



PUBLIC DISCLOSURE

June 03, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

One Bank & Trust, National Association
Charter Number 24136

300 W. Capitol Avenue, Little Rock, AR 72203

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 primary factors supporting this institution's rating:

- The loan-to-deposit ratio for One Bank & Trust, N.A. ("Bank" or "One Bank") is more than reasonable and is the highest of similarly situated banks in the assessment area ("AA").
- The majority of home mortgage and loans to small businesses were originated within the Bank's AA.
- The Bank's distribution of loans to borrowers of different incomes and businesses of different sizes reflects reasonable penetration.
- The Bank's distribution of loans to LMI geographies reflects reasonable dispersion.
- The Bank demonstrates excellent responsiveness to community development needs of the AA through its level of community development loans, qualified investments, and community development services.

Scope of Examination

The Bank was evaluated under the Intermediate Small Bank examination procedures, which includes a lending test and a community development ("CD") test. This Performance Evaluation was based on Home Mortgage Disclosure Act ("HMDA") data that was tested and found reliable. The lending test for One Bank covers its performance January 1, 2010 through December 31, 2012. The evaluation period for the CD test is May 6, 2008 through December 31, 2012. Loan data reviewed included home purchase, home improvement, and refinance loans. Community development activities consisted of community development loans, qualified investments/grants/donations, and community development services. Loan data for 2010 – 2011 was evaluated with 2000 Census data. Loan data for 2012 was evaluated using 2010 Census data. The most recent CRA examination was completed as of May 5, 2008.

Description of Institution

One Bank is located in Little Rock (Pulaski County), Arkansas ("AR"). The Bank has its main office in downtown Little Rock. Additionally, there are eight other full-service branches in Little Rock and one full-service branch in North Little Rock. The Bank is 100% owned by Onefinancial Corporation, a single-bank holding company headquartered in Little Rock, AR. As of December 31, 2012, the Bank reported total

assets of \$440 million. Assets are centered primarily in loans (\$294 million or 67 percent) and interest bearing bank balances (\$108 million or 25 percent). As of December 31, 2012, total deposits reported were \$377 million. This was comprised of \$196 million or 52 percent in time deposits at or below the insurance limit and \$116 million or 31 percent Negotiable Order of Withdrawal accounts. Tier 1 Capital was \$23 million.

The institution offers a variety of credit and banking services to its community. Loans are available for the purchase, refinance, home improvement, and construction of residential properties, multi-family residential properties, and commercial properties. In addition, the institution offers a full range of traditional deposit services.

The Bank's primary loan products are business and home loans. One Bank offers commercial and commercial real estate, residential real estate, consumer, and agriculture loans. Home improvement loans are not a significant product line for the Bank. The loan portfolio composition as of December 31, 2012, is as follows:

Loan Category	\$ (000)	%
Commercial Real Estate Loans	115,899	39.45%
Home Loans	100,110	34.08%
Commercial Loans	64,817	22.06%
Consumer Loans	11,750	4.00%
Agriculture Loans	1,208	0.41%
Total	293,784	100.00%

Bolded items are considered primary products.

One Bank is not subject to any financial, legal, or regulatory restrictions that could obstruct its ability to help meet the credit needs of its AA. The Bank was rated "Outstanding" at the last CRA examination conducted as of May 5, 2008.

Description of Assessment Area

One Bank's AA is Pulaski County, which is located in the Little Rock-North Little Rock-Conway Metropolitan Statistical Area ("MSA"). The AA meets the requirements of the regulation and does not arbitrarily exclude any low- and moderate-income geographies. Pulaski County is located in the geographical center of AR. Community contacts within the area indicated that the primary needs within the AA were affordable housing and home improvement loans to low- and moderate-income individuals and areas.

2000 Census

There were 83 census tracts ("CTs") in the AA based on 2000 Census information. The Median Family Income ("MFI") for the AA was \$46,412 in 2000. These income figures were used to determine the income level of individual CTs. According to the 2000 Census, there were 7 low-income CTs, 28 moderate-income CTs, 31 middle-income

CTs, and 17 upper-income CTs in the AA. According to the 2000 Census, the population of the county was 361,474.

The poverty level for the county was 12.44 percent in 2000; thus, making it more difficult for low-income families to purchase homes. In addition, the percentage of owner-occupied housing units in low-income geographies is less than 3 percent, indicating that there are few opportunities to make home mortgage loans in low-income tracts.

