



PUBLIC DISCLOSURE

October 22, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Credit First National Association
Charter Number 22594

6275 Eastland Road
Brook Park, OH 44142

Office of the Comptroller of the Currency

Midsize and Credit Card Bank Supervision
400 7th Street SW, Suite 3E-218
Washington, D.C. 20219

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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Overall CRA Rating:

This institution is rated Satisfactory.

The conclusions for the three rating criteria are:

- The bank demonstrates an outstanding level of qualified investment and community development services.
- The bank demonstrates no use of innovative or complex qualified investments or community development services.
- The bank demonstrates adequate responsiveness to credit and community development needs in its assessment area.

Definitions and Common Abbreviations

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

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

Assessment Area (AA): A geographic area that consists generally of one or more MSAs (using the MSA boundaries that were in effect as of January 1 of the calendar year in which the delineation is made) or one or more contiguous political subdivisions, such as counties, cities, or towns, in which the bank has its main office, branches, and deposit-taking ATMs.

Benefit to Assessment Area: The OCC considers all qualified investments, community development loans, and community development services that benefit areas within the bank's assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s).

Benefit Outside Assessment Area: The OCC considers the qualified investments, community development loans, and community development services that benefit areas outside the bank's assessment area(s), if the bank has adequately addressed the needs of its assessment area(s).

CEBA: Competitive Equality Banking Act of 1987, which permitted corporations to form limited-purpose credit card banks, whose operations are restricted to credit card activities, without the corporation becoming subject to the limitations of a "bank holding company" under the Bank Holding Company Act. A CEBA credit card bank engages only in credit card operations, does not accept demand deposits or savings or time deposits of less than \$100,000 (other than to secure extensions of credit), maintains only one office and does not engage in the business of making commercial loans.

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

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

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

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

Limited Purpose Institution: An institution that offers only a narrow product line (such as credit cards or automobile loans) to a regional or broader market and for which a designation as limited purpose bank is in effect.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

Net Operating Income: As listed in the Consolidated Report of Condition and Income: Income before income taxes and extraordinary items and other adjustments.

Pass-Through Receivables: Outstanding receivables tied to all accounts issued or owned by the bank. Pass-through receivables include receivables attributable and receivables retained on balance sheet as those terms are used in 12 CFR 8.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Total Assets: Total bank assets as listed in the Consolidated Report of Condition and Income.

Total Income: From the Consolidated Report of Condition and Income – Total Interest income plus Total Noninterest income.

Wholesale Institution: An institution that is not in the business of extending home mortgage, small business, small farm, or consumer loans to retail customers and for which a designation as a wholesale bank is in effect.

Description of Bank

Credit First, N.A. (CFNA or bank) operates as a Competitive Equality Banking Act (CEBA) credit card bank. On January 31, 1996, CFNA received a limited purpose designation from the OCC for evaluating CRA performance. CEBA banks are restricted to credit card operations, maintain only one office, and do not accept demand, savings, or time deposits of less than \$100,000 (other than to secure extensions of credit). In addition, CEBA banks may not engage in the business of making commercial loans. Of note, credit card loans to businesses, which meet the criteria for a small business concern, are eligible for business loans under regulations established by the Small Business Administration under 13 CFR 121, but are not considered commercial loans. Lending limitations preclude the bank from making CD loans. Other than these limitations, there are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA.

CFNA is a \$55 million bank located in Brook Park, Ohio, a suburb of Cleveland, Ohio. It has no branch offices. CFNA is a wholly owned subsidiary of Bridgestone Retail Operations (BSRO), LLC. BSRO is a Delaware limited liability company and is wholly owned by Bridgestone Americas Holding, Inc. (BSAH), located in Nashville TN. The Bridgestone Corporation, headquartered in Japan, wholly owns BSAH.

Bridgestone Corporation is the world's largest tire rubber manufacturer. The company employs more than 142,000 employees worldwide and sells a diverse portfolio of products, including tires, sporting goods, polymers, and building and industrial materials, in more than 150 countries. Bridgestone currently operates more than 180 manufacturing plants and research and development facilities in 25 countries. Bridgestone/Firestone Trust Fund (BFTF) is the philanthropic arm of BSAH, which provides investment avenues for qualified investments outside the bank's AA.

