



PUBLIC DISCLOSURE

April 4, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Relyance Bank, National Association
Charter Number 15482

912 South Poplar Street
Pine Bluff, AR 71611

Office of the Comptroller of the Currency

Victory Building
1401 West Capitol Avenue, Suite 350
Little Rock, AR 72201

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 Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

Summarize the major factors supporting the institution's rating.

- Relyance Bank N.A.'s (Relyance Bank) net loan-to-deposit (LTD) ratio is reasonable.
- A majority of home mortgage, business, and farm loans were originated in the bank's designated assessment areas (AA).
- Borrower distribution shows reasonable penetration to borrowers of different incomes and to businesses and farms of different sizes within the AAs.
- Geographic Distribution shows reasonable dispersion to borrowers, businesses, and farms located in low- and moderate-income (LMI) census tracts (CT) within the AAs.
- Responses to consumer complaints are appropriate
- Relyance Bank has shown excellent responsiveness to the Community Development (CD) needs of the AAs through CD lending, qualified investments, and CD services.

Scope of Examination

Relyance Bank was examined using the intermediate small bank examination procedures. The evaluation period for this Community Reinvestment Act (CRA) Performance Evaluation (PE) was March 19, 2012, through April 4, 2016. Loan products used to assess the bank's performance under the Lending Test include samples of business and farm loans, and home mortgage loans reported on the Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR). CD Activities include loans, qualified investments, and services.

Lending performance was evaluated by assessing loan products consistent with the performance context and the bank's lending strategy. Specifically, the bank's overall lending performance to small business and small farms was given the most weight, as the products represent a combined 50 percent of the portfolio, while residential real estate lending accounts for 14 percent of the portfolio. Additionally, performance within the Pine Bluff Metropolitan Statistical Area (MSA) Counties AA was given more weight, as loan originations from the AA account for the majority of originations within the evaluation period.

Data Integrity

A data integrity review assessing the accuracy of HMDA data was completed during February 2016; information was found to be accurate. In addition, the bank's compliance officer reviews the adequacy of HMDA data quarterly. The most recent internal review, dated December 31, 2015, indicates that HMDA data for 2015 is accurate. Internal reviews of 2013 and 2014 data reflect HMDA data collected during these periods was also accurate.

Selection of Areas for Full-Scope Review

As of December 31, 2015, Relyance Bank had three AAs: Lincoln and Jefferson counties which are located in the Pine Bluff MSA #38220; Pulaski and Saline counties located in the Little Rock – North Little Rock – Conway MSA #30780; and Garland County which is located in the Hot Springs MSA #26300.

The Pine Bluff MSA counties were selected for a full-scope review during this evaluation. As stated above, the majority of all HMDA reportable transactions from January 1, 2014, through December 31, 2015, originated within the Pine Bluff MSA counties. Additionally, Pine Bluff MSA Counties AA accounts for approximately 80 percent of the bank's total deposits. The Hot Springs MSA counties and Little Rock MSA counties are new markets for the bank and were entered into during the evaluation period. Due to the recent entrance into these markets, the Hot Springs MSA counties and Little Rock MSA counties were subjected to limited scope reviews.

Description of Institution

Relyance Bank is located in Pine Bluff (Jefferson County), Arkansas and is 100 percent owned by Jefferson Bancshares, Inc., located in Pine Bluff, Arkansas. Relyance Bank operates 15 branches.

The primary lending focus shows to be real estate lending, which accounts for 70 percent of the loan portfolio. Relyance Bank offers a variety of loan and deposit products, as well as traditional banking services to meet the needs of its AAs. Primary loan products are commercial, agriculture, and 1-4 family residential. Shown on the following page, Table 1 reflects the composition of the loan portfolio as of December 31, 2015.

Table 1 - Loan Portfolio Composition as of December 31, 2015		
Loan Type	Amount (000s)	Percent
Construction and Land Development	\$23,153	5%
Farmland	63,152	14%
1-4 Family Residential	59,765	14%
Multifamily (5 or more) Residential	25,599	6%
Commercial (nonfarm, nonresidential)	132,773	31%
Total Real Estate Loans	\$304,442	70%
Agriculture	82,390	19%
Commercial and Industrial	38,858	9%
Consumer and Other Loans	10,751	2%
Total Gross Loans	\$436,441	100.00%

Source: Schedule RC-C: Call Report- December 31, 2015

Relyance Bank does not have any legal or financial impediments that would limit its ability to meet the credit needs within its AAs. As of December 31, 2015, the bank reported total assets of \$563.1million, including gross loans of \$436.4 million (77.41 percent of total assets). Deposits totaled \$476.9 million, and Tier 1 Capital was \$76.6 million, or 15.97 percent of adjusted average assets. Relyance Bank's prior CRA PE was dated March 19, 2012, with a rating of Satisfactory.

