



## **PUBLIC DISCLOSURE**

December 31, 2011

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Bank of America, N.A.  
Charter Number: 13044

100 North Tryon Street  
Charlotte, NC 28202

Office of the Comptroller of the Currency

Large Bank Supervision  
Constitution Center  
400 7<sup>th</sup> Street SW  
Washington, DC 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, and should not 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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## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. 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 the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**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 usually have between 2,500 and 8,000 persons, and 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:** 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 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, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of LMI individuals.

**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.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income:** Individual income that 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.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

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

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that 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.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Description of Institution

Bank of America, N.A. (“BANA” or “the bank”) is a full-service interstate bank headquartered in Charlotte, North Carolina. The national bank is a subsidiary of Bank of America Corporation (BAC), a multinational banking and financial services corporation that at December 31, 2011, held approximately \$2.1 trillion in total assets and is the nation’s second largest bank holding company. BAC employs approximately 282,000 full-time employees. During the prior evaluation period, ending March 31, 2009, BAC was the nation’s largest bank holding company, with total assets of \$2.3 trillion. Since the prior evaluation period, the holding company has reduced assets in its efforts to streamline operations, reduce costs, and making the company more effective in executing its strategy and achieving its financial plan. This strategic initiative is known as “Project New BAC.”

The company offers its financial products and services through six business segments: Deposits, Card Services, Consumer Real Estate Services, Global Commercial Banking, Global Banking & Markets, and Global Wealth & Investment Management. Through its primary banking subsidiary, BANA, the company holds the largest retail deposit market share in the U.S. BANA provides banking services to 57 million consumer and small business customers through a retail platform consisting of 5,733 banking centers located across 34 states and operates approximately 18,000 automated teller machines (ATMs). This retail network reaches approximately 80 percent of the U.S. population. The bank offers online banking, which allows nationwide access to approximately 30 million of its customers.

As of December 31, 2011, BANA reported \$1.5 trillion in total assets and \$119.9 billion in Net Tier One Capital. During the evaluation period, the bank was required to increase its capital to meet heightened regulatory requirements resulting from the most recent economic downturn. The bank received \$45 billion in bailout funds in 2008 and early 2009 under the federal government’s Troubled Asset Relief Program (TARP), due to the financial crisis affecting the U.S. banking system. Those funds were fully repaid in December 2009. While the active phase of the liquidity crises took place during the prior evaluation period, the economic downturn continued to affect beyond the last evaluation period as the economy remained volatile with high unemployment rates, increases in foreclosures, and continued low consumer confidence. Like many financial institutions, the bank’s response to the economic environment has been to bolster capital. The economic events that unfolded in recent years continue to be a considerable performance context factor for the bank.

The bank offers a wide array of products and services. The bank’s lending products include commercial and small business loans, consumer loans, residential real estate loans, credit cards, Small Business Administration (SBA) guaranteed loans, and other specialized lending programs. Deposit products include business and personal checking, savings, money market, time deposit, and individual retirement accounts.

The current evaluation period covers April 1, 2009, through December 31, 2011, and includes 47 rated areas. The last evaluation period covered the period between January 1, 2007, and March 31, 2009, and included 43 rated areas. The increase in number of rated areas was the result of the Countrywide acquisition being folded into the bank during the second quarter of 2009, multistate MSA reclassifications in 2010, and a pilot program that added deposit-taking ATMs to increase the bank’s ability to service former Merrill Lynch customers in 2011.

In addition to BANA, the Bank of America Corporation had two other depository institutions subject to CRA: Bank of America Rhode Island (BARI) and FIA Card Services (FIA). BARI was designated as a wholesale bank under CRA in October 2009. FIA, also a subsidiary, and one of the leading issuers of credit cards in the United States, is designated as a limited purpose bank. FIA received a "Satisfactory" rating during its last evaluation period ending December 31, 2009. Other major subsidiaries acquired in the past five years (including during the prior evaluation period) are U.S. Trust, LaSalle Bank, Countrywide Financial, and Merrill Lynch.

BANA, along with 13 other mortgage servicers, entered into a Consent Order with the OCC and Federal Reserve Board on April 13, 2011, relating to allegations concerning certain servicing and foreclosure practices with residential mortgage loans during the evaluation period. The OCC charged the servicers with filing affidavits and other mortgage-related documents that were not properly notarized, including those not signed or affirmed in the presence of a notary. Under the Consent Order, the institutions agreed to submit to an independent foreclosure review to identify borrowers potentially harmed by the bank's foreclosure practices. On January 7, 2013, BANA and nine other institutions agreed to settle the independent foreclosure review requirement by providing homeowners around the country \$8.5 billion in cash payments and mortgage relief in the form of loan modifications and other loss mitigation activities. However, other requirements of the Consent Order remain in effect.

On September 13, 2012, BANA agreed to settle the U.S. Department of Justice (DOJ) allegations of discrimination against recipients of disability income. The DOJ alleged that loan applicants with disabilities were subjected to invasive requests for medical information from a doctor. These alleged practices occurred between May 1, 2007, and April 30, 2012. The bank agreed to hire a third party administrator to research approximately 25,000 loan applications where applicants listed Social Security Disability Insurance as a source of income to identify potential victims.

On May 26, 2011, BAC Home Loans Servicing LP, formerly known as Countrywide Home Loans Servicing LP, agreed to settle with the U.S. Department of Justice to resolve allegations that the bank unlawfully foreclosed on active military servicemembers in violation of the Servicemember Civil Relief Act (SCRA). The bank agreed to pay at least \$20 million into a Qualified Settlement Fund to be used to pay servicemembers that were deemed to have been foreclosed on in violation of the SCRA from 2006 through 2010. The DOJ identified approximately 300 borrowers that it determined were eligible for remediation payments for wrongful foreclosures.

Despite these legal matters discussed above, the bank and its affiliates were not constrained by any other legal or financial impediments that would hinder its ability to meet the credit, investment, and service needs of its communities.

BANA received an "Outstanding" rating during the last evaluation period, ending March 31, 2009. It was the bank's seventh consecutive "Outstanding" rating.

## Description of Evaluation Process

### Evaluation Period/Products Evaluated

Unless noted otherwise, the evaluation period for all products and services considered in this evaluation is April 1, 2009, through December 31, 2011. The prior evaluation was based on activities occurring during years 2007, 2008, and the first quarter of 2009. At the bank's request, we considered small business and small farm lending activities of FIA Card Services, N.A., a BANA affiliate, which occurred within the bank's assessment areas. In addition, we considered letters of credit, to the extent the credit products revitalized communities or enhanced lending to LMI areas or borrowers.

Please refer to Appendix A for information on the subsidiaries, affiliates, and products reviewed during this evaluation.

### Description of Evaluation Period

This evaluation period was marked with significant challenges for Bank of America, N.A., other financial institutions, and the United States economy in general. During this period, the United States continued to experience the worst financial crisis and recession since the Great Depression of the 1930's. Although the national economy has gradually improved over the course of the evaluation period, the economic recovery remains flat, coupled with persistent high unemployment and instability in the housing market.

Unemployment and housing foreclosures peaked late in the evaluation period. The economic conditions made it more difficult for LMI individuals to afford to purchase a home. LMI geographies were disproportionately affected, with higher unemployment rates and less demand for homes as individuals sought homes in middle- and upper-income geographies due to the continued decline in home prices. As delinquencies and foreclosures rose, banks also found it more challenging to attract qualified loan applicants. The low interest rate environment spurred a boom in refinance activity that was primarily concentrated in middle- and upper-income segments due to higher home equity levels. LMI geographies also typically had a greater concentration of homes with negative equity. The financial crisis and recession not only affected home mortgage, small business, and small farm lending, competition remained intense for community development loans and qualified investments.

### Selection of Areas for Full-Scope Review

BANA has defined 309 assessment areas within 34 states and 13 multistate metropolitan areas. For purposes of this evaluation, we consolidated the non-metropolitan assessment areas in each state, resulting in 275 assessment areas. From all states and multistate metropolitan area where the bank has an office, we selected a sample of 70 assessment areas for full-scope reviews. We generally selected assessment areas within each state or multistate metropolitan area with the bank's largest deposit and/or lending presence. In some states with several major metropolitan areas or where the bank has significant operations, we selected multiple assessment areas for full-scope reviews, such as in California, Florida, and Texas. We provided detailed rating narratives for the bank's six largest rating areas ("Primary Rating Areas") based on their deposits relative to the bank's total deposits. The rating areas,

comprising three states and three multistate metropolitan areas, with five percent or more of the bank's total deposits include Boston-Cambridge-Quincy MSA (5.1 percent), Texas (8.2 percent), Florida (8.3 percent), New York-Northern New Jersey-Long Island MSA (10.2 percent), Charlotte-Gastonia-Rock Hill MSA (13.5 percent), and California (23.9 percent). These primary rating areas together comprise 69 percent of the bank's total deposits. Refer to the "Description of Institution's Operations" section under each State and Multistate Metropolitan Area Rating section (as applicable) for details regarding how the areas were selected.

## Ratings

The bank's overall rating is a blend of the multistate metropolitan area ratings and state ratings. The ratings are based primarily on conclusions drawn on those assessment areas that received full-scope reviews, but were also influenced by performance in limited-scope areas, unless otherwise noted. The six primary rating areas carried the greatest weight in our overall conclusions as these areas represent the bank's most significant markets by deposits and loans. When consolidating assessment area conclusions into state ratings, communities with a large BANA presence received more weight than those with a small presence. We applied similar standards when consolidating state and multistate MSA ratings into the bank's overall rating.

Under the Lending Test, home mortgage lending carried the greatest weight, followed by lending to businesses and farms. During the evaluation period, home mortgage loans accounted for approximately 85 percent of loan volume. Within home mortgage lending, home refinance loans were weighted the heaviest, followed by home purchase. Home improvement lending received the least amount of weight. The weighting reflects the bank's loan volume over the evaluation period. In the prior evaluation, small business lending carried the greatest weight. The full impact of the Countrywide integration during the current evaluation period heavily influenced the home mortgage weighting.

In many markets, the bank originated very few, if any, small loans to farms and loans for multifamily housing. Where there were a sufficient number of small loans to farms or multifamily loans to analyze, conclusions are provided in the narrative for the applicable rating area. If there were an insufficient number of loans of any product in an assessment area to analyze, no analysis was performed.

The geographic and borrower income distribution conclusions for home mortgage, small loans to businesses, and small loans to farms provided the most weight in arriving at overall conclusions under the Lending Test. Expectations for lending in low-income geographies were the same for lending in moderate-income geographies. However, if there were a limited number of businesses or owner-occupied housing units in low-income geographies, we gave greater consideration to performance in moderate-income geographies. We also lowered expectations for lending to low-income borrowers than for moderate-income borrowers due to performance context issues such as the increased difficulty low-income borrowers face in qualifying for home mortgage loans. We considered that the bank did not collect nor have available revenue data for approximately 25 percent of the small loans to businesses reported. Loans lacking revenue data did not materially affect our ability to evaluate lending to businesses of different sizes.

Housing affordability in high-cost and extremely high-cost markets was considered in our analyses in the Boston-Cambridge-Quincy multistate MSA, New York-Northern New Jersey-Long Island multistate MSA, Philadelphia-Camden-Wilmington multistate MSA, Portland-Vancouver-Hillsboro multistate MSA, Seattle-Bellevue-Everett MSA, and all AAs in the state of California. We also considered the limited opportunities for home mortgage lending in communities with high percentages of retirees, including the Buffalo-Niagara Falls MSA, Delaware Non-MSA, Oregon Non-MSA, and several AAs in the state of Florida.

We considered the economic impact on opportunities for lending in low- and moderate-income geographies. Opportunities for lending in low- and moderate-income geographies during the economic crisis were impacted by high unemployment, negative equity, low interest rate environment, and changing consumer behavior. With double-digit unemployment in many parts of the country, LMI areas were typically disproportionately affected with higher unemployment, thus decreasing a lender's ability to qualify borrowers. Steep declines in home values and equity resulted in more than a third of homeowners in LMI tracts to be underwater, thus limiting opportunities to refinance. Due to the low interest rate environment, there was a spur in refinance activity; however, the refinance activity was mostly concentrated in the middle- and upper-income segments where there were higher equity levels present. There was also a shift in consumer behavior as home prices continued to fall in all segments and became more affordable, individuals purchased homes more frequently in middle- and upper-income geographies.

Community development lending based on volume, complexity, and responsiveness and the use of innovative and flexible lending programs provided either a neutral or a positive impact to AA lending conclusions.

When determining Investment Test conclusions for each assessment area, investment and contribution activity and responsiveness to community development needs were given the most weight. Qualitative factors, such as complexity and innovation, were also considered.

When determining Service Test conclusions for each assessment area, accessibility to branch offices and changes in branch locations provided the most weight. In assessment areas receiving full-scope reviews, we also considered improved branch accessibility for LMI individuals and geographies from nearby branches in middle- and upper-income geographies. Branch hours, products, and services, as well as community development services, received a lesser amount of weight.

In reviewing community development loans and investments, consideration was given to anomalies caused by the bank's method of aggregating and reporting deposits from geographically diverse regional and national corporations, as well as corporate deposits of the bank's own parent company.

### **Data Integrity**

BANA's public lending data used in this evaluation is considered accurate. To determine the accuracy of publicly available HMDA information and small business and small farm lending data (CRA data), we reviewed the bank's compliance risk management systems for collecting

and filing HMDA and CRA data and we tested statistical samples of loan files from various loan products. We determined that revenue information for small business lending data publicly filed in 2009 and 2010 were inaccurate and unreliable. As a result, BANA was required to conduct extensive look-back reviews of all small loans to businesses originated in 2009 and 2010 and re-file the corrected data. This evaluation includes the corrected data.

We also reviewed community development loans, investments, and services submitted by bank management to ensure they met the regulatory definition for community development. We had no concerns with community development loans, investments, or services not meeting the regulatory definition.

### **Community Contacts**

For this evaluation, OCC Community Affairs Officers updated previously completed community contacts or conducted new contacts in the full-scope AAs. These interviews were conducted with a wide variety of community organizations, including low-income housing agencies, small business development centers, social service organizations, and community action groups serving primarily LMI persons. Information from these community contacts for the Primary Rating Areas is summarized, as needed, in the Community Profiles found in Appendix C.

### **Other Information**

BANA is nationally recognized as a leader in providing loans for affordable housing. The bank offers many programs that support affordable housing initiatives. Community development lending alone supported the creation of nearly 26,000 affordable housing units.

## Fair Lending or Other Illegal Credit Practices Review

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

We also considered other material practices the bank engaged in during the evaluation period involving home mortgage lending practices and foreclosure issues that provide relevant context for the bank's activities during the period of the CRA evaluation.

The following evidence of discriminatory or other illegal credit practices adversely affects the bank's overall CRA rating:

- Unfair or deceptive acts or practices concerning the marketing, fulfillment, and billing practices for identity theft protection services. The bank entered into a settlement agreement with the OCC based on OCC findings that the bank's customers, who had requested identity theft protection products provided by the bank's vendors, were charged for services not consistently provided by those vendors. The bank has remediated the deficiencies, including making restitution to adversely affected customers, and no longer offers these products. For further information on this settlement, see OCC Consent Order #2014-027, dated April 7, 2014.
- Noncompliance with the Fair Housing Act and Equal Credit Opportunity Act (ECOA). The bank amended its lending policies and procedures when it entered into a settlement agreement with the U.S. Department of Justice (DOJ) based on DOJ and the Department of Housing and Urban Development (HUD) findings that the bank engaged in a pattern or practice of discrimination on the basis of disability and receipt of public assistance between May 2007 and April 2012. For further information on the HUD charge, please see HUD cases 00-10-0003-8, 05-10-1630-9, 05-10-1635-8, and 05-09-1203-8. For further information on the DOJ settlement, see DOJ Consent Decree 3:12-CV-605.
- Noncompliance with the Servicemembers Civil Relief Act (SCRA). In a settlement with the DOJ, Bank of America agreed to pay \$20 million to approximately 300 servicemembers whom the DOJ deemed were wrongfully foreclosed on between January 2006 and May 2009. For further information on the DOJ settlement, see DOJ case 2:11-CV-04534-PA-MRW, dated May 30, 2011.

Further, section 1025 of the Dodd–Frank Wall Street Reform and Consumer Protection Act (Pub. L. 111-203) assigns to the Consumer Financial Protection Bureau (CFPB) exclusive examination authority, and primary enforcement authority, to ensure compliance by banks and FSAs with Federal consumer financial laws, if the bank or FSA has more than \$10 billion in assets. In April 2014, the bank agreed to a settlement with the CFPB relating to alleged unfair or deceptive acts or practices in the marketing and servicing of add-on credit products, such as credit protection plans. The practices covered in this settlement occurred during the evaluation

period. For further information about the CFPB action, please see CFPB Consent Order 2014-CFPB-0004, dated April 7, 2014.

As a result of these findings, the CRA Performance Evaluation rating was lowered from Outstanding to Satisfactory.

## General Information and Overall CRA Rating

### General Information

The CRA requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including LMI neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Bank of America, N.A. issued by the OCC, the institution's supervisory agency, as of December 31, 2011. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 C.F.R. Part 25.

### Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

The following table indicates the performance level of Bank of America, N.A. with respect to the Lending, Investment, and Service Tests:

Performance Levels	Bank of America, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- Discriminatory or other illegal credit practices that occurred during this rating period (see “Fair Lending or Other Illegal Credit Practices Review” section on page 14) were considered and resulted in the overall rating being downgraded from Outstanding to Satisfactory.
- Lending performance was good throughout the U.S. as demonstrated through good geographic and borrower income distributions. While community development lending had a positive or significantly positive impact on lending performance in some assessment areas, the impact was neutral in most assessment areas.
- Investment activity reflected excellent responsiveness to the credit needs throughout the bank’s assessment areas, which was often provided in a leadership role.
- The provision of retail banking services through branch delivery and alternative delivery systems demonstrated excellent responsiveness to the banking needs of geographies and individuals of different income levels throughout the bank’s assessment areas.

## Executive Summary

This section provides narrative support for Bank of America, N.A.'s overall performance rating. Additional narrative regarding performance for each multistate MSA and state is included in the Primary Rating Areas and Other Rating Areas sections of this evaluation. Narrative is supported by numerical tables, found in Appendix D, that reflect data considered during the analysis of the bank's CRA performance.

### LENDING TEST

- Overall lending performance throughout all rating areas during the evaluation period was good. BANA's lending performance had a positive impact on many of the local communities within its footprint.

Economic conditions were challenging during the evaluation period as the U.S. continued to progress through the worst economic recession of the past 70 years. While BANA initiated a number of significant steps to regain financial stability, it remained committed in being responsive and meeting the credit needs of the communities it serves.

Good geographic and good borrower distributions, coupled with community development levels that had a neutral impact in many full-scope assessment areas, resulted in a High Satisfactory rating.

The geographic distribution was strongest in the Portland-Vancouver-Hillsboro multistate MSA and Washington state. Geographic distribution was weakest in the Augusta-Richmond County multistate MSA and in the states of Indiana, Oklahoma, and South Carolina. Borrower distribution was strongest in the Kansas City multistate MSA and in the states of Iowa and Minnesota. Borrower distribution was weakest in the New York-Northern New Jersey-Long Island multistate MSA and in the states of Delaware and Texas.

Community development lending was good in some assessment areas, which had a positive or significantly positive impact on lending performance in those assessment areas. However, in most assessment areas, community development lending had no impact on the lending test conclusions for those assessment areas. In approximately 21 percent of the 70 full-scope assessment areas we reviewed, community development lending had a positive impact, while it had no impact in the remaining 79 percent. Within all assessment areas, BANA originated or purchased more than \$3.5 billion in community development loans, with 65 percent providing nearly 26,000 units of much needed affordable housing, 25 percent helping to revitalize and stabilize low- and moderate-income geographies, and 10 percent funding social services targeted to low- and moderate-income individuals.

Based on deposit market share and ranking, lending activity levels were generally good. BANA was generally ranked in the top five depository financial institutions in each market and held a similar ranking for home mortgage and small business loans. As BANA is not a major agricultural lender, its small farm lending volumes were generally too low for any meaningful analysis.

### *Lending Gap Analysis*

We analyzed the bank's geographic lending patterns throughout its full-scope assessment areas to identify LMI areas with little or no loan penetration. We found no unexplained conspicuous gaps in the bank's lending. Areas with low loan penetration could be adequately explained from low lending opportunities (e.g., natural geographic barriers, relatively few owner-occupied housing units, or too few businesses and farms).

#### *Inside/Outside Ratio*

The bank originated or purchased a substantial majority of its home mortgage, small business, and small farm loans to borrowers within its defined assessment areas. Overall, the bank originated or purchased 81.3 percent of the number of its loans inside its assessment areas. The bank originated or purchased the following percentages of loans by product type: Home Purchase (81.7 percent), Home Improvement (82.5 percent), Home Refinance (80.6 percent), Small Business (95.2 percent), and Small Farm (82.4 percent).

#### *Product Innovation and Flexibility*

The bank's use of flexible lending programs throughout its footprint was considered favorably in its Lending Test performance for all rating areas.

During the evaluation period, the bank originated more than 100,000 in government-insured loans throughout all rating areas totaling over \$15.6 billion. These loans generally have more flexible underwriting guidelines such as lower down payments and lower closing cost requirements that are designed to increase home ownership for LMI borrowers.

The bank also participated in the Home Affordable Refinance Program (HARP) under the federal government's Making Home Affordable (MHA) program. These programs were designed to provide mortgage relief to distressed homeowners to avoid foreclosure. Although the bank engaged in serious deficient loan mortgage servicing, modification, and foreclosure practices during the evaluation period, it refinanced nearly 128,000 mortgages under HARP, totaling \$22.8 billion.

#### *Other*

BANA also extended \$769 million in credit in the form of 80 Letters of Credit to small businesses and farms throughout 24 assessment areas. These Letters of Credit, which provided financing to create over 5,900 units of affordable housing particularly in the New York-Northern New Jersey-Long Island Multistate MSA and states of Florida and Illinois, were vital in helping many financing deals come to fruition. More than \$365 million or 51 percent of the dollar volume of letters of credit were issued to businesses in the New York-Northern New Jersey-Long Island Multistate MSA creating 2,119 units of affordable housing.

During the evaluation period, BANA extended more than \$661 billion in credit to support its local communities while it also continued to work through massive delinquent mortgages related to BAC's acquisition of Countrywide. Cleaning up the legacy issues related to the housing crisis has been one of the bank's top priorities.

## INVESTMENT TEST

- Investment activity reflected excellent responsiveness to the needs in the bank's assessment areas.
- In many of the bank's larger assessment areas, it took a leadership role in developing and participating in investments that were complex and involved multiple partners with both public and private funding.
- Despite the economic challenges, the bank remained a stable, long-term provider of capital, which positively affected LMI communities and families.

BANA consistently demonstrated excellent investment performance during the evaluation period. Rating areas where investment performance is excellent represent almost 97 percent of the bank's total deposits. Investment performance is good in the rating areas that represent the remaining 3 percent of deposits. In some rating areas, investments made outside of the bank's defined assessment areas, but within the state or regional area, enhanced the investment performance of the rating area.

During the evaluation period, large dollar investments of more than \$200 million were made in each of the following assessment areas (in order of size): San Francisco-San Mateo-Redwood City MD, Los Angeles-Long Beach-Glendale MD, New York-White Plains-Wayne MD, Dallas-Plano-Irving MD, Boston-Quincy MD, Charlotte-Gastonia-Rock Hill MSA, and Chicago-Joliet-Naperville MD. The investment volume represents significant financial support despite challenging assessment areas.

The bank often demonstrated leadership, innovation, and responsiveness in support of affordable housing, job creation, and capacity building activities.

## SERVICE TEST

- The provision of retail services demonstrated excellent responsiveness to the banking needs of geographies and individuals of different income levels within the bank's defined assessment areas.
- The bank provided community development services that were consistently responsive to needs identified in the communities. The bank occasionally provided those services in a leadership capacity.

Overall, the bank demonstrated excellent Service Test performance during the evaluation period. Of the 70 full-scope areas we reviewed, the bank's performance was excellent in 51 areas, good in 14 areas, and adequate in the remaining 5 areas. The accessibility of the bank's branches, ATMs, and alternative delivery systems was excellent as the percentages of branches in LMI geographies were often near to or exceeded the percentages of the population in those areas. In addition, 441 branches in middle- and upper-income geographies are nearby and in some cases on the border of LMI geographies. We considered some of

those nearby branches to the extent they enhanced accessibility to LMI persons or those living in LMI geographies.

The bank's record of opening and closing branches did not adversely affect the accessibility of retail delivery systems, particularly in LMI areas. Most branch closures were due to not meeting operating and profitability expectations while some closures were beyond the bank's control (e.g., sale of leased property by owner). During the evaluation period, the bank opened 38 branches in LMI geographies, while closing 72 branches in LMI geographies. Additionally, 292 ATMs were opened in LMI geographies and 174 were closed in LMI geographies.

While branch hours vary by assessment area and within assessment areas, the bank's hours and services were typically tailored to the convenience and needs of the communities. Hours and services were considered excellent in 36 percent of the full-scope assessment areas, good in 34 percent of the areas, and adequate in the remaining 30 percent of the areas.

The bank provided an excellent level of community development services that were responsive to the community development needs of the assessment areas. The bank's provision of community development services is excellent in 43 percent of the rating areas, which represent 48 percent of the bank's deposits. Community development services were focused on the most pressing needs such as foreclosure prevention, homebuyer education, Volunteer Income Tax Assistance (VITA), and financial education to adults and in schools that primarily serve LMI students.

## Primary Rating Areas

- Boston-Cambridge-Quincy (MA-NH) Multistate MSA
- Charlotte-Gastonia-Rock Hill (NC-SC) Multistate MSA
- New York-Northern NJ-Long Island (NY-NJ) Multistate MSA
- State of California
- State of Florida
- State of Texas

## Boston-Cambridge-Quincy (MA-NH) Multistate MSA

CRA rating for the multistate MSA:<sup>1</sup> Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating:

- Lending levels that reflect good responsiveness to the credit needs of its AAs within the multistate MSA;
- Good distribution of loans among geographies and good distribution of borrowers of different income levels throughout the multistate MSA;
- Investment volume that reflects an excellent level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in Boston-Cambridge-Quincy (MA-NH) multistate MSA

BANA is the largest banking financial institution in the Boston-Cambridge-Quincy multistate MSA. As of June 30, 2011, the bank held 25 percent of the multistate MSA's deposits totaling \$48.7 billion. The bank's primary banking competitors for deposits in the MSA include State Street Bank and Trust Company, RBS Citizens, N.A., and Sovereign Bank, with deposit market shares of 14.7 percent, 14.3 percent, and 6.3 percent, respectively. The multistate MSA is a new rating area for BANA that resulted from a regulatory reclassification of certain multistate MSAs in 2010. Of the bank's 47 rating areas, the Boston-Cambridge-Quincy multistate MSA ranks 6<sup>th</sup> and accounts for 5.1 percent of the bank's total deposits. As of December 31, 2011, BANA operated 196 branches and 730 full-service ATMs in the multistate MSA.

Refer to the market profile for the Boston-Cambridge-Quincy Multistate MSA in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

### Scope of Evaluation in the Boston-Cambridge-Quincy Multistate MSA

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<sup>1</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

The bank has defined four assessment areas in the multistate MSA. The Boston-Quincy MD, which was selected for a full-scope review, comprises 80 percent of the bank's deposits and 39 percent of the bank's lending in the multistate MSA.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Lending Test in the Boston-Cambridge-Quincy multistate MSA is rated High Satisfactory. Based on a full-scope review, Lending Test performance in the Boston-Quincy MD is good.

#### **Lending Activity**

Lending activity in the Boston-Quincy MD is good, when considering the significant disparities between the bank's deposit market share and lending market shares. The bank ranks first in deposit market share, home purchase, home improvement, and home refinance lending market shares and third in small loans to businesses and farms. Its market shares of lending are significantly below its market share of deposits.

Refer to Table 1 Lending Volume in the Boston-Cambridge-Quincy multistate MSA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution is good due to good geographic distribution of home mortgage loans and adequate geographic distribution of small loans to businesses.

#### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans in the Boston-Quincy MD is good. The geographic distribution for home purchase lending is excellent; home improvement lending is adequate; and refinance lending is good. The bank's penetration into both LMI geographies for home purchase loans exceeds the percentage of owner-occupied housing units and was further supported by excellent market shares. The percentage of home improvement loans in both LMI geographies was below the respective percentages of owner-occupied housing units. Market shares for home improvement lending were good. Excellent performance in low-income census tracts for refinance lending was offset by only adequate performance in moderate-income census tracts. Market shares for refinance loans were, however, excellent in both LMI geographies.

Refer to Tables 2, 3, 4, and 5 in the Boston-Cambridge-Quincy multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

#### ***Small Loans to Businesses***

The geographic distribution of small loans to businesses is adequate. The percentages of small loans to businesses in LMI geographies are below the percentages of businesses in LMI geographies. Similarly, the bank's market shares of small loans to businesses in LMI geographies are near to, and below the bank's overall market share of small loans to businesses in the MD.

Refer to Table 6 in the Boston-Cambridge-Quincy multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

### ***Small Loans to Farms***

The bank made too few loans to farms in the MD during the evaluation period for any analysis to be meaningful.

Refer to Table 7 in the Boston-Cambridge-Quincy multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

### **Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution is good due to good borrower distributions of home mortgage loans and small loans to businesses.

### ***Home Mortgage Loans***

The distribution of home mortgage loans by borrower income is good. Considering the difficulty low-income individuals face in qualifying for mortgage loans in a high cost housing market, the distribution is excellent for home purchase and home improvement loans, and good for home refinance loans. For home purchase loans and home improvement loans, the percentages of the bank's loans to LMI individuals are below, and exceed the percentages of LMI families in the assessment area, respectively. For home refinance loans, the percentages of the bank's loans to LMI individuals are well below, and approximate the percentages of LMI families in the MD. The bank's market share of home purchase, home improvement, and home refinance loans to LMI individuals each exceeds its overall market share for each respective category of home mortgage loan.

Refer to Tables 8, 9, and 10 in the Boston-Cambridge-Quincy multistate MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Small Loans to Businesses***

The distribution of small loans to businesses is good. The percentage of the bank's small loans to businesses with revenues of \$1 million or less is below the percentage of businesses in the assessment area with revenues of \$1 million or less. The bank's market share of small loans to businesses with revenues of \$1 million or less exceeds its overall market share of small loans to any sized business.

Refer to Table 11 in the Boston-Cambridge-Quincy multistate MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

### **Community Development Lending**

Community development lending had a neutral impact on lending performance in the Boston-Quincy MD. The bank originated or purchased 20 community development loans totaling more than \$120.8 million of which several loans were complex and responsive to the needs identified in the community. More than 91 percent of the community development dollars helped to provide financing for 541 units of affordable housing.

Refer to Table 1 Lending Volume in the Boston-Cambridge-Quincy multistate MSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

### **Other Loan Data**

The bank issued one letter of credit totaling \$5.4 million that has a community development purpose. The letter of credit supported services targeted to LMI persons. Refer to Table 1, Other in the Boston-Cambridge-Quincy multistate MSA section of Appendix D for the facts and data on this letter of credit.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, Lending Test performance in the Cambridge-Newton-Framingham MD and Rockingham County-Strafford County MD is not inconsistent with the bank's overall High Satisfactory performance under the Lending Test in the Boston-Cambridge-Quincy multistate MSA. Lending Test performance in the Peabody MD is excellent and stronger than the overall performance in the Boston-Cambridge-Quincy multistate MSA. Stronger performance is primarily due to relatively higher levels of community development lending, representing 9.5 percent of allocated Tier One Capital.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in the Boston-Cambridge-Quincy multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Boston-Quincy MD is excellent. Performance in limited-scope assessment areas did not negatively affect the Investment Test rating for the multistate MSA.

Investment performance in the Boston-Cambridge MD is excellent. During the evaluation period, the bank made 271 investments in the assessment area totaling \$226.1 million. These current period investments represent approximately 4.6 percent of the bank's Tier One Capital allocated to the assessment area, based on the percent of the bank's total deposits. As of April 1, 2009, prior period investments that are still outstanding totaled \$176.9 million. Prior period investments continue to meet the needs of the AA and thus further support excellent performance. The largest type of investment during the evaluation period, totaling \$177.8 million, was related to Low Income Housing Tax Credit projects. The LIHTCs provided financing for more than 1,200 units of affordable housing for LMI individuals. The bank also invested \$14.6 million in a Historic Tax Credit for revitalizing a moderate-income neighborhood and it invested \$7.8 million in CDFIs for various affordable housing initiatives. In addition, the bank made 227 grants and donations totaling \$9.6 million to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

Refer to Table 14 in the Boston-Cambridge-Quincy multistate MSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Peabody and Cambridge-Newton-Framingham MDs is excellent and is not inconsistent with the bank's overall Outstanding performance under the Investment Test in the Boston-Cambridge-Quincy multistate MSA. Performance in the Rockingham County-Strafford County MD is adequate and weaker than the overall performance in multistate MSA. Weaker performance resulted from a lower amount of current period investments relative to the bank's operations in the assessment area.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the Boston-Cambridge-Quincy multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Boston-Quincy MD is excellent. Performance in limited-scope assessment areas did not negatively affect the Service Test rating for the multistate MSA.

### **Retail Banking Services**

Retail banking services and delivery systems in the Boston-Quincy MD are readily accessible to geographies and individuals of different income levels. The percentage of the bank's branches in low-income geographies exceeds the percentage of the population residing in low-income geographies. The percentage of branches in moderate-income geographies is near to the percentage of the population residing in moderate-income geographies. The bank has seven branches in middle- and upper-income geographies that are in close proximity to LMI geographies. These additional branches coupled with the use of telephone, online, and mobile banking delivery systems improved access to retail banking services for LMI individuals. Compared to 31 percent of the population residing in LMI geographies, 30 percent of the

customers using telephone, online, and mobile banking delivery systems reside in LMI geographies.

The bank opened no branches during the evaluation period. Of the seven branches closed, two were closed in low-income geographies and two were closed in moderate-income geographies. These branches were closed due to poor operating performance, low customer volume, or overlap with other BANA branches in the assessment area. Even with these closures, branch distribution was generally not adversely affected. The operating hours and services available do not vary in a way that inconveniences individuals residing in LMI geographies.

### **Community Development Services**

The bank provided an excellent level of community development services in the MD. Bank employees worked with 44 local community development organizations to provide 133 services targeted to LMI individuals. Employee involvement included providing financial expertise to the organizations and providing workshops for financial literacy, homebuyer education, foreclosure prevention, and tax preparation. More than 500 individuals participated in the bank's homebuyer education workshops.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Peabody MD and Rockingham County-Strafford County MD is not inconsistent with the bank's overall Outstanding performance under the Service Test in the Boston-Cambridge-Quincy multistate MSA. In the Cambridge-Newton-Framingham MD, the bank's performance is good, but weaker than the bank's overall performance in the multistate metropolitan area. Weaker performance is due to less accessible retail delivery systems for individuals residing in LMI geographies.

Refer to Table 15 in the Boston-Cambridge-Quincy multistate MSA section of Appendix D for the facts and data that support these conclusions.

## Charlotte-Gastonia-Rock Hill (NC-SC) Multistate MSA

CRA rating for the multistate MSA:<sup>2</sup> Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating:

- Lending levels that reflect excellent responsiveness to the credit needs of the multistate MSA;
- Poor geographic distribution of loans and good distribution among borrowers of different income levels;
- Investment volume that reflects a good level of responsiveness to needs in the multistate MSA;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services..

### Description of Institution's Operations in Charlotte-Gastonia-Rock Hill (NC-SC) multistate MSA

BANA is the largest banking financial institution in the Charlotte-Gastonia-Rock Hill multistate MSA. As of June 30, 2011, the bank held 80 percent of the multistate MSA's deposits totaling \$127.9 billion. Included in these deposits are approximately \$90 billion that belong to the bank's parent company. These deposits are not consumer or commercial deposits, but rather represent the parent company's funds used for general purposes. Because these deposits are not consumer deposits from the Charlotte-Gastonia-Rock Hill MSA, we considered their ultimate impact in our analysis for CD lending and the Investment Test. To illustrate the impact of these deposits in the overall market, by excluding these deposits, the bank's deposit market share in the MSA would fall to 54 percent.

The bank's primary banking competitors for deposits in the multistate MSA include Wells Fargo Bank, N.A., and Branch Banking and Trust Company, with deposit market shares of 11.4 percent and 2.5 percent, respectively. Of the bank's 47 rating areas, the Charlotte-Gastonia-Rock Hill multistate MSA ranks 2<sup>nd</sup> and accounts for 13.5 percent of the bank's total deposits. As of December 31, 2011, BANA operated 60 branches and 167 full-service ATMs in the

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<sup>2</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

multistate MSA. The Charlotte-Gastonia-Rock Hill MSA is the sole assessment area within the multistate MSA.

Refer to the market profile for the Charlotte-Gastonia-Rock Hill multistate MSA in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Lending Test performance in the Charlotte-Gastonia-Rock Hill multistate MSA is rated Low Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Charlotte-Gastonia-Rock Hill MSA is adequate.

### **Lending Activity**

Lending activity in the Charlotte-Gastonia-Rock Hill MSA is excellent. With the largest deposit market share, the bank ranked first, third and second in market share for home purchase, home improvement and home refinance loans among all lenders in the MSA, respectively. In addition, the bank's small business lending market share rank is fifth while the small farm lending market share rank is sixth.

Refer to Table 1 Lending Volume in the Charlotte-Gastonia-Rock Hill multistate MSA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution is poor due to poor geographic distribution of home mortgage loans driven by poor home refinance lending and good geographic distribution of small loans to businesses.

#### ***Home Mortgage Loans***

The penetration of home purchase lending within the MSA is adequate. The percentage of loans made in LMI geographies is well below the percentage of owner occupied units in like geographies. These poor levels of lending distributions are partially offset by good market shares in the MSA. The market share of loans in both LMI geographies is below and near to the bank's overall market share of home purchase loans with the MSA, respectively.

Home improvement loan geographic distribution within the MSA is good. Performance in low-income geographies approximates demographics and is excellent. Performance in moderate-income geographies is well below the level of owner-occupied housing. Overall market shares are good with excellent market shares in low-income tracts and adequate performance in moderate-income tracts.

Home refinance loan geographic distribution within the MSA is poor. The percentage of loans made in LMI geographies is significantly below the percentage of owner occupied units in like

geographies. Despite the poor penetration, the bank's market share in LMI geographies exceeds its overall market share of home refinance loans with the MSA.

Refer to Tables 2, 3, 4, and 5 in the Charlotte-Gastonia-Rock Hill multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

### ***Small Loans to Businesses***

The geographic distribution of small loans to businesses in the MSA is good. The distribution in low-income geographies exceeds the percentage of businesses in like geographies. The distribution in moderate-income geographies is below the percentage of businesses in like geographies. The bank's market share of small loans to businesses in LMI geographies is near to and below the bank overall market share within the MSA, respectively.

Refer to Table 6 in the Charlotte-Gastonia-Rock Hill multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

### ***Small Loans to Farms***

The numbers of small loans to farms in the MSA were minimal and therefore, were not used in the Lending Test evaluation.

Refer to Table 7 in the Charlotte-Gastonia-Rock Hill multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

## **Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution is good due to excellent borrower distribution of home mortgage loans and good borrower distribution of small loans to businesses.

### ***Home Mortgage Loans***

The borrower distribution of home mortgage loans is good. The borrower distribution of home purchase lending is excellent; home improvement lending is adequate; and home refinance lending is good.

The percentage of home purchase loans to LMI borrowers exceeds the percentage of like families within the MSA. The market share of loans to both LMI borrowers exceeds the bank's overall market share of home purchase loans within the MSA.

Home improvement loan borrower distribution is adequate. Lending to low-income borrowers is below the demographics, while the distribution to moderate-income borrowers exceeds the demographics. The market share of home improvement loans to low-income borrowers is significantly below the bank's overall market share for this type of loan in the MSA. The

market share for moderate-income borrowers is near to the bank's overall market share of home improvement loans within the MSA.

Home refinance loan borrower distribution is good. The percentage of loans to LMI borrowers is below and exceeds the percentage of like families within the MSA, respectively. The market share of loans to both LMI borrowers exceeds the bank's overall market share of home refinance loans within the MSA.

Refer to Tables 8, 9, and 10 in the Charlotte-Gastonia-Rock Hill multistate MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Small Loans to Businesses***

The borrower distribution of small loans to businesses is good. The percentage of loans to small businesses is near to the percentage of small businesses in the MSA. The bank's market share of small loans to businesses exceeds its overall business loan market share.

Refer to Table 11 in the Charlotte-Gastonia-Rock Hill multistate MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

### **Community Development Lending**

Community development lending had a neutral impact on lending performance in the Charlotte-Gastonia-Rock Hill MSA. During the evaluation period, the bank originated 10 community development loans for \$41 million. The community development lending included loans totaling almost \$3 million for economic development, over \$12 million for revitalization and stabilization of LMI geographies, and approximately \$26 million for affordable housing. The affordable housing lending helped to create almost 400 affordable housing units, which was particularly responsive to needs in the MSA.

Refer to Table 1 Lending Volume in the Charlotte-Gastonia-Rock Hill multistate MSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in the Charlotte-Gastonia-Rock Hill multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Investment Test performance in the Charlotte-Gastonia-Rock Hill MSA is good.