Table1 provides financial information relating to CFNA's financial capacity to help meet the needs of its AA. CFNA sells 100 percent of its receivables instantaneously to BSRO without recourse. The bank maintains a pre-paid cash account of approximately \$58 million to cover the estimated payments for the net settlement of the receivables. Total receivables attributed to the bank approximate \$874 million as of December 31, 2017.

The following table provides an overview of CFNA's financial information during the CRA review period:

Table 1: Financial Information (000s)

	Year-end 2014	Year-end 2015	Year-end 2016	Year-end 2017	Average for Evaluation Period
Tier 1 Capital	\$41,030	\$46,301	\$50,032	\$52,864	\$47,557
Total Income	\$44,061	\$44,657	\$44,210	\$45,385	\$44,578
Net Operating Income	\$21,609	\$20,843	\$18,419	\$16,241	\$19,278
Total Assets	\$43,241	\$48,740	\$53,000	\$55,078	\$50,015
Pass-Through Receivables / Managed Assets	\$853,308	\$862,039	\$883,652	\$871,448	\$867,612

Source: Consolidated Report of Condition, Income, and bank reported data.

Scope of the Examination

As part of our ongoing supervision of the bank, we reviewed the appropriateness of CD activities provided for consideration in our evaluation. This evaluation included the reviewing of CD investments, committee memberships, and CD services for accuracy and compliance as defined in the CRA regulation. The review period is January 1, 2014 through December 31, 2017. At the prior examination dated December 31, 2013, we rated the bank Satisfactory.

The bank has adequately addressed the needs of its AA; therefore, qualified investments and services outside of the AA were considered in evaluating its performance.

The CRA evaluation period covered the 2010 U.S. Census and 2015 American Community Survey (ACS) U.S. Census data. The total number of census tracts changed by one and there was a slight drop in total families, housing units, and population between the two census periods. Additional census data is reported on page nine of this report.

As noted earlier, CEBA banks are subject to certain restrictions pertaining to commercial lending. Therefore, this CRA review focused on the level of CD donations or grants and services within CFNA's AA. In addition, BFTF activities were included, which provide investment avenues for qualified investments outside the bank's AA.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this bank [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Description of Assessment Area

CFNA's AA, is based on 2010 U.S. Census and 2015 ACS U.S. Census data, and consists of Cuyahoga County, which is one of five counties in the Cleveland-Elyria-Mentor, OH MSA #17460.

According to the 2010 U.S. Census, total population for the AA was 1,280,122. The distribution of population by income levels was 14.80 percent in low-income tracts, 21.81 percent in moderate-income tracts, 34.14 percent middle-income tracts and 29.24 percent in upper-income tracts and 0.01 percent classified as unknown.

The 2014 median family income was \$62,600. Low- and moderate-income ranges were less than \$31,300 and \$31,300-\$50,000, respectively. Number of Families below the poverty level are 12.40 percent.

The Low-and moderate-income range is the following: Low individual income is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography. Moderate individual income is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Total housing units in the AA were 622,637. The total number of owner-occupied units for the AA was 336,055. The distribution of owner-occupied units represents 8.54 percent of units in low-income census tracts; 17.84 percent of units in moderate-income census tracts; 38.76 percent of units in middle-income census tracts; 34.85 percent of units in upper-income census tracts and 0.01 percent units classified as unknown.

Total rental-occupied housing units in the AA were 202,889. The distribution of rental-occupied housing units in the AA represent 25.54 percent of units in low-income census tracts, 30.98 percent of units in moderate-income census tracts, 29.50 percent of units in middle-income tracts, and 13.95 percent of units in the upper-income tracts, with 0.03 percent classified as unknown.

Total vacant units in the AA were 83,693. The distribution of vacant units represent 35 percent of units in low-income census tracts, 29.78 percent of units in the moderate-income census tracts, 22.22 percent of units in middle-income census tracts, and 13.00 percent of units in the upper-income census tracts.

The 2010 median housing age was 67, 62, 53, 44, and 71 for the housing stock in the low-, moderate-, middle-, and upper-income tracts, and classified as unknown, respectively.

