



PUBLIC DISCLOSURE

January 03, 2017

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Hatboro Federal Savings, Fa
Charter Number 704859

221 South York Road, Hatboro, PA 19040-3429

Office of the Comptroller of the Currency

Philadelphia Field Office
1150 Northbrook Drive, Suite 303
Trevose, PA 19053

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: Satisfactory

The major factors supporting this institution's rating are:

- The bank's loan-to-deposit ratio is reasonable given the institution's size, financial condition, lending-related activities, and credit needs of the assessment area.
- The bank originated a substantial majority of its home mortgage loans within its assessment area.
- The bank's home mortgage loan originations reflect reasonable distribution among individuals of different income levels in its assessment area.
- The bank's home mortgage loan originations reflect reasonable distribution among geographies of different income levels in its assessment area.
- The bank's responsiveness to community development needs and opportunities in its assessment area is adequate.

Scope of Examination

We evaluated Hatboro Federal Savings, FA ("HFS", "Hatboro" or "the bank") under the Intermediate Small Bank (ISB) examination procedures, which include a lending test and a community development (CD) test. The lending test evaluates the bank's record of meeting the credit needs of its assessment area (AA) through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AA through CD lending, qualified investments, and CD services.

The evaluation period for the lending test covers the bank's performance from January 1, 2014 through September 30, 2016. HFS's primary loan product is home mortgage loans. Home mortgage loans include 1-4 family residential home purchase, home refinance, and home improvement loans. The bank is required to collect and report home mortgage data in accordance with the Home Mortgage Disclosure Act (HMDA). Prior to this evaluation, we tested the accuracy of the bank's HMDA data and found it to be reliable for purposes of our analysis.

The evaluation period for the CD test covers the bank's performance from January 14, 2013 through January 3, 2017. We reviewed documentation supplied to us by bank management in order to determine if the bank's CD loans, investments, and services meet the regulatory definition for community development. Further discussion of the bank's CD activities is included in the 'Community Development' section of this performance evaluation.

Table 1 depicts the maximum income amount for each income range in the bank's AA. The 2016 FFIEC Updated Medium Family Income (MFI) was used as the basis for determining the maximum income amount in each income range.

Table 1 - Definition of Income Ranges Used in the Evaluation					
Income Category	Maximum Income for Income Range				2016 Median Family Income (MFI)
	Low	Moderate	Middle	Upper	
% Range of MFI	<50%	50%-<80%	80%-<120%	≥120%	
Bucks and Montgomery County	<\$49,750	<\$79,600	<\$119,400	≥\$119,400	\$99,500

Source: 2010 US Census; 2016 FFIEC Updated MFI

Description of Institution

HFS is a federally chartered mutual thrift institution headquartered in Hatboro, Pennsylvania. Hatboro is located in southeastern Pennsylvania, approximately 25 miles north of center city Philadelphia. HFS was chartered in 1941 by the Federal Home Loan Bank Board and is not part of a holding company structure. As of September 30, 2016 HFS had total assets of \$500 million and tier 1 capital of \$107 million. The bank had net loans and leases of \$301 million, or 60 percent of total assets as of September 30, 2016. The breakdown of loan types as a percentage of net loans and leases is: closed-end loans secured by 1-4 family residential properties (89%), home equity lines of credit (11%), and non-farm non-residential loans (<1%).

Table 2 depicts HFS's balance sheet composition as of September 30, 2016.

Table 2: Major Components of Assets, Liabilities, and Capital As of September 30, 2016		
Balance Sheet Component	Balance Sheet \$ Amount (000)'s	% of Total Assets
Net Loans	301,324	60.25%
1-4 Family Residential	269,082	53.81%
Non-farm Non-Residential	629	0.13%
Home Equity Lines of Credit	33,693	6.74%
Allowance for Loan and Lease Losses	1,716	0.34%
Investments	160,582	32.11%
US Agencies	29,700	5.94%
Mortgage Backed Securities	66,956	13.39%
Interest-Bearing Bank Balances	63,926	12.78%
Other Assets	38,197	7.64%
Cash and Due From Banks	532	0.11%
Premises and Fixed Assets	7,221	1.44%
Other Real Estate	353	0.07%