The economy of the AA for this period was stable. The leading employment industries were government, education, medical, finance, construction, and retail. According to the 2011 Business Demographic Data, there were 44,381 businesses and 838 farms in the AA. Of those, 30,566 or 67.60 percent were businesses and farms with annual gross revenues of less than \$1 million. The average unemployment rate between 2008 and 2011 was 6.30 percent for Pulaski County, 7.20 percent for the state of Arkansas, and 8.40 percent for the United States. The unemployment rate for Pulaski County was below average compared to the unemployment rates for Arkansas and the United States. The following table shows the demographic and economic characteristics of the AA.

Demographic Information for Full Scope Area [2000 Census]: Pulaski County, AR						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	83	8.43%	33.73%	37.35%	20.48%	0.00%
Population by Geography	361,474	4.70%	27.29%	39.09%	28.92%	0.00%
Owner-Occupied Housing by Geography	90,068	2.60%	21.36%	40.43%	35.61%	0.00%
Business by Geography	44,381	8.29%	20.96%	36.31%	34.44%	0.00%
Farms by Geography	838	3.82%	14.20%	39.14%	42.84%	0.00%
Family Distribution by Income Level	96,421	3.93%	25.57%	39.38%	31.12%	0.00%
Distribution of Low and Moderate Income Families throughout AA Geographies	37,199	7.52%	40.08%	37.96%	14.45%	0.00%
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		46,412 61,500 12.44%	Median Housing Value Unemployment Rate (2008-2011)		87,962 6.30%	

2010 Census

There are 95 CTs in the AA based on 2010 Census information. The MFI for the AA was \$58,911 in 2010. These income figures are used to determine the income level of individual CTs. According to the 2010 census, there are 10 low-income CTs, 29 moderate-income CTs, 31 middle-income CTs, 24 upper-income CTs, and 1 CT where the income designation is not available. According to the 2010 Census, the population of the county was 382,748.

The poverty level for the county was 14.86 percent in 2010; thus, making it more difficult for low-income families to purchase homes. In addition, the percentage of owner-occupied housing units in low-income geographies is less than 5 percent, indicating that there are few opportunities to make home mortgage loans in low-income tracts.

The economy of the AA for this period was considered to be in moderate growth mode. The leading employment industries were government, education, medical, finance, construction, and retail. According to the 2012 Business Demographic Data, there were 44,484 businesses and 906 farms in the AA. Of those, 31,669 or 69.77 percent were businesses with annual gross revenues of less than \$1 million. The average unemployment rate for 2012 was 6.60 percent for Pulaski County, 7.30 percent for the state of Arkansas, and 8.10 percent for the United States. The unemployment rate for Pulaski County was below average compared to the unemployment rates for Arkansas and the United States. The following table shows the demographic and economic characteristics of the AA.

Demographic Information for Full Scope Area [2010 Census]: Pulaski County, AR						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	95	10.53%	30.53%	32.63%	25.26%	1.05%
Population by Geography	382,748	8.16%	27.93%	30.78%	33.13%	0.00%
Owner-Occupied Housing by Geography	93,672	4.94%	24.33%	32.20%	38.52%	0.00%
Business by Geography	44,484	6.09%	29.84%	29.29%	34.76%	0.02%
Farms by Geography	906	4.19%	19.21%	33.00%	43.60%	0.00%
Family Distribution by Income Level	97,400	7.01%	27.28%	30.95%	34.76%	0.00%
Distribution of Low and Moderate Income Families throughout AA Geographies	39,920	13.34%	40.34%	29.60%	16.71%	0.00%
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		58,911 62,300 14.86%	Median Housing Value Unemployment Rate (2012)		143,569 6.60%	

Conclusions with Respect to Performance Tests

LENDING TEST

One Bank's lending test is rated satisfactory. This is based primarily on a few factors, including: the Bank's more than reasonable LTD ratio and a majority of the Bank's primary loan types were made to individuals and businesses in the AA.

Loan-to-Deposit Ratio

One Bank's LTD ratio is more than reasonable. The LTD ratio was calculated over twelve quarters beginning March 31, 2010 through December 31, 2012. The Bank's LTD ratio was compared to local competitors in the AA. One Bank had the highest quarterly average LTD ratio of similarly situated banks.

The following table shows total assets as of December 31, 2012, and the quarterly average LTD ratio from March 31, 2010 through December 31, 2012.

Loan-To-Deposit Ratio Averages		
Institution	Total Assets \$000's (As of 12/31/12)	Average Loan-to-Deposit Ratio
One Bank & Trust, National Association	439,726	92.41%
First Arkansas Bank & Trust	683,056	66.37%
Eagle Bank and Trust Company	364,545	43.38%
Bank of Little Rock	193,071	69.09%
National Bank of Arkansas in North Little Rock	189,309	71.29%
The Capital Bank	149,755	57.13%
Central Bank	91,053	85.97%

Lending in Assessment Area

Lending in the assessment area meets the standard for satisfactory performance.