Description of Assessment Areas

Relyance Bank has three AAs, all of which are located in three separate MSAs. Relyance Bank's AAs do not arbitrarily exclude LMI CTs. Of the 164 CTs, 56 are LMI CTs. The AAs are consistent with the legal requirements of 12 CFR § 25.41. The narratives below include information on economic and demographic factors relevant to the bank's performance in meeting the credit needs of the markets that it serves.

Community credit needs in the AAs were determined by a community contact with the Arkansas Economic Development Commission. The community contact noted improvements in current economic conditions as unemployment rates have declined. Affordable housing was identified as the primary credit need in the AAs.

Jefferson and Lincoln County AA

The Jefferson and Lincoln County AA is located within the Pine Bluff MSA. The MSA has three counties in total, but only Jefferson and Lincoln are included within Relyance Bank's AA due to branch distribution and the ability to reasonably service all areas in the AA. The AA is comprised of 28 CTs with 11 LMI tracts.

Relyance Bank is headquartered in Jefferson County. There are eight full-service branches located in the Jefferson and Lincoln AA, which account for 79.32 percent of deposits derived from the bank’s three AAs. There are two branches located in LMI tracts. Competition within the AA is moderate as community, regional, and large national banks operate in this market. According to the Federal Deposit Insurance Corporation (FDIC) Market Share Report, there are eight institutions operating 29 offices in Jefferson and Lincoln County. Of the bank’s operating within this AA, six of the institutions are headquartered in Arkansas. Relyance Bank’s market share of deposits within this AA is 29.65 percent.

The AA has a total population of 91,569 persons. Of this population, there are 21,404 families residing in the AA. LMI families total 6,922, or 32.24 percent of total families. The 2010 Census Bureau Median Family Income (MFI) of \$45,357 was used to determine the tract income for each CT. The 2015 Department of Housing and Urban Development (HUD) estimated MFI is \$49,000. The HUD estimated MFI is used to designate the income category of each Relyance Bank borrower. Occupied housing within the AA totals 32,105, while vacant housing units totaled 6,201 units. Of total housing units, 1-4 family units account for 76.98 percent, multi-family units account for 8.46 percent, and mobile homes account for 14.41 percent. According to the Bureau of Labor Statistics (BLS), the unemployment rate for the Pine Bluff MSA is 6.3 percent as of February 2016, which is approximately 200 basis points higher than the state average. For the total AA, the U.S. Census Bureau estimates approximately 21.26 percent of households have incomes below the poverty level. The elevated level of households living below the poverty line impacts the number of individuals that can qualify for traditional lending products.

Census Tract Category	# of Census Tracts	% of Total
Low Income	1	3.57%
Moderate Income	10	35.71%
Middle Income	10	35.71%
Upper Income	7	25.00%
Total	28	100.00%

Source: 2010 U.S. Census Data

Income Category	Families in the AA
Low Income Families	22.56%
Moderate Income Families	17.07%
Middle Income Families	18.52%
Upper Income Families	41.85%
Total	100.00%

Source: 2010 U.S. Census Data

Tract Category	Families residing in tracts
Low Income Tracts	2.49%
Moderate Income Tracts	29.85%
Middle Income Tracts	31.50%
Upper Income Tracts	36.16%
Total	100.00%

Source: 2010 U.S. Census Data

Pulaski and Saline County AA

The AA is located within the Little Rock-North Little Rock-Conway MSA. This MSA is comprised of six counties in total, but only Pulaski and Saline are included within AA. . The AA is comprised of 115 CTs, 40 of which are LMI CTs.

Relyance has five full-services branches located within the Pulaski and Saline County AA, which derive 11.62 percent of the institutions total deposits. None of the bank's branches are located in an LMI CT. Of the three MSAs the bank is located in, this AA has the strongest amount of competition. According to the FDIC Market Share Report, there are 29 financial institutions (comprised of community, regional, and large national banks) operating 221 offices in Pulaski and Saline Counties. All of the banks, except seven, are headquartered in Arkansas. Relyance Bank holds approximately 0.40 percent of the deposit market share.