All Other Assets (including life insurance assets)	30,091	6.02%
Total Assets	500,103	100.00%
Liabilities & Capital (LC)	500,103	% of Total LC
Total Deposits	387,073	77.40%
Borrowings	0	0.00%
Other Liabilities	4,878	0.98%
Total Liabilities	391,951	78.37%
Retained Earnings	106,769	21.35%
Accumulated Other Comprehensive Income	1,383	0.28%
Total Capital	108,152	21.63%

Source: September 30, 2016 HFS Call Report

HFS operates four full-service offices in Montgomery and Bucks counties. The main office is located in Hatboro, Montgomery County. An administration building and loan center are also located in Hatboro. Three other branches are located in Jamison, Warminster, and Warrington, all within Bucks County. The Hatboro, Jamison, and Warminster branches are located in middle-income census tracts (CTs). The Warrington branch is located in an upper-income CT. All branches have on-site automated-teller machines (ATMs) and offer extended hours on Fridays. The Hatboro, Jamison, and Warminster offices offer Saturday morning hours. There were no branches opened, closed, or relocated during the evaluation period. No mergers or acquisitions occurred during this period.

Table 3 represents the branch and deposit distribution by CT income category.

Census Tract Income Category	Branch Distribution	
	% of Branches	% of Deposits
Low	0%	0%
Moderate	0%	0%
Middle	75%	82%
Upper	25%	18%
Total #	4	100%

Source: June 30, 2016 FDIC Deposit Market Share Report

HFS offers traditional deposit and loan products to its customer base. Deposit products include free checking, passbook savings, statement savings, school savings, money market tiered, certificates of deposit, individual retirement accounts, and holiday club accounts. HFS is primarily a residential real estate lender. Residential loan products include home mortgages to purchase or refinance 1-4 family dwellings, home equity loans, and home equity lines of credit. The bank also offers a First Time Homebuyers Program to new homeowners.

HFS offers traditional services to its customer base. Services include online banking, online Bill Pay, mobile banking, Remote Deposit Capture, telephone banking, debit

cards, direct deposit, and money orders. HFS is part of the Allpoint ATM Network, the largest surcharge-free ATM network in the United States. Customers can access their money and make transactions free at more than 50,000 Allpoint ATMs worldwide.

There are no financial or legal impediments affecting HFS’s ability to help meet the community’s credit needs. The bank received a “Satisfactory” rating at the previous CRA examination performed January 14, 2013.

Description of Assessment Area

HFS’s AA consists of 19 municipalities in northeast Montgomery County, PA, and 24 municipalities in central Bucks County, PA. The AA is located in the Philadelphia, PA Metropolitan Division (MD) #37964. This AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas. Of the 150 CTs in this AA, two, or 1.33 percent are low-income, 17, or 11.33 percent are moderate-income, 84, or 56.00 percent are middle-income, and 47, or 31.33 percent are upper-income.

The 2010 U.S. Census reported the total population of the AA at 604,777. Within the AA, there are 161,195 families and 225,383 households. There are 236,091 housing units, of which 178,523 are owner-occupied, 46,860 are rental-occupied, and 10,708 are vacant. Approximately 0.15 percent of total owner-occupied housing units are located in low-income CTs; 6.99 percent are located in moderate-income CTs; 59.04 percent are located in middle-income CTs, and 33.82 percent are located in upper-income CTs. The median housing value is \$352,148.

The 2010 U.S. Census reported the median family income of the AA at \$93,721. The FFIEC updated median family income for 2016 is \$99,500. Approximately 16.41 percent of the families are low-income, 17.38 percent are moderate-income, 23.40 percent are middle-income, and 42.80 percent are upper income. Approximately 4.91 percent of total households are below the poverty level.