According to the 2015 ACS U.S. Census, total population in the AA was 1,263,189. The distribution of population by income levels was 17.00 percent in low-income tracts, 26.11 percent in moderate-income tracts, 28.17 percent in middle-income census tracts, 28.03 percent in upper-income tracts, and 0.70 percent classified as unknown.

The 2017 median family income was \$67,900. Low- and moderate-income ranges were \$33,950 and less and \$33,950-\$54,320, respectively.

Total housing units in the AA is 619,303. Total owner-occupied units for the AA were 317,310. The distribution of owner-occupied units represents 9.32 percent of units in low-income census tracts; 22.49 percent of units in moderate-income census tracts; 33.19 percent of units in middle-income census tracts; 34.70 percent of units in upper-income census tracts and 0.30 percent units classified as unknown.

Total rental-occupied housing units in the AA were 217,409. The distribution of rental-occupied housing units in the AA represent 27.31 percent of units in low-income census tracts, 34.93 percent of units in moderate-income census tracts, 22.85 percent of units in middle-income tracts, and 13.25 percent of units in the upper-income tracts, with 1.66 percent classified as NA.

Total vacant units in the AA were 84,584. The distribution of vacant units in the AA represent 35.92 percent of units in low-income census tracts, 34.16 percent of units in the moderate-income census tracts, 16.57 percent of units in middle-income census tracts, and 11.74 percent of units in upper-income census tracts, with 1.62 percent classified as NA.

The 2015 AA median housing age was 74, 66, 59, 50, and 56 for the housing stock in the low-, moderate-, middle-, and upper-income tracts, and classified as NA, respectively. Families below the poverty level are 14.50 percent.

According to the ACS U.S. Census 2015, Dun & Bradstreet Data, the largest businesses in the AA are retail trade at 13.07 percent; finance insurance and real estate at 10.22 percent; and services at 47.61 percent.

According to the Cuyahoga County website, the largest employers are Cleveland Clinic, University Hospitals, U.S. Office of Personnel Management, Progressive Corporation, Cuyahoga County, Cleveland Metropolitan School District, City of Cleveland and The Metro Health System. See tables 2a and 2b for additional data of the two census periods reflected within this CRA Evaluation report.

Table 2a: Assessment Area Description

	Number	Low	Moderate	Middle	Upper	NA
Tracts	446	21%	25%	30%	23%	1%
Families	319,049	25%	18%	19%	38%	
Businesses	94,354	10%	16%	34%	39%	1%

Source: Demographic Data – 2010 U.S. Census, Dun & Bradstreet Data. *Represents families by income level.

Table 2b: Assessment Area Description

	Number	Low	Moderate	Middle	Upper	NA
Tracts	447	24%	27%	25%	22%	2%
Families	305,683	27%	17%	18%	38%	
Businesses	86,771	11%	20%	29%	39%	1%

Source: Demographic Data – 2015 ACS U.S. Census, Dun & Bradstreet Data. *Represents families by income level.

Per U.S. Bureau of Labor Statistics, unemployment for the AA was 5.20 percent for 2014 and 4.90 percent for 2017. The national unemployment rate for same time periods were 5.60 percent and 4.10 percent, respectively. The 2017 unemployment rate for the AA is slightly higher than the national rate. According to Zillow, housing for LMI remains a challenge with the AA median single-family home list price for 2014 and 2017 are \$107,000 and \$129,000, respectively. The median list price shows a 20.56 percent increase over the review period of 2014 thru 2017.

Credit and CD needs were determined by contacting representatives from two nonprofit organizations that reside or conduct business within the bank's AA. The following community needs were identified for the bank's AA:

- Small business support and guidance,
- Financial education for homeowners,
- Small dollar loans to small businesses,
- Secured and unsecured credit cards for individuals and small businesses.

Conclusions about Performance

Summary

- CFNA's level of qualified investments and CD services, including those from its affiliate BTF, is outstanding given that the bank operates under a CEBA charter, with associated restrictions, and unique operations. The bank's financial condition is sound.