Investment performance in the Charlotte-Gastonia-Rock Hill MSA is good. During the evaluation period, the bank made 368 investments in the assessment area totaling \$216.1 million. These current period investments represent approximately 4.8 percent of the bank's Tier One Capital allocated to the assessment area, based on the percent of the bank's local deposits. In arriving at this conclusion, our analysis was based on only those local consumer and business deposits. As of April 1, 2009, prior period investments that are still outstanding totaled \$50.2 million. These prior period investments continue to meet the needs of the community. Combined, investments represent 5 percent of allocated Tier One Capital, when excluding all nonlocal deposits. The largest type of investment during the evaluation period, totaling \$114.4 million, was related to Mortgage Backed Securities, secured by mortgages to LMI borrowers. The bank also provided \$60.8 million in funding to various CDFIs and \$30.4 million in Low Income Housing Tax Credits. These investments helped provide financing for 368 units of affordable housing for LMI individuals. In addition, the bank made 155 grants and donations totaling \$7.9 million to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

Refer to Table 14 in the Charlotte-Gastonia-Rock Hill multistate MSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Service Test performance in the Charlotte-Gastonia-Rock Hill MSA is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Charlotte-Gastonia-Rock Hill MSA is excellent.

### **Retail Banking Services**

Service delivery systems in the Charlotte-Gastonia-Rock Hill are readily accessible to geographies and individuals of different income levels. The percentage of the bank's branches in both LMI geographies exceeds the percentage of the population residing in those geographies. Three branches located in close proximity to LMI geographies improved access by LMI individuals to retail banking services. The bank did not open or close any branches in LMI geographies. With five openings and six closures in middle- or upper-income geographies, this rating element has not affected access to LMI geographies. Hours and services do not vary in a way that inconveniences LMI individuals.

Refer to Table 15 in the Charlotte-Gastonia-Rock Hill multistate MSA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### **Community Development Services**

The bank is a leader in providing community development services in the MSA. Services were provided to 40 organizations pursuing a variety of initiatives targeted at LMI areas and individuals, which represents a high level of services. These services addressed community

development needs such as technical assistance for organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies. The bank also provided homebuyer education services and loans to 520 LMI individuals through partnership with non-profit organizations, which represents a significant level of service.

## New York-Northern New Jersey-Long Island (NY-NJ) Multistate MSA

CRA rating for the multistate MSA:<sup>3</sup> Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating:

- Lending levels that reflect excellent responsiveness to the credit needs of the multistate MSA;
- Excellent distribution of loans among geographies and poor distribution of loans among borrowers of different income levels throughout the multistate MSA;
- Investment volume that reflects an excellent level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's assessment area and it provides a relatively high level of community development services.

### Description of Institution's Operations in New York-Northern New Jersey-Long Island (NY-NJ) multistate MSA

BANA is the second largest banking financial institution in the New York-Northern New Jersey-Long Island multistate MSA. As of June 30, 2011, the bank held 9 percent of the multistate MSA's deposits totaling \$96.9 billion. The bank's primary banking competitors, with more than 5 percent of the deposit market share, in the multistate MSA include JPMorgan Chase Bank, N.A., The Bank of New York Mellon, Citibank, N.A., and HSBC Bank USA, N.A., with deposit market shares of 33.2 percent, 8.5 percent, 6.1 percent, and 5.3 percent, respectively. Of the bank's 47 rating areas, the New York-Northern New Jersey-Long Island multistate MSA ranks 3<sup>rd</sup> and accounts for 10.2 percent of the bank's total deposits. As of December 31, 2011, BANA operated 483 branches and 1,210 full-service ATMs in the multistate MSA.

Refer to the market profile for the New York-Northern New Jersey-Long Island multistate MSA in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

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<sup>3</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

## **Scope of Evaluation in the New York-Northern New Jersey-Long Island Multistate MSA**

The bank has defined four assessment areas within the multistate MSA. The New York-White Plains-Wayne MD, which was selected for a full-scope review, comprises 80.2 percent of the bank's deposits and 43 percent of the bank's lending in the multistate MSA.

### **LENDING TEST**

#### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Lending Test in the New York-Northern New Jersey-Long Island multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the New York-White Plains-Wayne (New York) MD is good. Performance in limited-scope assessment areas did not negatively affect the Lending Test rating for the multistate MSA.

#### **Lending Activity**

Lending activity in the New York MD is excellent. With the third ranking in deposit market share, the bank ranks second, third and third in market share for home purchase, home improvement, and home refinance loans among lending participants in the MD. In addition, the bank has the seventh market share for small business loans and the fourth market share of small farm loans in the MD, respectively.

Refer to Table 1 Lending Volume in the New York-Northern New Jersey-Long Island multistate MSA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

#### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution is excellent due to excellent geographic distribution of home mortgage loans and good distribution of small loans to businesses.

#### ***Home Mortgage Loans***

The geographic distributions of home purchase, home improvement, and home refinance lending within the New York MD is excellent. The percentages of home purchase and home improvement loans made in low-and moderate-income geographies exceed the percentages of owner-occupied housing units in like geographies. The percentages of home refinance loans in LMI geographies are near to the percentages of owner-occupied housing units. In addition, the market shares of home purchase, home improvement, and home refinance lending in LMI geographies exceed the bank's overall market shares of like loans within the MD.

Refer to Tables 2, 3, 4, and 5 in the New York-Northern New Jersey-Long Island multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

### ***Small Loans to Businesses***

The geographic distribution of small loans to businesses is good. The percentages of small loans to businesses in LMI geographies are well below and below the percentages of businesses in LMI geographies, respectively. The bank's market shares of small loans to businesses in LMI geographies are near to the bank's overall market share of small loans to businesses in the MD. Overall geographic distribution would be adequate, but is offset somewhat by excellent market shares.

Refer to Table 6 in the New York-Northern New Jersey-Long Island multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

### ***Small Loans to Farms***

The bank made too few loans to farms in the MD during the evaluation period for any analysis to be meaningful.

Refer to Table 7 in the New York-Northern New Jersey-Long Island multistate MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

### **Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution is poor driven mostly by poor home mortgage lending and to a lesser extent good borrower distribution of small loans to businesses.

#### ***Home Mortgage Loans***

The borrower distributions for home purchase, home improvement, and home refinance lending within the New York MD is poor. Our analysis considered the high cost of housing in the MD.

Home purchase lending is adequate. The percentage of home purchase loans to low-income borrowers is significantly below the percentage of low-income individuals in the MD. This poor performance is offset by excellent market share performance. The bank's market share of home purchase loans to low-income individuals exceeds its overall market share for home purchase loans.

Home improvement lending by borrower income is poor. The percentages of home improvement loans to low- and moderate-income borrowers are significantly below, and well below the percentages of low- and moderate-income individuals in the MD, respectively. Its market share of home improvement loans to LMI individuals is also significantly below its overall market share of home improvement loans.

Home refinance lending by borrower income is poor. The percentages of home refinance loans to low- and moderate-income individuals are significantly below the percentages of LMI

individuals in the MD. Its market shares of home refinance loans to LMI individuals exceed its overall market share of home refinance loans.

Refer to Tables 8, 9, and 10 in the New York-Northern New Jersey-Long Island multistate MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Small Loans to Businesses***

The distribution of small loans to businesses is good. The percentage of the bank's small loans to businesses with revenues of \$1 million or less is near to the percentage of businesses in the assessment area with revenues of \$1 million or less. The bank's market share of small loans to businesses with revenues of \$1 million or less exceeds its overall market share of small loans to any sized business.

Refer to Table 11 in the New York-Northern New Jersey-Long Island multistate MSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

### **Community Development Lending**

Community development lending had a neutral impact on lending performance in the New York MD. The bank originated or purchased 60 community development loans totaling more than \$211 million. Several loans were complex and particularly responsive to the needs identified in the community. The bank's community development loans for affordable housing helped to create 880 affordable housing units in the MD.

Refer to Table 1 Lending Volume in the New York-Northern New Jersey-Long Island multistate MSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

### **Other Lending Data**

The bank issued 18 letters of credit totaling \$395.1 million that have a community development purpose. Funding from the letters of credit helped finance 2,119 affordable housing units. Refer to Table 1, Other in the New York-Northern New Jersey-Long Island multistate MSA section of Appendix D for the facts and data of these letters of credit.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, Lending Test performance in the Edison-New Brunswick MD is not inconsistent with the bank's overall High Satisfactory performance under the lending test in the New York-Northern New Jersey-Long Island multistate MSA. In the Nassau-Suffolk and

Newark-Union MDs, the bank's performance is stronger than the bank's overall High Satisfactory performance under the Lending Test in the multistate MSA. Stronger performance is due to stronger borrower distribution.

Refer to the Tables 1 through 12 in the New York-Northern New Jersey-Long Island multistate MSA section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Investment Test performance in the New York-Northern NJ-Long Island multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the New York-White Plains-Wayne MD is excellent. Performance in limited-scope assessment areas did not affect the Investment Test rating for the multistate MSA

In New York-White Plains-Wayne MD, BANA made 333 investments totaling \$277 million during the current period. As of December 31, 2011, prior period investments totaled \$303.5 million, which continue to provide benefit and meet the needs of the AA. The largest investments in New York-White Plains-Wayne totaled \$202 million and consisted of investments in LIHTC projects, which provided more than 1,500 affordable housing units for LMI families. Positive consideration was given to the complexity of some of these projects. The bank also invested in one NMTC and one HTC project totaling \$4 million and \$18.4 million in eight CDFIs. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Refer to Table 14 in the New York-Northern New Jersey-Long Island multistate MSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, Investment Test performance in the Edison-New Brunswick and Newark-Union MDs is not inconsistent with the overall Outstanding performance in the multistate MSA. Weaker, but good performance in the Nassau-Suffolk MD is centered in a lower amount of qualified investments relative to the bank's operations in the AA.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the New York-Northern New Jersey-Long Island multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Service Test performance in the New York-White Plains-Wayne MD is good. Performance in limited-scope assessment areas did not significantly affect the Service Test rating for the multistate MSA.

## **Retail Banking Services**

Retail banking services and delivery systems in the New York-White Plains-Wayne, NY-NJ MD are reasonably accessible to geographies and individuals of different income levels after consideration of supplementary access provided by branches located in a close proximity and alternative delivery systems. The percentage of the bank's branches in both LMI geographies is below the percentage of the population residing in these areas. However, 28 branches located in middle- and upper-income geographies are in close proximity to LMI geographies. The adjacent 28 branches, along with the bank's use of telephone, online, and mobile banking delivery systems, improved access by LMI individuals to retail banking services. Specifically, compared to 38 percent of the population residing in LMI geographies, 31 percent of the customers using telephone, online, and mobile banking delivery systems reside in LMI geographies.

Branch openings have improved the accessibility of the bank's delivery systems in LMI geographies. The bank opened a net of two new branches in low-income and three branches in moderate-income geographies. Hours and services are tailored to the convenience and needs of the people living in the MD, including Saturday and weeknight later hours.

Refer to Table 15 in the New York-Northern New Jersey-Long Island multistate MSA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

## **Community Development Services**

The bank provided an excellent level of community development services in the MD. Bank employees worked with 67 local community development organizations to provide 90 services targeted to LMI individuals. Employee involvement included providing financial expertise to the organizations and providing workshops to persons of all ages for financial literacy, homebuyer education, foreclosure prevention, and affordable housing. One-hundred-twenty individuals participated in the bank's homebuyer education workshops.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Edison-New Brunswick MD, Nassau-Suffolk MD, and Newark-Union MD is not inconsistent with the bank's overall High Satisfactory performance under the Service Test in the New York-Northern New Jersey-Long Island multistate MSA. Despite moderate-income geography branch closures in all three areas, branch distribution was considered good.

Refer to Table 14 in the New York-Northern New Jersey-Long Island, NY-NJ multistate MSA section of Appendix D for the facts and data that support these conclusions.

## State of California Rating

**CRA Rating for California<sup>4</sup>:**      Outstanding

**The Lending Test is rated:**      High Satisfactory

**The Investment Test is rated:**      Outstanding

**The Service Test is rated:**      Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Good distribution of loans among geographies and good distribution of borrowers of different income levels throughout the state;
- Positive levels of community development lending;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in the State of California

BANA is the largest banking financial institution in the state of California. As of June 30, 2011, the bank held 25.6 percent of the state's deposits totaling \$226.5 billion. BANA's primary banking competitors for deposits in California include Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., Union Bank, N.A., and Citibank, N.A., with deposit market shares of 19.5 percent, 7.3 percent, 6.0 percent, and 5.1 percent, respectively. Of the bank's 47 rating areas, the state of California ranks 1<sup>st</sup> and accounts for nearly 24 percent of the bank's total deposits. As of December 31, 2011, the bank operated 957 branches and 3,575 full-service ATMs in California.

Refer to the market profiles for the state of California in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

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<sup>4</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

## Scope of Evaluation in the State of California

The bank has defined 30 assessment areas in the state of California. The Los Angeles-Long Beach-Glendale MD, Riverside-San Bernardino-Ontario MSA, Sacramento-Arden-Arcade-Roseville MSA, and San Francisco-San Mateo-Redwood City MD, which were selected for full-scope reviews, together comprise 67 percent of the bank's deposits and 45 percent of the bank's lending in the state of California. For purposes of this review, two assessment areas comprising 17 counties that are not MSAs or MDs have been combined under the California Non-MSA.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

Lending Test performance in the state of California is rated High Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Los Angeles-Long Beach-Glendale MD, Riverside-San Bernardino-Ontario MSA, Sacramento-Arden-Arcade-Roseville MSA, and San Francisco-San Mateo-Redwood City MD is good. Performance in limited-scope assessment areas did not significantly affect the Lending Test rating for the state of California.

### Lending Activity

Lending activity in the Los Angeles-Long Beach-Glendale MD is excellent. Ranking first in deposit market share, the bank ranks first, second, and second in market share for home purchase, home improvement, and home refinance loan volume among lenders in the market, respectively. In addition, the bank ranks fifth in market share for small loans to businesses and fourth in market share for small loans to farms.

Lending activity in the Riverside-San Bernardino-Ontario MSA is excellent. Ranking first in deposit market share, the bank ranks first, second, and first in market share for home purchase, home improvement, and home refinance loan volume, respectively. In addition, the bank ranks fifth in market share for small loans to businesses and third in market share for small loans to farms.

Lending activity in the Sacramento-Arden-Arcade-Roseville MSA is excellent. Ranking second in deposit market share, the bank ranks first, second, and second in market share for home purchase, home improvement, and home refinance loan volume, respectively. In addition, the bank ranks sixth in market share for small loans to businesses and fourth in market share for small loans to farms.

Lending activity in the San Francisco-San Mateo-Redwood City MD is good. Ranking first in deposit market share, it ranks second in market share for home purchase, home improvement, and home refinance loan volume. It ranks fifth in market share for small loans to businesses and fourth in market share for small loans to farms.

Refer to Table 1 Lending Volume in the state of California section of Appendix D for the facts and data used to evaluate the bank's lending activity.

## Distribution of Loans by Income Level of the Geography

The overall geographic distribution is good demonstrated by good geographic distribution of home mortgage lending and generally excellent distribution of small loans to businesses.

### *Home Mortgage Loans*

The geographic distribution of home mortgage loans within the Los Angeles-Long Beach-Glendale MSA is good overall. The geographic distribution is excellent for home purchase loans, good for home improvement loans, and good for home refinance loans. For home purchase loans, the percentages of loans made in LMI geographies exceed the percentages of owner-occupied housing units in LMI geographies. The market shares for home purchase loans in LMI geographies are near to the bank's overall market share for home purchase loans. For home improvement loans, the percentages of loans in LMI geographies are below the percentages of owner-occupied housing units, but the bank's market shares in LMI geographies exceed its overall market share for home improvement loans. For home refinance loans, the percentages of loans in LMI geographies are well below, and below the percentages of owner-occupied housing units in similar geographies, respectively. The bank's market shares of home refinance loans in LMI geographies exceed its overall market share for home refinance loans, which offsets otherwise adequate geographic distribution.

The geographic distribution of home mortgage loans within the Riverside-San Bernardino-Ontario MSA is adequate. The geographic distribution is good for home purchase loans, poor for home improvement loans, and adequate for home refinance loans. For home purchase loans, the percentages of loans made in LMI geographies are well below, and near to the percentages of owner-occupied housing units in LMI geographies, respectively. The bank's market shares in LMI geographies exceed its overall market share for home purchase loans. For home improvement loans, the percentages of loans in LMI geographies are significantly below, and below the percentages of owner-occupied housing units in similar geographies. The bank's market shares in LMI geographies are significantly below, and near to its overall market share for home improvement loans. For home refinance loans, the percentages of loans are significantly below and well below the percentages of owner-occupied housing units in LMI geographies, respectively. However, the bank's market shares for home refinance loans in LMI geographies exceed its overall market share for home refinance loans.

The geographic distribution of home mortgage loans within the Sacramento-Arden-Arcade-Roseville MSA is adequate. The geographic distribution is good for home purchase, poor for home improvement loans, and adequate for home refinance loans. For home purchase loans, the percentages of loans made in LMI geographies are near to, and below the percentages of owner-occupied housing units in LMI geographies, respectively. For home improvement loans, the percentages of loans made in LMI geographies are significantly below the percentages of owner-occupied housing units in those geographies. For home refinance loans, the percentages of loans made in LMI geographies are well below and significantly below the percentages of owner-occupied housing units in LMI geographies, respectively. The market shares for home purchase and home refinance loans exceed the bank's overall market shares for each respective home mortgage loan category. The market shares for home improvement

loans in LMI geographies are significantly below, and near to the bank's overall market share for home improvement loans.

The geographic distribution of home mortgage loans within the San Francisco-San Mateo-Redwood City MD is excellent. The geographic distribution is excellent for home purchase and home refinance loans, and good for home improvement loans. For home purchase loans, the percentages of loans made in LMI geographies exceed the percentages of owner-occupied housing units in those geographies. The bank's market shares of home purchase loans in LMI geographies exceed and are near to its overall market share of home purchase loans, respectively. For home improvement loans, the percentages of loans made in LMI geographies are below and approximate the percentages of owner-occupied housing units in LMI geographies, respectively. The bank's market shares of home improvement loans in LMI geographies exceed and are below its overall market share of home improvement loans, respectively. For home refinance loans, the percentages of loans made in LMI geographies exceed and are near to the percentages of owner-occupied housing units in LMI geographies, respectively. Its market shares of home refinance loans in LMI geographies exceed its overall market share for home refinance loans.

### ***Multifamily Loans***

The bank did not originate or purchase sufficient numbers of multifamily loans in any assessment area within California for a meaningful analysis, except in the San Francisco-San Mateo-Redwood City MD. The geographic distribution of multifamily loans within the San Francisco-San Mateo-Redwood City MD is adequate. The percentages of multifamily loans in LMI geographies are below and well below the percentages of multifamily housing units in low- and moderate-income geographies, respectively. In terms of market share, the bank exceeded its overall market share in low-income geographies, but was significantly below its overall market share within moderate-income geographies.

Refer to Tables 2, 3, 4, and 5 in the state of California section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

### ***Small Loans to Businesses***

The geographic distribution of small loans to businesses within the Los Angeles-Long Beach-Glendale MD is excellent. The percentages of small loans to businesses in LMI geographies approximate the percentages of businesses in LMI geographies. The bank's market shares of small loans to businesses in LMI geographies exceed its overall market share of small loans to businesses in the MD.

The geographic distribution of small loans to businesses within the Riverside-San Bernardino-Ontario MSA is good. The percentages of small loans to businesses in LMI geographies are below, and near to the percentages of businesses in LMI geographies, respectively. The bank's market shares of small loans to businesses in LMI geographies are near to its overall market share of small loans to businesses in the MSA.

The geographic distribution of small loans to businesses within the Sacramento-Arden-Arcade-Roseville MSA is good. The percentages of small loans to businesses in LMI geographies are near to the percentages of businesses in LMI geographies. The bank's market shares of small loans to businesses in LMI geographies exceed its overall market share of small loans to businesses in the MSA.

The geographic distribution of small loans to businesses within the San Francisco-San Mateo-Redwood City MD is excellent. The percentages of small loans to businesses in LMI geographies are near to and exceed the percentages of businesses in LMI geographies, respectively. The bank's market shares of small loans to businesses in LMI geographies exceed its overall market share of small loans to businesses in the MD.

Refer to Table 6 in the state of California section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

### ***Small Loans to Farms***

The geographic distribution of small loans to farms within the Los Angeles-Long Beach-Glendale MD is poor. The percentages of small loans to farms in LMI geographies are well below, and below the percentages of farms in LMI geographies, respectively. The bank's market share of small loans to farms in low-income geographies is zero. Its market share of small loans to farms in moderate-income geographies is well below its overall market share of small loans to farms in the MD.

The geographic distribution of small loans to farms within the Riverside-San Bernardino-Ontario MSA is good. The percentages of small loans to farms in LMI geographies exceed and are near to the percentages of farms in LMI geographies, respectively. The bank's market share of small loans to farms in low-income geographies is zero. Its market share of small loans to farms in moderate-income geographies is below its overall market share of small loans to farms in the MSA.

The geographic distribution of small loans to farms within the Sacramento-Arden-Arcade-Roseville MSA is good. The percentages of small loans to farms in LMI geographies are below, and approximate the percentages of farms in LMI geographies, respectively. The bank's market shares of small loans to farms in LMI geographies exceed, and are near to its overall market share of small loans to farms in the MSA.

The geographic distribution of small loans to farms within the San Francisco-San Mateo-Redwood City MD is poor. The percentages of small loans to farms in LMI geographies exceed, and are significantly below the percentages of farms in LMI geographies, respectively. The bank has zero market shares of small loans to farms in LMI geographies.

Refer to Table 7 in the state of California section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

### **Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution is good due to good home mortgage and small business lending.

### ***Home Mortgage Loans***

The overall distribution of home mortgage loans by borrower income is good for home purchase, home improvement, and home refinance loans in the Los Angeles-Long Beach-Glendale MD, Riverside-San Bernardino-Ontario MSA, and San Francisco-San Mateo-Redwood City MD and excellent in the Sacramento-Arden-Arcade-Roseville MSA. We considered performance context that the four full-scope assessment areas are high cost housing markets where low-income individuals have a difficult time qualifying for home loans. The Los-Angeles-Long Beach-Glendale MD and San Francisco-San Mateo-Redwood City MD are extremely high cost housing markets, where housing affordability is a barrier for both LMI individuals. Therefore, we adjusted our expectations for lending performance for each of these segments of the community.

The borrower distribution of home mortgage loans within the Los Angeles-Long Beach-Glendale MD is good. Considering the difficulty LMI individuals face in qualifying for mortgage loans in an extremely high cost housing market, the borrower distribution is good for home purchase loans, home improvement loans, and home refinance loans. For home purchase loans, the percentages of loans to LMI individuals are significantly below, and approximate the percentages of LMI families in the assessment area, respectively. The market shares for home purchase loans to LMI individuals are near to the bank's overall market share for home purchase loans. For home improvement loans, the percentages of loans to LMI individuals are well below, and approximate the percentages of LMI families, respectively. The market shares for home improvement loans for both LMI individuals exceed the bank's overall market share for home improvement loans. For home refinance loans, the percentages of loans to LMI individuals are also well below, and below the percentages of LMI families, respectively. The market shares for home refinance loans for both LMI individuals exceed the bank's overall market share for home refinance loans.

The borrower distribution of home mortgage loans within the Riverside-San Bernardino-Ontario MSA is good. Considering the affordability barriers in this high cost housing market, the borrower distribution is excellent for home purchase loans, and good for both home improvement and home refinance loans. For home purchase loans, the percentages of loans to LMI individuals are below, and exceed the percentages of LMI families in the assessment area, respectively. The bank's market shares for home purchase loans to LMI individuals are near to its overall market share for home purchase loans. For home improvement loans, the percentages of loans to LMI individuals are well below, and exceed the percentages of LMI families in the MSA, respectively. For home refinance loans, the percentages of loans to LMI individuals are well below, and below the percentages of LMI families in the MSA, respectively. The bank's market shares of home improvement and home refinance loans to LMI individuals both exceed the bank's overall market shares of home improvement and home refinance loans.

The borrower distribution of home mortgage loans within the Sacramento-Arden-Arcade-Roseville MSA is excellent. Considering the affordability barriers in this high cost housing market, the borrower distribution is excellent for home purchase, home improvement, and

home refinance mortgage loans. For home purchase loans, the percentages of loans to LMI individuals are near to, and exceed the percentages of LMI families in the MSA, respectively. The bank's market shares of home purchase loans to LMI individuals exceed its overall market share of home purchase loans. For home improvement loans, the percentages of loans to LMI individuals are below, and exceed the percentages of LMI families in the MSA, respectively. The bank's market shares of home improvement loans to LMI individuals are near to, and exceed its overall market share of home improvement loans in the MSA. For home refinance loans, the percentages of loans to LMI individuals are below, and approximate the percentages of LMI families in the MSA, respectively. Its market shares of home refinance loans to LMI individuals exceed its overall market share of home refinance loans in the MSA.

The borrower distribution of home mortgage loans within the San Francisco-San Mateo-Redwood City MD is good. Considering the affordability barriers for LMI individuals in this extremely high cost housing market, the borrower distribution is good for home purchase and home refinance loans and excellent for home improvement loans. For home purchase loans, the percentages of loans to LMI individuals are well below, and near to the percentages of LMI families in the MD, respectively. For home improvement loans, the percentages of loans to LMI individuals are below, and exceed the percentages of LMI families in the MD, respectively. For home refinance loans, the percentages of loans to LMI individuals are well below, and below the percentages of LMI families in the MD, respectively. The bank's market shares of home purchase, home improvement, and home refinance loans to LMI individuals exceed its overall market share of loans for each product.

Refer to Tables 8, 9 and 10 in the state of California section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Small Loans to Businesses***

The distribution of small loans to businesses is good in the Los Angeles-Long Beach-Glendale MD, Riverside-San Bernardino-Ontario MSA, Sacramento-Arden-Arcade-Roseville MSA, and San Francisco-San Mateo-Redwood City MD. The percentage of the bank's small loans to businesses with revenues of \$1 million or less in each assessment area is near to the percentage of businesses in each respective assessment area with revenues of \$1 million or less. In each assessment area, the bank's market share of small loans to businesses with revenues of \$1 million or less exceeds its overall market share of small loans to any sized business.

Refer to Table 11 in the state of California section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

### ***Small Loans to Farms***

The distribution of small loans to farms is adequate in the Riverside-San Bernardino-Ontario MSA and San Francisco-San Mateo-Redwood City MD and poor in the Los Angeles-Long Beach-Glendale MD and Sacramento-Arden-Arcade-Roseville MSA. The bank's percentage of small loans to farms with revenues of \$1 million or less in each assessment area is well

below the percentage of farms in each respective assessment area with revenues of \$1 million or less. The bank's market share of small loans to farms with revenues of \$1 million or less in the San Francisco-San Mateo-Redwood City MD exceeds its overall market share of small loans to farms in the assessment area. In the Riverside-San Bernardino-Ontario MSA, its market share of small loans to farms with revenues of \$1 million or less is near to its overall market share of small loans to farms. In the Los Angeles-Long Beach-Glendale MD and Sacramento-Arden-Arcade-Roseville MSA, the bank's market shares of small loans to farms with revenues of \$1 million or less are below, and well below the overall market share of small loans to farms in each respective assessment area.

Refer to Table 12 in the state of California section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

### **Community Development Lending**

Community development lending had a positive impact on lending performance in the Los Angeles-Long Beach-Glendale MD and Sacramento-Arden-Arcade-Roseville MSA. Community development lending had a neutral impact on lending performance in the Riverside-San Bernardino-Ontario MSA and San Francisco-San Mateo-Redwood City MD.

In the Los Angeles-Long Beach-Glendale MD, the bank originated or purchased 153 community development loans totaling more than \$474 million. Many loans were complex and responsive to the needs identified in the community. Most of the community development lending helped to provide financing for more than 1,600 affordable housing units and promoted economic development through financing small businesses in the MD.

In the Riverside-San Bernardino-Ontario MSA, the bank originated or purchased 22 community development loans totaling \$60.7 million. Several loans were complex and responsive to community needs. Approximately 70 percent of the community development lending dollars help financed 361 units of affordable housing. Community development loans also promoted economic development by providing financing to small businesses in the MSA.

In the Sacramento-Arden-Arcade-Roseville MSA, the bank originated or purchased 14 community development loans totaling \$56.3 million. Many of the loans were responsive to the identified needs in the MSA. Approximately 80 percent of the community development loan dollars helped to provide 473 units of affordable housing in the MSA.

In the San Francisco-San Mateo-Redwood City MD, the bank originated or purchased 15 community development loans totaling \$76.3 million. Many of the loans were responsive to identified needs. Approximately 83 percent of the loan dollars helped to provide financing for 300 units of affordable housing in the MD.

Refer to Table 1 Lending Volume in the state of California section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Lending Test performance in the Chico MSA, Fresno MSA, Hanford-Corcoran MSA, Madera-Chowchilla MSA, Merced MSA, Modesto MSA, Oakland-Fremont-Hayward MD, Salinas MSA, San Diego-Carlsbad-San Marcos MSA, San Jose-Sunnyvale-Santa Clara MSA, San Luis Obispo-Paso Robles MSA, Santa Ana-Anaheim-Irvine MD, Santa Barbara-Santa Maria-Goleta MSA, Santa Cruz-Watsonville MSA, Santa Rosa-Petaluma MSA, Vallejo-Fairfield MSA, Visalia-Porterville MSA, Yuba City MSA, and California Non-MSA is good and is not inconsistent with the overall High Satisfactory performance under the Lending Test in the state of California. Performance in the Napa MSA, Oxnard-Thousand Oaks-Ventura MSA, Redding MSA, and Stockton MSA is excellent and is stronger than the overall performance in the state. Stronger performance is due to higher levels of community development lending. Performance in the Bakersfield-Delano MSA and El Centro MSA is adequate and weaker than the overall performance in the state. Weaker performance is primarily due to relatively lower levels of community development lending.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in California is rated Outstanding. Based on full-scope reviews, the bank's Investment Test performance in the Los Angeles-Long Beach-Glendale MD, Riverside-San Bernardino-Ontario MSA, Sacramento-Arden-Arcade-Roseville MSA, and San Francisco-San Mateo-Redwood City MD is excellent. Performance in limited-scope assessment areas did not significantly affect the Investment Test rating for the state of California.

Investment performance in the Los Angeles-Long Beach-Glendale MD is excellent. During the evaluation period, the bank made 432 investments in the assessment area totaling \$369.4 million. These current period investments represent approximately 5.8 percent of the bank's Tier One Capital allocated to the assessment area, based on the percent of the bank's total deposits. As of April 1, 2009, prior period investments that are still outstanding totaled \$218.2 million. These prior period investments continue to provide benefit and meet the critical needs of the AA. The largest type of investment during the evaluation period, totaling \$268.1 million, was related to Low Income Housing Tax Credit projects, followed by \$57.1 million in various affordable housing securities backed primarily by mortgages to LMI borrowers. These two types of investments helped provide nearly 2,000 units of affordable housing in the assessment area. The bank also funded \$17.2 million in investments in various CDFIs, which in turn helped to promote economic development in and revitalize or stabilize LMI geographies. In addition, BANA made 327 grants and donations totaling \$10.8 million to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies.

Investment performance in the Riverside-San Bernardino-Ontario MSA is excellent. During the evaluation period, the bank made 157 investments totaling \$29.8 million. These current period investments represent approximately 2.8 percent of the bank's Tier One Capital allocated to the assessment area, based on the percent of the bank's total deposits. As of April 1, 2009,

prior period investments that are still outstanding totaled \$42.1 million. These prior period investments continue to provide benefit and meet the critical needs of the AA. The largest types of investments during the current evaluation period were \$13.1 million in LIHTCs and \$12.2 million in mortgage backed securities. These investments helped finance 329 units of affordable housing for LMI individuals. In addition, the bank made 125 grants and donations totaling \$3.2 million to various local and regional organizations providing economic development, affordable housing, revitalization, and stabilization in LMI geographies.

Investment performance in the Sacramento-Arden-Arcade-Roseville MD is excellent. During the evaluation period, the bank made 100 investments totaling \$43.6 million. These current period investments represent approximately 5.8 percent of the bank's Tier One Capital allocated to the assessment area, based on the percent of the bank's total deposits. As of April 1, 2009, prior period investments that are still outstanding totaled \$37.5 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest type of investments during the evaluation period was LIHTCs, totaling \$24 million. The bank also invested \$17.8 million in mortgage-backed securities. Both types of investments helped finance nearly 450 units of affordable housing for LMI individuals. In addition, the bank made 75 grants and donations totaling \$1.9 million to various local and regional organizations providing economic development, affordable housing, revitalization, and stabilization in LMI geographies.

Investment performance in the San Francisco-San Mateo-Redwood City MD is excellent. During the evaluation period, the bank made 432 investments totaling \$452.5 million. These current period investments represent approximately 4.1 percent of the bank's Tier One Capital allocated to the assessment area, based on the percent of the bank's total deposits. As of April 1, 2009, prior period investments that are still outstanding totaled \$165.6 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest type of investment during the evaluation period, totaling \$359.8 million, was mortgage-backed securities secured by home mortgages to LMI borrowers. These investments were followed by \$81.3 million in LIHTCs. Both investments helped finance nearly 2,000 units of affordable housing for LMI individuals. In addition, the bank made 239 grants and donations totaling \$8 million to various local and regional organizations providing economic development, affordable housing, revitalization, and stabilization in LMI geographies.

## **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bakersfield-Delano, Chico, El Centro, Fresno, Hanford-Corcoran, Madera-Chowchilla, Merced, Oakland-Fremont-Hayward, Oxnard-Thousand Oaks-Ventura, Redding, Salinas, San Diego-Carlsbad-San Marcos, San Jose-Sunnyvale-Santa Clara, Santa Ana-Anaheim-Irvine, San Luis Obispo-Paso Robles, Santa Barbara-Santa Maria-Goleta, Santa Rosa-Petaluma, Visalia-Porterville, and California Non-MSA MAs is not inconsistent with the bank's overall Outstanding performance under the Investment Test in California. Performance in the Napa and Vallejo-Fairfield MAs is good and weaker than the overall performance in California. Performance in the Modesto, Santa Cruz-Watsonville, Stockton, and Yuba City MAs is adequate and weaker than the overall performance in California. Weaker performance resulted from a lower amount of investments relative to the bank's operations in the assessment area.

Refer to Table 14 in the state of California section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the state of California is rated Outstanding. Based on full-scope reviews, the bank's Service Test performance in the Los Angeles-Long Beach-Glendale MD, Riverside-San Bernardino-Ontario MSA, Sacramento-Arden-Arcade-Roseville MSA, and San Francisco-San Mateo-Redwood City MD is excellent. Performance in limited-scope assessment areas did not significantly affect the Service Test rating for the state of California.

### **Retail Banking Services**

Retail banking services and delivery systems in the Los Angeles-Long Beach-Glendale MD are readily accessible to geographies and individuals of different income levels. The percentage of the bank's branches in low-income geographies approximates the percentage of the population residing in low-income geographies. The percentage of branches in moderate-income geographies is near the percentage of the population residing in moderate-income geographies. In middle- and upper-income geographies, the bank has 7 branches that are adjacent to low-income geographies and 38 branches that are adjacent to moderate-income geographies. These additional branches that are in close proximity to LMI geographies coupled with the availability of telephone, online, and mobile banking delivery systems improved access to retail banking services for LMI individuals. Compared to 37 percent of the population residing in LMI geographies, 29 percent of the customers using telephone, online, and mobile banking delivery systems reside in LMI geographies.

During the evaluation period, the bank opened four branches and closed eleven in the Los Angeles-Long Beach-Glendale MD, resulting in a net closure of one branch in a low-income geography. The closure was the result of consolidation due to redundancy with other BANA branches in the area. Despite the closure, the bank maintained an excellent distribution of branches within the assessment area. The operating hours and services available among the branches are tailored to the needs of the assessment area.

Retail banking services and delivery systems in the Riverside-San Bernardino-Ontario MSA are readily accessible to geographies and individuals of different income levels. The bank's percentage of branches in low-income geographies significantly exceeds the percentage of the population residing in low-income geographies. The percentage of branches in moderate-income geographies approximates the percentage of individuals residing in moderate-income geographies.

The bank opened two branches and closed three in the Riverside-San Bernardino-Ontario MSA, which had no net effect on branches available in LMI geographies. The operating hours and services available among the branches are tailored to the needs of the assessment area.

Retail banking services and delivery systems in the Sacramento-Arden-Arcade-Roseville MSA are readily accessible to geographies and individuals of different income levels. The bank's percentage of branches in low- income geographies is near the percentage of the population residing in low- income geographies. The percentage of branches in moderate-income geographies approximates the percentage of the population residing in moderate-income geographies. Alternative delivery systems, including telephone, online, mobile banking, and ATMs improved access to retail banking services for LMI individuals and geographies. Compared to 32 percent of the population residing in LMI geographies, 23 percent of the customers using telephone, online, and mobile banking reside in LMI geographies. The percentage of the bank's ATMs in moderate-income geographies exceeds the percentages of the population and branches in moderate-income geographies.

The bank opened one branch and closed eight in the Sacramento-Arden-Arcade-Roseville MSA, which had no net effect on branches available in LMI geographies. The operating hours and services available among the branches do not vary in a way that inconvenience individuals residing in LMI geographies.

Retail banking services and delivery systems in the San Francisco-San Mateo-Redwood City MD are readily accessible to geographies and individuals of different income levels. The percentage of branches in low-income geographies significantly exceeds the percentage of the population residing in low-income geographies while the percentage of branches in moderate-income geographies approximates the percentage of the population residing in moderate-income geographies.

The bank opened or closed no branches in low- or moderate-income geographies during the evaluation period. Operating hours and services available among the branches do not vary in a way that inconvenience individuals residing in LMI geographies.

Refer to Table 15 in the state of California section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

## **Community Development Services**

BANA provided an adequate level of community development services in the Los Angeles-Long Beach-Glendale MD, considering its capacity and opportunities available. Bank employees worked with 54 local community development organizations, which provided provided 103 instances of community development services targeted to LMI individuals. Employee involvement included providing financial expertise to the organizations through participation on boards or committees, and providing workshops for financial literacy, homebuyer education, foreclosure prevention, and tax preparation. Over the course of the evaluation period, only 11 LMI individuals participated in the homebuyer education workshops. The community development services provided were consistently responsive to the most pressing needs identified in the assessment area.

The bank provided an adequate level of community development services in the Riverside-San Bernardino-Ontario MSA, considering its capacity and opportunities available for participation. Bank employees worked with 26 local community development organizations to provide 48

instances of community development services targeted to LMI individuals. Employee involvement included providing financial expertise to the organizations through participation on boards or committees, and providing workshops for financial literacy, homebuyer education, foreclosure prevention, and tax preparation. Seven LMI individuals participated in the homebuyer education workshops over the course of the evaluation period. The community development services provided were consistently responsive to the most pressing needs identified in the assessment area. Approximately 69 percent of the services provided were related to needs identified.

The bank provided a good level of community development services in the Sacramento-Arden-Arcade-Roseville MSA, considering its capacity and opportunities available for participation. Its participation was often in a leadership role. Bank employees worked with 21 local community development organizations to provide 79 instances of community development services targeted to LMI individuals. Employee involvement included providing financial expertise to the organizations through participation on boards or committees, and providing workshops for financial literacy, homebuyer education, foreclosure prevention, and tax preparation. Twelve LMI individuals participated in the homebuyer education workshops over the course of the evaluation period. The community development services provided were consistently responsive to the most pressing needs identified in the assessment area. Approximately 97 percent of the services provided were related to needs identified.

The bank provided a good level of community development services in the San Francisco-San Mateo-Redwood City MD, considering its capacity and opportunities available for participation. Bank employees worked with 42 local community development organizations to provide 72 instances of community development services targeted to LMI individuals. Employee involvement included providing financial expertise to the organizations through participation on boards or committees, and providing workshops for financial literacy, homebuyer education, foreclosure prevention, and tax preparation. Thirty-five LMI individuals participated in the homebuyer education workshops over the course of the evaluation period. The community development services provided were consistently responsive to the most pressing needs identified in the assessment area. Approximately 75 percent of the services provided were related to needs identified.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Bakersfield-Delano MSA, Chico, El Centro MSA, Fresno MSA, Hanford-Corcoran MSA, Merced MSA, Modesto MSA, Napa MSA, Oakland-Fremont-Hayward MD, Oxnard-Thousand Oaks-Ventura MSA, Salinas MSA, San Diego-Carlsbad-San Marcos MSA, San Jose-Sunnyvale-Santa Clara MSA, San Luis Obispo-Paso Robles MSA, Santa Ana-Anaheim-Irvine MD, Santa Barbara-Santa Maria-Goleta MSA, Santa Cruz-Watsonville MSA, Santa Rosa-Petaluma MSA, Stockton MSA, Vallejo-Fairfield MSA, Visalia-Porterville MSA, Yuba City MSA, and California Non-MSA assessment areas is not inconsistent with the bank's overall Outstanding performance under the Service Test in the state of California. In the Madera-Chowchilla MSA and Redding MSA, the bank's performance is good and weaker than the bank's overall performance in the state. Weaker performance is due to less accessible retail delivery systems for individuals residing in LMI geographies

Refer to Table 15 in the state of California section of Appendix D for the facts and data that support these conclusions.

## State of Florida Rating

**CRA Rating for Florida<sup>5</sup>:**            Satisfactory

**The Lending Test is rated:**    High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:**    High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs;
- Adequate distribution of loans among geographies of different levels and good distribution among borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.
- .

### Description of Institution's Operations in the State of Florida

BANA is the largest banking financial institution in the state of Florida. As of June 30, 2011, the bank held 19.1 percent of the state's deposits totaling \$78.5 billion. The bank's primary banking competitors for deposits in Florida include Wells Fargo Bank, N.A., and SunTrust Bank, with deposit market shares of 15.6 percent and 10.4 percent, respectively. Of the bank's 47 rating areas, the state of Florida ranks 4<sup>th</sup> and accounts for 8.3 percent of the bank's total deposits. As of December 31, 2011, BANA operated 645 branches and 1,350 full-service ATMs in Florida.