A majority of the number and dollar volume of the Bank's primary loan products were originated in the Bank's AA. The following table details the Bank's lending within the AA by number and dollar amount of loans. Seventy percent of the number of loans originated in these primary loan products were made within the AA which represents \$192 million.

Lending in Pulaski County, AR – 2010 through 2012										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	334	63.62	191	36.38	525	66,657	68.25	31,002	31.75	97,659
Home Improvement	42	95.45	2	4.55	44	3,462	94.90	186	5.10	3,648
Refinance	437	71.52	174	28.48	611	115,367	75.85	36,727	24.15	152,094
Business Loans	60	100.00	0	0.00	60	6,919	100.00	0	0.00	6,919
Totals	873	70.40	367	29.60	1,240	192,405	73.91	67,915	26.09	260,320

Source: 2010-2012 HMDA data; sample of small loans to businesses.

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

Lending to borrowers of different income levels and to businesses of different sizes reflects reasonable penetration.

The overall borrower distribution for loans in the AA is reasonable. Although some areas of home lending reflect poor penetration, mitigating factors include overall declining loan demand, elevated poverty levels in the assessment area, and reasonable performance for lending to businesses of different sizes.

Home Purchase 2010-2011

The distribution of home purchase loans to low-income borrowers in the AA is reasonable. The percentage of Bank loans to low-income borrowers is somewhat lower than the percentage of low-income families in the AA. The distribution of home loans to moderate-income borrowers in the AA is more than reasonable. The percentage of Bank loans to moderate-income borrowers exceeds the percentage of moderate-income families.

Home Refinance Loans 2010-2011

The distribution of home refinance loans to low-income borrowers in the AA is poor. The percentage of Bank loans to low-income borrowers is significantly lower than the percentage of low-income families. The distribution of home refinance loans to moderate-income borrowers in the AA is reasonable. The percentage of Bank loans to moderate-income families is somewhat lower than the percentage of moderate-income families.

Poor performance for home refinance loans to low-income families within the AA is mitigated by the elevated poverty rate within the AA of 14.86 percent. This poverty level limits opportunities to qualify borrowers for these home loan products.

Borrower Distribution of Residential Real Estate Loans in Pulaski County, AR – 2010 & 2011								
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 Purchase	21.03	11.46	17.55	22.92	20.98	14.58	40.44	50.00
Home Improvement	21.03	0.00	17.55	4.17	20.98	8.33	40.44	87.50
Refinance	21.03	1.73	17.55	9.52	20.98	8.66	40.44	76.19

Source: 2010-2011 HMDA data; 2000 U.S. Census data.

Home Purchase Loans 2012

The distribution of home purchase loans to low-income borrowers in the AA is poor. The percentage of Bank loans to low-income borrowers is lower than the percentage of low-income families. Poor performance for home purchase loans to low-income families within the AA is mitigated by the elevated poverty rate within the AA of 14.86 percent. This poverty level limits the opportunities to qualify borrowers for home purchase products. The distribution of home purchase loans to moderate-income borrowers in the AA is reasonable. The percentage of Bank loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families.

Home Refinance Loans 2012

The distribution of home refinance loans to low- and moderate-income borrowers in the AA is poor. The percentage of Bank loans to low-income borrowers is significantly lower than the percentage of low-income families. However, the Bank made only one refinance loan to low-income families within the AA and four refinance loans to moderate-income families within the AA during this period. The percentage of Bank loans to moderate-income families is lower than the percentage of moderate-income families.

Poor performance for home refinance loans to low- and moderate-income families within the AA is mitigated by the elevated poverty rate within the AA of 14.86 percent. This poverty level limits the opportunities to qualify borrowers for these home loan products.

Borrower Distribution of Residential Real Estate Loans in Pulaski County, AR - 2012								
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 Purchase	23.22	8.45	17.77	11.27	18.93	15.49	40.09	64.79
Home Improvement	23.22	0.00	17.77	0.00	18.93	22.22	40.09	77.78
Refinance	23.22	0.97	17.77	3.88	18.93	14.56	40.09	80.58

Source: 2012 HMDA data; 2010 U.S. Census data.