- CFNA did not use any innovative or complex qualified investments or CD services to meet the needs of its AA.
- CFNA exhibits adequate responsiveness to CD needs within the AA. CFNA's qualified investments provided affordable housing and social programs targeted to low- and moderate-income individuals within the AA.

Qualified Investments

CFNA's qualified investments within and outside the bank's AA totaled \$468 thousand and \$9.7 million, respectively. Current qualified investments are up from the last CRA examination dated December 31, 2013 of \$306 thousand compared to the current period (October 22, 2018) level of \$468 thousand. Despite the increase in AA qualified investments, the level of Total Investment/Average Tier 1 Capital as reported in table 4 dropped from 1.27 percent recorded at the last examination to the current level of .98 percent. The drop was attributable to the requirements of The Federal Reserve Regulation W, which limits certain transactions between the depository bank and their affiliates.

Since the last examination, CFNA has maintained cash in excess \$14 million for affiliate transactions, which doubled the banks' asset size and capital levels. This high level of cash reserves caused a reduction of the aforementioned capital ratio. CFNA employees have provided qualifying services to three community organizations inside its AA. This level of qualified investment is outstanding given the nature CFNA's operations under CEBA restrictions, its financial condition, competition and available opportunities. While the qualified investments were responsive to community needs, which were identified during a community contact of two nonprofit organizations in the bank's AA, they were not innovative or complex. Table 4 reflects CFNA's Qualified Investments as a percentage of Average Tier 1 Capital, Average Total Income, and Average Pass-Through Receivables.

Table 3a quantifies the level of qualified investment activity that had a purpose, function or mandate of serving the AA as well as outside the AA.

Table 3a: Qualified Investment Activity (000s) 1/1/14 thru 12/31/17

	Benefits AA	Benefits Region or State, Including AA	Outside AA	Totals
Originated Investments	\$0	\$0	\$0	\$0
Originated Grants	\$468	\$146	\$9,781	\$10,395
Prior-Period Investments that Remain Outstanding	\$0	\$0	\$0	\$0
Total Qualified Investments	\$468	\$146	\$9,781	\$10,395
Unfunded Commitments*	\$0	\$0	\$0	\$0

Table 4a: Qualified Investment Percentages 1/1/14 thru 12/31/17

	Benefits AA (%)	Benefits Region or State, Including AA	Outside AA (%)	Total (%)
Total Investments/Average Tier 1 Capital	0.98	0.31	20.57	21.86
Total Investments/Average Total Income	1.05	0.33	21.94	23.32
Total Investments/Average Pass-Through Receivables	0.05	0.02	1.13	1.20

Table 4a provides a breakdown of the bank's investment activity in relation to its financial capacity in terms of average tier 1 capital, average total income and average pass-through receivables over the evaluation period.

Community Services for Low- and Moderate-Income Individuals: \$367 thousand

BFTF donated \$18 thousand to Renaissance Social Services (RSS), a nonprofit social services organization that helps to prevent homelessness in Chicago by providing short term, emergency funds to people at risk of losing their homes. RSS provide payment vouchers for urgent financial hardships, such as car repairs or unexpected medical bills, which could result in missed rent payments and homelessness. Some of the participants of the program are as follows: more than 50 percent of participants have chronic health conditions, 20 percent are veterans, and 50 percentage of participants have spent an average 3.5 years' incarceration during their lifetime. RSS has a three-prong approach to homelessness (1) Short-term financial grants to individuals and families at risk of losing their housing along with support and linkages to services to facilitate housing stabilization and (2) Supportive housing for individuals and families who are experiencing chronic homelessness. RSS provides long-term housing and supports that move participants towards the greatest degree of housing stability and self-determination possible (3) Health & Supportive Services for vital, proactive mental and primary healthcare services delivered at participants' homes and through partnerships at community-based providers.

BFTF donated \$76 thousand to several nonprofit food banks in and outside the AA to provide meals to low- and moderate-income residents and families in various counties of Ohio as well as Indianapolis, Indiana; Williamsburg, Kentucky; and Nashville, Tennessee.

BFTF donated \$26 thousand to four chapters of the Salvation Army located in Akron, OH, Russellville, OH, Bloomington, OH, and La Vergne, TN. The Salvation Army is a nonprofit organization that provides various social services for low- and moderate-income individuals. Social services include the following: temporary housing, medical care, meals, youth recreational activities, counseling services, disaster relief, and job training.