Refer to the market profiles for the state of Florida in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

### Scope of Evaluation in the State of Florida

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<sup>5</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The bank has defined 26 assessment areas in Florida. The Ft. Lauderdale-Pompano Beach-Deerfield Beach MD, Jacksonville MSA, Miami-Miami Beach-Kendall MD, Orlando-Kissimmee-Sanford MD, and Tampa-St. Petersburg-Clearwater MSA, which were selected for full-scope reviews, together comprise 73.4 percent of the bank's deposits and 57 percent of the bank's lending in the state of Florida. For purposes of this review, 5 assessment areas comprising 15 counties that are not MSA or MDs have been combined under the Florida Non-MSA.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Lending Test performance in Florida is rated High Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Fort Lauderdale-Pompano Beach-Deerfield Beach (Fort Lauderdale), Jacksonville, Miami-Miami Beach-Kendall (Miami), Orlando-Kissimmee-Sanford (Orlando), and Tampa-St. Petersburg-Clearwater (Tampa) MSAs is good. Performance in limited-scope assessment areas did not significantly affect the Lending Test rating for the state of Florida.

### **Lending Activity**

Lending activity in the Fort Lauderdale MSA is excellent. With the leading deposit market share, the bank ranks first, second and second in market share for home purchase, home improvement and home refinance loans among lending participants in the MSA, respectively. In addition, the bank has the third market shares of small business loans and small farm loans in the MSA.

Lending activity in the Jacksonville MSA is excellent. With the leading deposit market share, the bank has the first, fourth and second market shares of home purchase, home improvement, and home refinance loans among lending participants in the MSA, respectively. In addition, the bank has the third market shares of small business loans and small farm loans in the MSA.

Lending activity in the Miami MSA is excellent. With the second highest deposit market share, the bank has the first, second and third market shares of home purchase, home improvement and home refinance loans among lending participants in the MSA, respectively. In addition, the bank has the fifth market share of small business loans and second market share of small farm loans in the MSA.

Lending activity in the Orlando MSA is excellent. With the second highest deposit market share, the bank has the first, third and second market shares of home purchase, home improvement, and home refinance loans among lending participants in the MSA, respectively. In addition, the bank has the fourth market share of small business loans, and the second market share of small farm loans.

Lending activity in the Tampa MSA is excellent. With the leading deposit market share, the bank has the first, second and second market shares of home purchase, home improvement, and home refinance loans among lending participants in the MSA, respectively. In addition,

the bank has the fourth market share of small business loans and the second market share of small farm loans in the MSA.

Refer to Table 1 Lending Volume in the state of Florida section of Appendix D for the facts and data used to evaluate the bank's lending activity.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution is adequate. Home mortgage lending was adequate in three of the five full-scope AAs, while all five full-scope AAs had good distributions of small loans to businesses within LMI geographies.

#### ***Home Mortgage Loans***

Home purchase loan geographic distribution within the Fort Lauderdale MSA is good. The percentage of loans made in low-income geographies exceeds and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In addition, the market share of home purchase loans in low-income geographies is below and in moderate-income geographies exceeds the bank's overall market share within the MSA.

Home improvement loan geographic distribution within the Fort Lauderdale MSA is adequate. The percentage of loans made in low-income geographies is significantly below and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In addition, the market share of home improvement loans in LMI geographies exceeds the bank's overall market share within the MSA.

Home refinance loan geographic distribution within the Fort Lauderdale MSA is good. The percentage of loans made in low-income geographies exceeds and in moderate-income geographies is well below the percentage of owner-occupied units in like geographies. In addition, the market share of home refinance loans in LMI geographies exceeds the bank's overall market share within the MSA.

Home purchase loan geographic distribution within the Jacksonville MSA is poor. The percentage of loans made in low-income geographies is significantly below and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In addition, the market share of home purchase loans in low-income geographies is significantly below and in moderate-income geographies is near to the bank's overall market share within the MSA.

Home improvement loan geographic distribution within the Jacksonville MSA is good. The percentage of loans made in low-income geographies exceeds and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In addition, the market share of home improvement loans in low-income geographies exceeds and in moderate-income geographies is near to the bank's overall market share within the MSA.

Home refinance loan geographic distribution within the Jacksonville MSA is adequate. The percentage of loans made in low-income geographies is significantly below and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In

addition, the market share of home refinance loans in LMI geographies exceeds the bank's overall market share within the MSA.

Home purchase loan geographic distribution within the Miami MSA is excellent. The percentage of loans made in low-income geographies exceeds and in moderate-income geographies is near to the percentage of owner-occupied units in like geographies. In addition, the market share of home purchase loans in LMI geographies exceeds the bank's overall market share within the MSA.

Home improvement loan geographic distribution within the Miami MSA is good. The percentage of loans made in low-income geographies exceeds and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In addition, the market share of home improvement loans in low and moderate-income geographies is below the bank's overall market share within the MSA.

Home refinance loan geographic distribution in the Miami MSA is good. The percentage of loans made in low-income geographies exceeds and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In addition, the market share of home refinance loans in LMI geographies exceeds the bank's overall market share within the MSA.

Home purchase loan geographic distribution within the Orlando MSA is adequate. The percentage of loans made in low-income geographies is significantly below and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In addition, the market share of home purchase loans in low-income geographies is below and in moderate-income geographies is near to the bank's overall market share within the MSA.

Home improvement loan geographic distribution in the Orlando MSA is good. The percentage of loans made in low-income geographies exceeds and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In addition, the market share of home improvement loans in low-income geographies exceeds and in moderate-income geographies is near to the bank's overall market share within the MSA.

Home refinance loan geographic distribution in the Orlando MSA is adequate. The percentage of loans made in low-income geographies is significantly below and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In addition, the market share of home refinance loans in LMI geographies exceeds the bank's overall market share within the MSA.

Home purchase loan geographic distribution in the Tampa MSA is adequate. Of note, the higher than normal level of retirees in the MSA was taken into account when evaluating the performance for all home mortgage loan products. Retired workers typically have fewer needs for home mortgage products. The percentage of loans made in low-income geographies is significantly below and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In addition, the market share of home purchase loans in low-income geographies is below and in moderate-income geographies exceeds the bank's overall market share within the MSA.

Home improvement loan geographic distribution in the Tampa MSA is good. Although the percentage of loans made in low-income geographies is significantly below the percentage of owner-occupied housing units, few owner-occupied housing units exist in low-income geographies. The bank's percentage in moderate-income geographies approximates the percentage of owner-occupied units in like geographies. In addition, the market share of home improvement loans in moderate-income geographies exceeds the bank's overall market share within the MSA.

Home refinance loan geographic distribution in the Tampa MSA is adequate. The percentage of loans made in low-income geographies is significantly below and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. In addition, the market share of home refinance loans in LMI geographies exceeds the bank's overall market share within the MSA.

Refer to Tables 2, 3, 4, and 5 in the state of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

### **Multifamily Loans**

The bank either made no multifamily loans or the volume was minimal in the full-scope assessment areas in Florida; therefore, this analysis was not used in the Lending Test evaluation.

### ***Small Loans to Businesses***

The geographic distribution of small loans to businesses in the Fort Lauderdale MSA is good. The distribution of small loans to businesses in low-income geographies exceeds the percentage of businesses in like geographies. The distribution of small loans to businesses in moderate-income geographies is below the percentage of businesses in like geographies. The bank's market share of small loans to businesses in LMI geographies is near to its overall market share of small loans to businesses in the MSA.

The geographic distribution of small loans to businesses in the Jacksonville MSA is good. The distribution of small loans to businesses in low-income geographies is below the percentage of businesses in like geographies. The distribution of small loans to businesses in moderate-income geographies approximates the percentage of businesses in like geographies. The bank's market share of small loans to businesses in LMI geographies is near to and below its overall market share of small loans to businesses in the MSA, respectively.

The geographic distribution of small loans to businesses in the Miami MSA is good. The distribution of small loans to businesses in low-income geographies exceeds the percentage of businesses in like geographies. The distribution of small loans to businesses in moderate-income geographies is below the percentage of businesses in like geographies. The bank's market share of small loans to businesses in LMI geographies exceeds and is near to its overall market share of small loans to businesses in the MSA, respectively.

The geographic distribution of small loans to businesses in the Orlando MSA is good. The distribution of small loans to businesses in low-income geographies exceeds the percentage of businesses in like geographies. The distribution of small loans to businesses in moderate-income geographies is below the percentage of businesses in like geographies. The bank's market share of small loans to businesses in LMI geographies is below and near to its overall market share of small loans to businesses in the MSA, respectively.

The geographic distribution of small loans to businesses in the Tampa MSA is adequate. The distribution of small loans to businesses in low-income geographies is below the percentage of businesses in like geographies. The distribution of small loans to businesses in moderate-income geographies is near to the percentage of businesses in like geographies. The bank's market share of small loans to businesses in LMI geographies is well below and near to its overall market share of small loans to businesses in the MSA, respectively.

Refer to Table 6 in the state of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

### ***Small Loans to Farms***

In the Fort Lauderdale and Jacksonville MSAs, the overall volume of small loans to farms was minimal and thus not used in this analysis.

The geographic distribution of small loans to farms in the Miami MSA is very poor. The distribution of small loans to farms in LMI geographies is significantly below the percentage of farms in like geographies. In addition, the market share of loans in LMI geographies is significantly below the bank's overall market share of small loans to farms in the MSA.

The geographic distribution of small loans to farms in the Orlando MSA is good. Our analysis considered that there are a very limited number of small farms in low-income geographies in the MSA. The distribution of small loans to farms in LMI geographies is significantly below and exceeds the percentage of farms in like geographies, respectively. In addition, the market share of loans in LMI geographies is significantly below and exceeds the bank's overall market share of small loans to farms in the MSA, respectively.

The geographic distribution of small loans to farms in the Tampa MSA is poor. Our analysis considered that there are a very limited number of small farms in low-income geographies in the MSA. The distribution of small loans to farms in LMI geographies is significantly below and well below the percentage of farms in like geographies, respectively. In addition, the market share of loans in LMI geographies is significantly below and well below the bank's overall market share of small loans to farms in the MSA, respectively.

Refer to Table 7 in the state of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

### **Distribution of Loans by Income Level of the Borrower**

Overall borrower distribution is good based on good performance for both mortgage borrowers of different income levels and to businesses with different revenues.

### ***Home Mortgage Loans***

Home purchase loan borrower distribution in the Fort Lauderdale MSA is good. The percentage of loans originated to low-income borrowers is well below and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers is near to and exceeds the bank's overall market share of home purchase loans within the MSA, respectively.

Home improvement loan borrower distribution in the Fort Lauderdale MSA is good. The percentage of loans originated to low-income borrowers is well below and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home improvement loans to LMI borrowers is below and exceeds the bank's overall market share of home improvement loans within the MSA, respectively.

Home refinance loan borrower distribution in the Fort Lauderdale MSA is good. The percentage of loans originated to low-income borrowers is well below and to moderate-income borrowers is below the percentage of like families in the MSA. However, the market shares of home refinance loans to LMI borrowers exceed the bank's overall market share of home refinance loans within the MSA, respectively.

Home purchase loan borrower distribution in the Jacksonville MSA is good. The percentage of loans originated to low-income borrowers is below and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers is below and exceeds the bank's overall market share of home purchase loans within the MSA, respectively.

Home improvement loan borrower distribution in the Jacksonville MSA is good. The percentage of loans originated to low-income borrowers is near to and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home improvement loans to LMI borrowers is below and exceeds the bank's overall market share of home improvement loans within the MSA, respectively.

Home refinance loan borrower distribution in the Jacksonville MSA is good. The percentage of loans originated to low-income borrowers is below and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home refinance loans to LMI borrowers exceeds the bank's overall market share of home refinance loans within the MSA, respectively.

Home purchase loan borrower distribution in the Miami MSA is adequate. The percentage of loans originated to low-income borrowers is significantly below and to moderate-income borrowers is near to the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers is below and near to the bank's overall market share of home purchase loans within the MSA, respectively.

Home improvement loan borrower distribution in the Miami MSA is poor. The percentage of loans originated to low-income borrowers is significantly below and to moderate-income borrowers well below the percentage of like families in the MSA. The market share of home improvement loans to LMI borrowers is below and near to the bank's overall market share of home improvement loans within the MSA, respectively.

Home refinance loan borrower distribution in the Miami MSA is adequate. The percentage of loans originated to low-income borrowers is well below and to moderate-income borrowers is well below the percentage of like families in the MSA. The market share of home refinance loans to LMI borrowers exceeds the bank's overall market share of home refinance loans within the MSA, respectively.

Home purchase loan borrower distribution in the Orlando MSA is good. The percentage of loans originated to low-income borrowers is below and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers is near to and exceeds the bank's overall market share of home purchase loans within the MSA, respectively.

Home improvement loan borrower distribution in the Orlando MSA is good. The percentage of loans originated to low-income borrowers is below and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home improvement loans to LMI borrowers is well below and exceeds the bank's overall market share of home improvement loans within the MSA, respectively.

Home refinance loan borrower distribution in the Orlando MSA is good. The percentage of loans originated to low-income borrowers is below and to moderate-income borrowers approximates the percentage of like families in the MSA. The market share of home refinance loans to LMI borrowers exceeds the bank's overall market share of home refinance loans within the MSA, respectively.

Home purchase loan borrower distribution in the Tampa MSA is excellent. Of note, the higher than normal level of retirees in the MSA was taken into account when evaluating the performance for all home mortgage loan products. Retired workers typically have less of a need for home mortgage products. The percentage of loans originated to low-income borrowers is below and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers is near to and exceeds the bank's overall market share of home purchase loans within the MSA, respectively.

Home improvement loan borrower distribution in the Tampa MSA is excellent. The percentage of loans originated to low-income borrowers is near to and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home improvement loans to LMI borrowers is near to and exceeds the bank's overall market share of home improvement loans within the MSA, respectively.

Home refinance loan borrower distribution in the Tampa MSA is good. The percentage of loans originated to low-income borrowers is well below and to moderate-income is near to the percentage of like families in the MSA. The market share of home refinance loans to LMI

borrowers exceeds the bank's overall market share of home refinance loans within the MSA, respectively.

Refer to Tables 8, 9 and 10 in the state of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Small Loans to Businesses***

The borrower distribution of small loans to businesses is good in the Fort Lauderdale, Jacksonville, Miami, Orlando, and Tampa MSAs. The percentage of loans to small businesses is near to the percentage of small businesses in those MSAs. The bank's market share of small loans to businesses exceeds its overall business loans market share.

Refer to Table 11 in the state of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

### ***Small Loans to Farms***

In the Fort Lauderdale and Jacksonville MSAs, the overall volume of small loans to farms was minimal and thus not used in this analysis.

The borrower distribution of small loans to farms is poor in the Miami MSA. The percentage of loans to small farms is well below the percentage of farms in the MSA. The market share of loans to small farms is well below the bank's overall market share of farm loans within the MSA.

The borrower distribution of small loans to farms is adequate in the Orlando MSA. The percentage of loans to small farms is below the percentage of farms in the MSA. The market share of loans to small farms is near the bank's overall market share of farm loans within the MSA.

The borrower distribution of small loans to farms is adequate in the Tampa MSA. The percentage of loans to small farms is below the percentage of farms in the MSA. The market share of loans to small farms is below the bank's overall market share of farm loans within the MSA.

Refer to Table 12 in the state of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

## **Community Development Lending**

Community development lending had a neutral impact on the lending performance in the Fort Lauderdale MSA. During the evaluation period, the bank originated 13 community development loans totaling \$38.5 million. A significant majority of the dollars was for

affordable housing and helped to create 484 units of affordable housing, which was particularly responsive to needs in the MSA.

Community development lending had a neutral impact on the lending performance in the Jacksonville MSA. During the evaluation period, the bank originated one community development loans totaling \$1.5 million. This loan helped to create 83 units of affordable housing within the MSA.

Community development lending had a neutral impact on the lending performance in the Miami MSA. During the evaluation period, the bank originated 11 community development loans totaling \$27.6 million. A significant majority of the dollars was for affordable housing and helped to create 585 units of affordable housing, which was particularly responsive to needs in the MSA.

Community development lending had a neutral impact on the lending performance in the Orlando MSA. During the evaluation period, the bank originated six community development loans totaling \$28.7 million. The vast majority of the dollars was for affordable housing and helped to create 333 units of affordable housing, which was particularly responsive to needs in the MSA.

Community development lending had a positive impact on the lending performance in the Tampa MSA. During the evaluation period, the bank originated 12 community development loans totaling \$93 million. Almost all of the loans were for affordable housing and helped to create over 1,200 units of affordable housing, which was particularly responsive to needs in the MSA. Of note, the bank has provided financing for a 160 unit senior affordable housing complex which included bank provided equity, Low Income Housing Tax Credits and community development loans.

Refer to Table 1 Lending Volume in the state of Florida section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

## **Other Loan Data**

In the Fort Lauderdale MSA, the bank issued one letter of credit totaling \$26.2 million that has a community development purpose. Funding from the letter of credit to create or maintain 300 affordable housing units.

In the Orlando MSA, the bank issued seven letters of credit totaling \$40.3 million that have a community development purpose. Funding from the letters of credit helped to create or maintain 538 units of affordable housing.

Refer to Table 1, Other in the state of Florida section of Appendix D for the facts and data on letters of credit.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, performance in the Crestview-Fort Walton Beach-Destin, Deltona-Daytona Beach-Ormond Beach, Gainesville, Naples-Marco Island, Ocala, Palm Bay-Melbourne-Titusville, Palm Coast, Pensacola-Ferry Pass-Brent, Port St. Lucie, Sebastian-Vero Beach, and Tallahassee MSAs is good and is not inconsistent with the overall performance in the state. Performance in the Punta Gorda MSA is excellent and stronger than the overall performance in the state. The stronger performance is primarily due to a more favorable borrower distribution of small loans to businesses. Performance in the Cape Coral-Fort Myers, Lakeland-Winter Haven, North Port-Bradenton-Sarasota, West Palm Beach-Boca Raton-Boynton Beach MSAs, and the Florida Non-MSA is adequate and weaker than the overall performance in the state. Weaker performance is due to a less favorable geographic distribution of home mortgage loans.

Refer to the Tables 1 through 12 in the state of Florida section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Investment Test performance in Florida is rated Outstanding. Based on full-scope reviews, the bank's Investment Test performance in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD, Jacksonville MSA, Miami-Miami Beach-Kendall MD, Orlando-Kissimmee-Sanford MSA, and the Tampa- St. Petersburg-Clearwater MSA is excellent. Performance in limited-scope assessment areas did not significantly impact the Investment Test rating for the state of Florida.

BANA made 194 investments in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD totaling \$71.1 million. As of December 31, 2011, prior period investments totaled \$47.2 million. These prior period investment continue to provide benefit and meet the needs of the AA. The largest investments totaled \$29.9 million and consisted of the purchase of various affordable housing mortgage- backed securities that were targeted to LMI borrowers. The bank also invested in two LIHTC projects, which provided 620 units of affordable housing for LMI families. Additionally, the bank invested \$10 million, which helped support a designated disaster area (Hurricane Katrina) over the evaluation period.

The bank made 295 investments in the Jacksonville MSA totaling \$110.8 million. As of December 31, 2011, prior period investments totaled \$33.5 million. These prior period investments continue to provide benefit and meet the needs of the AA. The level of corporate deposits in this market was taken into consideration in forming our conclusion. The largest investments totaled \$107 million and consisted of the purchase of various affordable housing mortgage- backed securities that were targeted to LMI borrowers. The bank also invested \$1.5 million in two CDFIs.

BANA made 190 investments in the Miami-Miami Beach-Kendall MD totaling \$51.5 million. As of December 31, 2011, prior period investments totaled \$106.8 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments in the MD totaled \$46.2 million and consisted of the purchase of various

affordable housing mortgage- backed securities that were targeted to LMI borrowers. The bank also invested \$2 million in four CDFIs.

The bank made 116 investments totaling \$56.1 million in the Orlando-Kissimmee-Sanford MSA. As of December 31, 2011, prior period investments totaled \$17 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments totaled \$42.9 million and consisted of five LIHTC projects, which provided 513 units of affordable housing for LMI families.

BANA made 120 investments totaling \$88.5 million in the Tampa-St. Petersburg-Clearwater MSA. As of December 31, 2011, prior period investments totaled \$60.4 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments totaled \$83.8 million and consisted of investments in LIHTC projects, which provided 754 units of affordable housing for LMI families.

Other investments in the aforementioned assessment areas consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Refer to Table 14 in the state of Florida section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, Investment Test performance in the Lakeland-Winter Haven, Northport-Bradenton-Sarasota, Palm Bay-Melbourne-Titusville, Palm Coast, Pensacola-Ferry Pass-Brent, Port St. Lucie, West Palm Beach-Boca Raton-Boynton Beach MD/MSAs and Florida Non-MSA is excellent and is not inconsistent with the overall Outstanding performance in Florida. Performance in the Naples-Marco Island and Tallahassee MSAs is good and weaker than the overall performance in the state. Performance in the Cape Coral- Fort Myers, Crestview-Fort Walton Beach-Destin, Deltona-Daytona Beach- Ormond Beach, Gainesville, Ocala, and Sebastian-Vero Beach MSAs is adequate and weaker than the overall performance in the state. Performance in the Punta Gorda MSA is poor and weaker than the overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA.

Refer to the Table 14 in the state of Florida section of Appendix D for the facts and data that support these conclusions.

### **SERVICE TEST**

#### **Conclusions for Areas Receiving Full-Scope Reviews**

Service Test performance in Florida is rated High Satisfactory. Based on full-scope reviews, the bank's Service Test performance in the Miami-Miami Beach-Kendall MD, Orlando-Kissimmee-Sanford MSA, and Tampa-St. Petersburg-Clearwater MSA is excellent, performance in the Jacksonville MSA is good, and performance in the Ft. Lauderdale-Pompano Beach-Deerfield Beach MD is adequate.

## Retail Banking Services

Service delivery systems in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD are reasonably accessible to geographies and individuals of different income levels. The percentage of the bank's branches in low-income geographies is well below and in moderate-income geographies is below the percentage of the population residing in those areas. Fourteen branches located in close proximity to moderate-income geographies and the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 30 percent of the population that resides in LMI geographies, 21 percent of customers that use alternative delivery systems reside in LMI geographies. Branch openings and closings did not affect overall access with three branches opened and four branches closed during the evaluation period. The bank did not open or close any branches in LMI geographies during the evaluation period. Hours and services are tailored to the needs of the people living in the MSA.

Service delivery systems in the Jacksonville MSA are accessible to geographies and individuals of different income levels. The percentage of the bank's branches in low-income geographies exceeds and in moderate-income geographies is below the percentage of the population residing in those areas. Seven branches located in close proximity to moderate-income geographies and the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 23 percent of the population that resides in LMI geographies, 14 percent of customers that use alternative delivery systems reside in LMI geographies. The bank closed one branch in a moderate-income geography, which adversely affected accessibility to retail banking services in the MSA. Hours and services do not vary in a way that inconveniences the people living in the MSA.

Service delivery systems in the Miami-Miami Beach-Kendall MD are readily accessible to geographies and individuals of different income levels. The percentage of the bank's branches in LMI geographies is near to the percentage of the population residing in those areas. Fourteen branches located in close proximity to moderate-income geographies and one branch located in a low-income geography along with the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 33 percent of the population that resides in LMI geographies, 25 percent of customers that use alternative delivery systems reside in LMI geographies. The bank opened a total of three branches including one branch in a moderate-income geography, which improved the accessibility to retail banking services in the MSA. Hours and services are tailored to the needs of the people living in the MSA.

Service delivery systems in the Orlando-Kissimmee-Sanford MSA are readily accessible to geographies and individuals of different income levels. The percentage of the bank's branches in LMI geographies exceeds the percentage of the population residing in those areas. Ten branches located in close proximity to moderate-income geographies and one branch located in close proximity to low-income geographies, along with the bank's use of telephone and electronic banking delivery systems, improved access by LMI individuals to retail banking services. Compared to 24 percent of the population that resides in LMI geographies, 18 percent of customers that use alternative delivery systems reside in LMI geographies. The

bank closed four branches, but that did not have an impact on overall access. The bank did not close any branches in LMI geographies during the assessment period. Hours and services are tailored to needs of the people living in the MSA.

Service delivery systems in the Tampa-St. Petersburg-Clearwater MSA are readily accessible to geographies and individuals of different income levels. The percentage of the bank's branches in low-income geographies is near and in moderate-income geographies exceeds the percentage of the population residing in those areas. Eighteen branches located in close proximity to LMI geographies along with the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 27 percent of the population that resides in LMI geographies, 20 percent of customers that use alternative delivery systems reside in LMI geographies. Branch openings and closings have not affected access to banking services although the bank opened one branch in a low-income geography while closing one branch in a moderate-income geography. Hours and services are tailored to the needs of the people living in the MSA.

Refer to Table 15 in the state of Florida section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### **Community Development Services**

The bank provided a high level of community development services in the Fort Lauderdale MSA. Services were provided to 34 organizations pursuing a variety of initiatives targeted at LMI areas and individuals. These services addressed community development needs such as technical assistance for organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies. The bank also provided homebuyer education and loans to 37 individuals through partnership with non-profit organizations, which represents a good level of service.

The bank provided an adequate level of community development services in the Jacksonville MSA. Services were provided to 18 organizations pursuing a variety of initiatives targeted at LMI areas and individuals, which represents an adequate level of services. These services addressed community development needs such as technical assistance for organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies. The bank also provided homebuyer education and loans to 10 individuals through partnership with non-profit organizations, which represents an adequate level of service.

The bank provided a high level of community development services in the Miami-Miami Beach-Kendall MSA. Services were provided to 43 organizations pursuing a variety of initiatives targeted at LMI areas and individuals, which represents a high level of services. These services addressed community development needs such as technical assistance for organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

The bank provided a high level of community development services in the Orlando-Kissimmee-Sanford MSA. Services were provided to 24 organizations pursuing a variety of initiatives

targeted at LMI areas and individuals. These services addressed community development needs such as technical assistance for organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

The bank is a leader in providing community development services in the Tampa-St. Petersburg-Clearwater MSA. Services were provided to 23 organizations pursuing a variety of initiatives targeted at LMI areas and individuals, which represents a high level of services. These services addressed community development needs such as technical assistance for organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies. Of note, the bank provided significant leadership and innovation to five community development organizations during the assessment period. The bank also provided homebuyer education and loans to 43 individuals through partnership with non-profit organizations, which represents a high level of service.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, Service Test performance in the Deltona-Daytona Beach-Ormond Beach MSA, Naples-Marco Island MSA, North Port-Bradenton-Sarasota MSA, Palm Coast MSA, Sebastian-Vero Beach MSA, Tallahassee MSA, and West Palm Beach-Boca Raton-Boynton Beach MD is good and is not inconsistent with the bank's overall High Satisfactory performance under the Service Test in the state of Florida. Service Test performance in the Cape Coral-Fort Myers MSA, Gainesville MSA, Lakeland-Winter Haven MSA, Palm Bay-Melbourne-Titusville MSA, Pensacola-Ferry Pass-Brent MSA, Punta Gorda MSA, and Florida Non-MSA is excellent and stronger than the bank's overall High Satisfactory performance in the state of Florida. Stronger performance is due to more accessible retail delivery systems to LMI individuals and geographies. Service Test performance in the Crestview-Ft. Walton Beach-Destin MSA and Ocala MSA is adequate and weaker and performance in the Port St. Lucie MSA is poor and weaker than the bank's overall High Satisfactory performance in the state of Florida. Performance is weaker due to less accessible retail delivery systems in LMI geographies.

Refer to Table 15 in the state of Florida section of Appendix D for the facts and data that support these conclusions.

## State of Texas Rating

CRA Rating for Texas<sup>6</sup>: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to the credit needs of the state;
- Poor distribution of loans among geographies and good distribution among borrowers of different income levels;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas when considering the additional access from adjacent branches in middle- and upper-income geographies. The bank also provides a relatively high level of community development services.

### Description of Institution's Operations in the State of Texas

BANA is the second largest banking financial institution in the state of Texas. As of June 30, 2011, the bank held 14.3 percent of the state's deposits totaling \$77.6 billion. The bank's primary banking competitors for deposits in Texas include JPMorgan Chase Bank, N.A., Wells Fargo Bank, N.A., and USAA Federal Savings Bank, with deposit market shares of 17.7 percent, 9.4 percent, and 8.1 percent, respectively. Of the bank's 47 rating areas, the state of Texas ranks 5<sup>th</sup> and accounts for 8.2 percent of the bank's total deposits. As of December 31, 2011, BANA operated 452 branches and 1,110 full-service ATMs in Texas.

Refer to the market profiles for the state of Texas in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

### Scope of Evaluation in the State of Texas

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<sup>6</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The bank has defined 30 assessment areas in the state of Texas. The Dallas-Plano-Irving MD, Ft Worth-Arlington MD, and San Antonio-New Braunfels MSA, which were selected for full-scope reviews, together comprise 72 percent of the bank's deposits and 44 percent of the bank's lending in the state of Texas. For purposes of this review, five assessment areas comprising 16 counties that are not MSAs or MDs have been combined under the Texas Non-MSA.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Lending Test performance in Texas is rated Low Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Dallas-Plano-Irving (Dallas) MSA, Fort Worth-Arlington (Fort Worth) MSA, and San Antonio-New Braunfels (San Antonio) MSA is adequate. Performance in the limited-scope areas did not negatively affect the overall rating for the Lending Test in the state of Texas.

### **Lending Activity**

Lending activity in the Dallas MSA is excellent. With the leading deposit market share, the bank ranks second, third and second in market share for home purchase, home improvement, and home refinance loans for all lenders within the MSA, respectively. In addition, the bank's small business lending market share rank is fifth while its small farm lending market share is sixth.

Lending activity in the Fort Worth MSA is excellent. With the third deposit market share, the bank ranks second, fifth, and second for home purchase, home improvement and home refinance loans for all lenders within the MSA, respectively. In addition, the bank's small business lending market share rank is sixth while its small farm lending market share is fifth.

Lending activity in the San Antonio MSA is excellent. With the third deposit market share, the bank ranks second, eleventh, and second for home purchase, home improvement and home refinance loans for all lenders within the MSA, respectively. In addition, the bank's small business lending market share rank is seventh while its small farm lending market share is seventh.

Refer to Table 1 Lending Volume in the state of Texas section of Appendix D for the facts and data used to evaluate the bank's lending activity.

### **Distribution of Loans by Income Level of the Geography**

Overall geographic distribution is poor as noted by poor penetration of mortgage loans into LMI geographies and good distribution of small loans to businesses in LMI geographies.

#### ***Home Mortgage Loans***

Home purchase loan geographic distribution within the Dallas MSA is adequate. The percentage of loans made in low-income geographies is significantly below and in moderate-income geographies is well below the percentage of owner-occupied units in like geographies. This poor performance is partially offset by excellent market shares. The market share of home purchase loans in low-income geographies is near to and in moderate-income geographies exceeds the bank's overall market share within the MSA.

Home improvement loan geographic distribution within the Dallas MSA is poor. The percentage of loans made in low-income geographies is well below and in moderate-income geographies is significantly below the percentage of owner-occupied units in like geographies. In addition, the market share of home improvement loans in LMI geographies exceeds and is below the bank's overall market share within the MSA, respectively.

Home refinance loan geographic distribution within the Dallas MSA is poor. The percentage of loans made in LMI geographies is significantly below the percentage of owner-occupied units in like geographies. However, the market share of home refinance loans in LMI geographies exceeds the bank's overall market share within the MSA.

Home purchase loan geographic distribution within the Fort Worth MSA is poor. The percentage of loans made in low-and moderate-income geographies is significantly below the percentage of owner-occupied units in like geographies. In addition, the market share of home purchase loans in low-income geographies exceeds and in moderate-income geographies is near to the bank's overall market share within the MSA.

Home improvement loan geographic distribution within the Fort Worth MSA is very poor. The percentage of loans made in low-and moderate-income geographies is significantly below the percentage of owner-occupied units in like geographies. The market share of home improvement loans in LMI geographies is significantly below and well below the bank's overall market share within the MSA, respectively.

Home refinance loan geographic distribution within the Fort Worth MSA is poor. The percentage of loans made in low-and moderate-income geographies is significantly below the percentage of owner-occupied units in like geographies. In addition, the market share of home refinance loans in low-income tracts approximates and in moderate-income tracts exceeds the bank's overall market share within the MSA.

Home purchase loan geographic distribution within the San Antonio MSA is poor. The percentage of loans made in LMI geographies is significantly below the percentage of owner-occupied units in like geographies. This very poor performance is partially offset by good market shares to result in the poor conclusion. The market share of home purchase loans in low-income geographies is near to and in moderate-income geographies exceeds the bank's overall market share within the MSA.

Home improvement loan geographic distribution within the San Antonio MSA is poor. The percentage of loans made in low-income geographies is significantly below and in moderate-income geographies is below the percentage of owner-occupied units in like geographies. Similarly, the market share of home improvement loans in LMI geographies is significantly below and exceeds the bank's overall market share within the MSA, respectively.

Home refinance loan geographic distribution within the San Antonio MSA is poor. The percentage of loans made in LMI geographies is significantly below the percentage of owner-occupied units in like geographies. In addition, the market share of home refinance loans in LMI geographies is well below and exceeds the bank's overall market share within the MSA.

### **Multifamily Loans**

The bank either made no multifamily loans or the volume was minimal in the full-scope assessment areas in Texas; therefore, this analysis was not used in the Lending Test evaluation.

Refer to Tables 2, 3, 4, and 5 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

### ***Small Loans to Businesses***

The geographic distribution of small loans to businesses in the Dallas MSA is good. The distribution of small loans to businesses in low-income geographies is below the percentage of businesses in like geographies. The distribution of small loans to businesses in moderate-income geographies is near to the percentage of businesses in like geographies. The bank's market share of small loans to businesses in LMI geographies is near to its overall market share of small loans to businesses in the MSA.

The geographic distribution of small loans to businesses in the Fort Worth MSA is good. The distribution of small loans to businesses in low-income geographies is below the percentage of businesses in like geographies. The distribution of small loans to businesses in moderate-income geographies is near to the percentage of businesses in like geographies. The bank's market share of small loans to businesses in LMI geographies exceeds and is below its overall market share of small loans to businesses in the MSA, respectively.

The geographic distribution of small loans to businesses in the San Antonio MSA is excellent. The distribution of small loans to businesses in low-income geographies exceeds the percentage of businesses in like geographies. The distribution of small loans to businesses in moderate-income geographies is near to the percentage of businesses in like geographies. The bank's market share of small loans to businesses in LMI geographies is near to and exceeds its overall market share of small loans to businesses in the MSA, respectively.

Refer to Table 6 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

### ***Small Loans to Farms***

The geographic distribution of small loans to farms in the Dallas MSA is poor. The distribution of small loans to farms in low-income geographies is significantly below the percentage of businesses in like geographies. The distribution of small loans to farms in moderate-income

geographies is well below the percentage of farms in like geographies. The bank's market share of small loans to farms in LMI geographies is significantly below and well below its overall market share of small loans to farms in the MSA, respectively.

The geographic distribution of small loans to farms in the Fort Worth MSA is excellent. Our analysis took into account the minimal number of farms located in low-income geographies. The distribution of small loans to farms in low-income geographies exceeds the percentage of farms in like geographies. The distribution of small loans to farms in moderate-income geographies exceeds the percentage of farms in like geographies. The bank's market shares of small loans to farms in LMI geographies are significantly below, and exceeds its overall market share of small loans to farms in the MSA, respectively.

The geographic distribution of small loans to farms in the San Antonio MSA is adequate. Our analysis took into account the minimal number of farms located in low-income geographies. The distribution of small loans to farms in low-income geographies is significantly below the percentage of farms in like geographies. The distribution of small loans to farms in moderate-income geographies is below the percentage of farms in like geographies. The bank's market share of small loans to farms in LMI geographies is significantly below and is near to its overall market share of small loans to farms in the MSA, respectively.

Refer to Table 7 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

## **Distribution of Loans by Income Level of the Borrower**

Distributions of mortgage loans to borrowers of different income levels and small loans to businesses with different revenue sizes are both good.

### ***Home Mortgage Loans***

Home purchase loan borrower distribution in the Dallas MSA is good. The percentage of loans originated to low-income borrowers is below and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers exceeds the bank's overall market share of home purchase loans within the MSA.

Home improvement loan borrower distribution in the Dallas MSA is adequate. The percentage of loans originated to low-income borrowers is well below and to moderate-income borrowers is below the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers is below and exceeds the bank's overall market share of home improvement loans within the MSA, respectively.

Home refinance loan borrower distribution in the Dallas MSA is good. The percentage of loans originated to low-income borrowers is well below and to moderate-income borrowers is below the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers exceeds the bank's overall market share of home refinance loans within the MSA, respectively.

Home purchase loan borrower distribution in the Fort Worth MSA is excellent. The percentage of loans originated to low-income borrowers is near to and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers exceeds the bank's overall market share of home purchase loans within the MSA.

Home improvement loan borrower distribution in the Fort Worth MSA is poor. The percentage of loans originated to LMI borrowers is well below the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers is below and significantly below the bank's overall market share of home improvement loans within the MSA, respectively.

Home refinance loan borrower distribution in the Fort Worth MSA is good. The percentage of loans originated to low-income borrowers is well below and to moderate-income borrowers is below the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers exceeds the bank's overall market share of home refinance loans within the MSA, respectively. This excellent market share performance helps offset otherwise adequate distribution.

Home purchase loan borrower distribution in the San Antonio MSA is good. The percentage of loans originated to low-income borrowers is well below and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers is near to and exceeds the bank's overall market share of home purchase loans within the MSA, respectively.

Home improvement loan borrower distribution in the San Antonio MSA is good. The percentage of loans originated to low-income borrowers is well below and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market share of home purchase loans to LMI borrowers is well below and exceeds the bank's overall market share of home improvement loans within the MSA, respectively.

Home refinance loan borrower distribution in the San Antonio MSA is good. The percentage of loans originated to low-income borrowers is well below and to moderate-income borrowers exceeds the percentage of like families in the MSA. The market shares of home purchase loans to LMI borrowers are well below, and exceed the bank's overall market share of home refinance loans within the MSA, respectively.

Refer to Tables 8, 9 and 10 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Small Loans to Businesses***

The borrower distribution of small loans to businesses is good in the Dallas, Fort Worth and San Antonio MSAs. The percentage of loans to small businesses is near to the percentage of small businesses in those MSAs. The bank's market share of small loans to businesses exceeds its overall business loans market share.

Refer to Table 11 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

### ***Small Loans to Farms***

The borrower distribution of small loans to farms is adequate in the Dallas MSA. The percentage of loans to small farms is below the percentage of small farms in the MSA. The bank's market share of small loans to farms is near to its overall farm loans market share.

The borrower distribution of small loans to farms is poor in the Fort Worth MSA. The percentage of loans to small farms is well below the percentage of small farms in the MSA. The bank's market share of small loans to farms is below its overall farm loans market share.

The borrower distribution of small loans to farms is poor in the San Antonio MSA. The percentage of loans to small farms is well below the percentage of small farms in the MSA. The bank's market share of small loans to farms is well below its overall farm loans market share.

Refer to Table 12 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

### **Community Development Lending**

Community development lending had a neutral impact on the lending performance in the Dallas MSA. During the evaluation period, the bank originated seven community development loans totaling \$26.5 million. A significant majority of the dollars was for affordable housing and helped to create over 700 units of affordable housing, which was particularly responsive to needs in the MSA. In addition, one of the loans was to revitalize and stabilize a moderate-income geography and was expected to create approximately 1,000 jobs in the community.

Community development lending had a neutral impact on the lending performance in the Fort Worth MSA. During the evaluation period, the bank originated six community development loans totaling \$17.5 million. A significant majority of the dollars was for affordable housing and helped to create 240 units of affordable housing, which was particularly responsive to needs in the MSA.

Community development lending had a positive impact on the lending performance in the San Antonio MSA. During the evaluation period, the bank originated five community development loans totaling \$25.2 million. A significant majority of the dollars was for affordable housing and helped to create almost 400 units of affordable housing, which was particularly responsive to needs in the MSA.

Refer to Table 1 Lending Volume in the state of Texas section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5

includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, Lending Test performance in the Abilene, Amarillo, Beaumont-Port Arthur, Brownsville-Harlingen, College Station-Bryan, Houston-Sugarland-Baytown, Killeen-Temple-Fort Hood, Laredo, Longview, Lubbock, McAllen-Edinburg-Mission, Midland, Odessa, San Angelo, Sherman-Denison, Tyler, Victoria, Waco, and Wichita Falls MSAs as well as the Texas Non-MSA is adequate and is not inconsistent with the overall Low Satisfactory performance in the state. Performance in the Austin-Round Rock-San Marcos, Corpus Christi, and El Paso MSAs is good and stronger than the overall performance in the state. Stronger performance is due to a more favorable borrower distribution of home mortgage loans and relatively higher levels of community development lending.

Refer to the Tables 1 through 12 in the state of Texas section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

Investment Test performance in Texas is rated Outstanding. Based on full-scope reviews, the bank's Investment Test performance in the Dallas-Plano-Irving MD, Fort Worth-Arlington MD, and San Antonio-New Braunfels MSA is excellent. Performance in limited-scope AAs did not negatively affect the overall Investment Test rating in the state of Texas.