Tables 4 and 5 summarize the AA’s demographics:

Table 4 - Demographic Information in the AA						
Demographic Characteristics	#	% Low	% Moderate	% Middle	% Upper	% NA*
Geographies (Census Tracts)	150	1.33	11.33	56.00	31.33	0.00
Population by Geography	604,777	1.27	8.82	57.38	32.53	0.00
Owner-Occupied Housing by Geography	178,523	0.15	6.99	59.04	33.82	0.00
Businesses by Geography	59,357	0.39	7.66	57.74	34.20	0.00
Farms by Geography	1,423	0.35	6.54	60.37	32.75	0.00

Family Distribution by Income Level	161,195	16.41	17.38	23.40	42.80	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	54,478	2.61	14.44	61.72	21.23	0.00
Median Family Income	\$93,721	Median Housing Value		\$352,148		
FFIEC Adjusted Median Family Income for 2016	\$99,500	Unemployment Rate (2010 U.S. Census)		2.96%		
Households Below Poverty Level	5%					

Source: 2010 U.S. Census and 2016 FFIEC updated MFI

(*) The NA category consists of geographies that have not been assigned an income classification.

Income Category	% Family Distribution	Census Tract Data Distributions						
		# Tracts	% Housing Units	% Owner Occupied Units	% Rental Occupied Units	% Single Family Units	Median Housing Value	Median Housing Age
Low	1.33%	2	1.52%	0.15%	6.28%	1.19%	\$128,127	61
Moderate	11.33%	17	9.85%	6.99%	19.84%	8.68%	\$248,085	57
Middle	56.00%	84	58.30%	59.04%	56.09%	58.37%	\$316,108	48
Upper	31.34%	47	30.33%	33.82%	17.79%	31.76%	\$466,529	37
Total #	100%	150	100%	100%	100%	100%	\$352,148	46

Source: 2010 U.S. Census Data

There is intense competition for deposits among community banks, as well as branches of regional and national financial institutions in the AA. According to the June 30, 2016 FDIC Summary of Deposit Market Share Report, HFS’s deposit market share within Bucks and Montgomery counties is 0.88 percent; ranking 20th out of 52 financial institutions in these counties. Institutions with the greatest deposit market shares have larger branch networks in the AA. The top three institutions with the greatest deposit market shares are Wells Fargo Bank, N.A. (74 offices, 20.83% market share); TD Bank, N.A. (39 offices, 11.91% market share); and Citizens Bank of Pennsylvania (58 offices, 11.22% market share).

Competition for home mortgage loans is strong in the AA. According to 2015 Peer Mortgage HMDA Data, HFS ranks 18th out of 458 lenders in the AA. In 2015, HFS originated 226 home mortgage loans, accounting for a 1.14 percent market share. The top three lenders of home mortgages in the AA in 2015 were Wells Fargo Bank, N.A. (12.02% market share), JPMorgan Chase, N.A. (4.47% market share), and Quicken Loans (3.45% market share).

The local economy in the AA fared better than national averages during the Great Recession. Home prices, unemployment rates, and poverty levels were not affected as drastically as national averages. The October 2016 unemployment rates (not seasonally adjusted) for Bucks and Montgomery counties were 4.8 percent and 4.3 percent, respectively. Both counties have unemployment rates lower than the PA state average of 5.4 percent as of October 2016. The October national unemployment rate of

4.7 percent was higher than the Montgomery County unemployment rate, but slightly below the Bucks County unemployment rate.

The major industries in the AA include restaurants, elementary and secondary schools, and general medical and surgical hospitals. According to the Pennsylvania Department of Labor & Industry Center for Workforce Information and Analysis, as of June 30, 2016, the largest five employers in Bucks County are Giant Food Stores LLC, Central Bucks School District, Saint Mary Medical Center, Doylestown Hospital, and Northtec LLC. The largest five employers in Montgomery County are Merck Sharp & Dohme Corporation, Abington Memorial Hospital, Main Line Hospitals Inc., State Government, and Giant Food Stores LLC.

During the examination, we contacted an officer of a Community Development Corporation whose primary purpose is to provide affordable rental housing to low- and moderate-income (LMI) individuals in Eastern Montgomery County. The organization receives its funding through contributions from the private sector, local government, businesses, faith organizations, and individuals. The officer from this organization described the local economic conditions of the community as generally favorable compared to national economic data. The demographics of the area consist primarily of middle- and upper-income individuals and geographies. There are geographies in LMI areas where people need affordable housing and food subsidies.

