

PUBLIC DISCLOSURE

August 20, 2007

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**The Bancorp Bank
35444**

**405 Silverside Road, Suite 105
Silverside-Carr Corporate Center
Wilmington, Delaware 19809**

Federal Deposit Insurance Corporation

**20 Exchange Place
New York, New York, 19005**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

An institution in this group has a satisfactory record of helping to meet the credit needs of its entire assessment area, including low- and moderate-income individuals, in a manner consistent with its resources and capabilities. The rating is supported by the following factors:

- The net loan-to-deposit (LTD) ratio was reasonable, given the bank's size, financial condition, and assessment area credit needs.
- A majority of home mortgage and business loans were originated inside the assessment area during the review period. A total of 72 percent of loans by number, and 66 percent of loans by dollar amount were originated inside the assessment area during the review period.
- The geographic distribution of home mortgage and business loans reflected reasonable dispersion throughout the assessment area.
- There were no CRA complaints filed against the bank since the previous CRA evaluation.
- The bank's community development performance demonstrated overall adequate responsiveness to community development needs of its assessment area, considering the institution's size and capacity and the need and availability of such opportunities in the assessment area. Community development performance was demonstrated through a high level of community development loans, an adequate level of qualified investments, and an adequate level of community development services.
- The distribution of loans within the designated assessment area reflects poor penetration among borrowers of different income levels and businesses of different sizes.

SCOPE OF EXAMINATION

The institution's CRA performance was evaluated using Intermediate Small Institution Examination procedures. These procedures utilize two performance tests: the Lending Test and the Community Development Test.

The Lending Test evaluates The Bancorp Bank's performance pursuant to the following criteria: average net loan-to-deposit ratio, lending in the assessment area, geographic distribution of loans, lending to borrowers of different incomes and businesses of different sizes, and the bank's record of taking action in response to CRA complaints. The Community Development Test evaluates the bank's responsiveness to community development needs in its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the assessment area.

The analysis focused on the bank's two major product lines: residential, commercial and construction (business) loans originated in 2005, 2006 and as of June 30, 2007. This evaluation used home mortgage loans reported pursuant to the Home Mortgage Disclosure Act (HMDA). The institution does not originate a large volume of home mortgage loans and does not maintain a residential mortgage department. For the most part, mortgages are provided as an accommodation to business customers or for investment purposes. Home mortgage loans are originated through an agreement with a mortgage company and the majority of loans are sold in the secondary market. As the institution provided detailed information relative to business lending, the universe of these loan types was also used. Given the bank's business strategy and composition of its loan portfolio, business loans were weighed more heavily in the evaluation. Consumer loans and agricultural loans were not evaluated as their inclusion would have little impact on the bank's overall performance. The Community Development Test evaluation period covered activities since the June 28, 2002, CRA evaluation.

DESCRIPTION OF INSTITUTION

The Bancorp Bank, headquartered in Wilmington, Delaware, provides a full range of retail and commercial banking services, including a variety of deposit accounts. Lending focuses on commercial real estate loans and lines of credit, construction loans, and commercial leasing activities. Home mortgage loans are originated through an agreement with a mortgage company with the majority of loans sold in the secondary market. The bank also offers consumer home equity loans and unsecured personal loans.

As of June 30, 2007, assets totaled \$1.5 billion, with total loans of \$1.2 billion and total deposits

of \$1.2 billion. Total equity capital was \$144.7 million. The loan portfolio composition is depicted in Table 1.

Table 1 – Loan Distribution as of June 30, 2007		
Loan Type	Dollar Amount (000s)	Percent of Total Loans
1-4 Family Residential	187,156	16
Construction & Land Development	297,253	25
Multifamily (5 or more)	0	0
Farmland	0	0
Commercial	331,849	28
Total Real Estate Loans	816,258	69
Commercial and Industrial	191,599	16
Farm Loans	0	0
Consumer	85,192	7
Lease Financing Receivables	88,076	8
Other Loans	266	0
Total Loans	1,181,391	100

Source: Consolidated Report of Condition and Income (Call Report)

As shown above, the bank primarily originates loans secured by real estate, with the most significant focus on commercial real estate lending.