BANA made 390 investments in the Dallas-Plano-Irving MD totaling \$261 million. As of December 31, 2011, prior period investments totaled \$87 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments totaled \$217 million and consisted of purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. The bank also invested \$26.2 million in three LIHTC projects, which provided 284 affordable housing units for LMI families. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

In the Fort Worth-Arlington MD, BANA made 137 investments totaling \$77.4 million. As of December 31, 2011, prior period investments totaled \$13.8 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments totaled \$46.1 million and consisted of purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. The bank also invested \$24.6 million in three LIHTC projects, which provided 456 affordable housing units for LMI families. BANA also invested \$4.7 million in two NMTC projects targeting revitalization/stabilization of a low-income neighborhood. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

In the San Antonio-New Braunfels MSA, the bank made 61 investments totaling \$14.4 million. As of December 31, 2011, prior period investments totaled \$65.2 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investment consisted of a \$12.4 million LIHTC that created 186 affordable housing units for LMI families. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Refer to Table 14 in the state of Texas section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, Investment Test performance in the Abilene MSA, Austin-Round Rock-San Marcos MSA, Beaumont-Port Arthur MSA, Brownsville-Harlingen MSA, Corpus Christi MSA, El Paso MSA, Houston-Sugar Land-Baytown MSA, Laredo MSA, Longview MSA, McAllen-Edinburg-Mission MSA, San Angelo MSA, Sherman-Denison MSA, Victoria MSA, Waco MSA, Wichita Falls MSA, and Texas Non-MSA is excellent and is not inconsistent with the overall Outstanding performance in Texas. Performance in the College Station-Bryan MSA and Tyler MSA is adequate and weaker than the overall performance. Performance in the Amarillo MSA, Killeen-Temple-Fort Hood MSA, Lubbock MSA, Midland MSA, and Odessa MSA is poor and weaker than the overall performance in Texas. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA.

Refer to the Table 14 in the state of Texas section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test in the State of Texas is rated Outstanding. Based on full-scope reviews, the bank's Service Test performance in the Dallas-Plano-Irving MD and San Antonio-New Braunfels MSA is excellent, while performance in Fort Worth-Arlington MD is good. Performance in limited-scope areas did not negatively impact the Service Test rating in the state of Texas.

### **Retail Banking Services**

Retail banking services and delivery systems in the Dallas-Plano-Irving MD are readily accessible to geographies and individuals of different income levels after consideration of supplementary access provided by branches located in close proximity to LMI areas and alternative delivery systems. The percentages of the bank's branches in LMI geographies are below, and near to the percentages of the population residing in these areas. However, 10 branches located in middle- and upper-income geographies are in close proximity to LMI geographies. The adjacent 10 branches, along with the bank's use of telephone, online, and

mobile banking delivery systems, improved access by LMI individuals to retail banking services. Specifically, compared to 35 percent of the population residing in LMI geographies, 19 percent of the customers using telephone, online, and mobile banking delivery systems reside in LMI geographies. Branch openings have improved the accessibility of the bank's delivery systems in LMI geographies. The bank closed 18 branches in the AA and had a net opening of one new branch in a low-income geography. Hours and services are tailored to the convenience and needs of the people living in the MD, including Saturday and weeknight later hours.

Retail banking services and delivery systems in the Fort Worth-Arlington MD are accessible to essentially all geographies and individuals of different income levels after consideration of supplementary access provided by branches located in a close proximity and alternative delivery systems. The bank has no branches in low-income geographies. The percentage of branches in moderate-income geographies exceeds the demographic comparison. The bank has one branch located in a middle-income geography that is in close proximity to a low-income geography and one branch in an upper-income geography that is in close proximity to a moderate-income geography. The branches adjacent to the low- and moderate-income geographies, along with the bank's use of telephone, online, and mobile banking delivery systems, improved access by LMI individuals to retail banking services. Specifically, compared to 30 percent of the population residing in LMI geographies, 15 percent of the customers using telephone, online, and mobile banking delivery systems reside in LMI geographies. Branch openings and closings have generally not adversely affected the accessibility of the bank's delivery systems in LMI geographies. The bank closed a net of one branch in a moderate-income geography. Despite the closing, the percentage of branches located in these areas exceeded the demographic comparison. Hours and services do not vary in a way that inconvenience individuals residing in the assessment area.

Retail banking services and delivery systems in the San Antonio-New Braunfels MSA are readily accessible to geographies and individuals of different income levels after consideration of supplementary access provided by branches located in a close proximity and alternative delivery systems. The percentage of the bank's branches in low-income geographies exceeds the percentage of the population residing in low-income geographies, whereas the percentage of the bank's branches in moderate-income geographies is near to the percentage of the population residing in these areas. However, 10 branches located in middle- and upper-income geographies are in close proximity to LMI geographies. The adjacent 10 branches, along with the bank's use of telephone, online, and mobile banking delivery systems, improved access by LMI individuals to retail banking services. Specifically, compared to 38 percent of the population residing in LMI geographies, 24 percent of the customers using telephone, online, and mobile banking delivery systems reside in LMI geographies. The bank closed a net of one branch in a moderate-income geography; however, accessibility of the bank's delivery systems in LMI geographies was not adversely impacted by the closure. Hours and services do not vary in a way that inconvenience individuals living in the MD.

Refer to Table 15 in the state of Texas section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

## **Community Development Services**

The bank provided an excellent level of community development services in the Dallas-Plano-Irving MSA, two of which were in leadership positions. Bank employees worked with 39 local community development organizations to provide 92 instances of community development services targeted to LMI individuals. Employee involvement included providing financial expertise to the organizations and providing workshops to persons of all ages for financial literacy and technical assistance geared toward small businesses. Additionally, bank involvement for the needs of the homeless and Hispanic community was provided through various community development services.

The bank provided an excellent level of community development services in the Fort Worth-Arlington MSA, three of which were in leadership roles. Bank employees worked with 28 local community development organizations to provide 65 services targeted to LMI individuals. Employee involvement included providing financial expertise to the organizations and providing workshops to persons of all ages for financial literacy, and assisting with various affordable housing issues including for the elderly. Four LMI individuals participated in the bank's homebuyer education workshops.

The bank provided an adequate level of community development services in the San Antonio-New Braunfels MSA, one of which was in a leadership role. Bank employees worked with ten local community development organizations to provide 62 services targeted to LMI individuals; however, the bulk of these services were not considered responsive to identified needs. Employee involvement primarily related to financial literacy for youth, but also included providing financial expertise to an organization that provides micro lending to small businesses. One moderate-income individual participated in the bank's homebuyer education workshop.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, Service Test performance in the Amarillo MSA, Brownsville-Harlingen MSA, Midland MSA, Odessa MSA, Sherman-Denison MSA, Tyler MSA, Wichita Falls MSA, and in the Texas non-MSA is excellent and is not inconsistent with the overall Outstanding performance in Texas. Performance in the Abilene MSA, Beaumont-Port Arthur MSA, College Station-Bryan MSA, Corpus Christi MSA, El Paso MSA, Houston-Sugar Land-Baytown MSA, Laredo MSA, Longview MSA, Lubbock MSA, McAllen-Edinburg-Mission MSA, San Angelo MSA, Victoria MSA, and Waco MSA is good and weaker than the overall Outstanding performance in the state. Performance in the Austin-Round Rock-San Marcos MSA and Killeen-Temple-Fort Hood MSA is adequate and weaker than the overall Outstanding performance in the state. Weaker performance is due to less accessible retail delivery systems for individuals residing in LMI geographies.

Refer to Table 15 in the state of Texas section of Appendix D for the facts and data that support these conclusions.

## Other Rating Areas

- Allentown-Bethlehem-Easton (PA-NJ) Multistate MSA
- Augusta-Richmond County (GA-SC) Multistate MSA
- Kansas City (MO-KS) Multistate MSA
- Kingsport-Bristol-Bristol (TN-VA) Multistate MSA
- Philadelphia-Camden-Wilmington (PA-NJ-DE) MSA
- Portland-Vancouver-Hillsboro (OR-WA) Multistate MSA
- Providence-New Bedford-Fall River (RI-MA) Multistate MSA
- South Bend-Mishawaka (IN-MI) MSA
- St. Louis (MO-IL) Multistate MSA
- Washington-Arlington-Alexandria (DC-VA-MD) Multistate MSA
- State of Arizona
- State of Arkansas
- State of Colorado
- State of Connecticut
- State of Delaware
- State of Georgia
- State of Idaho
- State of Illinois
- State of Indiana
- State of Iowa
- State of Kansas
- State of Maine
- State of Maryland
- State of Massachusetts
- State of Michigan
- State of Minnesota
- State of Missouri
- State of Nevada
- State of New Hampshire
- State of New Jersey
- State of New Mexico
- State of New York
- State of North Carolina
- State of Ohio
- State of Oklahoma
- State of Oregon
- State of Pennsylvania
- State of South Carolina
- State of Tennessee
- State of Virginia
- State of Washington

## Allentown-Bethlehem-Easton (PA-NJ) Multistate MSA Rating

CRA rating for the multistate MSA <sup>7</sup>: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of the multistate MSA;
- Good distributions of loans by geography and borrower income;
- Investment volume that reflects an excellent level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in Allentown-Bethlehem-Easton (PA-NJ) multistate MSA

BANA is the 5<sup>th</sup> largest banking financial institution in the Allentown-Bethlehem-Easton multistate MSA. As of June 30, 2011, the bank held 5.3 percent of the multistate MSA's deposits totaling \$773 million. The bank's primary banking competitors, with more than 5 percent of the deposit market share, in the multistate MSA include Wells Fargo Bank, N.A., National Penn Bank, PNC Bank, N.A., and Lafayette Ambassador Bank, with deposit market shares of 24.3 percent, 11.1 percent, 10.9 percent, and 7.4 percent, respectively. Of the bank's 47 rating areas, the Allentown-Bethlehem-Easton multistate MSA ranks 40<sup>th</sup> and accounts for 0.08 percent of the bank's total deposits. As of December 31, 2011, BANA operated 21 branches and 26 full-service ATMs in the multistate MSA. The Allentown-Bethlehem-Easton MSA is the sole assessment area within the multistate MSA.

### LENDING TEST

Lending Test performance in the Allentown-Bethlehem-Easton multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Allentown-Bethlehem-Easton MSA is good.

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<sup>7</sup> This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate MSA.

Lending performance is characterized by excellent home mortgage lending and good small business lending activity, good geographic distribution, and good distribution of loans by borrower income. The geographic distribution is excellent for home purchase and home improvement loans and adequate for home refinance loans. The borrower income distribution is excellent for home purchase loans and good for home improvement and home refinance loans. The geographic distribution of small loans to businesses is adequate and the distribution of small loans to businesses with revenues of \$1 million or less is good. The bank did not originate or purchase any community development loans in the MSA during the evaluation period, which had a neutral impact on lending performance in the MSA.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the Allentown-Bethlehem-Easton multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Allentown-Bethlehem-Easton MSA is excellent.

During the evaluation period, the bank made 40 investments in the assessment area totaling \$4.9 million. These current period investments represent approximately 5.0 percent of the bank's Tier One Capital allocated to the assessment area, based on the percent of the bank's total deposits. As of April 1, 2009, prior period investments that are still outstanding totaled \$2.8 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest type of investment during the evaluation period, totaling \$4.0 million, was Mortgage Backed Securities that are secured by mortgages to LMI borrowers. The bank also provided \$600 thousand in funding to one CDFI. These investments helped provide financing for 24 units of affordable housing for LMI individuals and create 287 jobs for LMI individuals or in LMI geographies. In addition, the bank made 22 grants and donations totaling \$287 thousand to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

## **SERVICE TEST**

Service Test performance in the Allentown-Bethlehem-Easton multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Allentown-Bethlehem-Easton MSA is excellent.

The distribution of branches in LMI geographies is excellent. Despite closing seven offices including one branch in a moderate-income geography, the bank maintained an excellent branch distribution. Branch hours and services do not vary in a way that inconveniences LMI individuals or individuals residing in LMI geographies. The bank provided a good level of community development services through its work with 17 local organizations that provide needed services to LMI individuals.

Refer to Tables 1-15 in the Allentown-Bethlehem-Easton multistate MSA section of Appendix D for the facts and data that support all Test conclusions.

## Augusta-Richmond County (GA-SC) Multistate MSA Rating

CRA rating for the multistate MSA <sup>8</sup>: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of the multistate MSA;
- Poor distribution of loans by geography and good distribution by borrower income;
- Investment volume that reflects an excellent level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in Augusta-Richmond County (GA-SC) multistate MSA

BANA is the 3<sup>rd</sup> largest banking financial institution in the Augusta-Richmond County multistate MSA. As of June 30, 2011, the bank held 8.5 percent of the multistate MSA's deposits totaling \$617 million. The bank's primary banking competitors in the multistate MSA include Wells Fargo Bank, N.A., Georgia Bank & Trust Company of Augusta, Security Federal Bank, Regions Bank, SunTrust Bank, First Citizens Bank and Trust Company, and First Bank of Georgia, with deposit market shares of 21.2 percent, 17.2 percent, 8.3 percent, 7.9 percent, 7.6 percent, 6.4 percent, and 5.8 percent, respectively. Of the bank's 47 rating areas, the Augusta-Richmond County multistate MSA ranks 41<sup>st</sup> and accounts for 0.07 percent of the bank's total deposits. As of December 31, 2011, BANA operated 10 branches and 21 full-service ATMs in the multistate MSA. The Augusta-Richmond County MSA is the sole assessment area within the multistate MSA.

### LENDING TEST

Lending Test performance in the Augusta-Richmond County multistate MSA is rated Low Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Augusta-Richmond County MSA is adequate.

<sup>8</sup> This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate MSA.

Lending performance is characterized by excellent home mortgage and small business lending activity, poor geographic distribution, and good distribution of loans by borrower income. The overall geographic distribution of home mortgage loans is poor and the distribution of home mortgage loans by borrower income is good. The geographic distribution is poor for home purchase, home improvement, and home refinance loans. The borrower income distribution is good for home purchase and home refinance loans, and adequate for home improvement loans. The geographic distribution of small loans to businesses is adequate and the distribution of small loans to businesses with revenues of \$1 million or less is good. The bank did not originate or purchase any community development loans in the MSA during the evaluation period, which had a neutral impact on lending performance in the MSA.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the Augusta-Richmond County multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Augusta-Richmond County MSA is excellent.

During the evaluation period, the bank made 59 investments in the assessment area totaling \$3.6 million. These current period investments represent approximately 4.6 percent of the bank's Tier One Capital allocated to the assessment area, based on the percentage of the bank's total deposits in the area. As of April 1, 2009, prior period investments that are still outstanding totaled \$1.3 million. These prior period investments continue to provide benefit and meet the needs of the AA. Current period investments comprise almost solely of \$3.3 million in Mortgage Backed Securities that are secured by mortgages to LMI borrowers. The Mortgage Backed Securities helped provide financing for 23 units of affordable housing for LMI individuals. In addition, the bank made 43 grants and donations totaling \$288 thousand to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

## **SERVICE TEST**

Service Test performance in the Augusta-Richmond County multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Service Test performance in the Augusta-Richmond County MSA is good.

The bank has a somewhat limited presence in the MSA with only ten branches. While the bank is accessible to all geographies and to people of all income levels, the bank has an excellent presence in low-income communities. While the bank has no branches in moderate-income geographies, it has ATMs in those geographies. The bank has 20 percent of its branches located in low-income geographies where slightly more than 6 percent of the population resides. The bank also has three branches in middle- and upper-income geographies that are in close proximity to moderate-income geographies. These adjacent branches coupled with its ATM network, telephone, online, and mobile banking systems improved access to retail banking services for LMI individuals. Branch hours and services do not vary in a way that inconveniences LMI individuals. Bank employees provided a high level

of community development services through work with nine local organizations. The bank also sponsored 37 homebuyer education workshops during the evaluation period.

Refer to Tables 1-15 in the Augusta-Richmond County multistate MSA section of Appendix D for the facts and data that support all Test conclusions.

## Kansas City (MO-KS) Multistate MSA Rating

CRA rating for the multistate MSA <sup>9</sup>: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of the multistate MSA;
- Poor distribution of loans by geography and excellent distribution by borrower income;
- Investment volume that reflects an excellent level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in Kansas City (MO-KS) multistate MSA

BANA is the 3<sup>rd</sup> largest banking financial institution in the Kansas City multistate MSA. As of June 30, 2011, the bank held 10.4 percent of the multistate MSA's deposits totaling \$4.6 billion. The bank's primary banking competitors in the multistate MSA with more than 5 percent deposit market share include UMB Bank, N.A., Commerce Bank, and U.S. Bank, N.A., with deposit market shares of 13.4 percent, 12.5 percent, and 5.7 percent, respectively. Of the bank's 47 rating areas, the Kansas City multistate MSA ranks 25<sup>th</sup> and accounts for 0.48 percent of the bank's total deposits. As of December 31, 2011, BANA operated 50 branches and 84 full-service ATMs in the multistate MSA. The Kansas City MSA is the sole assessment area within the multistate MSA.

### LENDING TEST

Lending Test performance in the Kansas City multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Kansas City MSA is good.

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<sup>9</sup> This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate MSA.

Lending performance is characterized by an excellent level of home mortgage, small business, and small farm lending activity, poor geographic distribution, and excellent distribution of loans by borrower income. The geographic distribution of home mortgage loans is adequate and the distribution of home mortgage loans by borrower income is excellent. The geographic distribution is adequate for home purchase and home improvement loans and poor for home refinance loans. The borrower income distribution is excellent for home purchase, home improvement, and home refinance loans. The geographic distribution is good for small loans to businesses and good for small loans to farms. The distributions of small loans to businesses and farms with revenues of \$1 million or less is good. The bank's \$22 million in community development lending had a neutral impact on lending performance in the multistate MSA. BANA also issued two letters of credit totaling \$7.2 million that have a community development purpose.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the Kansas City multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Kansas City MSA is excellent.

During the evaluation period, the bank made 129 investments in the assessment area totaling \$42.6 million. These current period investments represent approximately 7.4 percent of the bank's Tier One Capital allocated to the assessment area, based on the percentage of the bank's total deposits in the area. As of April 1, 2009, prior period investments that are still outstanding totaled \$31.3 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments during the evaluation period comprised \$21.6 million in Mortgage Backed Securities and a \$17.9 million Qualified School Construction Bond for the construction and rehabilitation of various facilities within the Kansas City School District. The bank also invested \$655 thousand in affordable housing developments and \$363 thousand to a CDFI. These investments helped provide financing for 535 units of affordable housing for LMI individuals. In addition, the bank made 81 grants and donations totaling \$2.1 million to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

## **SERVICE TEST**

Service Test performance in the Kansas City multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Kansas City MSA is excellent.

The bank's service delivery systems are readily accessible to geographies and individuals of different income levels. In the Kansas City multistate MSA, the branch distribution is excellent. The bank has one branch in an upper-income geography that is in close proximity to low-income geographies. This additional branch improved access to retail banking services for LMI persons. The bank did not open any branches, but closed five including a closure of one branch in a moderate-income geography. Despite the closings, the distribution of branches remained excellent. Banking hours and services are tailored to the convenience and needs of the individuals residing in the multistate MSA. The bank provided a good level of community development services through its work with 16 local community development organizations.

Refer to Tables 1-15 in the Kansas City multistate MSA section of Appendix D for the facts and data that support all Test conclusions.

## Kingsport-Bristol-Bristol (TN-VA) Multistate MSA Rating

CRA rating for the multistate MSA <sup>10</sup>: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of the multistate MSA;
- Adequate geographic and good borrower distributions of loans;
- Investment volume that reflects an excellent level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in Kingsport-Bristol-Bristol (TN-VA) multistate MSA

BANA is the 11<sup>th</sup> largest banking financial institution in the Kingsport-Bristol-Bristol multistate MSA. As of June 30, 2011, the bank held 3.5 percent of the multistate MSA's deposits totaling \$156 million. The bank's primary banking competitors in the multistate MSA with more than 5 percent deposit market share include Regions Bank, Highlands Union Bank, The First Bank and Trust Company, First Tennessee Bank, N.A., Branch Banking and Trust Company, Wells Fargo Bank, N.A., and Bank of Tennessee, with deposit market shares of 10.9 percent, 10.1 percent, 9.8 percent, 9.6 percent, 9.4 percent, 7.5 percent, and 6.0 percent, respectively. Of the bank's 47 rating areas, the Kingsport-Bristol-Bristol multistate MSA ranks 43<sup>rd</sup> and accounts for 0.02 percent of the bank's total deposits. As of December 31, 2011, BANA operated five branches and six full-service ATMs in the multistate MSA. The Kingsport-Bristol-Bristol MSA is the sole assessment area within the multistate MSA.

### LENDING TEST

Lending Test performance in the Kingsport-Bristol-Bristol multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Kingsport-Bristol-Bristol MSA is good.

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<sup>10</sup> This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate MSA.

Lending performance is characterized by an excellent level of home mortgage and small business lending activity and adequate geographic and good borrower income distributions of loans. The geographic distribution of home mortgage loans is adequate and the distribution of home mortgage loans by borrower income is good. The geographic distribution is good for home purchase and home improvement loans and adequate for home refinance loans. The borrower income distribution is excellent for home purchase loans and good for home improvement and home refinance loans. The geographic distribution of small loans to businesses is good and the distribution of small loans to businesses with revenues of \$1 million or less is adequate. The bank did not originate or purchase any community development loans in the MSA during the evaluation period, which had a neutral impact on lending performance in the multistate MSA.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the Kingsport-Bristol-Bristol multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Kingsport-Bristol-Bristol MSA is excellent.

During the evaluation period, the bank made 20 investments in the assessment area totaling \$1.1 million. These current period investments represent approximately 6.2 percent of the bank's Tier One Capital allocated to the assessment area, based on the percentage of the bank's total deposits in the area. As of April 1, 2009, prior period investments that are still outstanding totaled \$617 thousand. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments during the evaluation period comprised \$560 thousand in Mortgage Backed Securities and \$460 thousand to a CDFI. These investments helped provide financing for five units of affordable housing for LMI individuals. In addition, the bank made 14 grants and donations totaling \$65 thousand to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

## **SERVICE TEST**

Service Test performance in the Kingsport-Bristol-Bristol multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Kingsport-Bristol-Bristol MSA is excellent.

BANA's presence in the MSA is limited with only five offices. The bank's service delivery systems are readily accessible to LMI individuals and those residing in moderate-income geographies. The assessment area has no low-income geographies. Of the bank's five branches in the assessment area, one is located in moderate-income geography. This branch, opened during the evaluation period, improved the accessibility of branches for LMI individuals. The bank closed one office in a middle-income census tract. Hours and services are tailored to the convenience and needs of the individuals residing in the assessment area. The bank provides a high level of community development services through its work with 13 local community development organizations.

Refer to Tables 1-15 in the Kingsport-Bristol-Bristol multistate MSA section of Appendix D for the facts and data that support all Test conclusions.

## Philadelphia-Camden-Wilmington (PA-NJ-DE) Multistate MSA Rating

CRA rating for the multistate MSA <sup>11</sup>: Satisfactory

The Lending Test is rated: High Satisfactory  
 The Investment Test is rated: Outstanding  
 The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of the assessment areas within the multistate MSA;
- Adequate distribution of loans by geography and excellent distribution by borrower income;
- Investment volume that reflects an excellent level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in Philadelphia-Camden-Wilmington (PA-NJ-DE)

BANA is the 9<sup>th</sup> largest banking financial institution in the Philadelphia-Camden-Wilmington multistate MSA. As of June 30, 2011, the bank held 2 percent of the multistate MSA's deposits totaling \$8.5 billion. The bank's primary banking competitors in the multistate MSA with more than 5 percent deposit market share include FIA Card Services, N.A. (BANA's credit card affiliate), ING Bank, F.S.B., TD Bank, N.A., Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A., with deposit market shares of 21.9 percent, 19.7 percent, 14.3 percent, 7.5 percent, and 6.1 percent, respectively. The multistate MSA is a new rating area for BANA as a result of regulatory reclassification of certain multistate MSAs in 2010. Of the bank's 47 rating areas, the Philadelphia-Camden-Wilmington multistate MSA ranks 20<sup>th</sup> and accounts for 0.89 percent of the bank's total deposits. As of December 31, 2011, BANA operated 98 branches and 156 full-service ATMs in the multistate MSA. The Philadelphia MD, which was selected for a full-scope review, comprises 85.5 percent of the bank's deposits and 58.9 percent of the bank's lending in the multistate MSA.

### LENDING TEST

<sup>11</sup> This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate MSA.

Lending Test performance in the Philadelphia-Camden-Wilmington multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Philadelphia MD is good.

Lending performance is characterized by an excellent level of home mortgage, small business, and small farm lending activity, adequate geographic distribution, and excellent distribution by borrower income. The geographic distribution of home mortgage loans is adequate and the distribution by borrower income is excellent. The geographic distribution is good for home purchase and home improvement loans and adequate for home refinance loans. The distribution by borrower income is excellent for home purchase, home improvement, and home refinance loans. The geographic distributions for small loans to businesses and farms are poor. The distributions of small loans to businesses and farms with revenues of \$1 million or less are good. The bank's \$5 million in community development lending had a neutral impact on lending performance in the Philadelphia MD.

Based on limited-scope reviews, Lending Test performance in the Camden MD and Wilmington MD is excellent and is stronger than the bank's overall High Satisfactory lending performance in the multistate MSA. Stronger performance is due to better geographic distribution of small business lending. Performance in limited-scope assessment areas did not affect the Lending Test rating.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the Philadelphia-Camden-Wilmington multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Philadelphia MD is excellent.

During the evaluation period, the bank made 173 investments in the assessment area totaling \$40.4 million. These current period investments represent approximately 5.5 percent of the bank's Tier One Capital allocated to the assessment area, based on the percentage of the bank's total deposits in the area. In arriving at this conclusion, we considered the impact from approximately \$2.1 billion in deposits in the Philadelphia MD area that are actually national deposits of companies located in other parts of the country. As of April 1, 2009, prior period investments that are still outstanding totaled \$37.5 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments during the evaluation period comprised \$19.5 million in Mortgage Backed Securities, \$11.9 million in Low Income Housing Tax Credits, and \$5.1 million in a CDFI. These investments helped provide financing for 165 units of affordable housing for LMI individuals. In addition, the bank made 131 grants and donations totaling \$3.9 million to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Camden and Wilmington MDs is not inconsistent with the bank's overall Outstanding performance under the Investment Test in the Philadelphia-Camden-Wilmington multistate MSA.

## **SERVICE TEST**

Service Test performance in the Philadelphia-Camden-Wilmington multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Service Test performance in the Philadelphia MD is excellent.

The bank's service delivery systems are accessible to geographies and individuals of different income levels. The distribution of branches in LMI geographies is considered excellent. The bank has six branches in middle- and upper-income geographies that are in very close proximity to LMI geographies. These additional branches improve access to service delivery systems for low- and moderate-income individuals and those residing in LMI geographies. The bank opened six offices while closing 22 branches during the evaluation period. This included a net closure of three branches in moderate-income geographies in the MSA. The record of opening and closing offices has generally not affected access. Branch hours and services do not vary in a way that inconvenience LMI individuals or those residing in LMI geographies. The use of telephone and electronic banking systems improved access by LMI individuals. Compared to 33 percent of the population that resides in LMI geographies, 28 percent of the customers that use alternative delivery systems also reside in LMI geographies.

The bank provided a high level of community development services through its work with 45 local community development organizations. These services have been responsive to the needs of the community.

Based on limited-scope reviews, the bank's performance under the Service Test in the Camden MD is not inconsistent with the bank's overall Outstanding performance under the Service Test in the Philadelphia-Camden-Wilmington multistate MSA. In the Wilmington MD, the bank's performance is weaker than its overall Service Test performance in the multistate MSA. Weaker performance is due to less accessible retail delivery systems for individuals residing in LMI geographies.

Refer to Tables 1-15 in the Philadelphia-Camden-Wilmington multistate MSA section of Appendix D for the facts and data that support all Test conclusions.

## Portland-Vancouver-Hillsboro (OR-WA) Multistate MSA Rating

CRA rating for the multistate MSA <sup>12</sup>: Outstanding

The Lending Test is rated: Outstanding  
 The Investment Test is rated: High Satisfactory  
 The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to the credit needs of the multistate MSA;
- Excellent distributions of loans by geography and borrower income;
- Investment volume that reflects a good level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in Portland-Vancouver-Hillsboro (OR-WA) multistate MSA

BANA is the largest banking financial institution in the Portland-Vancouver-Hillsboro multistate MSA. As of June 30, 2011, the bank held 21.1 percent of the multistate MSA's deposits totaling \$8.6 billion. The bank's primary banking competitors in the multistate MSA with more than 5 percent deposit market share include U.S. Bank, N.A., Wells Fargo Bank, N.A., Bank of America Oregon, N.A. (BANA affiliate), JPMorgan Chase Bank, N.A., and KeyBank, N.A., with deposit market shares of 18.8 percent, 15.4 percent, 8.7 percent, 7.7 percent, and 6.2 percent, respectively. Of the bank's 47 rating areas, the Portland-Vancouver-Hillsboro multistate MSA ranks 18<sup>th</sup> and accounts for 0.19 percent of the bank's total deposits. As of December 31, 2011, BANA operated 61 branches and 118 full-service ATMs in the multistate MSA. The Portland-Vancouver-Hillsboro MSA is the sole assessment area within the multistate MSA.

### LENDING TEST

Lending Test performance in the Portland-Vancouver-Hillsboro multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Lending Test performance in the Portland-Vancouver-Hillsboro MSA is excellent.

<sup>12</sup> This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate MSA.

Lending performance is characterized by a good level of home mortgage, small business, and small farm lending activity and excellent distributions of loans by geography and borrower income. The geographic distribution of home mortgage loans is excellent and the distribution by borrower income is excellent. The geographic distribution is excellent for home purchase, home improvement, and home refinance loans. The distribution by borrower income is excellent for home purchase and home refinance loans and good for home improvement loans. The geographic distribution is excellent for small loans to businesses and is adequate for small loans to farms. The distributions of small loans to businesses and farms with revenues of \$1 million or less are good. The bank's \$34 million in community development lending had a neutral impact on lending performance in the multistate MSA.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the Portland-Vancouver-Hillsboro multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Investment Test performance in the Portland-Vancouver-Hillsboro MSA is good.

During the evaluation period, the bank made 86 investments in the assessment area totaling \$42.7 million. These current period investments represent approximately 3.95 percent of the bank's Tier One Capital allocated to the assessment area, based on the percentage of the bank's total deposits in the area. In arriving at this conclusion, we considered that approximately \$264 million in deposits in the Portland-Vancouver-Hillsboro MSA are national deposits of companies located in other parts of the country. As of April 1, 2009, prior period investments that are still outstanding totaled \$15 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments during the evaluation period comprised \$26.8 million in Low Income Housing Tax Credits and \$9.5 million in Mortgage Backed Securities. These investments helped provide financing for 228 units of affordable housing for LMI individuals and 228 jobs for LMI individuals or in LMI geographies. In addition, the bank made 67 grants and donations totaling \$1.9 million to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

## **SERVICE TEST**

The Service Test performance in the Portland-Vancouver-Hillsboro multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Portland-Vancouver-Hillsboro MSA is excellent.

Branches are readily accessible to individuals and geographies of different income levels, particularly LMI. The distribution of branches is excellent. The percentages of branches in LMI geographies significantly exceed the percentages of the population residing in those geographies. The bank's record of opening and closing offices did not affect access. The bank did not open any branches. While the bank did close four offices, none were in LMI geographies. Branch hours and services are tailored to the convenience and needs of the people residing in the assessment area. The bank provided a high level of community development services through its work with 36 local community development organizations. It participated in a leadership role with five of the organizations.

Refer to Tables 1-15 in the Portland-Vancouver-Hillsboro multistate MSA section of Appendix D for the facts and data that support all Test conclusions.

## Providence-New Bedford-Fall River (RI-MA) Multistate MSA Rating

CRA rating for the multistate MSA <sup>13</sup>: Outstanding

The Lending Test is rated: Outstanding  
 The Investment Test is rated: Outstanding  
 The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to the credit needs of the multistate MSA;
- Good distributions of loans by geography and borrower income;
- Community development lending activities that had a significantly positive impact on lending performance in the multistate MSA;
- Investment volume that reflects an excellent level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in Providence-New Bedford-Fall River (RI-MA) multistate MSA

BANA is the 3<sup>rd</sup> largest banking financial institution in the Providence-New Bedford-Fall River multistate MSA. As of June 30, 2011, the bank held 15 percent of the multistate MSA's deposits totaling \$7.8 billion. The bank's primary banking competitors in the multistate MSA with more than 5 percent deposit market share include Bank of America Rhode Island, N.A. (BANA affiliate), Metlife Bank, N.A., and Sovereign Bank, with deposit market shares of 27.7 percent, 20.7 percent, 7.9 percent, and 6.2 percent, respectively. Of the bank's 47 rating areas, the Providence-New Bedford-Fall River multistate MSA ranks 22<sup>nd</sup> and accounts for 0.82 percent of the bank's total deposits. As of December 31, 2011, BANA operated 62 branches and 152 full-service ATMs in the multistate MSA. The Providence-New Bedford-Fall River MSA is the sole assessment area within the multistate MSA.

### LENDING TEST

<sup>13</sup> This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate MSA.

Lending Test performance in the Providence-New Bedford-Fall River multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Lending Test performance in the Providence-New Bedford-Fall River MSA is excellent.

Lending performance is characterized by a good level of home mortgage, small business, and small farm lending activity and good distributions of loans by geography and borrower income. The geographic and borrower income distributions of home mortgage loans are good. The geographic distribution is excellent for home purchase and home improvement loans and good for home refinance loans. The distribution by borrower income is good for home purchase, home improvement, and home refinance loans. The geographic distribution is good for small loans to businesses and adequate for small loans to farms. The borrower income distribution is adequate for both small loans to businesses and farms with revenues of \$1 million and less. The bank's \$141 million in community development lending had a significantly positive impact on lending performance in the multistate MSA. BANA also issued two letters of credit totaling \$6.6 million that have a community development purpose.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the Providence-New Bedford-Fall River multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Providence-New Bedford-Fall River MSA is excellent.

During the evaluation period, the bank made 145 investments in the assessment area totaling \$66.6 million. These current period investments represent approximately 6.73 percent of the bank's Tier One Capital allocated to the assessment area, based on the percentage of the bank's total deposits in the area. As of April 1, 2009, prior period investments that are still outstanding totaled \$31.2 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments during the evaluation period comprised \$48.7 million in Low Income Housing Tax Credits and affordable housing developments, \$8 million in CDFIs, and \$5.6 million in Mortgage Backed Securities. These investments helped provide financing for 274 units of affordable housing for LMI individuals. In addition, the bank made 121 grants and donations totaling \$4.2 million to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

## **SERVICE TEST**

Service Test performance in the Providence-New Bedford-Fall River multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Providence-New Bedford-Fall River MSA is excellent.

Branches are readily accessible to individuals and geographies of different income levels. The distribution of branches in LMI geographies is excellent. The percentages of branches in LMI geographies exceed the percentages of the population residing in those geographies. The bank closed a total of 14 offices including two branches in moderate-income geographies during the evaluation period. Despite the closures, the branch distribution remained excellent. Branch hours and services are tailored to the convenience and needs of the people residing in the assessment area. The bank provided a high level of community development services

through its work with 26 local community development organizations. It participated in a leadership role with at least one of the organizations. The services were consistently responsive to the needs identified in the community.

Refer to Tables 1-15 in the Providence-New Bedford-Fall River multistate MSA section of Appendix D for the facts and data that support all Test conclusions.

## South Bend-Mishawaka (IN-MI) Multistate MSA Rating

CRA rating for the multistate MSA <sup>14</sup>: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels that reflect adequate responsiveness to the credit needs of the multistate MSA;
- Poor distribution of loans by geography and excellent distribution by borrower income;
- Investment volume that reflects an excellent level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in South Bend-Mishawaka (IN-MI) multistate MSA

BANA is the 2<sup>nd</sup> largest banking financial institution in the South Bend-Mishawaka multistate MSA. As of June 30, 2011, the bank held 19.6 percent of the multistate MSA's deposits totaling \$964 million. The bank's primary banking competitors in the multistate MSA with more than 5 percent deposit market share include 1<sup>st</sup> Source Bank, KeyBank, N.A., Wells Fargo Bank, N.A., PNC Bank, N.A., and MutualBank, with deposit market shares of 32.4 percent, 11.2 percent, 10.6 percent, 6.3 percent, and 6 percent, respectively. Of the bank's 47 rating areas, the South Bend-Mishawaka multistate MSA ranks 39<sup>th</sup> and accounts for 0.10 percent of the bank's total deposits. As of December 31, 2011, BANA operated five branches and five full-service ATMs in the multistate MSA. The South Bend-Mishawaka MSA is the sole assessment area within the multistate MSA.

### LENDING TEST

Lending Test performance in the South Bend-Mishawaka multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the South Bend-Mishawaka MSA is good.

<sup>14</sup> This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate MSA.

Lending performance is characterized by an adequate level of home mortgage, small business, poor distribution of loans by geography, and excellent distribution of loans by borrower income. The geographic distribution of home mortgage loans is poor. The geographic distribution is adequate for home purchase loans, good for home improvement loans, and poor for home refinance loans. The distribution of home loans by borrower income is excellent. The distribution is excellent for home purchase loans, good for home improvement loans, and excellent for home refinance loans. The geographic and borrower income distributions for small loans to businesses are good. The bank did not originate or purchase any community development loans in the MSA during the evaluation period, which had a neutral impact on lending performance in the multistate MSA.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the South Bend-Mishawaka multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the South Bend-Mishawaka MSA is excellent.

During the evaluation period, the bank made 25 investments in the assessment area totaling \$10.1 million. These current period investments represent approximately 8.31 percent of the bank's Tier One Capital allocated to the assessment area, based on the percentage of the bank's total deposits in the area. As of April 1, 2009, prior period investments that are still outstanding totaled \$174 thousand. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments during the evaluation period comprised \$7.4 million in Low Income Housing Tax Credits and \$2.7 million in Mortgage Backed Securities. These investments helped provide financing for 97 units of affordable housing for LMI individuals. In addition, the bank made seven grants and donations totaling \$57 thousand to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

## **SERVICE TEST**

The Service Test performance in the South Bend-Mishawaka multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the South Bend-Mishawaka MSA is excellent.

Branches are readily accessible to individuals of different income levels and individuals residing in moderate-income geographies, especially considering the limited presence that it has in the MSA with only five offices. Although the bank has no branches in low-income geographies, less than two percent of the area's population resides in those geographies. The percentage of branches in moderate-income geographies exceeds the percentage of the population residing in moderate-income geographies and it is considered excellent. The use of telephone and electronic banking systems improved access by LMI individuals. Compared to 25 percent of the population that resides in LMI geographies, 20 percent of the customers that use alternative delivery systems also reside in LMI geographies

The bank closed one branch in a moderate-income geography during the evaluation period. Despite the net closure, the branch distribution remained excellent. Branch hours and services

are tailored to the convenience and needs of the people residing in the assessment area. Relative to the bank's limited presence in the assessment area, it provided a high level of community development services through its work with seven local community development organizations.

Refer to Tables 1-15 in the South Bend-Mishawaka multistate MSA section of Appendix D for the facts and data that support all Test conclusions.

## St. Louis (MO-IL) Multistate MSA Rating

**CRA rating for the multistate MSA**<sup>15</sup>: Satisfactory

**The Lending Test is rated:** High Satisfactory  
**The Investment Test is rated:** Outstanding  
**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of the multistate MSA;
- Poor distribution of loans by geography and excellent distribution by borrower income;
- Investment volume that reflects an excellent level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in St. Louis (MO-IL) multistate MSA

BANA is the 2<sup>nd</sup> largest banking financial institution in the St. Louis multistate MSA. As of June 30, 2011, the bank held 12.4 percent of the multistate MSA's deposits totaling \$8.9 billion. The bank's primary banking competitors in the multistate MSA with more than 5 percent deposit market share include U.S. Bank, N.A., Scottrade Bank, and Commerce Bank, with deposit market shares of 15.9 percent, 10.2 percent, and 6.7 percent, respectively. Of the bank's 47 rating areas, the St. Louis multistate MSA ranks 17<sup>th</sup> and accounts for 0.93 percent of the bank's total deposits. As of December 31, 2011, BANA operated 60 branches and 123 full-service ATMs in the multistate MSA. The St. Louis MSA is the sole assessment area within the multistate MSA.

### LENDING TEST

Lending Test performance in the St. Louis multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the St. Louis MSA is good.

Lending performance is characterized by an excellent level of home mortgage, small business, and small farm lending, poor distribution of loans by geography, and excellent distribution of loans by borrower income. The geographic distribution of home mortgage loans is poor. The

<sup>15</sup> This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate MSA.

distribution is adequate for home purchase and home improvement loans and poor for home refinance loans. The distribution of home mortgage loans by borrower income is excellent. The distribution is excellent for home purchase loans and good for home improvement and home refinance loans. The geographic distributions of small loans to businesses and farms are adequate. The distribution of small loans to businesses with revenues of \$1 million or less is good and the distribution of small loans to farms with revenues of \$1 million or less is poor. Farm lending volumes were nominal and thus carried very little weight in arriving at the overall Lending Test performance. The bank's \$22.7 million in community development lending had a neutral impact on lending performance in the multistate MSA. BANA also issued three letters of credit totaling \$25.7 million that have a community development purpose.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the St. Louis multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the St. Louis MSA is excellent.

During the evaluation period, the bank made 138 investments in the assessment area totaling \$51.4 million. These current period investments represent approximately 4.59 percent of the bank's Tier One Capital allocated to the assessment area, based on the percentage of the bank's total deposits in the area. As of April 1, 2009, prior period investments that are still outstanding totaled \$70 million. These prior period investments continue to provide benefit and meet the needs of the AA. When combined with current period investments, total investments represent more than 11 percent of the bank's Tier One Capital. The largest investments during the evaluation period comprised \$26.7 million in Low Income Housing Tax Credits and \$18.3 million in Mortgage Backed Securities. These investments helped provide financing for 534 units of affordable housing for LMI individuals. In addition, the bank made 80 grants and donations totaling \$3.4 million to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

## **SERVICE TEST**

Service Test performance in the St. Louis multistate MSA is rated Low Satisfactory. Based on a full-scope review, the bank's Service Test performance in the St. Louis MSA is adequate.