The AA has a total population of 489,866 persons. Of this population, there are 125,765 families that reside in the AA. LMI families total 34,950, or 27.79 percent of total families. The 2010 Census Bureau MFI of \$58,911 was used to determine the tract income for each CT. The 2015 HUD estimated MFI is \$63,400 and is used to designate the income category of each Relyance Bank borrower. Occupied housing within the AA totals 194,263, while vacant housing units total 23,167. 1-4 family units account for 75.91 percent of total housing, while multi-family units account for 15.75 percent. According to the BLS, the unemployment rate in the Little Rock-North Little Rock-Conway MSA is 4.2 percent and is in line with the state average. In the Pulaski and Saline AA, households below the poverty lines total 13.77 percent.

Garland County AA

Garland County is located within the Hot Springs MSA. The AA contains 20 CTs of which five are LMI CTs.

Relyance Bank has three full-service branch locations located in the Garland County AA, which derive 9.06 percent of the bank's total deposits. No branches are located in any LMI tracts. Competition within the AA is strong as community, regional, and large national banks operate in this market. According to the FDIC Market Share Report, there are 14 institutions operating 51 offices in the Garland County AA. Of the banks operating within this AA, 11 of the institutions are headquartered in Arkansas. Relyance Bank's market share of deposits within this AA is 2.52 percent.

The AA has a total population of 96,024 persons. Of this population, there are 25,731 families that reside in the AA. LMI families total 4,094, or 15.91 percent of total families. The 2010 Census Bureau MFI of \$45,745 was used to determine the tract income for each CT. The 2015 HUD estimated MFI is \$50,700. The HUD estimated MFI is used to designate the income category of each Relyance Bank borrower. Vacant housing units total 9,676 units. Of total housing units, 1-4 family units account for 76.83 percent and, multi-family units account for 9.39 percent.

According to the BLS, the unemployment rate in the Hot Springs MSA is 4.9 percent, which is slightly above the state average of 4.2 percent. In the Garland AA, households below the poverty line total 16.46 percent.

Conclusions with Respect to Performance Tests

LENDING TEST

Relyance Bank's performance under the Lending Test is rated **Satisfactory**. The LTD ratio is reasonable. A majority of loans originated inside Relyance Bank's AAs. Borrower distribution shows reasonable penetration. Geographic distribution shows reasonable dispersion. Bank management has shown an appropriate response to consumer complaints.

Loan-to-Deposit Ratio

Relyance Bank's average LTD ratio of 83.38 percent is **reasonable** given its size, financial condition, funding sources, and credit needs of its AA. The average LTD ratio was derived from a 16 quarter average taken from March 2012 to December 2015. For purposes of this analysis, Relyance Bank's average LTD was compared to other similarly situated financial institutions to determine the bank's performance relative to its competition. These banks include One Bank and Trust, National Association, Malvern National Bank, and Heartland Bank. These institutions had average LTDs ranging from a high of 92.88 percent to a low of 54.63 percent with an overall average LTD ratio of 76.01 percent.

The following table illustrates Relyance Bank's average LTD ratio and that of similarly situated institutions:

Financial Institution	Assets (000s) as of 12/31/2015	Average LTD Ratio
One Bank & Trust, National Association	\$329,386	92.88%
Relyance Bank, National Association	\$572,417	83.38%
Heartland Bank	\$248,929	73.14%
Malvern National Bank	\$511,553	54.63%

Source: Uniform Bank Performance Reports (UBPR)

Lending in Assessment Area

Relyance Bank originated a **majority of loans inside** the designated AAs.

Overall, 87.91 percent of the number and 86.67 percent of the dollar volume of loans originated by Relyance Bank were located inside the AA.

Approximately 90.91 percent of the number and 89.22 percent of the dollar volume of residential real estate loans were originated inside the AA. In addition, a total of 120 loans were sampled from the bank’s primary loan types (commercial and agricultural) to assess AA lending for these products. A majority, 86.42 percent of the number and 91.64 percent of the dollar volume, of business loans were originated within the AA. In addition, a majority, 53.85 percent of the number and 66.78 percent of the dollar volume, of farmland loans were originated within the AA.