The bank operates two basic businesses (1) a branchless community bank and (2) affinity banking services. The branchless community bank offers services through a division called the Philadelphia Private Bank; this division offers banking services specifically targeted to individuals and businesses in Philadelphia, Pennsylvania. The affinity banking division provides banking services to the members and employees of organizations or businesses comprised of established membership, client or customer bases. During the first six years of operation, the affinity banking line evolved into the following four distinct business lines:

- 1) Health Savings Accounts – Starting in 2004, the bank began soliciting third-party administrators, insurance companies and brokers for low-cost deposits.

- 2) Payment Processing Affinity Group – The bank provides affinity banking services to the payment processing industry, where it benefits from both low-cost deposits and fee-based income.
- 3) Private Client Affinity Group – This line focuses on asset management, trust companies, broker-dealers, registered investment advisors and clearing firms. This enables the bank to gain both loans and deposits
- 4) General Affinity – Division in which affinity opportunities outside of the three business lines are pursued and the driving business for deposit accounts.

Customers access services through the bank’s website, or the website of their affinity group; cash withdrawals are obtained from automated teller machines. No lending is done through Affinity Banking; lending is attributed to the Private Banking Division. The bank does not maintain a branch bank system. There were no legal or financial impediments that would impact the bank’s ability to meet the credit needs of the assessment area, including retail and community development needs. At the previous CRA evaluation dated June 18, 2002, a CRA rating of “Satisfactory” was assigned using Small Bank CRA examination procedures. The Bancorp Bank is a wholly-owned subsidiary of The Bancorp, Inc., Wilmington, Delaware.

DESCRIPTION OF ASSESSMENT AREA

The Bancorp Bank designated its assessment area as New Castle County, Delaware and Bucks, Chester, Delaware and Philadelphia Counties, Pennsylvania. The assessment area is part of the Philadelphia-Camden-Wilmington, Pennsylvania-New Jersey-Delaware-Maryland Metropolitan Statistical Area (MSA) #37964. The assessment area is in conformance with the CRA regulation and does not arbitrarily exclude low- and moderate-income areas.

The Department of Housing and Urban Development (HUD) annually adjusts the Median Family Income (MFI) from the most recent U.S. Census. The HUD-adjusted MFI was used to determine the distribution by borrower income level. The assessment area’s HUD-adjusted MFI for 2005 and 2006 were \$66,550 and \$69,800, respectively.

Census Tract Characteristics - Based upon 2000 U.S. Census data, the assessment area includes 1,114 census tracts, 131 (12 percent) are low-income, 215 (19 percent) are moderate-income, 387 (35 percent) are middle-income, and 362 (32 percent) are upper-income; the 19 remaining census tracts (2 percent) are considered not applicable (NA), as this area contains no households or housing units.

Population - Based upon 2000 U. S. Census data, the assessment area’s population is slightly over 4.3 million, which included 1.2 million families. Of these families, 22 percent are low-income, 17 percent are moderate-income, 21 percent are middle-income, and 40 percent are

upper-income.

Housing - Of the total housing units, 64 percent are owner-occupied. Also, 83 percent are single-family (1-4 units), and 16 percent are multi-family (5 or more units), 1 percent are mobile homes. By census tract income level, 12 percent, 22 percent, 34 percent, and 32 percent of owner-occupied housing units are located in low-, moderate-, middle-, and upper-income census tracts, respectively.

Businesses and Industry - According to information available from Dun & Bradstreet for 2006, there were 273,829 non-farm establishments within the assessment area. Of these businesses, 9 percent were located in low-income census tracts, 16 percent were located in moderate-income, 32 percent were located in middle- and 43 percent were located in upper-income census tracts. The majority of businesses (61 percent) that reported gross annual revenue data reported earning revenues of \$1 million or less. The area's two largest industries, as a percentage of total industries, were services (41 percent) and retail trade (16 percent).

Competition – The bank is subject to intense competition for home mortgage and business loans from other banks, mortgage and finance companies, savings and loan associations, and credit unions operating within the same assessment area.