The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels. The overall distribution of branches is adequate. The distribution of branches is adequate in low- income geographies and excellent in moderate-income geographies. The use of telephone and electronic banking systems improved access by LMI individuals. Compared to 26 percent of the population that resides in LMI geographies, 17 percent of the customers that use alternative delivery systems also reside in LMI geographies. The record of opening and closing offices has not affected access to banking services. The bank opened one office and closed three, one of which was in a moderate-income census tract. Despite the net closure, the branch distribution in moderate-income geographies remained excellent. Branch hours and services do not vary in a way that inconveniences LMI individuals or those residing in LMI geographies. The bank provided a good level of

community development services through its work with 18 local community development organizations. It participated in a leadership role with two of the organizations.

Refer to Tables 1-15 in the St. Louis multistate MSA section of Appendix D for the facts and data that support all Test conclusions.

## Washington-Arlington-Alexandria (DC-VA-MD) Multistate MSA Rating

CRA rating for the multistate MSA <sup>16</sup>: Outstanding

The Lending Test is rated: High Satisfactory  
The Investment Test is rated: Outstanding  
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of the assessment areas within the multistate MSA;
- Good distributions of loans by geography and borrower income;
- Community development lending activities that had a positive impact on lending performance in the multistate MSA;
- Investment volume that reflects an excellent level of responsiveness to the needs in the multistate MSA;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

### Description of Institution's Operations in Washington-Arlington-Alexandria (DC-VA-MD) multistate MSA

BANA is the 4<sup>th</sup> largest banking financial institution in the Washington-Arlington-Alexandria multistate MSA. As of June 30, 2011, the bank held 11.3 percent of the multistate MSA's deposits totaling \$19.6 billion. The bank's primary banking competitors in the multistate MSA with more than 5 percent deposit market share include E\*TRADE Bank, Capital One, N.A., Wells Fargo Bank, N.A., SunTrust Bank, Branch Banking and Trust Company, and PNC Bank, N.A., with deposit market shares of 18.1 percent, 13.2 percent, 11.8 percent, 9.1 percent, 7.2 percent, and 5 percent, respectively. Of the bank's 47 rating areas, the Washington-Arlington-Alexandria multistate MSA ranks 11<sup>th</sup> and accounts for 2.07 percent of the bank's total deposits. As of December 31, 2011, BANA operated 175 branches and 379 full-service ATMs in the multistate MSA. The Washington-Arlington-Alexandria MD, which was selected for a full-scope review, comprises 74.1 percent of the bank's deposits and 77.8 percent of the bank's lending in the multistate MSA.

### LENDING TEST

<sup>16</sup> This rating reflects performance within the multistate MSA. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate MSA.

Lending Test performance in the Washington-Arlington-Alexandria multistate MSA is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Washington-Arlington-Alexandria MD is good.

Lending performance is characterized by an excellent level of home mortgage, small business, and small farm lending activity, good geographic distribution, and good distribution by borrower income. The geographic distribution is excellent for home purchase and home improvement loans and good for home refinance loans. The distribution by borrower income is good for home purchase, home improvement, and home refinance loans. The geographic distributions for small loans to businesses and farms are adequate and good, respectively. The distributions of small loans to businesses and farms with revenues of \$1 million or less are good and poor, respectively. Farm lending volumes were nominal and thus carried very little weight in arriving at the overall Lending Test performance. The bank's \$119 million in community development lending had a positive impact on lending performance in the Washington-Arlington-Alexandria MD. BANA also issued nine letters of credit totaling \$26.8 million that have a community development purpose.

Based on a limited-scope review, Lending Test performance in the Bethesda-Rockville-Frederick MD is excellent and is stronger than the bank's overall High Satisfactory lending performance in the multistate MSA. Performance is stronger due to stronger borrower distribution.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the Washington-Arlington-Alexandria multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Washington-Arlington-Alexandria MD is excellent.

During the evaluation period, the bank made 196 investments in the assessment area totaling \$91.4 million. These current period investments represent approximately 4.98 percent of the bank's Tier One Capital allocated to the assessment area, based on the percentage of the bank's total deposits in the area. As of April 1, 2009, prior period investments that are still outstanding totaled \$74.3 million. These prior period investments continue to provide benefit and meet the needs of the AA. Combined with current period investments, total investments represent more than 9 percent of the bank's Tier One Capital. The largest investments during the evaluation period comprised \$61.4 million in Mortgage Backed Securities, \$9.1 million in real estate developments, \$7.1 million in New Markets Tax Credits, and \$5.7 million in Low Income Housing Tax Credits. These investments helped provide financing for 471 units of affordable housing for LMI individuals. In addition, the bank made 146 grants and donations totaling \$4.6 million to a variety of local and regional organizations providing economic development, affordable housing, revitalization, and stabilization to LMI geographies, and services targeted to LMI individuals.

Based on a limited-scope review, the bank's performance under the Investment Test in the Bethesda-Rockville-Frederick MD is good and weaker than the overall performance in the multistate MSA. Weaker performance resulted from a lower amount of current period investments relative to the bank's operations in the assessment area. Performance in the

limited-scope assessment area did not negatively affect the Investment Test rating for Washington-Arlington-Alexandria multistate MSA.

## **SERVICE TEST**

Service Test performance in the Washington-Arlington-Alexandria multistate MSA is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in Washington-Arlington-Alexandria MD is excellent.

The bank's service delivery systems are readily accessible to geographies and individuals of different income levels. The distribution of branches in low-income geographies is excellent. The distribution of branches in moderate-income geographies is also excellent, considering an additional 15 branches in middle- and upper-income geographies that are in close proximity to moderate-income geographies. These additional branches improve access to service delivery systems for low- and moderate-income individuals and those residing in moderate-income geographies. The use of telephone and electronic banking systems improved access by LMI individuals. Compared to 29 percent of the population that resides in LMI geographies, 25 percent of the customers that use alternative delivery systems also reside in LMI geographies. The record of opening and closing offices has not affected access in the MD. The bank opened four branches. The bank closed nine offices including four branches in moderate-income geographies during the evaluation period. Despite the closures, the branch distribution in moderate-income geographies remained excellent, when also considering the additional branches that are in close proximity.

Branch hours and services do not vary in a way that inconveniences LMI individuals or those residing in LMI geographies. Relative to the bank's presence in the assessment area, it provided an adequate level of community development services through its work with 26 local community development organizations. However, these services have been highly responsive to the needs of the community. The bank participated in a leadership role with three of the community development organizations.

Based on a limited-scope review, the bank's performance in the Bethesda-Rockville-Frederick MD is not inconsistent with the bank's overall Outstanding performance under the Service Test in the multistate MSA.

Refer to Tables 1-15 in the Washington-Arlington-Alexandria multistate MSA section of Appendix D for the facts and data that support all Test conclusions.

## State of Arizona Rating

**CRA Rating for the State <sup>17</sup>:** Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to the credit needs of its AAs within the state;
- Adequate distribution of loans in different income geographies and good distribution of loans to borrowers of different income levels;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Arizona

BANA is the 3<sup>rd</sup> largest banking financial institution in the state of Arizona. As of June 30, 2011, the bank held 19.3 percent of the state's deposits totaling \$16.3 billion. The bank's primary banking competitors for deposits in Arizona include Wells Fargo Bank, N.A., and JPMorgan Chase Bank, N.A., with deposit market shares of 26.1 percent and 23.5 percent, respectively. Of the bank's 47 rating areas, the state of Arizona ranks 12<sup>th</sup> and accounts for 1.7 percent of the bank's total deposits. As of December 31, 2011, BANA operated 168 branches and 523 full-service ATMs in Arizona. The bank has defined seven assessment areas in Arizona. The Phoenix-Mesa-Glendale and Tucson MSAs, which were selected for full-scope reviews, together comprise 91.3 percent of the bank's deposits and 85.5 percent of the bank's lending in the state of Arizona.

## LENDING TEST

<sup>17</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Arizona is rated High Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Phoenix-Mesa-Glendale MSA and Tucson MSA is good.

Lending performance in the Phoenix-Mesa-Glendale MSA is highlighted by good lending activity, adequate geographic distribution of home mortgage loans, good geographic and borrower distributions of small business loans, good borrower distribution of home mortgage loans, and adequate distribution of small farm loans among geographies and borrowers of different income levels. The bank's community development lending had a neutral impact on performance in the MSA.

Performance in the Tucson MSA is good and is highlighted by good lending activity, adequate geographic distribution of home mortgage loans, good geographic and borrower distributions of small business loans, and good borrower distribution of home mortgage loans. The bank's community development lending had a neutral impact on performance in the MSA.

Based on limited-scope reviews, Lending Test performance in the Flagstaff, Prescott and Yuma MSAs and the Arizona Non-MSA is good and is not inconsistent with the overall High Satisfactory performance in the state. Performance in the Lake Havasu City-Kingman MSA is adequate and weaker than the overall performance in the state. The weaker performance is due to a less favorable geographic distribution of home mortgage loans. Performance in the limited-scope areas did not negatively affect the Lending Test rating for Arizona.

## **INVESTMENT TEST**

Investment Test performance in Arizona is rated Outstanding. Based on full-scope reviews, the bank's Investment Test performance in the Phoenix-Mesa-Glendale and Tucson MSAs is excellent.

In the Phoenix MSA, BANA funded 203 investments totaling \$95.7 million. As of December 31, 2011, prior period investments totaled \$86 million. Combined, these investments represent 11 percent of allocated Tier One Capital. Nearly \$64 million of investments consisted of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. The bank also invested in two LIHTC projects totaling \$12.9 million. Overall, the investments provided more than 600 affordable housing units for LMI families.

In the Tucson MSA, BANA funded 69 investments totaling \$9.1 million. As of December 31, 2011, prior period investment totaled \$3.5 million. The bank invested \$5.3 million in a LIHTC project that provided 60 units of affordable housing to LMI families. The bank also invested \$1.4 million in two CDFIs.

Based on limited-scope reviews, Investment Test performance in the Flagstaff, Prescott, and Yuma MSAs and the Arizona Non-MSA is excellent and is not inconsistent with the overall outstanding performance in Arizona. Performance in the Lake Havasu City-Kingman MSA is adequate and weaker than the bank's overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not negatively affect the Investment Test rating for Arizona.

## SERVICE TEST

Service Test performance in Arizona is rated Outstanding. Based on full-scope reviews, the bank's Service Test performance in the Phoenix-Mesa-Glendale and the Tucson MSAs is excellent.

The bank has excellent branch accessibility in LMI geographies and to LMI individuals in the Phoenix-Mesa-Glendale MSA. Fifteen additional branches located in close proximity to LMI geographies improved access by LMI individuals to retail banking services. The bank's use of telephone and electronic banking delivery systems further enhanced access by LMI individuals to retail banking services. Compared to 35 percent of the population that reside in LMI geographies, 22 percent of customers that use alternative delivery systems reside in LMI geographies. The bank opened a total of five branches including two branches in moderate-income geographies during the assessment period. The bank closed 10 offices, but that did not affect overall access to banking services. Hours and services are tailored to the needs of the assessment area, particularly LMI individuals. The bank provided an excellent level of community development services through its work with 38 organizations during the evaluation period, and almost all of the services provided were considered responsive to identified needs. In addition, the bank provided homebuyer education to 29 LMI individuals in partnership with non-profit organizations, which represents a high level of service.

The bank has excellent branch accessibility in LMI geographies and to LMI individuals in the Tucson MSA. Three additional branches located in close proximity to LMI geographies improved access by LMI individuals to retail banking services. The bank's use of telephone and electronic banking delivery systems further enhanced access by LMI individuals to retail banking services. Compared to 38 percent of the population that reside in LMI geographies, 26 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches in the MSA during the assessment period. Hours and services are tailored to the convenience and needs of the assessment area particularly LMI individuals. The bank provided an excellent level of community development services through its work with 18 organizations during the evaluation period. The vast majority of the services provided were considered responsive to identified needs.

Based on limited-scope reviews, Service Test performance in the Yuma MSA is excellent and is not inconsistent with the overall performance in the state. Performance in the Flagstaff, Lake Havasu City-Kingman, and Prescott MSAs is good and weaker than the overall performance in the state. Performance in the Arizona non-MSA AA is adequate and weaker than the overall performance in the state. Weaker performance is due to the less accessible retail delivery systems to LMI geographies. Performance in the limited-scope AAs did not negatively affect the overall Service Test performance in Arizona.

Refer to Tables 1-15 in the state of Arizona section of Appendix D for the facts and data that support all Test conclusions.

## State of Arkansas Rating

<b>CRA Rating for the State <sup>18</sup>:</b>	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>Low Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>Outstanding</u>

The major factors that support this rating include:

- Lending levels that reflect adequate responsiveness to the credit needs of its AAs within the state;
- Poor distribution of loans in different income geographies and good distribution of loans to borrowers of different income levels;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Arkansas

BANA is the 3<sup>rd</sup> largest banking financial institution in the state of Arkansas. As of June 30, 2011, the bank held 6.4 percent of the state's deposits totaling \$3.3 billion. The bank's primary banking competitors for deposits in Arkansas with deposit shares greater than 5 percent include Arvest Bank, Regions Bank, and First Security Bank, with deposit market shares of 10.7 percent, 8.2 percent, and 5.6 percent, respectively. Of the bank's 47 rating areas, the state of Arkansas ranks 31<sup>st</sup> and accounts for 0.35 percent of the bank's total deposits. As of December 31, 2011, BANA operated 41 branches and 46 full-service ATMs in Arkansas. The bank has defined six assessment areas in Arkansas. The Little Rock-North Little Rock-Conway MSA, which was selected for a full-scope review, comprises 77.3 percent of the bank's deposits and 59.5 percent of the bank's lending in the state of Arkansas.

## LENDING TEST

Lending test performance in Arkansas is rated Low Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Little Rock-North Little Rock-Conway MSA is adequate.

<sup>18</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending performance is highlighted by adequate lending activity, good borrower distribution of home mortgage and small business loans, adequate geographic distribution of small business loans, and poor geographic distribution of home mortgage loans. The bank did not originate any community development loans in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Hot Springs, Jonesboro, and Pine Bluff MSAs is adequate and is not inconsistent with the overall Low Satisfactory performance in the state. Performance in the Fayetteville-Springdale-Rogers MSA and the Arkansas Non-MSA is good and stronger than the overall performance in the state. Stronger performance was primarily due to more favorable geographic distribution of home mortgage loans.

## **INVESTMENT TEST**

Investment Test performance in Arkansas is rated Outstanding. Based on a full-scope review, the bank's Lending Test performance in the Little Rock-North Little Rock MSA is excellent.

BANA funded 106 investments in the MSA totaling \$22.6 million. As of December 31, 2011, prior period investments totaled \$6.9 million. Combined, total investments represent 9 percent of Tier One Capital. One third of the number of investments in the MSA consisted of affordable housing mortgage-backed securities that were targeted to LMI borrowers. The bank made an \$11.9 million investment in a LIHTC project that provided 52 units of housing affordable to LMI families. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Hot Springs MSA, Pine Bluff MSA, and Arkansas Non-MSA is excellent and not inconsistent with the overall Outstanding performance in Arkansas. Performance in the Fayetteville-Springdale-Rogers MSA is good and weaker than the overall performance in the state. Performance in the Jonesboro MSA is poor and weaker than the overall performance in state. The weaker performance was due to a lower level of qualified investments during the evaluation period. Performance in limited-scope AAs did not negatively affect the Investment Test rating for Arkansas.

## **SERVICE TEST**

Service Test performance in Arkansas is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Little Rock-North Little Rock-Conway MSA is excellent.

Branches are readily accessible to all geographies and individuals of all income levels. Despite closing three branches, including one branch in a moderate-income geography, branch accessibility remains excellent. Moreover, two additional branches in middle- and upper-income geographies that are located in close proximity to moderate-income geographies improved access by LMI individuals to retail banking services. Hours and services are tailored to the convenience and needs of the assessment area particularly LMI individuals. The bank provided a good level of community development services, all of which were considered

responsive to identified needs, through its work with seven organizations during the evaluation period. In addition, the bank provided homebuyer education to 69 LMI individuals in partnership with non-profit organizations, which represents a good level of service.

Based on limited-scope reviews, Service Test performance in the Fayetteville-Springdale-Rogers, Hot Springs, and the Pine Bluff MSAs is excellent and is not inconsistent with the performance in the state. Performance in Jonesboro MSA and the Arkansas Non-MSA AA is adequate and weaker than the overall performance in the state. Weaker performance is due to the less accessible retail delivery systems to LMI geographies. Performance in the limited-scope AAs did not negatively affect the overall Service Test performance in Arkansas.

Refer to Tables 1-15 in the state of Arkansas section of Appendix D for the facts and data that support all Test conclusions.

## State of Colorado Rating

<b>CRA Rating for the State <sup>19</sup>:</b>	<u>Outstanding</u>
<b>The Lending Test is rated:</b>	<u>Outstanding</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Good distribution of loans in different income geographies and excellent distribution of loans to borrowers of different income levels;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.
- Accessibility to retail banking and the provision of community development services show adequate responsiveness to community needs.

## Description of Institution's Operations in the State of Colorado

BANA is the 14<sup>th</sup> largest banking financial institution in the state of Colorado. As of June 30, 2011, the bank held 1.4 percent of the state's deposits totaling \$1.3 billion. Some of the other large banking financial institutions operating in the state include Wells Fargo Bank, N.A., FirstBank, JPMorgan Chase Bank, N.A., US Bank, N.A., Bank of the West, and KeyBank, N.A. The state of Colorado was added as a new rating area in 2009 that resulted from the merging of Countywide Bank, F.S.B. into BANA. Of the bank's 47 rating areas, the state of Colorado ranks 36<sup>th</sup> and accounts for 0.14 percent of the bank's total deposits. As of December 31, 2011, BANA operated one branch and three full-service ATMs in Colorado. The Denver-Aurora-Broomfield MSA is the bank's sole assessment area within the state of Colorado.

## LENDING TEST

<sup>19</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending test performance in Colorado is rated Outstanding. Based on a full-scope review, the bank's Lending Test performance in the Denver-Aurora-Broomfield MSA is excellent.

Lending performance is highlighted by excellent lending activity, excellent borrower distribution of home mortgage loans, excellent geographic distribution of small business loans, good geographic distribution of home mortgage loans, and good borrower distribution of small business loans. The bank's \$9.4 million in community development lending had a neutral impact on performance in the MSA.

## **INVESTMENT TEST**

Investment Test performance in Colorado is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Denver-Aurora-Bloomfield MSA is excellent. The level of corporate deposits in the assessment area was taken into consideration in forming our conclusion.

The bank funded 46 investments in the Denver-Aurora-Bloomfield MSA totaling \$3.2 million. As of December 31, 2011, prior period investments totaled \$19.7 million. Combined, these investments represent 14 percent of Tier One Capital allocated to the MSA. The largest investments in the MSA were two CDFI investments totaling \$2.1 million. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

## **SERVICE TEST**

Service Test performance in Colorado is rated Low Satisfactory. Based on a full-scope review, the bank's Service Test performance in the Denver-Aurora-Broomfield MSA is adequate.

The bank has a limited presence in the MSA with one branch located in an upper-income census tract. The bank's use of telephone and electronic banking delivery systems enhanced access by LMI individuals to retail banking services. Compared to 32 percent of the population that reside in LMI geographies, 19 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches in LMI geographies during the assessment period. Hours and services do not vary in a way that inconveniences LMI individuals within the assessment area. The bank provided an excellent level of community development services, in light of its limited presence, through its work with six organizations during the evaluation period. The services were considered highly responsive to identified needs.

Refer to Tables 1-15 in the state of Colorado section of Appendix D for the facts and data that support all Test conclusions.

## State of Connecticut Rating

**CRA Rating for the State <sup>20</sup>:** Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect adequate responsiveness to the credit needs of its AAs within the state;
- Good distribution of loans among both geographies and borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Connecticut

BANA is the largest banking financial institution in the state of Connecticut. As of June 30, 2011, the bank held 23.9 percent of the state's deposits totaling \$24.3 billion. The bank's primary banking competitors for deposits in Connecticut with deposit shares greater than 5 percent include Webster Bank, N.A., People's United Bank, Wells Fargo Bank, N.A., and TD Bank, N.A., with deposit market shares of 11.4 percent, 10.0 percent, 7.9 percent, and 5.4 percent, respectively. Of the bank's 47 rating areas, the state of Connecticut ranks 8<sup>th</sup> and accounts for 2.56 percent of the bank's total deposits. As of December 31, 2011, BANA operated 164 branches and 286 full-service ATMs in Connecticut. The bank has defined six assessment areas in Connecticut. The Bridgeport-Stamford-Norwalk and Hartford-West Hartford-East Hartford MSAs, which were selected for full-scope reviews, together comprise 88 percent of the bank's deposits and 68 percent of the bank's lending in the state of Connecticut. For purposes of this review, two assessment areas comprising two counties that are not MSAs or MDs have been combined under the Connecticut Non-MSA.

## LENDING TEST

<sup>20</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Connecticut is rated High Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Bridgeport-Stamford-Norwalk MSA and Hartford-West Hartford-East Hartford MSA is good.

In the Bridgeport-Stamford-Norwalk MSA, lending performance is highlighted by adequate lending activity, and good geographic and borrower distributions of home mortgage loans and small loans to businesses. The bank's \$3.3 million in community development lending had a neutral impact on performance in the MSA.

In the Hartford-West Hartford-East Hartford MSA, lending performance is highlighted by adequate lending activity, and good geographic and borrower distributions of home mortgage loans and small loans to businesses. The bank's \$10.3 million in community development lending had a neutral impact on performance in the MSA.

Based on limited-scope reviews, Lending Test performance in the New Haven-Milford MSA, Norwich-New London MSA, and Connecticut Non-MSA is good and is not inconsistent with the overall performance within the state.

## **INVESTMENT TEST**

Investment Test performance in Connecticut is rated Outstanding. Based on full-scope reviews, the bank's Investment Test performance in the Hartford-West Hartford-East Hartford and Bridgeport-Stamford-Norwalk MSAs is excellent. The level of corporate deposits in the Hartford market was taken into consideration in forming our conclusion.

In the Bridgeport MSA, BANA funded 153 investments totaling \$20.5 million. As of year-end, prior period investments totaled \$28.7 million. Combined, these investments represent 10 percent of allocated Tier One Capital. The largest investments in this MSA totaled \$15.7 million and consisted of various affordable mortgage-backed securities that were targeted to LMI borrowers.

BANA funded 248 investments in the Hartford MSA totaling \$81.6 million. As of December 31, 2011, prior period investments totaled \$62.9 million. Combined, these investments represent 7 percent of allocated Tier One Capital. The largest investments in this MSA totaled \$76.6 million and consisted of various affordable mortgage-backed securities that were targeted to LMI borrowers.

Based on limited-scope reviews, Investment Test performance in the New Haven-Milford MSA and Connecticut Non-MSA is excellent and is not inconsistent with the overall Outstanding performance in Connecticut. Performance in the Norwich-New London MSA is adequate and weaker than the overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA.

## **SERVICE TEST**

Service Test performance in Connecticut is rated Outstanding. Based on full-scope reviews, the bank's Service Test performance in the Bridgeport-Stamford-Norwalk and the Hartford-West Hartford-East Hartford MSAs is excellent.

Branches are readily accessible within LMI geographies and to LMI individuals in the Bridgeport-Stamford-Norwalk MSA. The bank's use of telephone and electronic banking delivery systems enhanced access by LMI individuals to retail banking services. Compared to 33 percent of the population that reside in LMI geographies, 31 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches in LMI geographies during the assessment period although the bank did close two offices. Hours and services are tailored to the convenience and needs of the assessment area, particularly in LMI geographies. The bank provided a high level of community development services, which were highly responsive to identified needs, through its work with 18 organizations during the evaluation period.

Branches are readily accessible within LMI geographies and to LMI individuals in the Hartford-West Hartford-East Hartford MSA. Eight additional branches in middle- and upper-income geographies are located in close proximity to LMI geographies, which improved access by LMI individuals to retail banking services. The bank's use of telephone and electronic banking delivery systems enhanced access by LMI individuals to retail banking services. Compared to 24 percent of the population that reside in LMI geographies, 21 percent of customers that use alternative delivery systems reside in LMI geographies. The bank closed four branches, including one branch in a low-income geography during the assessment period, but this closure did not diminish the excellent branch accessibility in low-income geographies. The bank also opened one office during the evaluation period. Hours and services are tailored to the convenience and needs of the assessment area particularly LMI individuals. The bank provided a good level of community development services through its work with 28 organizations during the evaluation period. More notably, the services provided responsive to identified needs. In addition, the bank provided homebuyer education to 109 LMI individuals in partnership with non-profit organizations, which represents a high level of service.

Based on limited-scope reviews, Service Test performance in the New Haven-Milford MSA, Norwich-New London MSA, and Connecticut Non-MSA is excellent and is not inconsistent with the performance in the state.

Refer to Tables 1-15 in the Connecticut section of Appendix D for the facts and data that support all Test conclusions.

## State of Delaware Rating

<b>CRA Rating for the State <sup>21</sup>:</b>	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>High Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to the credit needs of its AAs within the state;
- Good distribution of loans in different income geographies and excellent distribution of loans to borrowers of different income levels;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a good level of community development services.

## Description of Institution's Operations in the State of Delaware

BANA is the 29<sup>th</sup> largest banking financial institution in the state of Delaware. As of June 30, 2011, the bank held 0.02 percent of the state's deposits totaling \$78 million. Competing financial institutions with significant market share include FIA Card Services, N.A. (BANA's credit card affiliate), ING Bank, F.S.B., TD Bank, N.A., Discover Bank, and Chase Bank USA, N.A., with deposit market shares of 28.3 percent, 25.4 percent, 13.3 percent, 10.9 percent, and 7.9 percent, respectively. Of the bank's 47 rating areas, the state of Delaware ranks 46<sup>th</sup> and accounts for less than 1 percent of the bank's total deposits. As of December 31, 2011, BANA operated no branches and one full-service ATM in Delaware. The Delaware Non-MSA, comprising solely of Sussex County, is the bank's only assessment area within the state of Delaware.

BANA was required to designate an assessment area in the state of Delaware because it has a deposit-taking ATM in Sussex County. The nearest branch is in the Wilmington MD, which is part of the Philadelphia-Camden-Wilmington multistate MSA. BANA's extremely limited presence in the state of Delaware was considered as part of our analyses for all tests.

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<sup>21</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

## **LENDING TEST**

Lending test performance in Delaware is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Delaware Non-MSA is good.

Lending performance is highlighted by good lending activity, good geographic and borrower distributions of home mortgage loans, and good geographic and borrower distributions of small business loans. The bank did not originate any community development loans in the MSA during the assessment period.

## **INVESTMENT TEST**

Investment Test performance in Delaware is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Delaware Non-MSA is excellent.

BANA provided four contributions totaling \$65 thousand to three organizations that provided community development services targeting LMI persons. As of December 31, 2011, prior period investments totaled \$1.7 million. Additionally, the bank funded 18 contributions in the state of Delaware totaling \$484 thousand.

## **SERVICE TEST**

Service Test performance in Delaware is rated Low Satisfactory. Based on a full-scope review, the bank's Service Test performance in the Delaware Non-MSA is adequate.

The bank provides reasonable access to banking services considering its very limited presence. The bank has one ATM in a middle-income geography. The bank's use of telephone and electronic banking delivery systems enhance access by LMI individuals to retail banking services. Of the customers utilizing the bank's alternative delivery systems, approximately 18 percent were LMI. The bank did not open or close any branches during the evaluation period. The bank provided a good level of community development services through its work with six organizations during the evaluation period. Half of the services provided were responsive to identified community needs.

Refer to Tables 1-15 in the state of Delaware section of Appendix C for the facts and data that support all Test conclusions.

## State of Georgia Rating

**CRA Rating for the State <sup>22</sup>:** Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Good geographic and borrower distributions of loans throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Georgia

BANA is the 3<sup>rd</sup> largest banking financial institution in the state of Georgia. As of June 30, 2011, the bank held 12.2 percent of the state's deposits totaling \$22.3 billion. The bank's primary banking competitors for deposits in Georgia with deposit shares greater than 5 percent include SunTrust Bank, Wells Fargo Bank, N.A., Synovus Bank, and Branch Banking and Trust Company, with deposit market shares of 18.7 percent, 15.3 percent, 7.2 percent, and 5.6 percent, respectively. Of the bank's 47 rating areas, the state of Georgia ranks 10<sup>th</sup> and accounts for 2.31 percent of the bank's total deposits. As of December 31, 2011, BANA operated 198 branches and 536 full-service ATMs in Georgia. The bank has defined 15 assessment areas in the state of Georgia. The Albany and Atlanta-Sandy Springs-Marietta MSAs, which were selected for full-scope reviews, together comprise 90 percent of the bank's deposits and 80 percent of the bank's lending in the state of Georgia. Because Atlanta represents 89 percent of the bank's deposit base in Georgia, performance in Atlanta will drive the overall conclusions. For purposes of this review, three assessment areas comprising twelve counties that are not MSAs or MDs have been combined under the Georgia Non-MSA.

## LENDING TEST

<sup>22</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Georgia is rated High Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Atlanta-Sandy Springs-Marietta MSA is good and in the Albany MSA is adequate.

Lending Test performance in the Atlanta-Sandy Springs-Marietta MSA is highlighted by excellent lending activity, adequate geographic distribution and good borrower distribution of home mortgage loans, and good geographic and borrower distributions of small business loans. The bank's \$22.8 million in community development lending had a neutral impact on performance in the MSA during the assessment period. BANA also issued four letters of credit totaling \$19.9 million that have a community development purpose.

Lending Test performance in the Albany MSA is adequate and is highlighted by excellent lending activity, good geographic and borrower distributions of small business loans, adequate borrower distribution of home mortgage loans, and poor geographic distribution of home mortgage loans. The bank did not originate any community development loans in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Athens-Clarke, Dalton, Gainesville, and Savannah MSAs is good and is not inconsistent with the overall High Satisfactory rating in Georgia. Performance in the Brunswick, Columbus, Hinesville-Ft. Stewart, Macon, Valdosta, Warner-Robbins MSAs and the Georgia Non-MSA is adequate and weaker than the overall performance in the state. The weaker performance is due to a less favorable geographic distribution of home mortgage loans. Performance in the limited-scope areas did not negatively affect the overall Lending Test rating in Georgia.

## **INVESTMENT TEST**

Investment Test performance in Georgia is rated Outstanding. Based on full-scope reviews, the bank's Investment Test performance in the Atlanta-Sandy Springs-Marietta MSA is excellent and in the Albany MSA is adequate. The level of corporate deposits in the Atlanta MSA was taken into consideration in forming our conclusion.

BANA funded 221 investments in the Atlanta MSA totaling \$107.4 million. As of December 31, 2011, prior period investments totaled \$56.7 million. Combined, these investments represent 7 percent of allocated Tier One Capital. The largest investments consisted of various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$75.3 million. Other large investments were made in CDFIs totaling \$16.5 million.

In the Albany MSA, BANA funded 11 investments totaling \$284 thousand. As of December 31, 2011, prior period investments totaled \$51 thousand. Combined, these investments represent 1.9 percent of allocated Tier One Capital. The largest investments consisted of mortgage-backed securities targeted to LMI borrowers totaling \$257 thousand.

Based on limited-scope reviews, Investment Test performance in the Athens-Clarke County, Brunswick, Columbus, Macon, Savannah, Warner-Robbins MSAs, and Georgia Non-MSA is not inconsistent with the overall Outstanding performance in Georgia. Performance is adequate and weaker in the Dalton, Gainesville, and Hinesville-Ft. Stewart MSA. Performance is poor and weaker in the Valdosta MSA. Weaker performance is centered in a lower amount of

qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not affect the Investment Test rating for Georgia.

## **SERVICE TEST**

Service Test performance in Georgia is rated Outstanding. Based on full-scope reviews, performance in the Albany and the Atlanta-Sandy Springs-Marietta MSAs is excellent.

Despite limited physical presence in the MSA with only four offices, branches are readily accessible to LMI individuals and within LMI geographies. Three of the bank's four offices are located in moderate-income census tracts. The bank's use of telephone and electronic banking delivery systems enhanced access by LMI individuals to retail banking services. Compared to 40 percent of the population that reside in LMI geographies, 29 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches in the MSA during the assessment period. Hours and services do not vary in a way that inconveniences LMI individuals within the assessment area. The bank provided a good level of community development services through its work with seven organizations during the evaluation period, although none of the services were considered responsive to identified needs.

Service Test performance in the Atlanta-Sandy Springs-Marietta MSA is excellent. Branches are readily accessible in LMI geographies and to LMI individuals in the Atlanta-Sandy Springs-Marietta MSA. Fifteen additional branches located in close proximity to LMI geographies improved access by LMI individuals to retail banking services. The bank's use of telephone and electronic banking delivery systems further enhanced access by LMI individuals to retail banking services. Compared to 29 percent of the population that reside in LMI geographies, 19 percent of customers that use alternative delivery systems reside in LMI geographies. The bank opened two offices and closed nineteen, including four offices in LMI geographies. The closures did not adversely affect overall accessibility to LMI persons or geographies. Hours and services do not vary in a way that inconveniences LMI individuals within the assessment area. The bank provided a high level of community development services, which were highly responsive to identified needs, through its work with 29 organizations during the evaluation period. In addition, the bank provided homebuyer education to 900 LMI individuals in partnership with non-profit organizations, which represents a high level of service.

Based on limited-scope reviews, Service Test performance in the Athens-Clarke County, Brunswick, Gainesville, Macon, and Valdosta MSAs along with the Georgia Non-MSA AA is excellent and is not inconsistent with the performance in the state. Performance in the Columbus, Dalton, Hinesville-Fort Stewart, and the Warner Robins MSAs is good and weaker than the overall performance in the state. Performance in the Savannah MSA is adequate and weaker than the overall performance in the state. Weaker performance is due to the less accessible retail delivery systems to LMI geographies. Performance in the limited-scope AAs did not negatively affect the overall Service Test performance in Georgia.

Refer to Tables 1-15 in the Georgia section of Appendix D for the facts and data that support all Test conclusions.

## State of Idaho Rating

**CRA Rating for the State** <sup>23</sup>: Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to the credit needs of its AAs within the state;
- Adequate distribution of loans among geographies and good distribution among borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Idaho

BANA is the 4<sup>th</sup> largest banking financial institution in the state of Idaho. As of June 30, 2011, the bank held 6 percent of the state's deposits totaling \$1.1 billion. The bank's primary banking competitors for deposits in Idaho with deposit shares greater than 5 percent include Wells Fargo Bank, N.A., U.S. Bank, N.A., Zions First National Bank, and KeyBank, N.A., with deposit market shares of 23.1 percent, 15.4 percent, 6.5 percent, and 5.4 percent, respectively. Of the bank's 47 rating areas, the state of Idaho ranks 38<sup>th</sup> and accounts for 0.12 percent of the bank's total deposits. We took into account that approximately half of the deposits in the Boise City-Nampa MSA comprise deposits of national companies that originated from their retail operations throughout the U.S. As of December 31, 2011, BANA operated 21 branches and 30 full-service ATMs in Idaho. The bank has defined six assessment areas in the state of Idaho. The Boise City-Nampa MSA, which was selected for a full-scope review, comprises 61 percent of the bank's deposits and 55 percent of the bank's lending in the state of Idaho. For purposes of this review, two assessment areas comprising seven counties that are not MSAs or MDs have been combined under the Idaho Non-MSA.

## LENDING TEST

<sup>23</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Idaho is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Boise City-Nampa MSA is good.

Lending performance is highlighted by good lending activity, excellent borrower distribution of home mortgage loans, good geographic and borrower distributions of small business loans, adequate geographic distribution of home mortgage loans and small farm loans, and poor borrower distribution of small farm loans. The bank did not originate any community development loans in the MSA during the evaluation period.

Based on limited-scope reviews, Lending Test performance in the Coeur d'Alene, Idaho Falls, and Pocatello MSAs is good and is not inconsistent with the overall High Satisfactory performance in Idaho. Performance in the Idaho Non-MSA is excellent and stronger than the overall performance in Idaho. The stronger performance was due to a higher level of community development lending.

## **INVESTMENT TEST**

Investment Test performance in Idaho is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Boise City-Nampa MSA is excellent. The level of corporate deposits in the Boise City-Nampa MSA was taken into considering in forming our conclusion.

BANA funded 60 investments in the MSA totaling \$2.3 million. As of December 31, 2011, the bank had \$1.8 million of prior period investments outstanding. Combined, these investments represent 5 percent of allocated Tier One Capital. The largest investments in the Boise City-Nampa MSA were the purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$2 million. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Coeur d'Alene MSA, Idaho Falls MSA, and Idaho Non-MSA is excellent and is not inconsistent with the overall Outstanding performance in Idaho. Performance in the Pocatello MSA is adequate and weaker than the overall performance in the state. Weaker performance is centered in the level of qualified investments relative to the bank's operations in the AA.

## **SERVICE TEST**

Service Test performance in Idaho is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Boise City-Nampa MSA is excellent.

Branches are readily accessible within LMI geographies and to LMI individuals. Three of the bank's six branches are located in moderate-income census tracts. The bank's use of telephone and electronic banking delivery systems enhanced access by LMI individuals to retail banking services. Compared to 22.5 percent of the population that reside in LMI geographies, 18 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches during the assessment period.

Hours and services do not vary in a way that inconveniences LMI individuals within the assessment area. The bank provided a high level of community development services, which were occasionally responsive to identified needs, through its work with six organizations during the evaluation period.

Based on limited-scope reviews, Service Test performance in the Coeur d'Alene, Idaho Falls, and Pocatello MSAs as well as the Idaho Non-MSA is excellent and is not inconsistent with the performance in the state.

Refer to Tables 1-15 in the Idaho section of Appendix D for the facts and data that support all Test conclusions.

## State of Illinois Rating

**CRA Rating for the State** <sup>24</sup>: Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Good distribution of loans among geographies and borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas. The good distribution of branches was elevated due to the additional access provided by those branches located in midde- or upper-income geographies. Service was also enhanced further by alternative delivery systems. The bank provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Illinois

BANA is the 3<sup>rd</sup> largest banking financial institution in the state of Illinois. As of June 30, 2011, the bank held 6.9 percent of the state's deposits totaling \$25.7 billion. The bank's primary banking competitors for deposits in Illinois with deposit shares greater than 5 percent include JPMorgan Chase Bank, N.A., Harris N.A., and The Northern Trust Company, with deposit market shares of 15.6 percent, 9 percent, and 5.1 percent, respectively. Of the bank's 47 rating areas, the state of Illinois ranks 7<sup>th</sup> and accounts for 2.69 percent of the bank's total deposits. As of December 31, 2011, BANA operated 189 branches and 369 full-service ATMs in Illinois. The bank has defined five assessment areas in the state of Illinois. The Chicago-Joliet-Naperville MD, which was selected for a full-scope review, comprises 96 percent of the bank's deposits and 88 percent of the bank's lending in the state of Illinois. For purposes of this review, two assessment areas comprising six counties that are not MSAs or MDs have been combined under the Illinois Non-MSA.

<sup>24</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

## LENDING TEST

Lending Test performance in Illinois is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Chicago-Joliet-Naperville MD is good.

Lending performance is highlighted by excellent lending activity, good geographic and borrower distributions of home mortgage loans, and good geographic and borrower distributions of small business loans, and adequate geographic and borrower distributions of small farm loans. The bank's \$150 million in community development lending had a neutral impact on performance in the MSA during the assessment period. BANA also issued four letters of credit totaling \$51.6 million that have a community development purpose.

Based on limited-scope reviews, Lending Test performance in the Lake County-Kenosha County MD MSA, Rockford MSA, and the Illinois Non-MSA is good and is not inconsistent with the overall performance in the state.

## INVESTMENT TEST

Investment Test performance in Illinois is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Chicago-Joliet-Naperville MD is excellent.

BANA made 522 investments in the MD totaling \$208.2 million. As of December 31, 2011, prior period investments totaled \$114.5 million. The largest investments in the Chicago-Napier-Joliet MD totaled \$120.7 million and consisted of investments in LIHTC projects. These projects provided more than 700 affordable housing units for LMI families. BANA also purchased \$37.8 million in various affordable housing mortgage-backed securities that were targeted to LMI borrowers. In addition, the bank invested \$34.5 million in 16 CDFIs. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Rockford MSA is excellent and is not inconsistent with the overall Outstanding performance in Illinois. Performance in the Illinois Non-MSA is good and weaker than the overall performance. Performance in the Lake County-Kenosha County MD is adequate and weaker than the overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not negatively affect the Investment Test rating for Illinois.

## SERVICE TEST

Service Test performance in Illinois is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Chicago-Joliet-Naperville MD is excellent.

Branches are readily accessible within LMI geographies and to LMI individuals. Branches in LMI geographies provide good access, however, ten additional branches located in close proximity to LMI geographies improved access by LMI individuals to retail banking services. The bank's use of telephone and electronic banking delivery systems enhanced access by LMI

individuals to retail banking services. Compared to 31 percent of the population that reside in LMI geographies, 24 percent of customers that use alternative delivery systems reside in LMI geographies. Three branches were opened, including one in a moderate-income geography. However, 17 branches were closed. The closings generally did not adversely impact access to LMI individuals or within LMI geographies. Hours and services are tailored to the convenience and needs of the assessment area particularly LMI individuals. The bank provided a high level of community development services, which were highly responsive to identified needs, through its work with 35 organizations during the evaluation period.

Based on limited-scope reviews, Service Test performance in the Illinois Non-MSA is excellent and is not inconsistent with the performance in the state. Performance in the Rockford MSA is good and weaker while performance in the Lake County-Kenosha County MD is poor and weaker than the overall performance in the state. Weaker performance is due to the less accessible retail delivery systems to LMI geographies. Performance in the limited-scope AAs did not negatively affect the overall Service Test performance in Illinois.