Table 1 - Lending in AA										
Loan Type	Number of Loans					Dollars of Loans (\$000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	254	90.71	26	9.29	280	27,128	89.02	3,347	10.98	30,475
Home Improvement	64	91.43	6	8.57	70	3,233	90.26	349	9.74	3,582
Refinancing	122	91.04	12	8.96	134	23,500	89.30	2,815	10.70	26,315
Small Business	70	86.42	11	13.58	81	44,332	91.64	4,042	8.36	48,374
Small Farms	21	53.85	18	46.15	39	13,299	66.78	6,616	33.22	19,915
Totals	531	87.91	73	12.09	604	111,492	86.67	17,169	13.33	128,661

Source: Home Mortgage Disclosure Act (HMDA) Data; Loan Sample

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

Relyance Bank’s borrower distribution shows **reasonable penetration** to businesses and farms of different sizes and to borrowers of different incomes within the AAs.

Lincoln & Jefferson County AA

Relyance Bank’s borrower distribution within this AA displays excellent penetration to small businesses, reasonable penetration to small farms, and reasonable penetration to borrowers of different incomes, after consideration is given to the bank’s performance context.

As mentioned in the “Scope of Examination” section, more significance was placed on the bank’s lending performance to small businesses and small farms in determining the overall borrower distribution.

Business

Borrower distribution of business loans shows excellent penetration. The number and dollar volume of loans to small businesses (businesses with revenues of \$1 million or less) exceeds the percentage of small businesses in the AA, as depicted in the table on the following page.

Table 2A - Borrower Distribution of Loans to Businesses in AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unknown	Total
<i>Full Scope AA (Lincoln & Jefferson County)</i>				
% of AA Businesses	76.00	4.14	19.86	100%
% of Bank Loans in AA by #	95.00	5.00	0	100%
% of Bank Loans in AA by \$	82.95	17.05	0	100%
<i>Limited Scope AA (Pulaski & Saline County)</i>				
% of AA Businesses	76.66	5.49	17.86	100%
% of Bank Loans in AA by #	55.00	45.00	0	100%
% of Bank Loans in AA by \$	64.47	35.33	0	100%
<i>Limited Scope AA (Garland County)</i>				
% of AA Businesses	80.00	4.08	15.92	100%
% of Bank Loans in AA by #	65.00	35.00	0	100%
% of Bank Loans in AA by \$	48.14	51.86	0	100%

Source: 2014 Dunn & Bradstreet Data and 2014-2016 Sample of Business Loans

Farms

Borrower distribution of farm loans shows reasonable penetration. The number and dollar volume of the Bank's loans to small farms (farms with revenues of \$1 million or less) is somewhat lower than the percentage of small farms in the AA, as depicted in the following table.

Table 2A - Borrower Distribution of Loans to Farms in AA				
Farm Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unknown	Total
<i>Full Scope AA (Lincoln & Jefferson County)</i>				
% of AA Farms	97.63	0.89	1.48	100%
% of Bank Loans in AA by #	75.00	25.00	0	100%
% of Bank Loans in AA by \$	60.39	39.07	0	100%
<i>Limited Scope AA (Pulaski & Saline County)</i>				
% of AA Farms	96.79	1.76	1.45	100%
% of Bank Loans in AA by #	100.00	0	0	100%
% of Bank Loans in AA by \$	100.00	0	0	100%

Source: 2014 Dunn & Bradstreet Data and 2014-2016 Sample of Farm Loans

Residential Real Estate

The bank's level of residential real estate lending to LMI borrowers is lower than the percentage of LMI families in the AA for home purchase and home refinancing loans. The borrower distribution of residential real estate loans shows reasonable penetration

within the home improvement segment. After consideration is given to the performance context, the borrower distribution of residential real estate loans shows reasonable penetration.