Business Loans 2010-2011

The distribution of loans to businesses reflects excellent penetration among businesses of different sizes. Based on 2011 Dunn and Bradstreet Data, 67 percent of all businesses located in the AA were considered small business. Small businesses are defined as entities that generate revenues of \$1 million or less. The percentage of Bank loans to businesses with revenues of \$1 million or less exceeds the percentage of businesses that reported revenues of \$1 million or less.

Borrower Distribution of Loans to Businesses in Pulaski County, AR – 2010 & 2011				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	67.06	3.65	29.29	100%
% of Bank Loans in AA by #	95.00	5.00	0.00	100%
% of Bank Loans in AA by \$	95.83	4.17	0.00	100%

Source: Loan sample; 2011 Dunn and Bradstreet data.

Business Loans 2012

The distribution of loans to businesses reflects excellent penetration among businesses of different sizes. Based on 2012 Dunn and Bradstreet Data, 69.77 percent of all businesses located in the AA were considered small business. The percentage of Bank loans to businesses with revenues of \$1 million or less exceeds the percentage of businesses that reported revenues of \$1 million or less.

Borrower Distribution of Loans to Businesses in Pulaski County, AR - 2012				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	69.77	4.60	25.63	100%
% of Bank Loans in AA by #	85.00	15.00	0.00	100%
% of Bank Loans in AA by \$	91.09	8.91	0.00	100%

Source: Loan sample; 2012 Dunn and Bradstreet data.

Geographic Distribution of Loans Reflects Reasonable Dispersion

The geographic dispersion of loans is reasonable and reflects lending in CTs of all income levels. Some areas of the Bank's residential lending within the AA reflect poor dispersion. However, when mitigating factors are considered, the overall geographic distribution is reasonable. The Bank's geographic distribution of business loans is reasonable. Business loans comprise the majority of the Bank's loan portfolio and reflect the Bank's current business strategy of focusing on commercial loans.

Home Purchase Loans 2010-2011

The geographic dispersion of home purchase loans in low- and moderate-income CTs within the AA is reasonable. The percentage of Bank loans in low-income CTs is equal to the percentage of owner-occupied housing units in low-income CTs. The percentage of Bank loans in moderate-income CTs is somewhat lower than the percentage of owner-occupied housing units in moderate-income CTs.

Home Refinance Loans 2010-2011

The geographic dispersion of home refinance loans in low- and moderate-income CTs within the AA is poor. The percentage of Bank loans in low-income CTs is significantly lower than owner-occupied housing units in low-income CTs. One Bank did not

originate any home refinance loans in low-income CTs. The percentage of Bank loans in moderate-income CTs is lower than the percentage of owner-occupied housing units in moderate-income CTs.

Poor performance for home refinance loans in low- and moderate-income CTs within the AA is mitigated by the elevated poverty rate within the AA of 12.44 percent. This poverty level limits the opportunities to qualify borrowers for these home loan products.

Geographic Distribution of Residential Real Estate Loans in Pulaski County, AR – 2010 & 2011								
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
Home Purchase	2.60	2.60	21.36	12.50	40.43	25.52	35.61	59.38
Home Improvement	2.60	0.00	21.36	8.33	40.43	25.00	35.61	66.67
Refinance	2.60	0.00	21.36	2.16	40.43	19.05	35.61	78.79

Source: 2010-2011 HMDA data; 2000 U.S. Census data.

Home Purchase Loans 2012

The geographic dispersion of home purchase loans in low- and moderate-income CTs within the AA is poor. The percentage of Bank loans in low-income CTs is significantly lower than the percentage of owner-occupied housing units in low-income CTs. Only, approximately 5 percent of owner-occupied housing units within the AA are located in low-income CTs; however, the Bank made no home purchase loans in low-income CTs within the AA during this period. The percentage of Bank loans in moderate-income CTs is somewhat lower than the percentage of owner-occupied housing units in moderate-income CTs. Approximately 24 percent of owner-occupied housing units within the AA are located in moderate-income CTs; however, the Bank made only seven home purchase loans in moderate-income CTs within the AA during this period.

Home Refinance Loans 2012

The geographic dispersion of home refinance loans in low- and moderate-income CTs within the AA is poor. The percentage of Bank loans in low-income CTs is significantly lower than the percentage of owner-occupied housing units in low-income CTs. Only, approximately 5 percent of owner-occupied housing units within the AA are located in low-income CTs; however, the Bank made no home refinance loans in low-income CTs within the AA during this period. The percentage of Bank loans in moderate-income CTs is lower than the percentage of owner-occupied housing units. Approximately 24 percent of owner-occupied units within the AA are located in moderate-income CTs; however, the Bank made only five refinance loans in moderate-income CTs within the AA during this period.