In addition to providing affordable rental housing to LMI individuals, this organization also provides the following services to its community: financial and housing counseling, promoting home ownership, and free services such as tax preparation and senior farm market vouchers. The organization is in need of qualified professionals, such as bankers, to assist with providing counseling and financial services to LMI individuals in its community. It is also in need of donations to continue funding its operations. The contact specifically named HFS as the financial institution that refinanced the mortgages on 21 of their residential housing units in 2013 and as the rental payment service provider for its tenants.

Conclusions with Respect to Performance Tests

LENDING TEST

The Lending Test is rated Satisfactory. Factors supporting this rating are included in the following sections.

Loan-to-Deposit Ratio

HFS's average net loan-to-deposit ratio is reasonable given the bank's size, financial condition, lending-related activities, and credit needs of the AA. The bank's average net loan-to-deposit ratio over the twelve quarters since the last CRA examination was 79.60

percent. This ratio ranged from a low of 76.58 percent as of the second quarter of 2013 to a high of 82.56 percent as of the third quarter of 2014.

The bank’s average net loan-to-deposit ratio compares similarly to financial institutions of similar asset sizes headquartered in Pennsylvania. We compared the bank’s net loan-to-deposit ratio to a peer group of state and federally chartered banks and thrifts headquartered in Central and Eastern Pennsylvania. We limited the peer group to institutions of similar asset sizes (between \$450 million and \$550 million). The average net loan-to-deposit ratio for this peer group was 79.46 percent over the past twelve quarters.

Lending in Assessment Area

A substantial majority of HFS’s home mortgage loans were originated in its AA during the evaluation period. Specifically, 90.07 percent of the total number and 87.24 percent of the total dollar amount of home mortgage loans were originated in the bank’s AA. Please see the following table for additional details.

Table 6 - Concentration of Home Mortgage Loans Originated In and Outside of the Assessment Area						
Loan Type	% Inside Area		% Outside Area		Total	
	#	\$(000)	#	\$(000)	#	\$(000)
Home Mortgage Loans	689	\$87,808	76	\$12,840	765	\$100,648

Source: HFS 01/01/2014 – 09/30/2016 HMDA Data

Lending to Borrowers of Different Incomes

The distribution of borrower’s with home mortgage loans in the AA reflect reasonable distribution among individuals of different income levels. In our analysis, we considered the lack of affordability of home ownership for low- and moderate-income families. The median housing value is \$352,148. A low-income family earns less than \$49,750 annually, and a moderate-income family earns less than \$79,600 annually. Lack of home ownership affordability limits opportunities for home loan lending to low- and moderate-income individuals and families in the AA.

Home Purchase Loans

The bank’s originations of home purchase loans to low-income borrowers in the AA exceeded the aggregate industry distribution, but were lower than the percentage of low-income families in the AA. The bank’s originations of home purchase loans to moderate-income borrowers in the AA exceeded both the aggregate industry distribution and the percentage of moderate-income families in the AA.

The following table shows the bank’s distribution of home purchase loans among borrowers of different income levels for the period of January 1, 2014 through September 30, 2016, as compared to the aggregate industry distribution and the percentage of families in each income category.

Table 7 - Distribution of Home Purchase Loans By Borrower Income Level in the Assessment Area			
Borrower Income Category	% of Loans	% Family Distribution	% of Aggregate (or Peers)
Low	11.86%	16.41%	8.23%
Moderate	25.99%	17.38%	24.07%
Middle	29.94%	23.40%	27.68%
Upper	32.20%	42.80%	40.03%

Source: HFS 01/01/2014 – 09/30/2016 HMDA Data;
2010 U.S. Census Data; 2015 Peer Mortgage Data

Home Refinance Loans

The bank’s originations of home refinance loans to low-income borrowers in the AA were lower than the aggregate industry distribution and significantly lower than the percentage of low-income families in the AA. The bank’s originations of home refinance loans to moderate-income borrowers in the AA exceeded both the aggregate industry distribution and the percentage of moderate-income families in the AA.

The following table shows the bank’s distribution of home refinance loans among borrowers of different income levels for the period of January 1, 2014 through September 30, 2016, as compared to the aggregate industry distribution and the percentage of families in each income category.