Refer to Tables 1-15 in the Illinois section of Appendix D for the facts and data that support all Test conclusions.

## State of Indiana Rating

**CRA Rating for the State** <sup>25</sup>: Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Poor distribution of loans in different income geographies and good distribution of loans to borrowers of different income levels;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Indiana

BANA is the 23<sup>rd</sup> largest banking financial institution in the state of Indiana. As of June 30, 2011, the bank held 0.97 percent of the state's deposits totaling \$962 million. Competing financial institutions with significant market share include JPMorgan Chase Bank, N.A., PNC Bank, N.A., and Fifth Third Bank, with deposit market shares of 12.8 percent, 10.5 percent, and 6.6 percent, respectively. Of the bank's 47 rating areas, the state of Indiana ranks 45<sup>th</sup> and accounts for less than 1 percent of the bank's total deposits. As of December 31, 2011, BANA operated one branch and one full-service ATM in Indiana. The Elkhart-Goshen MSA is the bank's only assessment area within the state of Indiana.

## LENDING TEST

Lending Test performance in Indiana is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Elkhart-Goshen MSA is good.

Lending performance is highlighted by excellent lending activity, excellent borrower distribution of home mortgage loans, good geographic and borrower distributions of small business loans,

<sup>25</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

and poor geographic distribution of home mortgage loans. The bank did not originate any community development loans in the MSA during the assessment period.

## **INVESTMENT TEST**

Investment Test performance in Indiana is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Elkhart-Goshen MSA is excellent.

The bank funded eight investments in the Elkhart-Goshen MSA totaling \$256 thousand. As of December 31, 2011, prior period investments totaled \$146 thousand. Combined, these investments represent 13 percent of allocated Tier One Capital. The largest investments in the MSA were purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$202 thousand. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

## **SERVICE TEST**

Service Test performance in Indiana is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Elkhart-Goshen MSA is excellent.

Although the bank has a very limited presence in the MSA, its one branch is readily accessible to LMI because it is located in a moderate-income census tract. The bank's use of telephone and electronic banking delivery systems further enhanced access by LMI individuals to retail banking services. Compared to 6.5 percent of the population that reside in LMI geographies, 6 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches in LMI geographies, but they did close one office located in a middle-income census tract. Hours and services are tailored to the convenience and needs of the assessment area particularly LMI individuals. The bank provided an excellent level of community development services through its work with four organizations during the evaluation period. All of the services were responsive to identified community needs.

Refer to Tables 1-15 in the Indiana section of Appendix D for the facts and data that support all Test conclusions.

## State of Iowa Rating

<b>CRA Rating for the State <sup>26</sup>:</b>	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>High Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>High Satisfactory</u>
<b>The Service Test is rated:</b>	<u>Outstanding</u>

The major factors that support this rating include:

- Lending levels that reflect adequate responsiveness to the credit needs of its AAs within the state;
- Adequate distribution of loans among geographies and excellent distribution of borrowers of different income levels throughout its AAs;
- Investment volume that reflects a good level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Iowa

BANA is the 3<sup>rd</sup> largest banking financial institution in the state of Iowa. As of June 30, 2011, the bank held 5.1 percent of the state's deposits totaling \$3.5 billion. The bank's primary banking competitors for deposits in Iowa with deposit shares greater than 5 percent include Wells Fargo Bank, N.A., and U.S. Bank, N.A., with deposit market shares of 8.7 percent and 6.4 percent, respectively. Of the bank's 47 rating areas, the state of Iowa ranks 29<sup>th</sup> and accounts for 0.37 percent of the bank's total deposits. As of December 31, 2011, BANA operated 13 branches and 13 full-service ATMs in Iowa. The bank has defined three assessment areas in the state of Iowa. The Des Moines-West Des Moines MSA, which was selected for a full-scope review, comprises 95 percent of the bank's deposits and 90 percent of the bank's lending in the state of Iowa.

## LENDING TEST

Lending Test performance in Iowa is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Des Moines-West Des Moines MSA is good.

<sup>26</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending performance is highlighted by adequate lending activity, good geographic and borrower distributions of small business loans, and adequate geographic distribution and excellent borrower distribution of home mortgage loans. The bank's \$6 million in community development lending had a neutral impact on performance in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Sioux City MSA is good and is not inconsistent with the overall High Satisfactory performance in Iowa. Performance in the Iowa Non-MSA is adequate and weaker than the overall performance in the state. The weaker performance is due to a less favorable geographic distribution of home mortgage loans.

## **INVESTMENT TEST**

Investment Test performance in Iowa is rated High Satisfactory. Based on a full-scope review, the bank's Investment Test performance in the Des Moines-West Des Moines MSA is good. The significant level of corporate deposits in this market was taken into consideration in our analysis, which raised otherwise adequate performance to a good level.

BANA funded 70 investments in the MSA totaling \$9.7 million. As of December 31, 2011, prior period investments totaled \$2.8 million. The largest investments in the Des Moines-West Des Moines MSA totaled \$9.4 million and consisted of the purchase of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Sioux City MSA is excellent and stronger than the overall performance in Iowa. Performance in the Iowa Non-MSA is adequate and weaker than the bank's overall performance in the state. Weaker and stronger performance is centered in the level of qualified investments relative to the bank's operations in the AA.

## **SERVICE TEST**

The Service Test performance in the state of Iowa is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Des Moines-West Des Moines MSA is excellent.

The service delivery systems are readily accessible to individuals and geographies of different income levels. The bank has a limited presence in the MSA with only six offices, in which one is located in a low-income census tract and one is located in a moderate-income tract. Thirty-three percent of BANA's branches are in LMI geographies. The bank had a net closure of one branch in a moderate-income geography in the MSA during the evaluation period. Despite the closure, banking accessibility remained excellent. Branch hours and services do not vary in a way that inconvenience LMI individuals or those residing in LMI geographies. The use of telephone and electronic banking systems further improved access by LMI individuals. Compared to approximately 25 percent of the population that resides in LMI geographies, 16 percent of the customers that use alternative delivery systems also reside in LMI geographies.

Relative to the bank's limited presence in the assessment area, it provided a high level of community development services through its work with six local community development organizations. The services provided were consistently responsive to the needs identified in the community.

Based on limited-scope reviews, the bank's performance under the Service Test in the Sioux City MSA and Iowa Non-MSA assessment areas is excellent and not inconsistent with the bank's overall Outstanding performance under the Service Test in Iowa.

Refer to Tables 1-15 in the Iowa section of Appendix D for the facts and data that support all Test conclusions.

## State of Kansas Rating

**CRA Rating for the State** <sup>27</sup>: Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect adequate responsiveness to the credit needs of its AAs within the state;
- Poor distribution of loans among geographies and excellent distribution among borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Kansas

BANA is the largest banking financial institution in the state of Kansas. As of June 30, 2011, the bank held 8 percent of the state's deposits totaling \$4.9 billion. Some of the bank's primary banking competitors for deposits in Kansas include Capitol Federal Savings Bank, Intrust Bank, N.A., Commerce Bank, and U.S. Bank, N.A., with deposit market shares of 7.7 percent, 4.7 percent, 4.7 percent, and 2.8 percent, respectively. Of the bank's 47 rating areas, the state of Kansas ranks 32<sup>nd</sup> and accounts for 0.32 percent of the bank's total deposits. As of December 31, 2011, BANA operated 43 branches and 56 full-service ATMs in Kansas. The bank has defined seven assessment areas in the state of Kansas. The Wichita MSA, which was selected for a full-scope review, comprises 55 percent of the bank's deposits and 50 percent of the bank's lending in the state of Kansas. For purposes of this review, three assessment areas comprising eleven counties that are not MSAs or MDs have been combined under the Kansas Non-MSA.

## LENDING TEST

<sup>27</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Kansas is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Wichita MSA is good.

Lending performance is highlighted by adequate lending activity, poor geographic distribution of home mortgage loans, excellent geographic distribution of small business loans, very poor geographic distribution of small farm loans, excellent borrower distribution of home mortgage loans, good borrower distribution of small business loans, and poor borrower distribution of small farm loans. The bank did not originate any community development loans in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Lawrence and Manhattan MSAs and the Kansas Non-MSA is good and is not inconsistent with the overall High Satisfactory rating in Kansas. Performance in the Topeka MSA is adequate and weaker than the overall performance in the state. The weaker performance is due to a less favorable geographic distribution of home mortgage loans. Performance in the limited-scope areas did not negatively affect the Lending Test rating in Kansas.

## **INVESTMENT TEST**

Investment Test performance in Kansas is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Wichita MSA is excellent.

BANA funded 107 investments in the MSA totaling \$22 million, which represents 10 percent of allocated Tier One Capital. As of December 31, 2011, the bank had \$4.8 million in prior period investments outstanding. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investment in the Wichita MSA totaled \$12.5 million and consisted of a bond to construct school facilities benefiting students of LMI families. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Manhattan MSA, Topeka MSA, and the Kansas Non-MSA is excellent and is not inconsistent with the overall Outstanding performance in Kansas. Performance in the Lawrence MSA is adequate and weaker than the overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA.

## **SERVICE TEST**

The Service Test performance in the state of Kansas is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Wichita MSA is excellent.

The service delivery systems are readily accessible to individuals and geographies of different income levels. Branch distribution is excellent. Although the bank has no branches in low-income geographies, only approximately two percent of the population resides in low-income geographies. The percentage of branches in moderate-income geographies significantly exceeds the percentage of the population residing in moderate-income geographies and is considered excellent. The bank closed two offices including one branch in a moderate-income

geography in the MSA during the evaluation period. Despite the closure, branch distribution in moderate-income geographies remained excellent. Branch hours and services do not vary in a way that inconvenience LMI individuals or those residing in LMI geographies. The use of telephone and electronic banking systems improved access by LMI individuals. Compared to approximately 25 percent of the population that resides in LMI geographies, 20 percent of the customers that use alternative delivery systems also reside in LMI geographies.

Bank employees provided a high level of community development services through work with 10 local community development organizations. The services provided were responsive to the needs identified in the community.

Based on limited-scope reviews, the bank's performance under the Service Test in the Lawrence MSA, Manhattan MSA, Topeka MSA, and Kansas Non-MSA assessment areas is excellent and is not inconsistent with the overall Outstanding performance in the state of Kansas.

Refer to Tables 1-15 in the Kansas section of Appendix D for the facts and data that support all Test conclusions.

## State of Maine Rating

**CRA Rating for the State <sup>28</sup>:** Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of the assessment areas within the state;
- Good distributions of loans by geography and borrower income;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Maine

BANA is the 5<sup>th</sup> largest banking financial institution in the state of Maine. As of June 30, 2011, the bank held 5.5 percent of the state's deposits totaling \$1.7 billion. The bank's primary banking competitors for deposits in Maine with deposit shares greater than 5 percent include TD Bank USA, N.A., TD Bank, N.A., KeyBank, N.A., Bangor Savings Bank, and The Camden National Bank, with deposit market shares of 29.4 percent, 11.2 percent, 8 percent, 6 percent, and 5.1 percent, respectively. Of the bank's 47 rating areas, the state of Maine ranks 34<sup>th</sup> and accounts for 0.18 percent of the bank's total deposits. As of December 31, 2011, BANA operated 35 branches and 57 full-service ATMs in Maine. The bank has defined four assessment areas in the state of Maine. The Portland-South Portland-Biddeford MSA, which was selected for a full-scope review, comprises 77 percent of the bank's deposits and 78 percent of the bank's lending in the state of Maine.

## LENDING TEST

Lending Test performance in the state of Maine is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Portland-South Portland-Biddeford MSA is good.

<sup>28</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending performance is characterized by an excellent level of home mortgage and small business lending activity, good geographic distribution of home mortgage loans, adequate geographic distribution of small business loans, and good borrower distributions of home mortgage and small business loans. The geographic distribution is excellent for home purchase loans, poor for home improvement loans, good for home refinance loans, and adequate for small loans to businesses. The borrower distributions are good for home purchase, home improvement, home refinance, and small business loans. The bank did not originate or purchase any community development loans in the MSA during the evaluation period.

Based on limited-scope reviews, Lending Test performance in the Bangor MSA and Lewiston-Auburn MSA is good and is not inconsistent with the bank's overall High Satisfactory lending performance in the state of Maine. Lending Test performance in the Maine Non-MSA assessment area is excellent and is stronger than the bank's overall High Satisfactory lending performance in the state. Stronger performance is due to a relatively higher level of community development lending, which had a positive impact on lending performance.

## **INVESTMENT TEST**

Investment Test performance in Maine is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Portland-South Portland-Biddeford MSA is excellent.

BANA funded 75 investments in the MSA totaling \$9.3 million. As of December 31, 2011, prior period investments totaled \$22.3 million. Combined with current period investments, total investments represent 19% of allocated Tier One Capital. The largest investments in the Portland-South Portland-Biddeford MSA totaled \$6.2 million and consisted of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. The bank also purchased LIHTC investments totaling \$2.6 million, which provided 182 units of affordable housing. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Bangor MSA, Lewiston-Auburn MSA, and Maine Non-MSA is excellent and is not inconsistent with the overall outstanding performance in the state.

## **SERVICE TEST**

The Service Test performance in the state of Maine is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Portland-South Portland-Biddeford MSA is excellent.

The service delivery systems are readily accessible to individuals and geographies of different income levels. Although the bank has no branches in low-income geographies, slightly more than one percent of the area's population resides in those geographies. The percentage of branches in moderate-income geographies significantly exceeds the percentage of the

population residing in moderate-income geographies and is considered excellent. The use of telephone and electronic banking systems improved access by LMI individuals. Compared to 13 percent of the population that resides in LMI geographies, 12 percent of the customers that use alternative delivery systems also reside in LMI geographies.

The bank closed three branches in the MSA during the evaluation period. Branch hours and services do not vary in a way that inconveniences LMI individuals or those residing in LMI geographies. Relative to the bank's limited presence in the assessment area, it provided a high level of community development services through its work with eight local community development organizations. The services provided were consistently responsive to the needs identified in the community.

Based on limited-scope reviews, Service Test performance in the Lewiston-Auburn MSA and Maine Non-MSA is excellent and is not inconsistent with the bank's overall Outstanding performance. Service Test performance in the Bangor MSA is good and is weaker than the bank's overall Outstanding performance in the state. Performance is weaker due to less accessible retail delivery systems in LMI geographies.

Refer to Tables 1-15 in the Maine section of Appendix D for the facts and data that support all Test conclusions.

## State of Maryland Rating

<b>CRA Rating for the State</b> <sup>29</sup> :	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>High Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that reflect adequate responsiveness to the credit needs of its AAs within the state;
- Good distributions of loans among geographies and borrowers of different income levels throughout its AAs;
- Community development lending activities that had a positive impact on performance in the state;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a good level of community development services.

## Description of Institution's Operations in the State of Maryland

BANA is the largest banking financial institution in the state of Maryland. As of June 30, 2011, the bank held 20.5 percent of the state's deposits totaling \$23.7 billion. The bank's primary banking competitors for deposits in Maryland with deposit shares greater than 5 percent include Manufacturers and Traders Trust Company, PNC Bank, N.A., Capital One, N.A., Wells Fargo Bank, N.A., SunTrust Bank, and Branch Banking and Trust Company, with deposit market shares of 14.9 percent, 9.2 percent, 8.3 percent, 7.1 percent, 7.1 percent, and 5.7 percent, respectively. Of the bank's 47 rating areas, the state of Maryland ranks 13<sup>th</sup> and accounts for 1.71 percent of the bank's total deposits. As of December 31, 2011, BANA operated 108 branches and 228 full-service ATMs in Maryland. The bank has defined four assessment areas in the state of Maryland. The Baltimore-Towson MSA, which was selected for a full-scope review, comprises 97 percent of the bank's deposits and 91 percent of the bank's lending in the state of Maryland. For purposes of this review, two assessment areas

<sup>29</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

comprising five counties that are not MSAs or MDs have been combined under the Maryland Non-MSA.

## **LENDING TEST**

Lending Test performance in Maryland is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Baltimore-Towson MSA is good.

Lending performance is highlighted by adequate lending activity, good geographic distribution of home mortgage loans, adequate geographic distribution of small business loans, very poor geographic distribution of small farm loans, good borrower distributions of home mortgage and small business loans, and poor borrower distribution of small farm loans. The bank's \$138 million in community development lending, representing almost 7 percent of allocated Tier One Capital, had a positive impact on performance in the MSA during the assessment period, and was especially responsive to the needs of the community. BANA also issued six letters of credit totaling \$10.9 million that have a community development purpose.

Based on limited-scope reviews, Lending Test performance in the Salisbury MSA and the Maryland Non-MSA is good and is not inconsistent with the overall performance in Maryland.

## **INVESTMENT TEST**

Investment Test performance in Maryland is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Baltimore-Towson MSA is excellent.

BANA funded 247 investments in the MSA totaling \$122.2 million, which represents 6 percent of allocated Tier One Capital. As of December 31, 2011, prior period investments totaled \$60.5 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments in the Baltimore-Towson MSA totaled \$51.4 million and consisted of five LIHTC projects, which provided 437 affordable housing units for LMI families. The bank also invested in four NMTC projects totaling \$12.5 million, purchased \$30.9 million in various affordable housing mortgage-backed securities that were targeted to LMI borrowers, and invested \$5.9 million in three CDFIs. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Salisbury MSA and Maryland Non-MSA is excellent and is not inconsistent with the overall Outstanding performance in Maryland.

## **SERVICE TEST**

Service Test performance in Maryland is rated High Satisfactory. Based on a full-scope review, the bank's Service Test performance in the Baltimore-Towson MSA is good.

Branches are accessible to LMI people and LMI geographies throughout the MSA. The percentage of the bank's branches in low-income geographies is well below the percentage of the population residing in low-income geographies. The bank has two branches in middle- and

upper-income geographies that are in close proximity to low-income geographies and an additional 17 branches that are in close proximity to moderate-income geographies. Considering that these additional branches improved banking access in low- and moderate-income geographies, branch distribution for low-income geographies is adequate. The percentage of branches in moderate-income geographies exceeds the percentage of the population residing in moderate-income geographies and is considered excellent. The use of telephone, online, and mobile banking delivery systems improved access to retail banking services for LMI individuals. Compared to just less than 29 percent of the population residing in LMI geographies, 22 percent of the customers using telephone, online, and mobile banking delivery systems reside in LMI geographies.

The bank opened two branches while closing six branches in the MSA during the evaluation period. None were located in LMI geographies. Branch hours and services do not vary in a way that inconvenience LMI individuals or those residing in LMI geographies. The bank provided a good level of community development services through its work with 28 local community development organizations. The services provided were occasionally responsive to the needs identified in the community.

Based on limited-scope reviews, Service Test performance in the Maryland Non-MSA assessment area is excellent and stronger than the overall High Satisfactory performance in the state of Maryland. Stronger performance is due to more accessible retail delivery systems to LMI geographies. Service Test performance in the Salisbury MSA is adequate and weaker than the overall High Satisfactory performance in the state. Performance is weaker due to less accessible retail delivery systems in LMI geographies.

Refer to Tables 1-15 in the Maryland section of Appendix D for the facts and data that support all Test conclusions.

## State of Massachusetts Rating

<b>CRA Rating for the State</b> <sup>30</sup> :	<u>Outstanding</u>
<b>The Lending Test is rated:</b>	<u>Outstanding</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>Outstanding</u>

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Good distribution of loans among geographies and of borrowers of different income levels throughout its AAs;
- Community development lending activities that had a significantly positive impact on performance in the state;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Massachusetts

BANA is the largest banking financial institution in the state of Massachusetts. As of June 30, 2011, the bank held 22.8 percent of the state's deposits totaling \$52.8 billion. The bank's primary banking competitors for deposits in Massachusetts with deposit shares greater than 5 percent include State Street Bank and Trust Company, RBS Citizens, N.A., and Sovereign Bank, with deposit market shares of 12.4 percent, 12.3 percent, and 6.7 percent, respectively. Of the bank's 47 rating areas, the state of Massachusetts ranks 28<sup>th</sup> and accounts for 0.38 percent of the bank's total deposits. As of December 31, 2011, BANA operated 67 branches and 216 full-service ATMs in Massachusetts. The bank has defined four assessment areas in the state of Massachusetts. The Springfield and Worcester MSAs, which were selected for full-scope reviews, together comprise 82 percent of the bank's deposits and 72 percent of the bank's lending in the state of Massachusetts.

## LENDING TEST

<sup>30</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Massachusetts is rated Outstanding. Based on full-scope reviews, performance in the Springfield and Worcester MSAs is excellent.

In the Springfield MSA, good overall lending performance is highlighted by excellent lending activity, good geographic distributions of home mortgage and small business loans, and good borrower distributions of home mortgage loans and small business loans. The bank's \$20 million in community development lending had a significantly positive impact on performance in the MSA during the assessment period and was the primary consideration in raising our conclusion to an excellent level for this MSA.

In the Worcester MSA, excellent overall lending performance is highlighted by good lending activity, good geographic distributions of home mortgage and small business loans, excellent borrower distribution of home mortgage loans, and good borrower distribution of small business loans. The bank's \$16 million in community development lending had a positive impact on performance in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Barnstable Town MSA and the Massachusetts Non-MSA is good and weaker than the overall performance in Maryland. The weaker performance is due to a lower level of community development lending. Performance in the limited-scope areas did not negatively affect the Lending Test rating in Massachusetts.

## **INVESTMENT TEST**

Investment Test performance in Massachusetts is rated Outstanding. Based on full-scope reviews, the bank's Investment Test performance in both the Springfield and Worcester MSAs is excellent.

In the Springfield MSA, BANA funded 36 investments totaling \$26.2 million and represents 14 percent of allocated Tier One Capital. As of December 31, 2011, prior period investments totaled \$16.6 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments in the Springfield MSA totaled \$24 million and consisted of two LIHTC projects and one NMTC project. The LIHTC projects provided 88 affordable housing units for LMI families. The bank also invested \$1.7 million in one CDFI. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

In the Worcester MSA, BANA funded 92 investments totaling \$11.7 million, which represents 6 percent of allocated Tier One Capital. As of December 31, 2011, prior period investments totaled \$20.5 million. These prior period investments continue to provide benefit and meet the needs of the AA. The largest investments consisted of various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$8 million. The bank also invested in two LIHTC projects totaling \$2.7 million, which provided 62 affordable housing units for LMI families.

Based on limited-scope reviews, Investment Test performance in the Barnstable Town MSA and Massachusetts Non-MSA is excellent and is not inconsistent than the overall Outstanding performance in Massachusetts.

## **SERVICE TEST**

Service Test performance in Massachusetts is rated Outstanding. Based on full-scope reviews, the bank's Service Test performance in the Springfield MSA is good and in the Worcester MSA is excellent.

In the Springfield MSA, the bank's service delivery systems are accessible to geographies and individuals of different income levels. The distribution of branches in low-income geographies is good and it is excellent in moderate-income geographies. The bank's ATMs are more accessible in low-income geographies than its branches. The use of telephone and electronic banking systems improved access by LMI individuals. Compared to 26 percent of the population that resides in LMI geographies, 23 percent of the customers that use alternative delivery systems also reside in LMI geographies. The bank closed five branches including two closures in low-income geographies during the evaluation period. Branch hours and services do not vary in a way that inconvenience LMI individuals and those residing in LMI geographies. The bank provided a good level of community development services through its work with seven community organizations. Homebuyer education, with 169 participants, was the most common service provided, which was highly responsive to community needs.

In the Worcester MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. The distribution of branches in LMI geographies is excellent. The bank closed three offices including one in a low-income geography during the evaluation period. Despite the closure, the branch distribution remained excellent. Branch hours and services do not vary in a way that inconvenience LMI individuals and those residing in LMI geographies. The bank provided a good level of community development services through its work with four community organizations. Homebuyer education, with 149 participants, was the most common service provided, which was highly responsive to community needs.

Based on limited-scope reviews, the bank's performance in the Barnstable Town MSA is excellent and is not inconsistent with the bank's overall Outstanding performance under the Service Test in the state of Massachusetts. Performance in the Massachusetts Non-MSA is good and weaker than the bank's overall Outstanding performance. Performance is weaker due to less accessible retail delivery systems to LMI individuals and geographies.

Refer to Tables 1-15 in the Massachusetts section of Appendix D for the facts and data that support all Test conclusions.

## State of Michigan Rating

<b>CRA Rating for the State</b> <sup>31</sup> :	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>High Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to the credit needs of its AAs within the state;
- Adequate distribution of loans among geographies and good distribution of borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Michigan

BANA is the 4<sup>th</sup> largest banking financial institution in the state of Michigan. As of June 30, 2011, the bank held 9.1 percent of the state's deposits totaling \$14.3 billion. The bank's primary banking competitors for deposits in Massachusetts with deposit shares greater than 5 percent include JPMorgan Chase Bank, N.A., Comerica Bank, PNC Bank, N.A., and Fifth Third Bank, with deposit market shares of 16.2 percent, 13.8 percent, 9.6 percent, and 8.3 percent, respectively. Of the bank's 47 rating areas, the state of Michigan ranks 15<sup>th</sup> and accounts for 1.5 percent of the bank's total deposits. As of December 31, 2011, BANA operated 213 branches and 257 full-service ATMs in Michigan. The bank has defined 18 assessment areas in the state of Michigan. The Detroit-Livonia-Dearborn MD, Kalamazoo-Portage MSA, and Warren-Troy-Farmington Hills MD, which were selected for full-scope reviews, together comprise 86 percent of the bank's deposits and 64 percent of the bank's lending in the state of Michigan. For purposes of this review, three assessment areas comprising five counties that are not MSAs or MDs have been combined under the Michigan Non-MSA.

## LENDING TEST

<sup>31</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Michigan is rated High Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Detroit-Livonia-Dearborn MD is good, in the Kalamazoo-Portage MSA is good, and in the Warren-Troy-Farmington Hills MD is good.

In the Detroit-Livonia-Dearborn MD, lending performance is good and is highlighted by excellent lending activity, poor geographic distribution of home mortgage loans, good geographic distribution of small business loans, and good borrower distributions of home mortgage and small business loans. The bank's \$53.5 million in community development lending had a significantly positive impact on performance in the MSA during the assessment period. Community development lending raised otherwise adequate performance to the good level.

In the Kalamazoo-Portage MSA, lending performance is good and is highlighted by good lending activity, adequate geographic distribution of home mortgage loans, adequate geographic distribution of small business loans, and good borrower distributions of home mortgage and small business loans. The bank did not originate any community development loans in the MSA during the assessment period.

In the Warren-Troy-Farmington Hills MD, lending performance is good and is highlighted by adequate lending activity, adequate geographic distribution of home mortgage loans, excellent geographic distribution of small business loans, excellent borrower distribution of home mortgage loans, and good borrower distribution of small business loans. The bank did not originate any community development loans in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Ann Arbor, Battle Creek, Bay City, Grand Rapids, Lansing-East Lansing, Monroe, Muskegon-Norton Shores, Niles-Benton Harbor MSAs and the Michigan Non-MSA is good and is not inconsistent with the overall performance in the state. Performance in the Flint MSA and Holland Grand Haven MSA is excellent and stronger than the overall performance in the state. The stronger performance is due to a more favorable geographic distribution of small business loans. Performance in the Jackson MSA and the Saginaw-Saginaw Township North MSA is adequate and weaker than the overall performance in the state. Weaker performance is due to a less favorable borrower distribution of small business loans.

## **INVESTMENT TEST**

Investment Test performance in Michigan is rated Outstanding. Based on full-scope reviews, the bank's Investment Test performance in the Detroit-Livonia-Dearborn MD and Warren-Troy-Farmington Hills MD is excellent and in the Kalamazoo-Portage MSA is adequate.

In the Detroit-Livonia-Dearborn MD, BANA funded 101 investments totaling \$32.4 million, which represents 11 percent of allocated Tier One Capital. As of December 31, 2011, there were \$17.2 million in prior period investments, which continue to provide ongoing benefit to the AA. The largest investments consisted of two LIHTC projects that totaled \$10.7 and one NMTC project totaling \$11.7 million. The LIHTC projects helped provide 114 units of affordable housing to LMI families. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

In the Kalamazoo-Portage MSA, BANA funded 13 investments totaling \$625 thousand, which represents 2 percent of allocated Tier One Capital. The largest investments consisted of various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$540 thousand. Prior period investments totaled \$513 thousand. These prior period investments continue to provide benefit to the AA.

In the Warren-Troy-Farmington Hills MD, the bank funded 153 investments totaling \$69.9 million, which represents 6 percent of allocated Tier One Capital. The majority of investments consisted of various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$68.6 million. Prior period investments totaled \$28.9 million and continue to meet the needs in the MD.

Based on limited-scope reviews, Investment Test performance in the Battle Creek MSA, Bay City MSA, Flint MSA, Grand Rapids-Wyoming MSA, Holland-Grand-Haven MSA, Jackson MSA, Monroe MSA, Muskegon-Norton Shores MSA, Niles-Benton Harbor MSA, Saginaw-Saginaw Township North MSA, and Michigan Non-MSA is excellent and not inconsistent with the overall Outstanding performance in Michigan. Performance in Lansing-East Lansing MSA is good and weaker and in the Ann Arbor MSA is adequate and weaker than the overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not negatively affect the Investment Test rating for Michigan.

## **SERVICE TEST**

Service Test performance in Michigan is rated High Satisfactory. Based on full-scope reviews, the bank's Service Test performance in the Detroit-Livonia-Dearborn MD is good, in the Kalamazoo-Portage MSA is adequate, and in the Warren-Troy-Farmington Hills MD is good.

Performance in the Detroit-Livonia-Dearborn MD is good. The bank's service delivery systems are accessible to geographies and individuals of different income levels. The distribution of branches in low-income geographies is poor, while the distribution in moderate-income geographies is good. The bank has three branches in middle- and upper-income geographies that are in close proximity to low-income geographies, which improves accessibility to banking services in low-income geographies. The bank also has one branch in close proximity to a moderate-income geography. Considering the improved accessibility from the additional branches in close proximity to low-income geographies, branch distribution in low-income geographies is adequate. The use of telephone and electronic banking systems also improved access by LMI individuals. Compared to 38 percent of the population that resides in LMI geographies, 20 percent of the customers that use alternative delivery systems also reside in LMI geographies. The bank opened one office while closing ten offices during the evaluation period. None were in a LMI geography. Branch hours and services do not vary in a way that inconveniences the needs of LMI individuals. The bank provided a high level of community development services and leadership through its work with 20 community organizations. The services were highly responsive to identified community needs.

Performance in the Kalamazoo-Portage MSA is adequate. Branches are reasonably accessible to LMI individuals and geographies. The bank has no branches in low-income geographies, where slightly more than 5 percent of the population lives, and its distribution in

moderate-income geographies is adequate. However, the bank has one branch in a middle-income geography that is in very close proximity to a moderate-income geography, which improves accessibility to banking services in moderate-income geographies. Considering the improved accessibility from this additional branch, the branch distribution in moderate-income geographies is adequate. The use of telephone and electronic banking systems also improved access by LMI individuals. Compared to 27 percent of the population that resides in LMI geographies, 16 percent of the customers that use alternative delivery systems also reside in LMI geographies. The bank closed two offices during the evaluation period. Neither was in a LMI geography. Branch hours and services are tailored to the needs of LMI individuals and those residing in LMI geographies. Relative to the bank's presence in the assessment area, it provided a good level of community development services through its work with four community organizations. The services were occasionally responsive to identified community needs.

Performance in the Warren-Troy-Farmington Hills MD is good. The bank's service delivery systems are accessible to geographies and individuals of different income levels. The distribution of branches is good. The distribution of branches in low-income geographies is good, considering only approximately 2 percent of the population resides in low-income geographies. The distribution is also good in moderate-income geographies. The bank has 3 branches in middle- and upper-income geographies that are in close proximity to low-income geographies and 8 branches in close proximity to moderate-income geographies. These additional branches improve banking accessibility to individuals in LMI geographies. Considering these additional branches, the distribution is good. The bank's ATMs are more accessible in moderate-income geographies than its branches. In addition, the use of telephone and electronic banking systems improved access by LMI individuals. Compared to 23 percent of the population that resides in LMI geographies, 15 percent of the customers that use alternative delivery systems also reside in LMI geographies. The bank opened one branch in a low-income geography and closed a total of twelve offices, including two branch closures in moderate-income geographies during the evaluation period. Branch hours and services are tailored to the needs of LMI individuals and those residing in LMI geographies. The bank provided a good level of community development services through its leadership and participation with 19 community organizations. The types of services provided were responsive to identified community needs.

Based on limited-scope reviews, the bank's performance in the Jackson MSA and Niles-Benton Harbor MSA is good and is not inconsistent with the bank's overall High Satisfactory performance under the Service Test in the state of Michigan. Performance in Ann Arbor MSA, Flint MSA, Grand Rapids-Wyoming MSA, Lansing-East Lansing MSA, Monroe MSA, and Saginaw-Saginaw Township North MSA is excellent and stronger than the bank's overall High Satisfactory performance. Stronger performance is due to more accessible retail delivery systems to LMI individuals and geographies. Performance in the Battle Creek MSA, Bay City MSA, Holland-Grand Haven MSA, Muskegon-Norton Shores MSA, and Michigan Non-MSA is adequate and weaker than the bank's overall High Satisfactory performance in the state. Performance is weaker due to less accessible retail delivery systems to LMI individuals and geographies.

Refer to Tables 1-15 in the Michigan section of Appendix D for the facts and data that support all Test conclusions.

## State of Minnesota Rating

<b>CRA Rating for the State</b> <sup>32</sup> :	<u>Outstanding</u>
<b>The Lending Test is rated:</b>	<u>Outstanding</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Good distribution of loans in different income geographies and excellent distribution of loans to borrowers of different income levels;
- Community development lending activities that had a significantly positive impact on performance in the state;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides an adequate level of community development services.

## Description of Institution's Operations in the State of Minnesota

BANA has a very limited presence in the state of Minnesota. Based on deposits, BANA ranks 175<sup>th</sup> out of 438 banking financial institutions in the state. As of June 30, 2011, the bank held 0.06 percent of the state's deposits totaling \$91.6 million. The two dominant financial institutions with significant market share include Wells Fargo Bank, N.A., and U.S. Bank, N.A., with deposit market shares of 30.6 percent and 25.1 percent, respectively. No other financial institution has more than 4 percent market share of deposits. Of the bank's 47 rating areas, the state of Minnesota ranks 44<sup>th</sup> and accounts for less than 1 percent of the bank's total deposits. As of December 31, 2011, BANA operated one branch and two full-service ATMs in Minnesota. The Minneapolis-St. Paul-Bloomington MSA is the bank's only assessment area within the state of Minnesota.

## LENDING TEST

<sup>32</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Minnesota is rated Outstanding. Based on a full-scope review, the bank's Lending Test performance in the Minneapolis-St. Paul-Bloomington MSA is excellent.

Lending performance is highlighted by excellent lending activity, good geographic distribution of home mortgage loans, adequate geographic distribution of small business loans, excellent borrower distribution of home mortgage loans, and good borrower distribution of small business loans. The bank's \$2.5 million in community development lending had a significantly positive impact on performance in the MSA during the assessment period. The bank also issued one letter of credit totaling \$3.7 million that has a community development purpose.

## **INVESTMENT TEST**

Investment Test performance in Minnesota is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Minneapolis-St. Paul-Bloomington MSA is excellent.

The bank funded 39 investments in the MSA totaling \$1.5 million, or 13 percent of allocated Tier One Capital in this MSA. As of December 31, 2011, prior period investments totaled \$8.3 million. Combined, these investments represent 85 percent of allocated Tier One Capital. The largest investment totaled \$880 thousand, which was made in a CDFI. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

## **SERVICE TEST**

The Service Test performance in Minnesota is rated Low Satisfactory. Based on a full-scope review, the bank's Service Test performance in the Minneapolis-St. Paul-Bloomington MSA is adequate.

The service delivery systems are reasonably accessible to individuals and geographies of different income levels. The bank has only one branch located in a middle-income geography in the MSA and two ATMs, one of which is located in a moderate-income geography. The use of telephone and electronic banking systems improved access by LMI individuals. Compared to less than 22 percent of the population that resides in LMI geographies, 15 percent of the customers that use alternative delivery systems also reside in LMI geographies.

The bank opened and closed one branch in the MSA during the evaluation period. Branch hours and services do not vary in a way that inconvenience LMI individuals or those residing in LMI geographies. Relative to the bank's limited presence in the assessment area, it provided a high level of community development services through its work with eight local community development organizations. The services provided were responsive to the needs identified in the community.

Refer to Tables 1-15 in the Minnesota section of Appendix D for the facts and data that support all Test conclusions.

## State of Missouri Rating

**CRA Rating for the State** <sup>33</sup>: Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Poor geographic distribution of loans and good distribution of loans to borrowers of different income levels;
- Community development lending was significantly positive in the Non-MSA area and helped to elevate otherwise adequate performance to the good level;
- Investment volume that reflects a good level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Missouri

BANA is the 2<sup>nd</sup> largest banking financial institution in the state of Missouri. As of June 30, 2011, the bank held 9.6 percent of the state's deposits totaling \$12.6 billion. The bank's primary banking competitors for deposits in Missouri with deposit shares greater than 5 percent include U.S. Bank, N.A., Commerce Bank, Scottrade Bank, and UMB Bank, N.A., with deposit market shares of 11.1 percent, 8.7 percent, 5.5 percent, and 5.5 percent, respectively. Of the bank's 47 rating areas, the state of Missouri ranks 37<sup>th</sup> and accounts for 0.13 percent of the bank's total deposits. As of December 31, 2011, BANA operated 36 branches and 46 full-service ATMs in Missouri. The bank has defined seven assessment areas in the state of Missouri. The Missouri Non-MSA and Springfield MSA, which were selected for full-scope reviews, together comprise 66 percent of the bank's deposits and 72 percent of the bank's lending in the state of Missouri. For purposes of this review, three assessment areas comprising sixteen counties that are not MSAs or MDs have been combined under the Missouri Non-MSA.

<sup>33</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

## LENDING TEST

Lending Test performance in Missouri is rated High Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Missouri Non-MSA is good and in the Springfield MSA is adequate.

In the Missouri Non-MSA, lending performance is good and is highlighted by excellent lending activity, poor geographic distribution of home mortgage loans, good geographic distribution of small business loans, very poor geographic distribution of small farm loans, good borrower distributions of home mortgage and small business loans, and adequate borrower distribution of small loans to farms. The bank's \$5.3 million in community development lending had a significantly positive impact on performance in the assessment area during the evaluation period. It was the CD lending that helped raise otherwise adequate performance to the good level.

In the Springfield MSA, lending performance is highlighted by excellent lending activity, poor geographic distribution of home mortgage loans, adequate geographic distribution of small business and small farm loans, and good borrower distributions of home mortgage, small loans to businesses, and small loans to farms. The bank originated no community development loans in the MSA during the assessment period, which had a neutral impact on lending performance.

Based on limited-scope reviews, Lending Test performance in the Columbia MSA and the Joplin MSA is good and is not inconsistent with the overall performance in the state. Performance in the Cape Girardeau MSA is adequate and weaker than the overall performance in the state. The weaker performance is due to a less favorable borrower distribution of small business loans. Performance in the limited-scope areas did not negatively affect the Lending Test rating in Missouri.

## INVESTMENT TEST

Investment Test performance in Missouri is rated High Satisfactory. Based on full-scope reviews, the bank's Investment Test performance in the Missouri Non-MSA is good and in the Springfield MSA is excellent.

In the Missouri Non-MSA, BANA funded 45 investments totaling \$2.8 million, which represents 5 percent of allocated Tier One Capital, with the largest investments also consisting of mortgage-backed securities. As of December 31, 2011, prior period investments totaled \$684 thousand.

In the Springfield MSA, the bank funded 54 investments totaling \$1.8 million. As of December 31, 2011, prior period investments totaled \$5.5 million. Combined, these investments represent 21 percent of allocated Tier One Capital. The prior period investments continue to benefit the AA. The largest investments were purchases of \$1.6 million in various affordable housing mortgage-backed securities that were targeted to LMI borrowers.

Other investments in the Missouri Non-MSA and Springfield MSA consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Columbia and Joplin MSAs is excellent and stronger than the overall High Satisfactory performance in Missouri. Stronger performance is primarily due to a higher amount of qualified investments relative to the bank's operations in the AA. Performance in the Cape Girardeau-Jackson MSA is adequate and weaker than the overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA.

## **SERVICE TEST**

Service Test performance in Missouri is rated Outstanding. Based on full-scope reviews, the bank's Service Test performance in the Missouri Non-MSA is good and in the Springfield MSA is excellent.

In the Missouri Non-MSA, the bank has good branch accessibility in LMI geographies and to LMI individuals. Three additional branches located in close proximity to LMI geographies as well as the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. This is what elevated otherwise adequate performance to a good level. Compared to 9 percent of the population that resides in LMI geographies, 7 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches in LMI geographies although there were three offices closed. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services through its work with six organizations during the evaluation period.

In the Springfield MSA, the bank has excellent branch accessibility in LMI geographies and to LMI individuals. One additional branch located in close proximity to LMI geographies as well as the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 21 percent of the population that resides in LMI geographies, 16 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches in LMI geographies. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services through its work with nine organizations during the evaluation period.

Based on limited-scope reviews, Service Test performance in the Cape Girardeau MSA and Columbia MSA is excellent and is not inconsistent with the overall performance in the state. Performance in the Joplin MSA is good and weaker than the overall performance in the state. Weaker performance is due to less accessible retail delivery systems in LMI geographies.

Refer to Tables 1-15 in the Missouri section of Appendix D for the facts and data that support all Test conclusions.