In 2005, over 459 institutions were identified as originating/purchasing and reporting HMDA loans within The Bancorp Bank's assessment area. Countrywide Home Loans and Wells Fargo Bank, N.A. led the market by number of originations with market shares of 8 percent and 5 percent, respectively. The Bancorp Bank ranked 342nd with a market share of 0.01 percent by number. The major competitors for commercial loans were identified as Sovereign Bank, Royal Bank America and Commerce Bank.

Community Contact - As part of this evaluation, information obtained from interviews conducted with individuals in the assessment area considered knowledgeable regarding the local community, its economic base, and community development initiatives were reviewed. Opportunities identified for financial institution participation included involvement in community development ventures through housing loan pools and/or equity funds and direct grants.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The Bancorp Bank’s performance under the Lending Test was evaluated pursuant to the following criteria: LTD ratio, lending in the assessment area, geographic distribution of loans, lending to borrowers of different incomes and businesses of different sizes, and the bank’s record of taking action in response to CRA complaints. Overall, the Lending Test results were satisfactory. Each of the criteria is described below.

Loan-to-Deposit Ratio

The bank’s average net loan-to-deposit ratio is reasonable and indicates adequate responsiveness to area credit needs. The bank’s average net loan-to-deposit ratio based on the 20 quarters since the last evaluation is 89 percent. Both loans and deposits steadily increased during the evaluation period.

The Bancorp Bank’s average net loan-to-deposit ratio was compared to two banks that were considered to be similarly situated in that they are predominantly commercial lenders headquartered in the assessment area with total assets of at least \$500 million. The respective average net loan-to-deposit ratios of the two similarly situated institutions for the same time period were 89 and 67 percent.

Lending Inside the Assessment Area

The bank’s lending performance in this criterion is evaluated based on the number and amount of loans of each type extended inside the assessment area. Overall, a majority of home mortgage and business loans were made inside the assessment area. Specifically, 72 and 66 percent of the number and dollar amount of loans, respectively, were originated inside the assessment area. The lending distribution is shown in the following table.

<i>Table 2 - Distribution of Loans Inside and Outside of the Assessment Area</i>						
<i>Loan Category or Type</i>	<i>Number of Loans</i>			<i>Dollars in Loans (000s)</i>		
	<i>Inside</i>	<i>Outside</i>	<i>Total</i>	<i>Inside</i>	<i>Outside</i>	<i>Total</i>

**Intermediate Small Institution Performance Evaluation
September 2005**

	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2005	39	65	21	35	60	18,521	52	16,906	48	35,427
2006	53	69	24	31	77	20,138	57	15,259	43	35,397
YTD 2007	7	39	11	61	18	1,859	36	3,339	64	5,198
Subtotal	99	64	56	36	155	40,518	53	35,504	47	76,022
Business										
2005	205	78	61	22	266	259,176	79	69,373	21	328,549
2006	210	72	80	28	290	295,605	59	206,702	41	502,307
YTD 2007	88	67	38	33	126	126,219	68	58,939	32	185,158
Subtotal	504	74	179	26	683	681,000	67	335,014	33	1,016,014
Total	603	72	235	28	838	721,518	66	370,518	34	1,092,036

Source: HMDA Disclosure Statements (2005 and 2006) HMDA Data Collection (2007), Bank Records

The percentage of the number of both home mortgage and business loans originated inside the assessment area for 2005 and 2006 is relatively stable. Although still considered adequate, the percentage of the dollar volume of business loans originated inside the assessment area declined from 79 to 59 between 2005 and 2006. It is noted that 68 percent of business loans by dollar amount for year-to-date 2007 were originated inside the assessment area; essentially mirroring the percentage by number. While a majority of home mortgage loans by number and dollar volume were originated inside the assessment area during 2005 and 2006; year-to-date 2007 shows that less than a majority of home mortgage loans by number and dollar volume at 39 and 36 percent, respectively were inside the assessment area.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

Overall, the bank has achieved a poor penetration among borrowers of different income levels and businesses of different sizes. This criterion evaluates the bank's record of lending to low-, moderate-, middle-, and upper-income borrowers and to businesses of different sizes. An analysis of lending by dollar volume revealed similar results.