Table 2 - Borrower Distribution of Residential Real Estate Loans in AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans
<i>Full Scope AA (Lincoln & Jefferson County)</i>								
Home Purchase	22.56	6.16	17.07	3.42	18.52	16.44	41.85	52.74
Home Improvement	22.56	3.85	17.07	17.31	18.52	5.77	41.85	53.85
Refinancing	22.56	6.25	17.07	11.25	18.52	11.25	41.85	48.74
<i>Limited Scope AA (Pulaski & Saline County)</i>								
Home Purchase	21.66	0.00	17.89	3.33	19.95	6.67	40.51	46.67
Home Improvement	21.66	0.00	17.89	16.67	19.95	16.67	40.51	16.67
Refinancing	21.66	7.69	17.89	0.00	19.95	15.38	40.51	23.08
<i>Limited Scope AA (Garland County)</i>								
Home Purchase	20.75	2.56	17.25	6.41	21.13	3.85	40.87	32.05
Home Improvement	20.75	0.00	17.25	16.67	21.13	33.33	40.87	50.00
Refinancing	20.75	0.00	17.25	24.14	21.13	17.24	40.87	37.93

Source: Home Mortgage Disclosure Act (HMDA) Data

Pulaski and Saline County AA

Based on a limited-scope review, the bank's performance under the Lending Test in the Pulaski and Saline County AA is not inconsistent with the bank's overall satisfactory performance under the lending test. This is due to an overall reasonable penetration of residential real estate loans, loans to small businesses, and loans to small farms. Based on low lending volume relative to the bank's overall lending volume, this AA is considered part of a limited review and does not have a significant impact on the overall conclusion.

Garland County AA

Based on a limited-scope review, the bank's performance under the Lending Test in the Pulaski and Saline County AA and the Garland County AA is not inconsistent with the bank's overall satisfactory performance under the lending test. This is due to an overall reasonable penetration of residential real estate loans and loans to small businesses. There were no farm loans made in the AA by the bank. Based on low lending volume relative to the bank's overall lending volume, this AA is considered part of a limited review and does not have a significant impact on the overall conclusion.

Geographic Distribution of Loans

Relyance Bank's geographic distribution shows **reasonable dispersion** to borrowers, businesses, and farms located in LMI CTs within the AAs.

Lincoln & Jefferson County AA

Relyance Bank's geographic distribution within this AA shows reasonable dispersion to businesses, farms, and borrowers located in LMI CTs after consideration is given to the bank's performance context.

Business & Farms

Loans to businesses and farms in LMI CTs was near the percentage of AA businesses and farms located in LMI CTs. Loan dispersion in moderate income CTs outperformed loan dispersion in low income CTs. Of the 11 LMI CTs, only one CT is designated as low income. After taking into consideration the performance factors, overall geographic distribution of business and farm loans shows reasonable distribution.

Table 3A - Geographic Distribution of Loans to Businesses and Farms in AA									
Census Tract Level	Income	Low		Moderate		Middle		Upper	
		% of AA	% of # of Loans	% of AA	% of # of Loans	% of AA	% of # of Loans	% of AA	% of # of Loans
<i>Full Scope AA (Lincoln & Jefferson County)</i>									
Businesses		5.06	0.00	30.33	26.67	35.18	53.33	29.44	20.00
Farms		1.48	0.00	38.17	33.33	43.79	46.67	16.57	20.00
<i>Limited Scope AA (Pulaski & Saline County)</i>									
Businesses		5.14	0	26.23	30.00	34.34	25.00	34.27	45.00
Farms		3.83	20.00	15.93	0.00	39.40	30.00	40.85	50.00
<i>Limited Scope (Garland County)</i>									
Businesses		1.56	0	18.74	25.00	48.60	55.00	31.10	20.00

Source: 2014 Dunn & Bradstreet Data and 2014-2016 Sample of Business & Farm Loans

Residential Real Estate Lending

Home purchase loans exceeded the level of owner occupied housing in low income CTs. Home purchase loans were somewhat lower than the level of owner occupied housing in moderate income CTs. Home improvement and home refinancing loans were near the percentage of owner occupied housing in low income areas.

However, home improvement and home refinancing loans displayed excellent dispersion in moderate income CTs by exceeding the level of owner occupied housing in moderate income areas.

Table 3 - Geographic Distribution of Residential Real Estate Loans in AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% 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
<i>Full Scope AA (Lincoln & Jefferson County)</i>								
Home Purchasing	2.27	2.74	26.90	17.12	32.16	47.26	38.67	32.88
Home Improvement	2.27	1.92	26.90	32.69	32.16	34.62	38.67	30.77
Refinancing	2.27	1.25	26.90	30.00	32.16	31.25	38.67	37.50
<i>Limited Scope (Pulaski & Saline County)</i>								
Home Purchasing	3.73	0.00	19.47	16.67	42.33	60.00	34.36	23.33
Home Improvement	3.73	16.67	19.47	16.67	42.33	16.67	34.36	50.00
Refinancing	3.73	7.69	19.47	7.69	42.33	23.08	34.36	61.54
<i>Limited Scope (Garland County)</i>								
Home Purchasing	1.21	1.28	11.65	16.67	55.43	53.85	31.71	28.21
Home Improvement	1.21	0.00	11.65	0.00	55.43	50.00	31.71	50.00
Refinancing	1.21	0.00	11.65	10.34	55.43	58.62	31.71	31.03