Table 8 - Distribution of Home Refinance Loans By Borrower Income Level in the Assessment Area			
Borrower Income Category	% of Loans	% Family Distribution	% of Aggregate (or Peers)
Low	7.22%	16.41%	7.63%
Moderate	24.19%	17.38%	19.83%
Middle	33.57%	23.40%	28.03%
Upper	35.02%	42.80%	44.51%

Source: HFS 01/01/2014 – 09/30/2016 HMDA Data;
2010 U.S. Census Data; 2015 Peer Mortgage Data

Home Improvement Loans

The bank’s originations of home improvement loans to low-income borrowers in the AA were lower than the aggregate industry distribution and significantly lower than the percentage of low-income families in the AA. The bank’s originations of home improvement loans to moderate-income borrowers in the AA exceeded both the aggregate industry distribution and the percentage of moderate-income families in the AA.

The following table shows the bank’s distribution of home improvement loans among borrowers of different income levels for the period of January 1, 2014 through September 30, 2016, as compared to the aggregate industry distribution and the percentage of families in each income category.

Table 9 - Distribution of Home Improvement Loans By Borrower Income Level in the Assessment Area			
Borrower Income Category	% of Loans	% Family Distribution	% of Aggregate (or Peers)
Low	7.62%	16.41%	10.50%
Moderate	23.32%	17.38%	18.85%
Middle	29.60%	23.40%	25.13%
Upper	39.46%	42.80%	45.52%

Source: HFS 01/01/2014 – 09/30/2016 HMDA Data;
2010 U.S. Census Data; 2015 Peer Mortgage Data

Geographic Distribution of Loans

The bank’s home mortgage loan originations reflect reasonable dispersion among geographies of different income levels in the AA. In our analysis, we considered the limited opportunities for the bank to lend in low- and moderate-income geographies in the AA. Out of the AA’s 150 CTs, only two, or 1.33 percent are low-income and 17, or 11.33 percent are moderate-income. The income distribution of the AA’s geographies limits the volume of lending opportunities within low- and moderate-income areas.

Home Purchase Loans

The bank’s originations of home purchase loans in low-income geographies exceeded both the aggregate industry distribution and the percentage of owner-occupied housing units in low-income geographies in the AA. The bank’s originations of home purchase loans in moderate-income geographies exceeded both the aggregate industry distribution and the percentage of owner-occupied housing units in moderate-income geographies in the AA.

The following table shows the bank’s distribution of home purchase loans among geographies of different income levels for the period of January 1, 2014 through September 30, 2016, as compared to the aggregate industry distribution and the percentage of owner-occupied housing units in each income category.

Table 10 - Distribution of Home Purchase Loans By Census Tract Income Level in the Assessment Area			
Census Tract Income Category	% of Loans	% Owner Occupied	% of Aggregate (or Peers)
Low	0.56%	0.15%	0.11%
Moderate	13.41%	6.99%	8.45%
Middle	65.36%	59.04%	61.02%
Upper	20.67%	33.82%	30.42%

Source: HFS 01/01/2014 – 09/30/2016 HMDA Data;
2010 U.S. Census Data; 2015 Peer Mortgage Data

Home Refinance Loans

The bank did not originate any home refinance loans in low-income geographies in the AA. The bank’s originations of home refinance loans in moderate-income geographies exceeded both the aggregate industry distribution and the percentage of owner-occupied housing units in moderate-income geographies in the AA.

The following table shows the bank’s distribution of home refinance loans among geographies of different income levels for the period of January 1, 2014 through September 30, 2016, as compared to the aggregate industry distribution and the percentage of owner-occupied housing units in each income category.

Table 11 - Distribution of Home Refinance Loans By Census Tract Income Level in the Assessment Area			
Census Tract Income Category	% of Loans	% Owner Occupied	% of Aggregate (or Peers)
Low	0.00%	0.15%	0.26%
Moderate	10.64%	6.99%	6.65%
Middle	64.18%	59.04%	59.61%
Upper	25.18%	33.82%	33.48%

Source: HFS 01/01/2014 – 09/30/2016 HMDA Data;
2010 U.S. Census Data; 2015 Peer Mortgage Data

Home Improvement Loans

The bank did not originate any home improvement loans in low-income geographies in the AA. The bank’s originations of home improvement loans in moderate-income geographies was lower than both the aggregate industry distribution and the percentage of owner-occupied housing units in moderate-income geographies in the AA.