Business Lending

Overall, 50 percent, by number, of business loans were reported to businesses with gross annual revenues of \$1 million or less for 2005 and 2006. Comparatively, based upon data available from Dun & Bradstreet for 2006, 66 percent of assessment area businesses reported gross annual

revenues of \$1 million and less. An analysis of year-to-date 2007 data shows improvement, as 61 percent of business loans by number were originated to businesses with gross annual revenues of \$1 million or less. The following table details the distribution of small business loans made inside the assessment area during the period reviewed by gross annual revenue of the business.

<i>Table 3 - Distribution of Business Loans by Gross Annual Revenues of Business</i>							
<i>Gross Annual Revenues (000s)</i>	<i>% of Businesses</i>	<i>2005</i>		<i>2006</i>		<i>Total</i>	
	<i>2006</i>	<i>#</i>	<i>%</i>	<i>#</i>	<i>%</i>	<i>#</i>	<i>%</i>
<i>≤ \$1,000</i>	66	104	51	104	49	208	50
<i>> \$1,000 or NA</i>	34	101	49	106	51	207	50
<i>Total*</i>	100	205	100	210	100	415	100

Source: Bank Data, Dun & Bradstreet

Home Mortgage Lending

The percentage of loans originated by the bank to low- and moderate-income borrowers during 2005 is well below aggregate data, reflecting poor penetration to borrowers of different income levels. As a percentage of total loans originated, performance in 2006 decreased. An analysis of lending for year-to-date 2007 shows that no loans were originated to low- or moderate-income borrowers. The following table details the distribution of HMDA loans within the assessment area by borrower income. Only loans extended within the assessment area are included in the analysis. For comparative purposes, the percentage of families within the assessment area by income level according to 2000 U.S. Census data and the percentage of HMDA loans extended by all lenders within the assessment area during 2005, the most recent year for which aggregate data is available, are also shown.

<i>Table 4 - Distribution of HMDA Loans by Borrower Income</i>								
<i>Borrower Income Level</i>	<i>% of Total Families</i>	<i>Aggregate Lending Data (% of #)</i>	<i>2005</i>		<i>2006</i>		<i>Total</i>	
			<i>2005</i>	<i>#</i>	<i>%</i>	<i>#</i>	<i>%</i>	<i>#</i>

<i>Low</i>	22	7	1	3	0	0	1	1
<i>Moderate</i>	17	19	3	8	2	4	5	5
<i>Middle</i>	21	23	5	13	2	4	7	8
<i>Upper</i>	40	37	25	63	31	58	56	61
<i>\$0/NA Income</i>	0	14	5	13	18	34	23	25
<i>Total*</i>	<i>100</i>	<i>100</i>	<i>39</i>	<i>100</i>	<i>53</i>	<i>100</i>	<i>92</i>	<i>100</i>

Source: U.S. Census, HMDA Disclosure Statements (2005 and 2006) and HMDA Aggregate Data

Geographic Distribution of Loans

Overall, the geographic distribution of loans reflects reasonable dispersion throughout the assessment area. This criterion assesses the bank's performance in addressing the credit needs in low-, moderate-, middle-, and upper-income census tracts. An analysis of lending by dollar amount showed similar results.

Business Lending

While the bank's performance in 2005 reflects poor penetration of business lending in low- and moderate-income census tracts compared to demographic data, an increasing trend for 2006 is noted. Particularly the increase in the number and percentage of loans originated in moderate-income census tracts. The geographic distribution of business loans is presented in the following table. Business demographic data is included for comparison purposes.