CFNA donated \$21 thousand to America Scores Cleveland, an organization that primarily targets low- and moderate-income youth in the AA to help them lead healthy lives, be engaged students, and have confidence and character to make a difference in the world.

CFNA donated \$30 thousand to The City Mission, a nonprofit in Cleveland that provides after

school programs for low- and moderate-income children within the bank's AA.

CFNA donated \$26 thousand to The Scan Hunger (SHO) organization, a nonprofit food pantry that collects and distributes food donations to economically disadvantaged residents in the AA.

BFTF donated \$23 thousand to the Foodshare and Opportunity Network of Prescott, AR. The program provides food resources and training opportunities to low-income individuals and families in the Arkansas area to help them move out of poverty.

BFTF donated \$25 thousand to the Kids of The Community (KOTC) in Warren, TN. The program provides tutoring and education programs, counseling programs, adventure and athletic programs, and community enhancement programs to kids. The program is open to all kids and families in the area including low- and moderate-income families based upon annual income requirements.

BFTF donated \$100 thousand to the Middle Tennessee Council, Boy Scouts of America (MTCBSA) Scoutreach Program Initiative. As of December 2016, the program served 1,550 low income, at-risk and underserved youth within the Davidson County. The majority of the youth in the Scoutreach Program are from the inner city of Nashville, Davidson County-North, East and downtown Nashville and neighborhoods such as Woodbine, Woodlawn, Antioch, Glenclyff, Paragon Mills, Elysian Fields, Madison and Inglewood. Two of the four program aids are bilingual families, which helps the boy scouts to reach out to more culturally diverse neighborhoods.

CFNA donated \$22 thousand to the Southwest Community Health Foundation and Southwest General for the Dennis C. Simmerman Community Care Fund. This fund supports the low-income hospice patients and their families who face significant financial difficulties due to their health conditions. The fund also provides critical financial support to subsidize short-term room and board at hospice as well as the cost of rent, travel, utilities and food for families.

Affordable Housing: \$102 thousand

BFTF donated \$37 thousand to the Habitat for Humanity of Greater Cleveland (HHC), a nonprofit organization that constructs and provides new single-family housing to the low- and moderate-income families who provide at least 500 hours on the construction of their home. CFNA also donated \$29 thousand to the HHC.

CFNA donated \$36 thousand to the Cleveland Housing Network (CHN), a nonprofit affordable housing developer and housing service provider. CHN collaborates with utility companies, financial institutions, and public agencies to manage and deliver large-scale housing resources to low-income individuals, families, seniors, the disabled and underserved communities in and around the AA.

Community Development Services

CFNA employees provided CD services to three organizations within the AA that provides community services to low- and moderate-income individuals. The CD services are listed below:

- CFNA's employees volunteer over 230 hours to the Berea Community Outreach Program. The community organization provides food to at-risk children in the Berea City School System during the week and on weekends. In addition, some bank employees provided administrative or technical support in meeting the goals of Berea programs such as Winter Crisis Program (WCP) assistance and Dinner to your Door, which are programs for LMI families and elderly citizens in the area.
- Two CFNA bank managers volunteered 96 hours as members of the Bridge Board, an organization of the Boys and Girls Club of Cleveland (BGC). The Bridge Board helps deliver the mission of the Clubs to encourage children and teens to become productive, responsible and caring citizens. A key program under BGC that the bank supports is Notes for Notes, or N4N, provides a safe space where youth of all backgrounds can create music together and influence through their lives. The studio's primary community partnership is with the Boys & Girls Clubs of Cleveland and is comparable to an embassy model with separate leadership, staff, resources and liability. N4N provides free access to the studio as well as music and production instruction, (BGC) provides in-kind rent and access to the facilities for those low- and moderate-income families, specifically their children. The range of children is approximately 6-18 years of age.
- CFNA employees volunteer over 223 hours to Audrey's Outreach, a nonprofit food and clothing pantry serving LMI residents within the AA. The bank employees help in the managing and planning of the program operations.