Source: Home Mortgage Disclosure Act (HMDA) Data

Pulaski and Saline County AA

Based on a limited-scope review, the bank’s performance under the Lending Test in the Pulaski and Saline County AA is not inconsistent with the bank’s overall satisfactory performance under the lending test. This is due to an overall reasonable dispersion of residential real estate loans, loans to small businesses, and loans to small farms. Based on low lending volume relative to the bank’s overall lending volume, this AA is considered part of a limited review and does not have a significant impact on the overall conclusion.

Garland County AA

Based on a limited-scope review, the bank’s performance under the Lending Test in the Pulaski and Saline County AA and the Garland County AA is not inconsistent with the bank’s overall satisfactory performance under the lending test. This is due to an overall reasonable dispersion of residential real estate loans and loans to small businesses. Based on low lending volume relative to the bank’s overall lending volume, this AA is considered part of a limited review and does not have a significant impact on the overall conclusion.

Responses to Complaints

Relyance Bank has an appropriate process of receiving and responding to customer complaints. No CRA related complaints were received by the Comptroller of the Currency since the previous CRA evaluation dated May 19, 2012.

COMMUNITY DEVELOPMENT TEST

Relyance Bank demonstrated **excellent responsiveness** to CD through its level of CD loans, qualified investments and CD services in its AAs.

Number and Amount of Community Development Loans

Relyance Bank demonstrated excellent responsiveness to CD needs through lending activities with the AAs during the evaluation period. Relyance Bank originated 12 CD loans that totaled \$7.1 million. The loans were centered in multi-family properties. All of the properties are located in LMI geographies. Tenants pay below market rent or are assisted by government programs to pay their rent.

Number and Amount of Qualified Investments

Relyance Bank demonstrated excellent responsiveness to CD needs through qualified investment activities within the AAs during the evaluation period. Relyance Bank purchased 32 municipal bonds totaling approximately \$6 million. A majority of the bonds, \$5.2 million, were for school districts located in counties with distressed or underserved middle-income nonmetropolitan geographies. The bank invested in four Arkansas Development Finance Authority (ADFA) bonds totaling \$765 thousand. ADFA is Arkansas' largest source of low-cost financing for LMI housing development, small industries, government, education, public facilities and health care. ADFA administers funding in the form of tax exempt bonds and other debt instruments through development finance and affordable housing development.

Relyance Bank donates to numerous non-profit organizations that provide services to LMI individuals. Services include food/nutrition, health, counseling, drug prevention, and shelter. The bank donated to 41 organizations with a total of \$63 thousand.

Extent to Which the Bank Provides Community Development Services

Relyance Bank demonstrated excellent responsiveness to CD needs by offering qualifying services to LMI individuals with the AAs during the evaluation period. Bank officers and employees routinely provide technical assistance and financial services by serving on boards, committees, or as members of organizations that provide community services to LMI individuals. Examples include food banks, advocacy for children, shelters for the homeless and medical care.

Relyance Bank assisted the Jefferson County Community Development Corporation (CDC) for an application for a Federal Home Loan Bank grant. The bank donated \$5 thousand to the CDC and the Federal Home Loan Bank provided a \$15 thousand grant. The funds will be used to provide LMI families affordable housing.

Pulaski and Saline County AA

Based on a limited-scope review, the bank's performance under the CD Test in the Pulaski and Saline County AA is weaker than the bank's overall excellent responsiveness to CD. Based on low lending and deposit volume relative to the bank overall, this AA is considered part of a limited review and does not have a significant impact on the overall conclusion.

Garland County AA

Based on a limited-scope review, the bank's performance under the CD Test in the Garland County AA is weaker than the bank's overall excellent responsiveness to CD. Based on low lending and deposit volume relative to the bank overall, this AA is considered part of a limited review and does not have a significant impact on the overall conclusion.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 CFR § 25.28(c), or 12 CFR 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

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