | 11.96 | 0.00 |
| Family Distribution by Income Level | | 0.00 | 13.35 | 78.98 | 7.67 | |
| Distribution of Low- and Moderate-Income Families throughout AA Geographies | | 25.32 | 15.12 | 19.05 | 40.51 | 0.00 |
| Median Family Income = \$45,300 HUD Adjusted Median Family Income for 2016 = \$44,940 Households Below the Poverty Level = 4,262 | | | Median Housing Value = \$92,000 Unemployment Rate = 3.84% | | | |

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2016 HUD updated MFI.

Family Bank’s assessment area (AA) includes all of Mitchell and Decatur Counties, located in the southwestern corner of Georgia. No part of the AA is in a Metropolitan Statistical Area (MSA). The AA includes twelve census tracts, of which one is upper income, nine are middle-income, and two are moderate-income. All nine middle-income census tracts are designated as distressed or underserved geographies due to the AA’s poverty level. These identified areas are considered the most in need of revitalization or stabilization, which gives lending institutions greater opportunities to provide community development lending. The AA meets the technical requirements of the Act, and does not arbitrarily exclude low- or moderate-income census tracts.

Data obtained from the Mitchell and Decatur County government websites indicate the leading industry in the AA is agribusiness, including cotton, pecan, and corn farming; as well as poultry production and processing. Mitchell County is listed in the top 10 US counties for pecan production, including the innovative “paper-shell” pecan. Other industries that primarily support the local economy are hunting plantations, corn-to-fuel manufacturing, solar power production, and eco-tourism. Major employers include Keystone Foods, Southeast Milk, Inc., Flint Hill Resources, Camilla Solar, and Sowega Cotton. Decatur County features an inland river port providing direct cargo shipping access to the Gulf of Mexico.

FB is the only savings association in the AA, and experiences a high level of competition from nine other banks operating twelve branch locations in the AA. Two of the competing banks are large regional state banks with headquarters in other states. As of June 30, 2017, the bank had \$83 million in total deposits with the fifth highest deposit market share at 11 percent. The highest deposit market share in the AA belonged to First Port City Bank with \$149 million in deposits and a 20 percent market share.

As part of this performance evaluation, a community contact was made with a local development organization. This contact indicated that the credit needs of the community were being sufficiently met. The primary need for the area was stated to be small dollar business loans and loans to start-up companies. Another community contact interviewed in November of 2016 confirmed credit needs were being met by local financial institutions. They mentioned a need for credit programs for home financing for low income individuals and financial literacy programs.