The following table shows the bank’s distribution of home improvement loans among geographies of different income levels for the period of January 1, 2014 through September 30, 2016, as compared to the aggregate industry distribution and the percentage of owner-occupied housing units in each income category.

Table 12 - Distribution of Home Improvement Loans By Census Tract Income Level in the Assessment Area			
Census Tract Income Category	% of Loans	% Owner Occupied	% of Aggregate (or Peers)
Low	0.00%	0.15%	0.25%
Moderate	5.70%	6.99%	7.52%
Middle	67.98%	59.04%	60.41%
Upper	26.32%	33.82%	31.82%

Source: HFS 01/01/2014 – 09/30/2016 HMDA Data;
2010 U.S. Census Data; 2015 Peer Mortgage Data

Responses to Complaints

HFS did not receive any CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The Community Development (CD) Test is rated Satisfactory. The bank's level of CD activities is considered adequate given its size, capacity, performance context, and the availability of CD opportunities within the bank's AA. The bank is primarily a 1-4 family residential real estate lender. Therefore, it does not customarily offer the types of loans that would qualify as CD loans. Additionally, approximately 90 percent of the population and 87 percent of the geographies in the AA are middle- and upper-income. These demographic factors limit CD opportunities with the bank's AA.

Table 13 summarizes the bank's CD loans and investments and Table 14 summarizes the bank's CD services during the evaluation period.

Table 13 – Qualified Community Development Investments, Loans, Contributions & Sponsorships in the Assessment Area		
Organization	Instrument or Activity	Amount
Willow Grove Charities	Donation	\$14,000
College Settlement	Donation	\$58,350
YMCA	Donation	\$30,000
Habitat for Humanity	Donation	\$2,500
Total Investments		\$104,850
Willow Grove CDC	Loan	\$1,235,000
Total Loans, Contributions & Sponsorships		\$1,235,000

Table 14 – Qualified Community Development Services			
Organization	Instrument or Activity	Employees	Hours
Willow Grove CDC	Rental payment services associated with housing units for LMI individuals.	9	520
College Settlement	Board Member provides financial services and advice to organization that provides camp and leadership programs to LMI children.	1	312
Willow Grove Charities	Treasurer provides financial services and advice to organization that provides financial support to LMI families.	1	480
Total Staff & Hours committed to QCD Service		11	1,312

Number and Amount of Community Development Loans

During the evaluation period, HFS originated 21 CD loans totaling \$1.24 million. These loans were made to a local community development corporation that provides affordable rental housing to low- and moderate-income individuals in Eastern

Montgomery County. The bank refinanced mortgages on 21 of this organization's residential properties in 2013. These loans were not reported under HMDA and therefore did not receive consideration under the Lending Test.

Number and Amount of Qualified Investments

During the evaluation period, the bank did not make any qualified investments. However, HFS made qualifying donations to four organizations totaling \$104,850. These organizations help to provide affordable housing, or educational and community services to low- and moderate-income individuals and families in the AA.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, 11 bank employees provided a total of 1,312 hours of CD services to three organizations serving the bank's AA. These services focused on providing rental payment assistance and financial assistance to low- and moderate-income individuals.

Responsiveness to Community Development Needs

HFS's CD activities demonstrate adequate responsiveness to the AA's community development needs. The bank met these needs by:

- Originating 21 CD loans totaling \$1.24 million to a community development corporation that provides affordable rental housing to low- and moderate-income individuals in Eastern Montgomery County.
- Making qualifying donations to four organizations totaling \$104,850. These organizations help to provide affordable housing, or educational and community services to low- and moderate-income individuals and families in the AA.
- Eleven bank employees provided a total of 1,312 hours of CD services to three organizations serving the bank's AA. These services focused on providing rental payment assistance and financial assistance to low- and moderate-income individuals in the AA.
- Offering a variety of free or low-cost deposit products to consumers through the bank's retail branch network and through its online and mobile banking services.

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.