Table 5 - Distribution of Business Loans by Income Category of the Census Tract							
Census Tract Income Level	% of Assessment Area Businesses	2005		2006		Total	
		#	%	#	%	#	%
Low	9	4	2	5	2	9	2

**Intermediate Small Institution Performance Evaluation
September 2005**

Moderate	16	5	3	43	21	48	12
Middle	32	49	24	35	17	84	20
Upper	43	146	71	126	60	272	66
\$0/NA Income	0	1	0	1	0	2	0
Total*	100	205	100	210	100	415	100

Source: Bank Records, Dun & Bradstreet 2006

Home Mortgage Lending

Lending levels in low-income census tracts outperformed aggregate lending in 2005, however, poor penetration in moderate-income census tracts is noted. An increasing trend in number and percentage of loans originated in low-income census tracts between 2005 and 2006 is noted. The geographic distribution of home mortgage lending is shown in the following table.

Table 6 - Distribution of HMDA Loans by Income Category of the Census Tract								
Census Tract Income Level	% of Total Owner-Occupied Housing Units	Aggregate Lending Data (% of #)	2005		2006		Total	
			2005	#	%	#	%	#

**Intermediate Small Institution Performance Evaluation
September 2005**

Low	12	5	3	8	7	13	10	11
Moderate	22	18	2	5	3	6	5	6
Middle	34	39	10	25	12	23	22	24
Upper	32	38	24	62	31	58	55	59
\$0/NA Income	0	0	0	0	0	0	0	0
Total*	100	100	39	100	53	100	92	100

Source: U.S. Census, HMDA Disclosure Statements (2005 and 2006), HMDA Aggregate Data 2005

Response to Complaints

No CRA-related complaints were received during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The Community Development Test evaluates the institution's community development loans, qualified investments, and community development services. Adequacy of the bank's responsiveness to assessment area community development needs was evaluated based on the bank's capacity for community development activities, its assessment area's need for community development activities, and the availability of community development opportunities in the assessment area. As an intermediate small institution, The Bancorp Bank has the flexibility to allocate its resources among community development loans, qualified investments, and

community development services in amounts that it reasonably determines are most responsive to community development needs and opportunities.

Community development activities include: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or (4) activities that revitalize or stabilize low- or moderate-income tracts.

The Bancorp Bank’s community development performance demonstrated overall adequate responsiveness to community development needs of its assessment area, considering the institution’s size and capacity and the need and availability of such opportunities in the assessment area. Community development performance was demonstrated through a high level of community development loans, an adequate level of qualified investments, and an adequate level of community development services.

Community Development Lending

For the purpose of this evaluation, a community development loan is defined as a loan that: (1) has community development as its primary purpose, (2) has not already been reported by the bank for consideration under small business or residential mortgage lending (unless it is a multifamily dwelling loan), and (3) benefits the bank’s assessment area or a broader statewide or regional area that includes the bank’s assessment area.

Given the bank’s resources and capacity, The Bancorp Bank originated a high level of community development loans during the review period. During the evaluation period, the bank originated 13 loans totaling \$47 million within its assessment area. Table 7 shows the distribution of the bank’s community development lending.

Table 7 - Qualified Community Development Lending Activity		
Loan Description	Number of Loans	Dollar Volume (000s)
Affordable Housing (excluding multi-family rental housing) for Low-and Moderate-Income Individuals	1	500
Multi-Family Affordable Housing for Low-and Moderate-Income Individuals	2	680
Community services targeted to low or moderate-income individuals	1	525

Activities that Revitalize or Stabilize Low- and Moderate-Income Geographies	9	45,705
Grand Total	13	47,410

Source: Bank Records

Following is a discussion of the some of the bank's community development loans:

- The bank originated a \$500,000 working capital line of credit to a nonprofit organization that owns and manages more than 800 units of affordable housing throughout the City of Philadelphia. The institution also provided \$525,000 in construction financing to fund the acquisition and construction of the organization's office building.
- The Bancorp Bank funded \$298,725 of a \$500,000 commitment to a multi-bank community development corporation that promotes and facilitates revitalization through the financing of, and investment in, housing and community development activities. The organization works to address the needs of low- and moderate-income individuals and areas throughout Bucks, Chester, Delaware and Montgomery Counties, Pennsylvania. The Bancorp Bank's \$500,000 commitment matches the largest commitment made by the corporation's 25 member banks. Current and past projects include construction of affordable housing for low-income seniors and affordable housing for low- and moderate-income individuals with physical and mental challenges.
- Two loans totaling \$25 million to fund the development of condominiums and a residential apartment complex in Coatesville, Chester County. The project is part of a formal plan developed in conjunction with the Coatesville Redevelopment Authority to revitalize the City of Coatesville.
- The Bancorp Bank provided a \$9.5 million working capital line of credit to support activities conducted in a charter school located in a moderate-income census tract in Chester, Delaware County. The school provides educational and before and after school services to many children from Chester's low- and moderate-income families. Contributions to the school's non-profit arm qualify for tax credits through the Education Improvement Tax Credit program administered by the Pennsylvania Department of Community and Economic Development.
- The bank provided \$3.4 million in acquisition and commercial development funding for Wilmington's Ships Tavern District, Wilmington, Delaware. Permanent financing will be provided by Delaware Community Investment Corporation. The project, part of a plan to revitalize downtown Wilmington, is also funded through federal and state tax credits.
- The bank originated a \$180,000 loan for an eight-unit apartment complex located in a low-income census tract in Darby, Delaware County, Pennsylvania. A review of the rents indicates that the property is affordable housing.

Qualified Investments

A qualified investment for the purposes of this evaluation is a lawful investment, deposit, donation membership share, or grant that has community development as its primary purpose.

Since the previous evaluation, the bank invested \$1.7 million in qualified investments, and donated \$36,262 to 26 community development organizations. Overall, the level of The Bancorp Bank's qualified investments during the evaluation period demonstrated an adequate responsiveness to community development needs.

Following is a description of some of the community development investment activity during the evaluation period.

- The Bancorp Bank purchased two mortgage-backed securities totaling \$1.7 million between CRA performance evaluations. The securities were collectively collateralized by 14 mortgages made to low- and moderate-income borrowers in the bank's assessment area.
- The bank donated \$5,000 to Ingleside Homes, a non-profit organization that is a leader in providing affordable housing and healthcare services for low- and moderate-income seniors.
- Six grants totaling \$4,000 to Child, Inc., an organization that provides shelters, domestic violence and treatment programs to Delaware's neglected and abused children. The grant monies were used to provide additional funds for families moving from shelters to independent living.

Community Development Services

The bank participates in various community development service initiatives and provides technical expertise to community development organizations. Following is a list of bank services that meet the definition of community development are conducted as a representative of the bank and are related to the provision of financial services:

A bank vice president serves on the Board of Community Capital Works. This Community Development Financial Institution (CDFI) makes small business loans to micro-enterprises owned and operated by low- and moderate-income entrepreneurs. The organization has offices in Philadelphia and Chester.

The bank is represented on the Board and loan committee of the West Philadelphia Financial Services Institution, a CDFI that was created to implement the Federal Empowerment Zone Program. The organization serves the West Philadelphia Empowerment Zone community through providing small business lending services.

A bank representative attends Community Lenders Community Development Corporation meetings. The organization promotes revitalization through the financing of, and investment in, housing and community development activities which address the needs of low- and moderate-income individuals and areas throughout the Delaware Valley.

A bank vice president is a member of the Greater Urban Affairs Coalition's Small Business Lending Task Force. The group addresses concerns relating to increasing lending in low- and moderate-income areas and minority neighborhoods within the City of Philadelphia.

A senior vice president is a member of The Reinvestment Fund's (TRF) Loan Approval Committee. TRF works to finance neighborhood revitalization by providing funding for affordable housing, for a broad range of human and social services, and by offering flexible financing programs to commercial developers and entrepreneurs.

A bank officer is a Board member of St. Mary's Shelter, Phoenixville, Chester County. The organization serves as a homeless shelter for families and provides job placement, housing assistance, and other social services.

A bank officer serves on the Board of Elite Companies Charitable Foundation, Exton, Chester County. The organization works to support organizations that provide temporary housing for homeless women and children, as well as those that build home and revitalize neighborhoods.

Fair Lending or Other Illegal Credit Practices Review

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