## State of Nevada Rating

<b>CRA Rating for the State</b> <sup>34</sup> :	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>Low Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that reflect an excellent responsiveness to the credit needs of its AAs within the state;
- Poor distribution of loans among geographies and good distribution of borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Nevada

BANA is the 4<sup>th</sup> largest banking financial institution in the state of Nevada. As of June 30, 2011, the bank held 4.1 percent of the state's deposits totaling \$10.7 billion. The two dominant financial institutions with significant market share include Citibank, N.A., and Charles Schwab Bank, with deposit market shares of 64.1 percent and 19.4 percent, respectively. No other financial institution has more than 5 percent market share of deposits. Of the bank's 47 rating areas, the state of Nevada ranks 16<sup>th</sup> and accounts for 1.13 percent of the bank's total deposits. As of December 31, 2011, BANA operated 84 branches and 257 full-service ATMs in Nevada. The bank has defined four assessment areas in the state of Nevada. The Las Vegas-Paradise MSA, which was selected for a full-scope review, comprises 84 percent of the bank's deposits and 72 percent of the bank's lending in the state of Nevada.

## LENDING TEST

Lending Test performance in Nevada is rated Low Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Las Vegas-Paradise MSA is adequate.

<sup>34</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending performance is highlighted by excellent lending activity, poor geographic distribution of home mortgage loans, good geographic distribution of small business loans, and good borrower distributions of home mortgage loans and small business loans. The bank's \$4 million in community development lending had a neutral impact on performance in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Reno-Sparks MSA and the Nevada Non-MSA is adequate and is not inconsistent with the overall performance in the state. Performance in the Carson City MSA is excellent and stronger than the overall performance in the state. The stronger performance is due to a more favorable geographic distribution of home mortgage loans.

## **INVESTMENT TEST**

Investment Test performance in Nevada is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Las Vegas-Paradise MSA is excellent. The level of corporate deposits was taken into account in forming our conclusion.

In the Las Vegas-Paradise MSA, BANA funded 184 investments in the MSA totaling \$48 million. As of December 31, 2011, prior period investments totaled \$38.8 million and continue to provide ongoing benefit to the MSA. Combined, these investments represent 8 percent of allocated Tier One Capital. The largest investments totaled \$42 million and consisted of purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. In addition, the bank made a \$3.7 million investment in a LIHTC project that provided 20 affordable housing units for LMI families. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Reno-Sparks MSA is good and weaker than the overall Outstanding performance in Nevada. Performance in the Carson City MSA and Nevada Non-MSA is adequate and weaker than the overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not negatively impact the Investment Test rating for Nevada.

## **SERVICE TEST**

Service Test performance in Nevada is rated High Satisfactory. Based on a full-scope review, performance in the Las Vegas-Paradise MSA is good.

The bank's branches are accessible in LMI geographies and to LMI individuals. Seven additional branches located in close proximity to LMI geographies improved access by LMI individuals to retail banking services. The bank closed a total of five offices, but did not open or close any branches in LMI geographies. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a high level of community development services through its work with 22 organizations during the evaluation period. Particularly, the bank demonstrated significant responsiveness to community needs in sponsoring a rescue fair to assist delinquent homeowners in refinancing their mortgages. In addition, the bank provided

homebuyer education and loans to 56 individuals through partnership with non-profit organizations which represents a significant level of service.

Based on limited-scope reviews, Service Test performance in the Reno-Sparks MSA is excellent and is stronger than the overall High Satisfactory performance in Nevada. The stronger performance is due to more favorable retail delivery systems in LMI geographies. Performance in the Carson City MSA is adequate and in the Nevada Non-MSA is very poor and weaker than the overall performance in the state due to less accessible retail delivery systems in LMI geographies. Performance in limited-scope AAs did not negatively affect the overall Service Test performance for Nevada.

Refer to Tables 1-15 in the Nevada section of Appendix D for the facts and data that support all Test conclusions.

## State of New Hampshire Rating

<b>CRA Rating for the State</b> <sup>35</sup> :	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>High Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>High Satisfactory</u>
<b>The Service Test is rated:</b>	<u>Outstanding</u>

The major factors that support this rating include:

- Lending levels that reflect an adequate responsiveness to the credit needs of its AAs within the state;
- Good distribution of loans among geographies and of borrowers of different income levels throughout its AAs;
- Investment volume that reflects a good level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of New Hampshire

BANA is the 3<sup>rd</sup> largest banking financial institution in the state of New Hampshire. As of June 30, 2011, the bank held 17.7 percent of the state's deposits totaling \$4.8 billion. The bank's primary banking competitors for deposits in New Hampshire with deposit shares greater than 5 percent include RBS Citizens, N.A. and TD Bank, N.A., with deposit market shares of 25 percent and 19.1 percent, respectively. Of the bank's 47 rating areas, the state of New Hampshire ranks 26<sup>th</sup> and accounts for 0.43 percent of the bank's total deposits. As of December 31, 2011, BANA operated 18 branches and 37 full-service ATMs in New Hampshire. The bank has defined two assessment areas in the state of New Hampshire. The Manchester-Nashua MSA, which was selected for a full-scope review, comprises 75 percent of the bank's deposits and 70 percent of the bank's lending in the state of New Hampshire.

## LENDING TEST

Lending Test performance in New Hampshire is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Manchester-Nashua MSA is good.

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<sup>35</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending performance is highlighted by adequate lending activity, good geographic distribution of home mortgage loans, excellent geographic distribution of small business loans, and good borrower distributions of home mortgage loans and small business loans. The bank did not originate any community development loans in the MSA during the assessment period, which had a neutral impact on lending performance.

Based on limited-scope reviews, Lending Test performance in the New Hampshire Non-MSA is good and is not inconsistent with the overall performance in the state.

## **INVESTMENT TEST**

Investment Test performance in New Hampshire is rated High Satisfactory. Based on a full-scope review, the bank's Investment Test performance in the Manchester-Nashua MSA is good.

In the Manchester-Nashua MSA, BANA funded 111 investments totaling \$16.9 million, which represents 4 percent of allocated Tier One Capital. As of December 31, 2011, prior period investments totaled \$3.5 million. These prior period investments continue to provide ongoing benefit to the AA. The largest investments in the MSA consisted of \$14.5 million in purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers and an investment in a CDFI totaling \$1.7 million. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on a limited-scope review, Investment Test performance in the New Hampshire Non-MSA is excellent and stronger than the overall High Satisfactory performance in New Hampshire. Performance is stronger due to higher levels of qualified investments relative to the bank's operations in the AA.

## **SERVICE TEST**

Service Test performance in New Hampshire is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Manchester-Nashua MSA is excellent.

The bank's branches are readily accessible in LMI geographies and to LMI individuals. The bank's use of telephone and electronic banking delivery systems enhanced access by LMI individuals to retail banking services. Compared to 20 percent of the population that resides in LMI geographies, 18 percent of customers that use alternative delivery systems reside in LMI geographies. The bank closed two offices during the evaluation period but did not open or close any branches in LMI geographies. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services through its work with 13 organizations during the evaluation period.

Based on a limited-scope review, Service Test performance in the New Hampshire Non-MSA is adequate and is weaker than the overall Outstanding performance in the state. Performance is weaker due to less accessible retail banking services.

Refer to Tables 1-15 in the New Hampshire section of Appendix C for the facts and data that support all Test conclusions.

## State of New Jersey Rating

<b>CRA Rating for the State</b> <sup>36</sup> :	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>High Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>High Satisfactory</u>
<b>The Service Test is rated:</b>	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that reflect an good responsiveness to the credit needs of its AAs within the state;
- Good geographic distribution and excellent borrower distribution of loans throughout its AAs;
- Investment volume that reflects a good level of responsiveness to the needs in the state;
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of New Jersey

BANA is the largest banking financial institution in the state of New Jersey. As of June 30, 2011, the bank held 15.9 percent of the state's deposits totaling \$40.7 billion. The bank's primary banking competitors for deposits in New Jersey with deposit shares greater than 5 percent include Wells Fargo Bank, N.A., TD Bank, N.A., Hudson City Savings Bank, and PNC Bank, N.A., with deposit market shares of 11.3 percent, 10.9 percent, 8 percent, and 7.6 percent, respectively. Of the bank's 47 rating areas, the state of New Jersey ranks 33<sup>rd</sup> and accounts for 0.29 percent of the bank's total deposits. As of December 31, 2011, BANA operated 41 branches and 70 full-service ATMs in New Jersey. The bank has defined four assessment areas in the state of New Jersey. The Trenton-Ewing MSA, which was selected for a full-scope review, comprises 66 percent of the bank's deposits and 36 percent of the bank's lending in the state of New Jersey.

## LENDING TEST

Lending Test performance in New Jersey is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Trenton-Ewing MSA is good.

<sup>36</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending performance is highlighted by adequate lending activity, good geographic distribution of home mortgage loans, poor geographic distribution of small business loans, excellent borrower distribution of home mortgage loans, and good borrower distribution of small business loans. The bank did not originate any community development loans in the MSA during the assessment period, which had a neutral impact on lending performance.

Based on limited-scope reviews, Lending Test performance in the Atlantic City-Hammonton, Ocean City, and Vineland-Millville-Bridgeton MSAs is good and is not inconsistent with the overall performance in the state.

## **INVESTMENT TEST**

Investment Test performance in New Jersey is rated High Satisfactory. Based on a full-scope review, the bank's Investment Test performance in the Trenton-Ewing MSA is good.

In the Trenton-Ewing MSA, BANA funded 61 investments totaling \$8.6 million, which represents 4 percent of allocated Tier One Capital. As of December 31, 2011, prior period investments totaled \$2.4 million, which continue to provide ongoing benefit to the AA. The largest investments consisted of \$8 million in purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Atlantic City and Vineland-Millville-Bridgeton MSAs is excellent and stronger than the overall performance in the state. Stronger performance is centered in a higher amount of qualified investments relative to the bank's operations in the AA. Performance in the Ocean City MSA is adequate and weaker than the bank's overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not affect the Investment Test rating for New Jersey.

## **SERVICE TEST**

Service Test performance in New Jersey is rated High Satisfactory. Based on a full-scope review, the bank's Service Test performance in the Trenton-Ewing MSA is good.

The bank's branches are accessible in LMI geographies and to LMI individuals. Three additional branches in close proximity to LMI geographies as well as the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 27 percent of the population that reside in LMI geographies, 16 percent of customers that use alternative delivery systems reside in LMI geographies. The bank closed four offices but did not open or close any branches in LMI geographies. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided an excellent level of community development services through its work with 15 organizations during the evaluation period. In addition, bank associates provided innovative technical

assistance to two non-profit organizations that assist the community regarding its most pressing needs.

Based on limited-scope reviews, Service Test performance in the Atlantic City-Hamilton and Vineland-Millville-Bridgeton MSAs is excellent and is stronger than the overall performance within the state. The stronger performance is due to more favorable retail delivery systems in LMI geographies. Performance in the Ocean City MSA is adequate and weaker than the overall performance in New Jersey. The weaker performance was due to less accessible retail delivery systems to LMI geographies. Performance in the limited-scope assessment areas did not negatively affect the overall Service Test performance in New Jersey.

Refer to Tables 1-15 in the New Jersey section of Appendix D for the facts and data that support all Test conclusions.

## State of New Mexico Rating

**CRA Rating for the State** <sup>37</sup>: Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to the credit needs of its AAs within the state;
- Good distribution of loans among geographies and borrowers of different income levels throughout its AAs;
- Investment volume that reflects a good level of responsiveness to the needs in the state;
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a good level of community development services.

## Description of Institution's Operations in the State of New Mexico

BANA is the 2<sup>nd</sup> largest banking financial institution in the state of New Mexico. As of June 30, 2011, the bank held 14.7 percent of the state's deposits totaling \$3.8 billion. The bank's primary banking competitors for deposits in New Mexico with deposit shares greater than 5 percent include Wells Fargo Bank, N.A., U.S. Bank, N.A., and Los Alamos National Bank, with deposit market shares of 24.4 percent, 5.9 percent, and 5.1 percent, respectively. Of the bank's 47 rating areas, the state of New Mexico ranks 27<sup>th</sup> and accounts for 0.41 percent of the bank's total deposits. As of December 31, 2011, BANA operated 46 branches and 100 full-service ATMs in New Mexico. The bank has defined six assessment areas in the state of New Mexico. The Albuquerque MSA, which was selected for a full-scope review, comprises 74 percent of the bank's deposits and 65 percent of the bank's lending in the state of New Mexico. For purposes of this review, two assessment areas comprising nine counties that are not MSAs or MDs have been combined under the New Mexico Non-MSA.

## LENDING TEST

<sup>37</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in New Mexico is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Albuquerque MSA is good.

Lending performance is highlighted by good lending activity, good geographic distributions of home mortgage loans and small business loans, and good borrower distributions of home mortgage loans and small business loans. The bank's community development lending at \$2.8 million had a neutral impact on performance in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the New Mexico Non-MSA is good and is not inconsistent with the overall performance in the state. Performance in the Santa Fe MSA is excellent and stronger than the overall performance in the state. The stronger performance is due to a higher level of community development lending during the assessment period. Performance in the Farmington MSA and the Las Cruces MSA is adequate and weaker than the overall performance in the state. Weaker performance is due to a less favorable borrower distribution of home mortgage loans. Performance in limited-scope areas did not negatively affect the Lending Test rating for New Mexico.

## **INVESTMENT TEST**

Investment Test performance in New Mexico is rated High Satisfactory. Based on a full-scope review, the bank's Investment Test performance in the Albuquerque MSA is good.

In the Albuquerque MSA, BANA funded 111 investments totaling \$15 million, which represents 4 percent of allocated Tier One Capital. As of December 31, 2011, prior period investments totaled \$4 million, which continue to provide ongoing benefit to the AA. The largest investments totaled \$14 million and consisted of the purchase of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Santa Fe MSA is good and is not inconsistent with the overall High Satisfactory performance in New Mexico. Performance in the Farmington MSA, Las Cruces MSA, and New Mexico Non-MSA is excellent and stronger than the bank's overall performance in the state. Stronger performance is centered in a higher amount of qualified investments relative to the bank's operations in the assessment area.

## **SERVICE TEST**

Service Test performance in New Mexico is rated High Satisfactory. Based on a full-scope review, performance in the Albuquerque MSA is good.

The bank has good branch accessibility in LMI geographies and to LMI individuals. Two additional branches located in close proximity to LMI geographies as well as the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 31 percent of the population that reside in LMI geographies, 22 percent of customers that use alternative delivery systems reside in LMI geographies. The

bank closed three offices but did not open or close any branches in LMI geographies. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services through its work with 11 non-profit organizations during the evaluation period.

Based on limited-scope reviews, Service Test performance in the New Mexico Non-MSA is excellent and stronger than the overall performance in the state due to more favorable retail delivery systems in LMI geographies. Performance in the Farmington MSA and Las Cruces MSA is good and is not inconsistent with the overall performance in the state. Performance in the Santa Fe MSA is adequate and weaker than the overall performance in the state due to less accessible retail delivery systems to LMI geographies. Performance in the limited-scope areas did not negatively affect the overall Service Test performance in New Mexico.

Refer to Tables 1-15 in the New Mexico section of Appendix D for the facts and data that support all Test conclusions.

## State of New York Rating

<b>CRA Rating for the State</b> <sup>38</sup> :	<u>Outstanding</u>
<b>The Lending Test is rated:</b>	<u>High Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>Outstanding</u>

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Adequate geographic distribution and good borrower distribution of loans;
- Generally positive levels of community development lending;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of New York

BANA is the 4<sup>th</sup> largest banking financial institution in the state of New York. As of June 30, 2011, the bank held 6.7 percent of the state's deposits totaling \$65.8 billion. The bank's primary banking competitors for deposits in New York with deposit shares greater than 5 percent include JPMorgan Chase Bank, N.A., The Bank of New York Mellon, HSBC Bank USA, N.A., and Citibank, N.A., with deposit market shares of 35.5 percent, 9.3 percent, 7 percent, and 6.5 percent, respectively. Of the bank's 47 rating areas, the state of New York ranks 24<sup>th</sup> and accounts for 0.58 percent of the bank's total deposits. As of December 31, 2011, BANA operated 157 branches and 202 full-service ATMs in New York. The bank has defined 11 assessment areas in the state of New York. The Albany-Schenectady-Troy, Buffalo-Niagara Falls, Rochester, and Syracuse MSAs, which were selected for full-scope reviews, together comprise 68 percent of the bank's deposits and 69 percent of the bank's lending in the state of New York. For purposes of this review, two assessment areas comprising nine counties that are not MSAs or MDs have been combined under the New York Non-MSA.

<sup>38</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

## LENDING TEST

Lending Test performance in New York is rated High Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Albany-Schenectady-Troy and Buffalo-Niagara Falls MSAs is excellent and in the Rochester and Syracuse MSAs is good.

In the Albany-Schenectady-Troy MSA, lending performance is highlighted by excellent lending activity, good geographic distribution of home mortgage loans, adequate geographic distribution of small business loans, and good borrower distributions of home mortgage loans and small loans to businesses. The bank's \$29 million in community development lending had a significantly positive impact on performance in the MSA during the assessment period.

In the Buffalo-Niagara Falls MSA, lending performance is excellent and is highlighted by excellent lending activity, adequate geographic distributions of home mortgage loans and small business loans, excellent borrower distribution of home mortgage loans, and good borrower distribution of small business loans. The bank's \$23 million in community development lending had a significantly positive impact on performance in the MSA during the assessment period.

In the Rochester MSA, lending performance is good and is highlighted by excellent lending activity, adequate geographic distribution of home mortgage loans, good geographic distribution of small business loans, adequate geographic distribution of small farm loans, excellent borrower distribution of home mortgage loans, good borrower distribution of small business loans, and adequate borrower distribution of small farm loans. The bank did not originate any community development loans in the MSA during the assessment period, which had a neutral impact on lending performance.

In the Syracuse MSA, lending performance is good and is highlighted by excellent lending activity, adequate geographic distribution of home mortgage loans, good geographic distribution of small business loans, and good borrower distributions of home mortgage loans and small business loans. The bank did not originate any community development loans in the MSA during the assessment period, which had a neutral impact on lending performance.

Based on limited-scope reviews, Lending Test performance in the Glens Falls, Ithaca, Kingston, and Poughkeepsie-Newburg-Middletown MSAs and the New York Non-MSA is good and is not inconsistent with the overall performance in the state. Performance in the Utica-Rome MSA is excellent and stronger than the overall performance in the state. The stronger performance is due to an overall higher level of community development lending.

## INVESTMENT TEST

Investment Test performance in New York is rated Outstanding. Based on full-scope reviews, the bank's Investment Test performance in the Albany-Schenectady-Troy MSA, Buffalo-Niagara Falls MSA, Rochester MSA, and Syracuse MSA is excellent.

In the Albany-Schenectady-Troy MSA, BANA funded 76 investments totaling \$15.1 million, which represents 10 percent of allocated Tier One Capital. As of December 31, 2011, prior period investments totaled \$7.2 million, which continue to provide ongoing benefit to the AA. The largest investments in the MSA consisted of investments in NMTC/LIHTC projects totaling

\$13.9 million that will help to revitalize and stabilize low-income geographies and provided 70 housing units for LMI seniors.

In the Buffalo-Niagara Falls MSA, BANA funded 83 investments totaling \$6.4 million. As of December 31, 2011, prior period investments totaled \$25.3 million. Combined, these investments represent 22 percent of allocated Tier One Capital. The largest investments consisted of various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$5.7 million.

In the Rochester MSA, BANA funded 68 investments totaling \$4.1 million. As of December 31, 2011, prior period investments totaled \$17.3 million. Combined, these investments represent 26 percent of allocated Tier One Capital. The largest investments consisted of various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$3.1 million.

In the Syracuse MSA, BANA funded 46 investments totaling \$3.7 million. As of December 31, 2011, prior period investments totaled \$4.7 million. Combined, these investments represent 9 percent of allocated Tier One Capital. The largest investments consisted of deposits in three CDFIs and various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$3.4 million.

Other investments in the four assessment areas consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Glens Falls MSA, Ithaca MSA, Kingston MSA, Poughkeepsie-Newburgh-Middletown MSA, Utica-Rome MSA, and the New York Non-MSA is excellent and is not inconsistent with the overall Outstanding performance in New York.

## **SERVICE TEST**

Service Test performance in New York is rated Outstanding. Based on full-scope reviews, the bank's Service Test performance in the Albany-Schenectady-Troy MSA, Buffalo-Niagara Falls MSA, and Rochester MSA is excellent while performance in the Syracuse MSA is good.

In the Albany-Schenectady-Troy MSA, branches are readily accessible to LMI geographies and to LMI individuals after considering the positive impact from branches located near LMI geographies and alternative delivery systems. Three additional branches in middle- and upper-income geographies that are located in close proximity to LMI geographies as well as the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 24 percent of the population that resides in LMI geographies, 19 percent of customers that use alternative delivery systems reside in LMI geographies. During the evaluation period, the bank closed two offices including one branch in a moderate-income geography. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided an excellent level of community development services through its work with 23 organizations during the evaluation period.

In the Buffalo-Niagara Falls MSA, branches are readily accessible to LMI geographies and to LMI individuals. Four additional branches located in close proximity to LMI geographies as well as the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 25 percent of the population that resides in LMI geographies, 24 percent of customers that use alternative delivery systems reside in LMI geographies. During the evaluation period, the bank closed one branch in a low-income geography and one branch in a moderate-income geography. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services through its work with 10 organizations during the evaluation period.

In the Rochester MSA, the bank has excellent branch accessibility in LMI geographies and to LMI individuals. During the evaluation period, the bank closed three offices including one branch in a moderate-income geography. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services through its work with 10 organizations during the evaluation period.

In the Syracuse MSA, branches are accessible to LMI geographies and to LMI individuals. Three additional branches located in close proximity to LMI geographies as well as the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 24 percent of the population that resides in LMI geographies, 21 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches in LMI geographies. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services through its work with six organizations during the evaluation period.

Based on limited-scope reviews, performance in the Poughkeepsie-Newburgh-Middletown MSA is good and is not inconsistent with the overall performance in the state. Performance in the Glens Falls, Ithaca, Kingston, and the Utica-Rome MSAs along with the New York Non-MSA is excellent and stronger than the overall performance in the state. Stronger performance is due to more accessible retail delivery systems to LMI geographies

Refer to Tables 1-15 in the New York section of Appendix D for the facts and data that support all Test conclusions.

## State of North Carolina Rating

<b>CRA Rating for the State</b> <sup>39</sup> :	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>High Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Adequate distribution of loans among geographies and good distribution of borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of North Carolina

BANA is the largest banking financial institution in the state of North Carolina. As of June 30, 2011, the bank held 47.4 percent of the state's deposits totaling \$134.7 billion. Included in these deposits are approximately \$90 billion in non-consumer and non-commercial deposits belonging to the bank's parent company, which is used for general corporate needs (see the Description of Institution's Operations in the Charlotte-Gastonia-Rock Hill (NC-SC) Multistate MSA section for additional details of these deposits).

The bank's primary banking competitors for deposits in North Carolina with deposit shares greater than 5 percent include Wells Fargo Bank, N.A., and Branch Banking and Trust Company, with deposit market shares of 13.6 percent, and 12.3 percent, respectively. Of the bank's 47 rating areas, the state of North Carolina ranks 23<sup>rd</sup> and accounts for 0.75 percent of the bank's total deposits. As of December 31, 2011, BANA operated 141 branches and 218 full-service ATMs in North Carolina. The bank has defined 14 assessment areas in the state of North Carolina. The Greensboro-High Point MSA, North Carolina Non-MSA, and Raleigh-Cary MSA, which were selected for full-scope reviews, together comprise 61.5 percent of the bank's deposits and 56.2 percent of the bank's lending in the state of North Carolina. For purposes of

<sup>39</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

this review, two assessment areas comprising twenty-five counties that are not MSAs or MDs have been combined under the North Carolina Non-MSA.

## LENDING TEST

Lending Test performance in North Carolina is rated High Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Greensboro-High Point MSA, North Carolina Non-MSA, and Raleigh-Cary MSA is good.

In the Greensboro-High Point MSA, lending performance is highlighted by excellent lending activity, adequate geographic distribution of home mortgage loans, good geographic distribution of small business loans, and good borrower distributions of home mortgage loans and small business loans. The bank's \$4.8 million in community development lending had a neutral impact on performance in the MSA during the assessment period. BANA also issued one letter of credit totaling \$3.9 million that has a community development purpose.

In the North Carolina Non-MSA, lending performance is good and is highlighted by excellent lending activity, adequate geographic distribution of home mortgage loans, poor geographic distributions of small business loans and small farm loans, good borrower distributions of home mortgage loans and small business loans, and poor borrower distribution of small farm loans. The bank's \$13 million in community development lending had a positive impact on performance in the assessment area during the assessment period.

In the Raleigh-Cary MSA, lending performance is good and is highlighted by excellent lending activity, adequate geographic distribution of home mortgage loans, poor geographic distribution of small business loans, excellent borrower distribution of home mortgage loans, and good borrower distribution of small business loans. The bank's community development lending, totaling \$888 thousand, had a neutral impact on performance in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Asheville, Burlington, Goldsboro, Hickory-Lenoir-Morganton, and Winston-Salem MSAs is good and is not inconsistent with the overall performance in the state. Performance in the Durham-Chapel Hill, Fayetteville, Greenville, Jacksonville, and Wilmington MSAs is adequate and weaker than the overall performance in the state. The weaker performance is due to a less favorable geographic distribution of home mortgage loans. Performance in the limited-scope AAs did not negatively affect the Lending Test rating for North Carolina.

## INVESTMENT TEST

Investment Test performance in North Carolina is rated Outstanding. Based on full-scope reviews, the bank's Investment Test performance in the Greensboro-High Point MSA, North Carolina Non-MSA, and Raleigh-Cary MSA is excellent.

In the Greensboro-High Point MSA, BANA funded 52 investments totaling \$4.8 million. As of December 31, 2011, prior period investments totaled \$4 million. Combined, these investments represent 8 percent of allocated Tier One Capital. The prior period investments continue to provide benefit and meet the needs of the AA. The largest investments in the MSA totaled

\$4.2 million and consisted of purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers.

In the North Carolina Non-MSA, BANA funded 118 investments for \$10.6 million. As of December 31, 2011, prior period investments totaled \$9.7 million. Combined, these investments represent 9 percent of allocated Tier One Capital. Prior period investments continue to provide benefit and meet the needs of the AA. The largest investments in the MSA totaled \$9.7 million and consisted of purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers.

In the Raleigh-Cary MSA, BANA funded 87 investments for \$9.7 million. As of December 31, 2011, prior period investments totaled \$5.8 million. Combined, these investments represent 7 percent of allocated Tier One Capital. The prior period investments provide ongoing benefit to the AA. The largest investments in the MSA totaled \$9.1 million and consisted of purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers.

Other investments in the aforementioned assessment areas consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Asheville MSA, Durham-Chapel Hill MSA, Fayetteville MSA, Goldsboro MSA, Greenville MSA, Hickory-Lenoir-Morganton MSA, Jacksonville MSA, Wilmington MSA, and Winston-Salem MSA is excellent and is not inconsistent with the overall Outstanding performance in North Carolina. Performance in the Burlington, MSA is good and weaker than the overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not negatively affect the Investment Test rating for North Carolina.

## **SERVICE TEST**

Service Test performance in North Carolina is rated High Satisfactory. Based on full-scope reviews, the bank's Service Test performance in the Greensboro-High Point MSA and the North Carolina Non-MSA is excellent and performance in the Raleigh-Cary MSA is adequate.

In the Greensboro-High Point MSA, branches are readily accessible to LMI geographies and to LMI individuals. The bank closed one office but it did not open or close any branches in LMI geographies. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services through its work with 15 organizations during the evaluation period. In addition, the bank provided homebuyer education and loans to 16 LMI individuals through partnership with non-profit organizations, which represents a good level of service.

In the North Carolina Non-MSA, branches are readily accessible to LMI geographies and to LMI individuals. The bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 10 percent of the population that resides in LMI geographies, 6 percent of customers that use alternative delivery systems reside in LMI geographies. The bank closed two offices but did not open or

close any branches in LMI geographies. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services through its work with four organizations during the evaluation period.

In the Raleigh-Cary MSA, the bank has adequate branch accessibility in LMI geographies and to LMI individuals. Additional access provided by branches near LMI geographies and the use of alternative delivery systems enhanced otherwise poor accessibility. Four additional branches located in close proximity to LMI geographies as well as the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 25 percent of the population that resides in LMI geographies, 12 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches in LMI geographies. Hours and services are tailored to the needs of LMI individuals and those living in LMI geographies. The bank provided an excellent level of community development services through its work with 15 organizations during the evaluation period.

Based on limited-scope reviews, Service Test performance in the Winston-Salem MSA is good and is not inconsistent with the overall performance in the state. Performance in the Asheville MSA, Burlington MSA, Fayetteville MSA, Greenville MSA, and the Wilmington MSA is excellent and stronger than the overall performance in the state due to more accessible retail delivery systems in LMI geographies. Performance in the Durham-Chapel Hill, Goldsboro, Hickory-Lenoir-Morganton, and Jacksonville MSAs is adequate and weaker than the overall performance in the state. The weaker performance is due to the less accessible retail delivery systems to LMI geographies.

Refer to Tables 1-15 in the North Carolina section of Appendix D for the facts and data that support all Test conclusions.

## State of Ohio Rating

<b>CRA Rating for the State <sup>40</sup>:</b>	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>High Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Adequate distribution of loans in different income geographies and excellent distribution of loans to borrowers of different income levels;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides an adequate level of community development services.

### Description of Institution's Operations in the State of Ohio

BANA has an extremely limited presence in the state of Ohio. As of December 31, 2011, BANA operated no branches and one full-service ATM in Ohio. Cincinnati (Hamilton County) is the bank's only assessment area within the state of Ohio.

BANA was required to designate an assessment area in the state of Ohio because it has a deposit-taking ATM in Cincinnati. In November 2010, this deposit-taking ATM was installed to increase banking accessibility for existing Merrill Lynch customers in the area. BANA's extremely limited presence in the state of Ohio was considered as part of our analyses for all tests.

### LENDING TEST

Lending Test performance in Ohio is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Cincinnati MSA is good.

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<sup>40</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending performance is highlighted by excellent lending activity, adequate geographic distributions of home mortgage loans and small business loans, excellent borrower distribution of home mortgage loans, and good borrower distribution of small business loans. The bank did not originate any community development loans in the MSA during the assessment period, which had a neutral impact on lending performance.

## **INVESTMENT TEST**

Investment Test performance in Ohio is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Cincinnati MSA is excellent.

BANA funded 13 contributions to eight organizations that provide affordable housing and community development services targeting LMI persons totaling \$128 thousand. As of December 31, 2011, prior period investments totaled \$235 thousand, which continues to provide benefit and meet the needs of the AA.

## **SERVICE TEST**

Service Test performance in Ohio is rated Low Satisfactory. Based on a full-scope review, the bank's Service Test performance in the Cincinnati MSA is adequate.

Retail banking services are reasonably accessible to LMI geographies and to LMI individuals. Although the bank has no physical offices in the AA, access to retail banking services are provided through alternative delivery systems, including the use of telephone and electronic banking delivery systems. Compared to 30 percent of the population that resides in LMI geographies, 18 percent of customers that use alternative delivery systems reside in LMI geographies. The bank provided one community development service in the MSA during the evaluation period, which demonstrates an adequate level of community development services relative to its limited operations in the assessment area.

Refer to Tables 1-15 in the Ohio section of Appendix D for the facts and data that support all Test conclusions.

## State of Oklahoma Rating

<b>CRA Rating for the State <sup>41</sup>:</b>	<u>Satisfactory</u>
<b>The Lending Test is rated:</b>	<u>Low Satisfactory</u>
<b>The Investment Test is rated:</b>	<u>Outstanding</u>
<b>The Service Test is rated:</b>	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to the credit needs of its AAs within the state;
- Poor distribution of loans among geographies and good distribution of borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides an adequate level of community development services. Excellent performance in the full-scope AA was offset by weaker performance in the rest of the state, which resulted in the overall High Satisfactory rating.

## Description of Institution's Operations in the State of Oklahoma

BANA is the 5<sup>th</sup> largest banking financial institution in the state of Oklahoma. As of June 30, 2011, the bank held 5.0 percent of the state's deposits totaling \$3.5 billion. The bank's primary banking competitors for deposits in Oklahoma with deposit shares greater than 5 percent include BOKF, N.A., MidFirst Bank, BancFirst, and Arvest Bank, with deposit market shares of 13.0 percent, 7.6 percent, 6.6 percent, and 5.1 percent, respectively. Of the bank's 47 rating areas, the state of Oklahoma ranks 30<sup>th</sup> and accounts for 0.37 percent of the bank's total deposits. As of December 31, 2011, BANA operated 41 branches and 53 full-service ATMs in Oklahoma. The bank has defined five assessment areas in the state of Oklahoma. The Tulsa MSA, which was selected for a full-scope review, comprises 58 percent of the bank's deposits and 34 percent of the bank's lending in the state of Oklahoma. For purposes of this review, two assessment areas comprising four counties that are not MSAs or MDs have been combined under the Oklahoma Non-MSA.

## LENDING TEST

<sup>41</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Oklahoma is rated Low Satisfactory. Based on a full-scope review, performance in the Tulsa MSA is adequate.

Lending performance is highlighted by good lending activity, poor geographic distribution of home mortgage loans, adequate geographic distributions of small business loans and small farm loans, good borrower distributions of home mortgage loans and small business loans, and adequate borrower distribution of small farm loans. The bank's \$14 million in community development lending had a neutral impact on performance in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Lawton MSA, Oklahoma City MSA, and the Oklahoma Non-MSA is adequate and is not inconsistent with the overall performance in the state.

## **INVESTMENT TEST**

Investment Test performance in Oklahoma is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Tulsa MSA is excellent.

BANA funded 70 investments in the MSA totaling \$15.2 million, which represents 6 percent of allocated Tier One Capital. As of December 31, 2011, prior period investments totaled \$8.1 million. These prior period investments provide ongoing benefit to the AA. The largest investment in the Tulsa MSA totaled \$5.4 million, which was made to a LIHTC project to provide 40 units of affordable housing to LMI families. Additionally, the bank made a \$4.1 investment in a NMTC project to revitalize and stabilize a moderate-income geography and helping to provide 33 jobs for LMI individuals. The bank also purchased \$4.9 million of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Lawton and Oklahoma City MSAs is excellent and not inconsistent with the overall Outstanding performance in Oklahoma. Performance in the Oklahoma Non-MSA is adequate and weaker than the overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not negatively affect the Investment Test rating for Oklahoma.

## **SERVICE TEST**

Service Test performance in Oklahoma is rated High Satisfactory. Based on a full-scope review, the bank's Service Test performance in the Tulsa MSA is excellent.

The bank has excellent branch accessibility in moderate-income geographies and to LMI individuals. Three additional branches located in close proximity to LMI geographies as well as the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 26 percent of the population that

reside in LMI geographies, 16 percent of customers that use alternative delivery systems reside in LMI geographies. The bank closed one branch in a moderate-income geography. Despite the closure, the distribution of branches in moderate-income tracts is considered excellent. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided an adequate level of community development services through its work with eight organizations during the evaluation period.

Based on limited-scope reviews, Service Test performance in the Oklahoma City MSA is good and is not inconsistent with the overall performance in the state. Performance in the Lawton MSA is adequate and weaker while the Oklahoma Non-MSA AA is very poor and weaker than the overall performance in the state due to less accessible retail delivery systems in LMI geographies. Performance in the limited-scope AAs negatively affected the overall Service Test performance in Oklahoma and resulted in the overall High Satisfactory Service Test rating.

Refer to Tables 1-15 in the Oklahoma section of Appendix D for the facts and data that support all Test conclusions.

## State of Oregon Rating

**CRA Rating for the State <sup>42</sup>:** Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Good distribution of loans among geographies and borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Oregon

BANA is the 2<sup>nd</sup> largest banking financial institution in the state of Oregon. As of June 30, 2011, the bank held 15.4 percent of the state's deposits totaling \$9.3 billion. The bank's primary banking competitors for deposits in Oregon with deposit shares greater than 5 percent include U.S. Bank, N.A., Wells Fargo Bank, N.A., Umpqua Bank, JPMorgan Chase Bank, N.A., Bank of America Oregon, N.A. (BANA affiliate), and KeyBank, N.A., with deposit market shares of 18.0 percent, 14.6 percent, 7.7 percent, 6.8 percent, 5.8 percent, and 5.5 percent, respectively. Of the bank's 47 rating areas, the state of Oregon ranks 35<sup>th</sup> and accounts for 0.14 percent of the bank's total deposits. As of December 31, 2011, BANA operated 35 branches and 57 full-service ATMs in Oregon. The bank has defined seven assessment areas in the state of Oregon. The Oregon Non-MSA and Salem MSA, which were selected for full-scope reviews, together comprise 60 percent of the bank's deposits and 47 percent of the bank's lending in the state of Oregon. For purposes of this review, two assessment areas comprising thirteen counties that are not MSAs or MDs have been combined under the Oregon Non-MSA.

## LENDING TEST

<sup>42</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Oregon is rated High Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Oregon Non-MSA is good and in the Salem MSA is good.

In the Oregon Non-MSA, lending performance is highlighted by excellent lending activity, good geographic distribution of home mortgage loans, excellent geographic distribution of small business loans, good geographic distribution of small farm loans, good borrower distributions of home mortgage loans and small business loans, and adequate borrower distribution of small farm loans. The bank's \$1.3 million in community development lending had a neutral impact on performance in the assessment area during the evaluation period.

In the Salem MSA, lending performance is good and is highlighted by excellent lending activity, good borrower distributions of home mortgage and small business loans, good geographic distribution of small business loans, adequate geographic distribution of home mortgage loans, adequate borrower distribution of small farm loans, and very poor geographic distribution of small farm loans. The bank's \$22 thousand in community development lending had a neutral impact on performance in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Bend, Corvallis, Eugene-Springfield, and Medford MSAs is good and is not inconsistent with the overall performance in the state.

## **INVESTMENT TEST**

Investment Test performance in Oregon is rated Outstanding. Based full-scope reviews, the bank's Investment Test performance in the Oregon Non-MSA and Salem MSA is excellent.

In the Oregon Non-MSA, BANA funded 56 investments totaling \$4 million. As of December 31, 2011, prior period investments totaled \$4.1 million. Prior period investments continue to provide ongoing benefit to the AA. Combined, these investments represent 10 percent of allocated Tier One Capital. The largest investments in the Oregon Non-MSA were purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$3.6 million. In addition, the bank made an investment in a CDFI totaling \$209 thousand.

In the Salem MSA, BANA funded 11 investments totaling \$906 thousand. As of December 31, 2011, prior period investments totaled \$623 thousand. The prior period investments continue to provide ongoing benefit to the AA. Combined, these investments represent 7 percent of allocated Tier One Capital. The largest investments in the MSA were purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$570 thousand. The bank also made a \$300 thousand investment in a CDFI.

Other investments in the aforementioned assessment areas consisted of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Bend MSA, Eugene-Springfield MSA, and Medford MSA is excellent and is not inconsistent with the overall Outstanding performance in Oregon. Performance in the Corvallis MSA is good and weaker than the overall performance in the state. Weaker performance is due to a lower amount of qualified investments relative to the bank's operations in the AA.

## **SERVICE TEST**

Service Test performance in Oregon is rated Outstanding. Based on full-scope reviews, the bank's Service Test performance in the Oregon Non-MSA and the Salem MSA is excellent.

In the Oregon Non-MSA, branches are readily accessible to moderate-income geographies and to LMI individuals. The bank opened one branch while closing two office, but it did not open or close any branches in moderate-income geographies. Hours and services are tailored to the convenience and needs of the assessment area particularly LMI individuals. The bank provided an excellent level of community development services through its work with 12 organizations during the evaluation period.

In the Salem MSA, branches are readily accessible to LMI geographies and to LMI individuals. The bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services and thus improved otherwise adequate performance. Compared to 22 percent of the population that resides in LMI geographies, 18 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided an excellent level of community development services through its responsive work with six organizations during the evaluation period.

Based on limited-scope reviews, Service Test performance in the Bend MSA, Corvallis MSA, Eugene-Springfield MSA, and Medford MSA is excellent and is not inconsistent with the overall performance within Oregon.

Refer to Tables 1-15 in the Oregon section of Appendix D for the facts and data that support all Test conclusions.

## State of Pennsylvania Rating

**CRA Rating for the State <sup>43</sup>:** Satisfactory

**The Lending Test is rated:** Low Satisfactory

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to the credit needs of its AAs within the state;
- Poor distribution of loans among geographies and good distribution to borrowers of different income levels throughout its AAs;
- Investment volume that reflects a good level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Pennsylvania

BANA is the 7<sup>th</sup> largest banking financial institution in the state of Pennsylvania. As of June 30, 2011, the bank held 2.8 percent of the state's deposits totaling \$8.3 billion. The bank's primary banking competitors for deposits in Pennsylvania with deposit shares greater than 3 percent include PNC Bank, N.A., Wells Fargo Bank, N.A., Citizens Bank of Pennsylvania, Sovereign Bank, and TD Bank, N.A., with deposit market shares of 20.7 percent, 12.0 percent, 8.2 percent, 3.7 percent, and 3.7 percent, respectively. Of the bank's 47 rating areas, the state of Pennsylvania ranks 42<sup>nd</sup> and accounts for 0.04 percent of the bank's total deposits. As of December 31, 2011, BANA operated 14 branches and 22 full-service ATMs in Pennsylvania. The bank has defined five assessment areas in the state of Pennsylvania. The Scranton-Wilkes Barre MSA, which was selected for a full-scope review, comprises 75 percent of the bank's deposits and 15 percent of the bank's lending in the state of Pennsylvania.

## LENDING TEST

Lending test performance in Pennsylvania is rated Low Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Scranton-Wilkes Barre MSA is adequate.