Poor performance for home purchase and home refinance loans in low- and moderate-income CTs within the AA is mitigated by the elevated poverty rate within the AA of 14.86 percent. This poverty level limits the opportunities to qualify borrowers for these home loan products.

Geographic Distribution of Residential Real Estate Loans in Pulaski County, AR - 2012								
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
Home Purchase	4.94	0.00	24.33	9.86	32.20	21.13	38.53	69.01
Home Improvement	4.94	11.11	24.33	0.00	32.20	22.22	38.53	66.67
Refinance	4.94	0.00	24.33	4.85	32.20	13.59	38.53	81.55

Source: 2012 HMDA data; 2010 U.S. Census data.

Business Loans 2010-2011

The geographic dispersion of business loans in low-income CTs within the AA is excellent. The percentage of Bank loans in low-income CTs within the AA exceeds the percentage of businesses located in low-income CTs within the AA for this period. The geographic dispersion of business loans in moderate-income CTs within the AA is reasonable for this period. The percentage of Bank loans in moderate-income CTs within the AA is somewhat lower than the percentage of businesses located in moderate-income CTs within the AA.

Geographic Distribution of Loans to Businesses in Pulaski County, AR – 2010 & 2011								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Businesses	8.29	10.26	20.96	12.82	36.31	35.90	34.44	41.03

Source: Loan Sample; 2011 D & B data.

Business Loans 2012

The geographic dispersion of business loans in low-income CTs within the AA is poor. The Bank made no loans to businesses in low-income CTs within the AA during this period. The geographic dispersion of business loans in moderate-income CTs within the AA is excellent for this period. The percentage of Bank loans in moderate-income CTs within the AA exceeds the percentage of businesses located in moderate-income CTs within the AA.

Geographic Distribution of Loans to Businesses in Pulaski County, AR – 2012								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Commercial	6.09	0.00	29.84	30.00	29.29	45.00	34.76	25.00

Source: Loan sample; 2012 D & B data.

Responses to Complaints

One Bank did not receive any CRA related complaints during the evaluation period. No further follow up or response is necessary.

COMMUNITY DEVELOPMENT TEST

One Bank demonstrates an excellent response to community development through its level of community development loans, qualified investments, and community development services.

Number and Amount of Community Development Loans

One Bank demonstrated excellent responsiveness to community development needs through lending activities within the AA during the evaluation period. The Bank originated nineteen loans totaling \$15.1 million that qualify as CD loans between May 6, 2008 and December 31, 2012. The majority of the loans were to finance the purchase of multi-family housing units. Eleven of the nineteen (58%) CD loans were originated for affordable housing needs. The units are leased at below market rates and the residents are low- and moderate-income individuals. All nineteen loans are located in low- and moderate-income CTs. Four of the nineteen (21%) CD loans were originated for stabilization and revitalization needs in low- and moderate-income geographies in the community. The purpose of the loans were to support job creation and retention in low- and moderate-income geographies.

Number and Amount of Qualified Investments

One Bank demonstrated adequate responsiveness to community development needs through qualified investment and grant/donation activities. During the evaluation period, the Bank made five separate equity investments into a multi-fund Small Business Investment Corporation ("SBIC") totaling \$498 thousand. The SBIC provides funding and capital resources to small businesses and growing businesses that stabilize and retain jobs in and around the AA. In addition to equity investments, the Bank also granted and donated funds that provide services to low- and moderate-income individuals. Grants and donations in-kind were made to four organizations and totaled \$118 thousand during the evaluation period. These grants and donations in-kind went

to organizations that revitalize low- and moderate-income geographies and provide community services to low- and moderate-income individuals.

Extent to Which the Bank Provides Community Development Services

One Bank demonstrated adequate responsiveness to community development needs by offering qualifying services to low- and moderate-income individuals within the AA. Bank officers and employees are actively involved in three community development service activities. Bank employees used their banking experience and expertise to assist these organizations. These organizations provide basic living needs, educational opportunities, and youth mentoring opportunities to low- and moderate-income individuals and families.

The distribution of One Bank's branches throughout the AA is good. One Bank branch distribution shows 0 percent in low-income CTs, 30 percent in moderate-income CTs, 20 percent in middle-income CTs, and 50 percent in upper-income CTs. The main office is located in a moderate-income CT. Each branch location has an ATM. One Bank is part of the MoneyPass network, which allows customers to use ATMs in the MoneyPass network free of surcharges.

Fair Lending or Other Illegal Credit Practices Review

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