<sup>43</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending performance is highlighted by excellent lending activity, poor geographic distribution of home mortgage loans and adequate distribution of small business loans, and good borrower distributions of home mortgage loans and small business loans. The bank did not originate any community development loans in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Lancaster MSA, Reading MSA, and the Pennsylvania Non-MSA is adequate and is not inconsistent with the overall performance in the state. Performance in the Pittsburgh MSA is good and stronger than the overall performance in the state. Stronger performance is due relatively higher levels of community development loans.

## **INVESTMENT TEST**

Investment Test performance in Pennsylvania is rated High Satisfactory. Based on a full-scope review, the bank's Investment Test performance in the Scranton-Wilkes-Barre MSA is good.

BANA funded 27 investments in the MSA totaling \$1.6 million. As of December 31, 2011, prior period investments totaled \$750 thousand and continue to provide ongoing benefit. Combined, these investments represent 6 percent of allocated Tier One Capital. The largest investments in the MSA were purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers totaling \$1.5 million.

Based on limited-scope reviews, performance in the Allegheny County, Lancaster MSA, and Reading MSA is excellent and stronger than the overall performance in Pennsylvania. Stronger performance is centered in a higher amount of qualified investments relative to the bank's operations in the AA. Performance in the Pennsylvania Non-MSA is adequate and weaker than the overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs had a neutral impact on the Investment Test performance in Pennsylvania.

## **SERVICE TEST**

Service Test performance in Pennsylvania is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Scranton-Wilkes Barre MSA is excellent.

Branches are readily accessible to LMI geographies and to LMI individuals. The bank did not open or close any branches in LMI geographies. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services during the evaluation period through its work with eight organizations.

Performance in the Lancaster MSA, Reading MSA, Pittsburgh MSA, and the Pennsylvania Non-MSA is adequate and weaker than the overall performance in the state. The weaker performance was due to less accessible retail delivery systems to LMI geographies.

Refer to Tables 1-15 in the Pennsylvania section of Appendix D for the facts and data that support all Test conclusions.

## State of South Carolina Rating

**CRA Rating for the State <sup>44</sup>:** Satisfactory

**The Lending Test is rated:** Low Satisfactory

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect adequate responsiveness to the credit needs of its AAs within the state;
- Poor distribution of loans among geographies and good distribution among borrowers of different income levels throughout its AAs;
- Investment volume that reflects a good level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of South Carolina

BANA is the 2<sup>nd</sup> largest banking financial institution in the state of South Carolina. As of June 30, 2011, the bank held 13.3 percent of the state's deposits totaling \$9.0 billion. The bank's primary banking competitors for deposits in South Carolina with deposit shares greater than 5 percent include Wells Fargo Bank, N.A., Branch Banking and Trust Company, and First Citizens Bank and Trust Company, with deposit market shares of 17.7 percent, 9.8 percent, and 9.0 percent, respectively. Of the bank's 47 rating areas, the state of South Carolina ranks 19<sup>th</sup> and accounts for 0.89 percent of the bank's total deposits. As of December 31, 2011, BANA operated 99 branches and 187 full-service ATMs in South Carolina. The bank has defined 12 assessment areas in the state of South Carolina. The Columbia and Greenville-Mauldin-Easley MSAs, which were selected for full-scope reviews, together comprise 61 percent of the bank's deposits and 35 percent of the bank's lending in the state of South Carolina. For purposes of this review, four assessment areas comprising ten counties that are not MSAs or MDs have been combined under the South Carolina Non-MSA.

## LENDING TEST

<sup>44</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in South Carolina is rated Low Satisfactory. Based on full-scope reviews, the bank's Lending Test performance in the Columbia MSA is adequate and Greenville-Mauldin-Easley MSA is good.

In the Columbia MSA, lending performance is highlighted by adequate lending activity, poor geographic distribution of home mortgage loans, good geographic distribution of small business loans, and good borrower distributions of home mortgage loans and small business loans. The bank's \$5.6 million in community development lending had a neutral impact on performance in the MSA during the assessment period.

In the Greenville-Mauldin-Easley MSA, lending performance is good and is highlighted by adequate lending activity, adequate geographic distributions of home mortgage loans and small business loans, and good borrower distributions of home mortgage loans and small business loans. The bank's \$5.7 million in community development lending had a neutral impact on performance in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Anderson, Florence, Myrtle Beach-North Myrtle Beach-Conway, Spartanburg, and Sumter MSAs and the South Carolina Non-MSA is adequate and is not inconsistent with the overall performance in the state. Performance in the Charleston-North Charleston-Summerville MSA is good and is stronger than the overall performance in the state. The stronger performance is due to a higher level of community development lending, which had a significantly positive impact on performance.

## **INVESTMENT TEST**

Investment Test performance in South Carolina is rated High Satisfactory. Based on full-scope reviews, the bank's Investment Test performance in the Columbia MSA is adequate and in the Greenville-Mauldin-Easley MSA is excellent.

In the Columbia MSA, BANA funded 85 investments totaling \$15.9 million, which represent 3 percent of allocated Tier One Capital. As of December 31, 2011, prior period investments totaled \$1.8 million, which continue to provide ongoing benefit to the AA. The largest investments totaled \$7.9 million and consisted of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. The bank also funded one LIHTC project for \$7.2 million that provided 72 units of affordable housing to LMI families.

In the Greenville-Mauldin-Easley MSA, BANA funded 36 investments for \$10.4 million. As of December 31, 2011, prior period investments totaled \$8.3 million. Combined, these investments represent 10 percent of allocated Tier One Capital. Prior period investments continue to provide ongoing benefit to the AA. The largest investment totaled \$7.8 million and consisted of a LIHTC project that provided 64 units of affordable housing to LMI families. The bank also invested \$2.3 million in various affordable housing mortgage-backed securities that were targeted to LMI borrowers.

Other investments in the aforementioned assessment areas consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Florence MSA is good and is not inconsistent with the overall High Satisfactory performance in South Carolina. Performance in the Anderson MSA, Charleston-North Charleston-Summerville MSA, Myrtle Beach-North Myrtle Beach-Conway MSA, Spartanburg MSA, Sumter MSA, and the South Carolina Non-MSA is excellent and stronger than the overall performance in the state. Stronger performance is centered in a higher amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs had a neutral impact on the Investment Test rating for South Carolina.

## **SERVICE TEST**

Service Test performance in South Carolina is rated Outstanding. Based on full-scope reviews, the bank's Service Test performance in the Columbia MSA and the Greenville-Mauldin-Easley MSA is excellent.

In the Columbia MSA, branches are readily accessible to LMI geographies and to LMI individuals. Four additional branches located in close proximity to LMI geographies as well as the bank's use of telephone and electronic banking delivery systems improved access by LMI individuals to retail banking services. Compared to 31 percent of the population that resides in LMI geographies, 19 percent of customers that use alternative delivery systems reside in LMI geographies. During the evaluation period, the bank closed three branches, including one branch in a low-income geography. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services through its work with 15 organizations during the evaluation period. In addition, the bank provided homebuyer education and loans to 58 LMI individuals through partnership with non-profit organizations, which represents a good level of service.

In the Greenville-Mauldin-Easley MSA, the bank has excellent branch accessibility in LMI geographies and to LMI individuals. The bank closed two offices during the evaluation period, but did not open or close any branches in LMI geographies. Hours and services are tailored to the convenience and needs of the assessment area particularly LMI individuals. The bank provided a good level of community development services through its work with six organizations during the evaluation period.

Based on limited-scope reviews, Service Test performance in the Charleston-North Charleston-Summerville MSA, Florence MSA, Myrtle Beach-North Myrtle Beach-Conway, Spartanburg MSA, and Sumter MSA is excellent and is not inconsistent with the overall performance in the state. Performance in the Anderson MSA and the South Carolina Non-MSA is adequate and weaker than the overall performance in the state. The weaker performance is due to the less accessible retail delivery systems to LMI geographies.

Refer to Tables 1-15 in the South Carolina section of Appendix D for the facts and data that support all Test conclusions.

## State of Tennessee Rating

**CRA Rating for the State** <sup>45</sup>: Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to the credit needs of its AAs within the state;
- Adequate distribution of loans among geographies and good distribution of borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas. Nearby branches in middle- and upper-income geographies further improved access in LMI geographies and to LMI individuals. The bank provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Tennessee

BANA is the 4<sup>th</sup> largest banking financial institution in the state of Tennessee. As of June 30, 2011, the bank held 7.0 percent of the state's deposits totaling \$8.2 billion. The bank's primary banking competitors for deposits in Tennessee with deposit shares greater than 5 percent include Regions Bank, First Tennessee Bank, N.A., and SunTrust Bank, with deposit market shares of 14.9 percent, 13.4 percent, and 9.6 percent, respectively. Of the bank's 47 rating areas, the state of Tennessee ranks 21<sup>st</sup> and accounts for 0.86 percent of the bank's total deposits. As of December 31, 2011, BANA operated 81 branches and 167 full-service ATMs in Tennessee. The bank has defined nine assessment areas in the state of Tennessee. The Nashville-Davidson-Murfreesboro-Franklin MSA, which was selected for a full-scope review, comprises 78 percent of the bank's deposits and 52 percent of the bank's lending in the state of Tennessee. For purposes of this review, three assessment areas comprising seven counties that are not MSAs or MDs have been combined under the Tennessee Non-MSA.

## LENDING TEST

<sup>45</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Tennessee is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Nashville-Davidson-Murfreesboro-Franklin MSA is good.

Lending performance is highlighted by good lending activity, adequate geographic distributions of home mortgage loans and small business loans, very poor geographic distribution of small farm loans, excellent borrower distribution of home mortgage loans, good borrower distribution of small business loans, and poor borrower distribution of small farm loans. The bank's \$3.8 million in community development lending had a neutral impact on performance in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Chattanooga, Clarksville, Johnson City and Memphis MSAs, is good and is not inconsistent with the overall performance in the state. Performance in the Knoxville MSA is excellent and stronger than the overall performance in the state. The stronger performance is due to a more favorable borrower distribution of home mortgage loans. Performance in the Tennessee Non-MSA is adequate and weaker than the overall performance in the state. The weaker performance is due to a less favorable borrower distribution of home mortgage loans. Performance in the limited-scope areas did not negatively affect the Lending Test rating in Tennessee.

## **INVESTMENT TEST**

Investment Test performance in Tennessee is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Nashville-Davidson-Murfreesboro-Franklin MSA is excellent. The level of corporate deposits in this assessment area was considered when forming our conclusion.

BANA funded 131 investments in the MSA totaling \$34.5 million. As of December 31, 2011, prior period investments totaled \$9.5 million. Combined, these investments represent 7 percent of allocated Tier One Capital. The largest investments in the MSA totaled \$21.3 million and consisted of purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. The bank also invested \$10 million in a CDFI. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Chattanooga MSA, Johnson City MSA, and Memphis MSA is excellent and is not inconsistent with the overall Outstanding performance in Tennessee. Performance in the Knoxville MSA is good and weaker than the overall Outstanding performance in Tennessee. Performance in the Clarksville MSA and Tennessee Non-MSA is adequate and weaker than the overall performance. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not negatively affect the Investment Test rating for Tennessee.

## **SERVICE TEST**

Service Test performance in Tennessee is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Nashville-Davidson-Murfreesboro-Franklin MSA is good.

Branches are accessible to LMI geographies and to LMI individuals. Seven additional branches in close proximity to LMI geographies as well as the bank's use of telephone and electronic banking improved access by LMI individuals to retail banking services. Compared to 25 percent of the population that reside in LMI geographies, 16 percent of customers that use alternative delivery systems reside in LMI geographies. The bank did not open or close any branches in LMI geographies. Hours and services do not vary in a way that inconvenience LMI individuals. The bank provided an excellent level of community development services through its work with 23 organizations during the evaluation period a number of which exhibited significant innovation. In addition, the bank provided homebuyer education and loans to 17 LMI individuals during the evaluation period.

Based on limited-scope reviews, Service Test performance in the Clarksville MSA, Johnson City MSA, and Knoxville MSA is excellent and is not inconsistent with the overall performance in Tennessee. Performance in the Chattanooga MSA, Memphis MSA, and Tennessee Non-MSA is good is adequate and weaker than the overall performance in Tennessee. The weaker performance was due to the less accessible retail delivery systems to LMI geographies. Performance in the limited-scope AAs did not negatively affect the overall Service Test performance in Tennessee.

Refer to Tables 1-15 in the Tennessee section of Appendix D for the facts and data that support all Test conclusions.

## State of Virginia Rating

**CRA Rating for the State <sup>46</sup>:** Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect adequate responsiveness to the credit needs of its AAs within the state;
- Adequate distribution of loans among geographies and good distribution of borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Virginia

BANA is the 4<sup>th</sup> largest banking financial institution in the state of Virginia. As of June 30, 2011, the bank held 9.5 percent of the state's deposits totaling \$21.7 billion. The bank's primary banking competitors for deposits in Virginia with deposit shares greater than 5 percent include Capital One Bank (USA), N.A., E\*TRADE Bank, Wells Fargo Bank, N.A., Branch Banking and Trust Company, SunTrust Bank, and Capital One, N.A., with deposit market shares of 16.2 percent, 13.8 percent, 12.0 percent, 8.9 percent, 7.3 percent, and 5.9 percent, respectively. Of the bank's 47 rating areas, the state of Virginia ranks 14<sup>th</sup> and accounts for 1.65 percent of the bank's total deposits. As of December 31, 2011, BANA operated 122 branches and 205 full-service ATMs in Virginia. The bank has defined 11 assessment areas in the state of Virginia. The Richmond MSA, which was selected for a full-scope review, comprises 72 percent of the bank's deposits and 34 percent of the bank's lending in the state of Virginia. For purposes of this review, three assessment areas comprising twenty-two counties that are not MSAs or MDs have been combined under the Virginia Non-MSA.

## LENDING TEST

<sup>46</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Virginia is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Richmond MSA is good.

Lending performance is highlighted by adequate lending activity, adequate geographic distribution of home mortgage loans, good geographic distribution of small business loans, poor geographic distribution of small farm loans, good borrower distributions of home mortgage loans, small business loans, and small farm loans. The bank's \$2.8 million in community development lending had a neutral impact on performance in the MSA during the assessment period.

Based on limited-scope reviews, Lending Test performance in the Blacksburg-Christiansburg-Radford, Charlottesville, Danville, Harrisonburg, Lynchburg, and Roanoke MSAs and the Virginia Non-MSA is good and is not inconsistent with the overall performance in the state. Performance in the Virginia Beach-Norfolk-Newport News MSA is excellent and stronger than the overall performance in the state. The stronger performance is due to a higher level of community development lending.

## **INVESTMENT TEST**

Investment Test performance in Virginia is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Richmond MSA is excellent. The level of corporate deposits was considered in this assessment area in forming our conclusion.

In the Richmond MSA, BANA funded 179 investments totaling \$60.2 million. As of December 31, 2011, prior period investments totaled \$27.9 million. Combined, these investments represent 6 percent of allocated Tier One Capital. The largest investments in the MSA totaled \$49.1 million and consisted of purchases of various affordable housing mortgage-backed securities that were targeted to LMI borrowers. The bank also had one investment of \$9 million in a LIHTC project that provided 222 affordable housing units for LMI families. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Blacksburg-Christiansburg-Radford MSA, Danville MSA, Roanoke MSA, Virginia Beach-Norfolk-Newport News MSA, and Virginia Non-MSA is excellent is not inconsistent with the bank's overall Outstanding performance in Virginia. Performance in the Harrisonburg MSA is good and weaker than the overall performance in the state. Performance in the Charlottesville MSA and Lynchburg MSA is adequate and weaker than the bank's overall performance in the state. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not negatively affect the Investment Test rating in Virginia.

## **SERVICE TEST**

Service Test performance in Virginia is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Richmond MSA is excellent.

The bank has excellent branch accessibility in LMI geographies and to LMI individuals. The bank opened one office and closed five during the evaluation period, but it did not open or close any branches in LMI geographies. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a high level of community development services through its work with 18 organizations during the evaluation period. After identifying it as a pressing need, the bank, through its Neighborhood Excellence Initiative provided technical assistance to three different community development organizations.

Based on limited-scope reviews, Service Test performance in the Danville MSA, Lynchburg MSA, and the Roanoke MSA is excellent and is not inconsistent with the performance in the state. Performance in the Blacksburg-Christiansburg-Radford MSA, Harrisonburg MSA, Virginia Beach-Norfolk-Newport News MSA, and the Virginia Non-MSA is good and weaker than the overall performance in Virginia. The weaker performance is due to the less accessible retail delivery systems to LMI geographies. Performance in the Charlottesville MSA is adequate and weaker than the performance in the state due to the less accessible retail delivery systems to LMI geographies. Performance in the limited-scope AAs did not negatively affect the overall Service Test performance in Virginia.

Refer to Tables 1-15 in the Virginia section of Appendix D for the facts and data that support all Test conclusions.

## State of Washington Rating

**CRA Rating for the State <sup>47</sup>:** Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels that reflect adequate responsiveness to the credit needs of its AAs within the state;
- Excellent distribution of loans among geographies and good distribution of borrowers of different income levels throughout its AAs;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state;
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's assessment areas and it provides a relatively high level of community development services.

## Description of Institution's Operations in the State of Washington

BANA is the largest banking financial institution in the state of Washington. As of June 30, 2011, the bank held 21.7 percent of the state's deposits totaling \$23.8 billion. The bank's primary banking competitors for deposits in Washington with deposit shares greater than 5 percent include Wells Fargo Bank, N.A., U.S. Bank, N.A., JPMorgan Chase Bank, N.A., and KeyBank, N.A., with deposit market shares of 10.4 percent, 9.7 percent, 8.7 percent, and 7.4 percent, respectively. Of the bank's 47 rating areas, the state of Washington ranks 9<sup>th</sup> and accounts for 2.44 percent of the bank's total deposits. As of December 31, 2011, BANA operated 215 branches and 438 full-service ATMs in Washington. The bank has defined 14 assessment areas in the state of Washington. The Seattle-Bellevue-Everett MD, which was selected for a full-scope review, comprises 78 percent of the bank's deposits and 60 percent of the bank's lending in the state of Washington. For purposes of this review, two assessment areas comprising eighteen counties that are not MSAs or MDs have been combined under the Washington Non-MSA.

## LENDING TEST

<sup>47</sup> For institutions with branches in two or more states in a multistate MSA, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate MSA. Refer to the multistate MSA rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Test performance in Washington is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Seattle-Bellevue-Everett MD is good.

Lending performance is highlighted by adequate lending activity, excellent geographic distribution of home mortgage loans, good geographic distribution of small business loans, poor geographic distribution of small farm loans, good borrower distribution of home mortgage loans, good borrower distribution of small business loans, and adequate borrower distribution of small farm loans. The bank's \$115 million in community development lending had a neutral impact on performance in the MD during the assessment period. Of note, the bank's community development lending efforts helped to create in excess of one thousand affordable housing units during the assessment period. BANA also issued four letters of credit totaling \$31.7 million that have a community development purpose.

Based on limited-scope reviews, Lending Test performance in the Lewistown MSA, Longview MSA, Mount Vernon-Anacortes MSA, Olympia MSA, Wenatchee-East Wenatchee MSA, and Washington Non-MSA is good and is not inconsistent with the overall performance in the state. Performance in the Bellingham MSA, Bremerton-Silverdale MSA, Kennewick-Pasco-Richmond MSA, Spokane MSA, Tacoma MD, and Yakima MSA is excellent and stronger than the overall performance in the state. Stronger performance is due to stronger geographic distributions and/or higher levels of community development lending.

## **INVESTMENT TEST**

Investment Test performance in Washington is rated Outstanding. Based on a full-scope review, the bank's Investment Test performance in the Seattle-Bellevue-Everett MD is excellent.

In the Seattle-Bellevue-Everett MD, BANA funded 209 investments totaling \$110.4 million. As of December 31, 2011, prior period investments totaled \$133 million. Combined, these investments represent nearly 11 percent of allocated Tier One Capital. The largest investments in the Seattle-Bellevue-Everett MD totaled \$75 million and consisted of investments in affordable housing mortgage-backed securities that were targeted to LMI borrowers. The bank also invested \$28.4 million in four LIHTC projects, which provided 285 affordable housing units for LMI families. A \$3.9 million investment in a CDFI was also made. Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize LMI geographies.

Based on limited-scope reviews, Investment Test performance in the Bellingham MSA, Bremerton-Silverdale MSA, Kennewick-Pasco-Richland MSA, Mount Vernon-Anacortes MSA, Tacoma MD, Wenatchee-East Wenatchee MSA, Yakima MSA, and Washington Non-MSA is excellent and is not inconsistent with the overall Outstanding performance in Washington. Performance in the Lewiston MSA and Longview MSA is good and weaker than the bank's overall performance in the state. Performance in the Olympia MSA and Spokane MSA is adequate and weaker than the bank's overall performance in the state. Weaker performance is centered in a lower level of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not negatively affect the Investment Test rating for Washington.

## SERVICE TEST

Service Test performance in Washington is rated Outstanding. Based on a full-scope review, the bank's Service Test performance in the Seattle-Bellevue-Everett MD is excellent.

Despite closing one branch in a low-income geography during the evaluation period, the bank's service delivery systems are readily accessible in LMI geographies and to LMI individuals. The bank also has excellent ATM accessibility in LMI geographies and to LMI individuals. In total, the bank opened seven offices and closed twelve during the evaluation period. Hours and services do not vary in a way that inconveniences LMI individuals. The bank provided a good level of community development services during the evaluation period through its work with 16 organizations.

Based on limited-scope reviews, Service Test performance in the Bellingham MSA, Lewiston MSA, Mt. Vernon-Anacortes MSA, Olympia MSA, Spokane MSA, Tacoma MD, Yakima MSA, Wenatchee-East Wenatchee MSA, and the Washington Non-MSA is excellent and is not inconsistent with the overall performance in the state. Performance in the Bremerton-Silverdale MSA, Kennewick-Pasco-Richland MSA, and the Longview MSA is adequate and weaker than the overall performance in the state due to less accessible retail delivery systems to LMI geographies. Performance in the limited-scope AAs did not negatively affect the overall Service Test performance in Washington.

Refer to Tables 1-15 in the Washington section of Appendix D for the facts and data that support all Test conclusions.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test: April 1, 2009 to December 31, 2011 Investment Test: April 1, 2009 to December 31, 2011 Service Test: April 1, 2009 to December 31, 2011	
Financial Institution		Products Reviewed
Bank of America, N.A. Charlotte, NC		Home Mortgage Loans, Small Business Loans, Small Farm Loans, Letters of Credit Community Development Loans Community Development Investments Community Development Services
Subsidiary or Affiliate	Relationship	Products Reviewed
FIA Card Services, N.A.	NB Holdings Corporation Subsidiary	Small Business Loans, Small Farm Loans, CD Services
The Bank of America Charitable Foundation, Inc.	BAC Subsidiary	CD Investments
Banc of America Community Development Corporation	Bank Subsidiary	CD Investments
Banc of America Community Holdings Inc. (BACHI)	NB Holdings Corporation Subsidiary	CD Investments
Banc of America Public Capital Corp	Bank Subsidiary	CD Investments
Banc of America CDE, LLC	Bank Subsidiary	CD Investments
Banc of America Historic New Ventures, LLC	Bank Subsidiary	CD Investments
Standard Federal Bank Community Development Corporation	Bank Subsidiary	CD Investments
LaSalle Community Development Corporation	Bank Subsidiary	CD Investments
Merrill Lynch Community Development Company, LLC	Bank Subsidiary	CD Investments
MLBUSA Community Development Corporation	Bank Subsidiary	CD Investments
CWB Community Assets, Inc.	Bank Subsidiary	CD Investments
Framework, Inc.	Bank Subsidiary	CD Investments
TriSail Capital Corporation	BAC Subsidiary	CD Investments
MBNA Community Development Corporation	BAC Subsidiary	CD Investments

<b>List of Assessment Areas and Type of Examination</b>			
<b>Assessment Area and MSA # (Some AA's include percentages of counties)</b>		<b>Type of Exam</b>	<b>Other Information (Reflects counties within aggregated AA's)</b>
<b>Multistate MSAs</b>			
<b>Allentown-Bethlehem-Easton, PA/NJ</b>			
Allentown-Bethlehem-Easton, PA/NJ	10900	Full-Scope	
<b>Augusta-Richmond County, GA/SC</b>			
Augusta-Richmond County, GA/SC	12260	Full-Scope	
<b>Boston-Cambridge-Quincy, MA/NH</b>			
Boston-Quincy, MA	14484	Full-Scope	
Cambridge-Newton-Framingham, MA	15764	Limited-Scope	
Peabody, MA	37764	Limited-Scope	
Rockingham County-Strafford County, NH	40484	Limited-Scope	
<b>Charlotte-Gastonia-Rock Hill, NC/SC</b>			
Charlotte-Gastonia-Rock Hill, NC/SC	16740	Full-Scope	
<b>Kansas City, MO/KS</b>			
Kansas City, MO/KS	28140	Full-Scope	
<b>Kingsport-Bristol-Bristol, TN/VA</b>			
Kingsport-Bristol-Bristol, TN/VA	28700	Full-Scope	
<b>New York-Northern New Jersey-Long Island, NY/NJ</b>			
New York-White Plains-Wayne, NY/NJ	35644	Full-Scope	
Edison-New Brunswick, NJ	20764	Limited-Scope	
Nassau-Suffolk, NY	35004	Limited-Scope	
Newark-Union, NJ	35084	Limited-Scope	All counties except Pike (PA)
<b>Philadelphia-Camden-Wilmington, PA/NJ/DE</b>			
Philadelphia, PA	37964	Full-Scope	
Camden, NJ	15804	Limited-Scope	
Wilmington, DE	48864	Limited-Scope	New Castle County (DE) only
<b>Portland-Vancouver-Hillsboro, OR/WA</b>			
Portland-Vancouver-Hillsboro, OR/WA	38900	Full-Scope	
<b>Providence-New Bedford-Fall River, RI/MA</b>			
Providence-New Bedford-Fall River, RI/MA	39300	Full-Scope	
<b>South Bend-Mishawaka, IN/MI</b>			
South Bend-Mishawaka, IN/MI	43780	Full-Scope	
<b>St. Louis, MO/IL</b>			
St. Louis, MO/IL	41180	Full-Scope	
<b>Washington-Arlington-Alexandria DC/VA/MD</b>			
Washington-Arlington-Alexandria DC/VA/MD	47894	Full-Scope	All counties except Jefferson (WV)
Bethesda-Rockville-Frederick, MD	13644	Limited-Scope	
<b>ARIZONA</b>			
Phoenix-Mesa-Glendale, AZ	38060	Full-Scope	
Tucson, AZ	46060	Full-Scope	

Flagstaff, AZ	22380	Limited-Scope	
Lake Havasu City-Kingman, AZ	29420	Limited-Scope	
Prescott, AZ	39140	Limited-Scope	
Yuma, AZ	49740	Limited-Scope	
Arizona Non-MSA		Limited-Scope	
<b>ARKANSAS</b>			
Little Rock-North Little Rock-Conway, AR	30780	Full-Scope	
Fayetteville-Springdale-Rogers, AR	22220	Limited-Scope	All counties except McDonald (MO)
Hot Springs, AR	26300	Limited-Scope	
Jonesboro, AR	27860	Limited-Scope	
Pine Bluff, AR	38220	Limited-Scope	
Arkansas Non-MSA		Limited-Scope	
<b>CALIFORNIA</b>			
Los Angeles-Long Beach-Glendale, CA	31084	Full-Scope	
Riverside-San Bernardino-Ontario, CA	40140	Full-Scope	
Sacramento-Arden-Arcade-Roseville, CA	40900	Full-Scope	
San Francisco-San Mateo-Redwood City, CA	41884	Full-Scope	
Bakersfield-Delano, CA	12540	Limited-Scope	
Chico, CA	17020	Limited-Scope	
El Centro, CA	20940	Limited-Scope	
Fresno, CA	23420	Limited-Scope	
Hanford-Corcoran, CA	25260	Limited-Scope	
Madera-Chowchilla, CA	31460	Limited-Scope	
Merced, CA	32900	Limited-Scope	
Modesto, CA	33700	Limited-Scope	
Napa, CA	34900	Limited-Scope	
Oakland-Fremont-Hayward, CA	36084	Limited-Scope	
Oxnard-Thousand Oaks-Ventura, CA	37100	Limited-Scope	
Redding, CA	39820	Limited-Scope	
Salinas, CA	41500	Limited-Scope	
San Diego-Carlsbad-San Marcos, CA	41740	Limited-Scope	
San Jose-Sunnyvale-Santa Clara, CA	41940	Limited-Scope	
San Luis Obispo-Paso Robles, CA	42020	Limited-Scope	
Santa Ana-Anaheim-Irvine, CA	42044	Limited-Scope	
Santa Barbara-Santa Maria-Goleta, CA	42060	Limited-Scope	
Santa Cruz-Watsonville, CA	42100	Limited-Scope	
Santa Rosa-Petaluma, CA	42220	Limited-Scope	
Stockton, CA	44700	Limited-Scope	
Vallejo-Fairfield, CA	46700	Limited-Scope	
Visalia-Porterville, CA	47300	Limited-Scope	

Yuba City, CA	49700	Limited-Scope	
California Non-MSA		Limited-Scope	
<b>COLORADO</b>			
Denver-Aurora-Broomfield, CO	19740	Full-Scope	
<b>CONNECTICUT</b>			
Bridgeport-Stamford-Norwalk, CT	14860	Full-Scope	
Hartford-West Hartford-East Hartford, CT	25540	Full-Scope	
New Haven-Milford, CT	35300	Limited-Scope	
Norwich-New London, CT	35980	Limited-Scope	
Connecticut Non-MSA		Limited-Scope	
<b>DELAWARE</b>			
Delaware Non-MSA		Full-Scope	
<b>FLORIDA</b>			
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL	22744	Full-Scope	
Jacksonville, FL	27260	Full-Scope	
Miami-Miami Beach-Kendall, FL	33124	Full-Scope	
Orlando-Kissimmee-Sanford, FL	36740	Full-Scope	
Tampa-St. Petersburg-Clearwater, FL	45300	Full-Scope	
Cape Coral-Fort Myers, FL	15980	Limited-Scope	
Crestview-Ft Walton Beach-Destin, FL	18880	Limited-Scope	
Deltona-Daytona Beach-Ormond Beach, FL	19660	Limited-Scope	
Gainesville, FL	23540	Limited-Scope	
Lakeland-Winter Haven, FL	29460	Limited-Scope	
Naples-Marco Island, FL	34940	Limited-Scope	
North Port-Bradenton-Sarasota, FL	35840	Limited-Scope	
Ocala, FL	36100	Limited-Scope	
Palm Bay-Melbourne-Titusville, FL	37340	Limited-Scope	
Palm Coast, FL	37380	Limited-Scope	
Pensacola-Ferry Pass-Brent, FL	37860	Limited-Scope	
Port St. Lucie, FL	38940	Limited-Scope	
Punta Gorda, FL	39460	Limited-Scope	
Sebastian-Vero Beach, FL	42680	Limited-Scope	
Tallahassee, FL	45220	Limited-Scope	
West Palm Beach-Boca Raton-Boynton Beach, FL	48424	Limited-Scope	
Florida Non-MSA		Limited-Scope	
<b>GEORGIA</b>			
Albany, GA	10500	Full-Scope	
Atlanta-Sandy Springs-Marietta, GA	12060	Full-Scope	

Athens-Clarke County, GA	12020	Limited-Scope	
Brunswick, GA	15260	Limited-Scope	
Columbus, GA	17980	Limited-Scope	All counties except Russell (AL)
Dalton, GA	19140	Limited-Scope	
Gainesville, GA	23580	Limited-Scope	
Hinesville-Ft Stewart, GA	25980	Limited-Scope	
Macon, GA	31420	Limited-Scope	
Savannah, GA	42340	Limited-Scope	
Valdosta, GA	46660	Limited-Scope	
Warner Robins, GA	47580	Limited-Scope	
Georgia Non-MSA		Limited-Scope	
<b>IDAHO</b>			
Boise City-Nampa, ID	14260	Full-Scope	
Coeur d'Alene, ID	17660	Limited-Scope	
Idaho Falls, ID	26820	Limited-Scope	
Pocatello, ID	38540	Limited-Scope	
Idaho Non-MSA		Limited-Scope	
<b>ILLINOIS</b>			
Chicago-Joliet-Naperville, IL	16974	Full-Scope	
Lake County-Kenosha County, IL	29404	Limited-Scope	Lake County (IL) only
Rockford, IL	40420	Limited-Scope	
Illinois Non-MSA		Limited-Scope	
<b>INDIANA</b>			
Elkhart-Goshen, IN	21140	Full-Scope	
<b>IOWA</b>			
Des Moines-West Des Moines, IA	19780	Full-Scope	
Sioux City, IA	43580	Limited-Scope	Woodbury County (IA) only
Iowa Non-MSA		Limited-Scope	
<b>KANSAS</b>			
Wichita, KS	48620	Full-Scope	
Lawrence, KS	29940	Limited-Scope	
Manhattan, KS	31740	Limited-Scope	
Topeka, KS	45820	Limited-Scope	
Kansas Non-MSA		Limited-Scope	
<b>MAINE</b>			
Portland-South Portland-Biddeford, ME	38860	Full-Scope	
Bangor, ME	12620	Limited-Scope	
Lewiston-Auburn, ME	30340	Limited-Scope	
Maine Non-MSA		Limited-Scope	
<b>MARYLAND</b>			

Baltimore-Towson, MD	12580	Full-Scope	
Salisbury, MD	41540	Limited-Scope	
Maryland Non-MSA		Limited-Scope	
<b>MASSACHUSETTS</b>			
Springfield, MA	44140	Full-Scope	
Worcester, MA	49340	Full-Scope	
Barnstable Town, MA	12700	Limited-Scope	
Massachusetts Non-MSA		Limited-Scope	
<b>MINNESOTA</b>			
Minneapolis-St. Paul-Bloomington, MN	33460	Full-Scope	All counties except Pierce (WI) and St. Croix (WI)
<b>MICHIGAN</b>			
Detroit-Livonia-Dearborn, MI	19804	Full-Scope	
Kalamazoo-Portage, MI	28020	Full-Scope	
Warren-Troy-Farmington Hills, MI	47644	Full-Scope	
Ann Arbor, MI	11460	Limited-Scope	
Battle Creek, MI	12980	Limited-Scope	
Bay City, MI	13020	Limited-Scope	
Flint, MI	22420	Limited-Scope	
Grand Rapids-Wyoming, MI	24340	Limited-Scope	
Holland-Grand Haven, MI	26100	Limited-Scope	
Jackson, MI	27100	Limited-Scope	
Lansing-East Lansing, MI	29620	Limited-Scope	
Monroe, MI	33780	Limited-Scope	
Muskegon-Norton Shores, MI	34740	Limited-Scope	
Niles-Benton Harbor, MI	35660	Limited-Scope	
Saginaw-Saginaw Township North, MI	40980	Limited-Scope	
Michigan Non-MSA		Limited-Scope	
<b>MISSOURI</b>			
Missouri Non-MSA		Full-Scope	
Springfield, MO	44180	Full-Scope	
Cape Girardeau, MO	16020	Limited-Scope	All counties except Alexander (IL)
Columbia, MO	17860	Limited-Scope	
Joplin, MO	27900	Limited-Scope	
<b>NEVADA</b>			
Las Vegas-Paradise, NV	29820	Full-Scope	
Carson City, NV	16180	Limited-Scope	
Reno-Sparks, NV	39900	Limited-Scope	
Nevada Non-MSA		Limited-Scope	
<b>NEW HAMPSHIRE</b>			

Manchester-Nashua, NH	31700	Full-Scope	
New Hampshire Non-MSA		Limited-Scope	
<b>NEW JERSEY</b>			
Trenton-Ewing, NJ	45940	Full-Scope	
Atlantic City-Hammonton, NJ	12100	Limited-Scope	
Ocean City, NJ	36140	Limited-Scope	
Vineland-Millville-Bridgeton, NJ	47220	Limited-Scope	
<b>NEW MEXICO</b>			
Albuquerque, NM	10740	Full-Scope	
Farmington, NM	22140	Limited-Scope	
Las Cruces, NM	29740	Limited-Scope	
Santa Fe, NM	42140	Limited-Scope	
New Mexico Non-MSA		Limited-Scope	
<b>NEW YORK</b>			
Albany-Schenectady-Troy, NY	10580	Full-Scope	
Buffalo-Niagara Falls, NY	15380	Full-Scope	
Rochester, NY	40380	Full-Scope	
Syracuse, NY	45060	Full-Scope	
Glens Falls, NY	24020	Limited-Scope	
Ithaca, NY	27060	Limited-Scope	
Kingston, NY	28740	Limited-Scope	
Poughkeepsie-Newburgh-Middletown, NY	39100	Limited-Scope	
Utica-Rome, NY	46540	Limited-Scope	
New York Non-MSA		Limited-Scope	
<b>NORTH CAROLINA</b>			
Greensboro-High Point, NC	24660	Full-Scope	
North Carolina Non-MSA		Full-Scope	
Raleigh-Cary, NC	39580	Full-Scope	
Asheville, NC	11700	Limited-Scope	
Burlington, NC	15500	Limited-Scope	
Durham-Chapel Hill, NC	20500	Limited-Scope	
Fayetteville, NC	22180	Limited-Scope	
Goldsboro, NC	24140	Limited-Scope	
Greenville, NC	24660	Limited-Scope	
Hickory-Lenoir-Morganton, NC	25860	Limited-Scope	
Jacksonville, NC	27340	Limited-Scope	
Wilmington, NC	48900	Limited-Scope	
Winston-Salem, NC	49180	Limited-Scope	
<b>OHIO</b>			
Hamilton County, OH	17140	Full-Scope	Hamilton County (OH) only

<b>OKLAHOMA</b>			
Tulsa, OK	46140	Full-Scope	
Lawton, OK	30020	Limited-Scope	
Oklahoma City, OK	36420	Limited-Scope	
Oklahoma Non-MSA		Limited-Scope	
<b>OREGON</b>			
Oregon Non-MSA		Full-Scope	
Salem, OR	41420	Full-Scope	
Bend, OR	13460	Limited-Scope	
Corvallis, OR	18700	Limited-Scope	
Eugene-Springfield, OR	21660	Limited-Scope	
Medford, OR	32780	Limited-Scope	
<b>PENNSYLVANIA</b>			
Scranton-Wilkes Barre, PA	42540	Full-Scope	
Allegheny County, PA	38300	Limited-Scope	Allegheny County (PA) only
Lancaster, PA	29540	Limited-Scope	
Reading, PA	39740	Limited-Scope	
Pennsylvania Non-MSA		Limited-Scope	
<b>SOUTH CAROLINA</b>			
Columbia, SC	17900	Full-Scope	
Greenville-Mauldin-Easley, SC	24860	Full-Scope	
Anderson, SC	11340	Limited-Scope	
Charleston-North Charleston-Summerville, SC	16700	Limited-Scope	
Florence, SC	22500	Limited-Scope	
Myrtle Beach-N Myrtle Beach-Conway, SC	34820	Limited-Scope	
Spartanburg, SC	43900	Limited-Scope	
Sumter, SC	44940	Limited-Scope	
South Carolina Non-MSA		Limited-Scope	
<b>TENNESSEE</b>			
Nashville-Davidson-Murfreesboro-Franklin, TN	34980	Full-Scope	
Chattanooga, TN	16860	Limited-Scope	All counties except Catoosa (GA), Dade (GA), and Walker (GA)
Clarksville, TN/KY	17300	Limited-Scope	All counties except Christian (KY) and Trigg (KY)
Johnson City, TN	27740	Limited-Scope	
Knoxville, TN	28940	Limited-Scope	
Memphis, TN	32820	Limited-Scope	All counties except Crittenden (AR), De Soto (MS), Marshall (MS), Tate (MS), and Tunica (MS)
Tennessee Non-MSA		Limited-Scope	
<b>TEXAS</b>			

Dallas-Plano-Irving, TX	19124	Full-Scope	
Ft Worth-Arlington, TX	23104	Full-Scope	
San Antonio-New Braunfels, TX	41700	Full-Scope	
Abilene, TX	10180	Limited-Scope	
Amarillo, TX	11100	Limited-Scope	
Austin-Round Rock-San Marcos, TX	12420	Limited-Scope	
Beaumont-Port Arthur, TX	13140	Limited-Scope	
Brownsville-Harlingen, TX	15180	Limited-Scope	
College Station-Bryan, TX	17780	Limited-Scope	
Corpus Christi, TX	18580	Limited-Scope	
El Paso, TX	21340	Limited-Scope	
Houston-Sugar Land-Baytown, TX	26420	Limited-Scope	
Killeen-Temple-Fort Hood, TX	28660	Limited-Scope	
Laredo, TX	29700	Limited-Scope	
Longview, TX	30980	Limited-Scope	
Lubbock, TX	31180	Limited-Scope	
McAllen-Edinburg-Mission, TX	32580	Limited-Scope	
Midland, TX	33260	Limited-Scope	
Odessa, TX	36220	Limited-Scope	
San Angelo, TX	41660	Limited-Scope	
Sherman-Denison, TX	43300	Limited-Scope	
Tyler, TX	46340	Limited-Scope	
Victoria, TX	47020	Limited-Scope	
Waco, TX	47380	Limited-Scope	
Wichita Falls, TX	48660	Limited-Scope	
Texas Non-MSA		Limited-Scope	
<b>VIRGINIA</b>			
Richmond, VA	40060	Full-Scope	
Blacksburg-Christiansburg-Radford, VA	13980	Limited-Scope	
Charlottesville, VA	16820	Limited-Scope	
Danville, VA	19260	Limited-Scope	
Harrisonburg, VA	25500	Limited-Scope	
Lynchburg, VA	31340	Limited-Scope	
Roanoke, VA	40220	Limited-Scope	
Virginia Beach-Norfolk-Newport News, VA	47260	Limited-Scope	
Virginia Non-MSA		Limited-Scope	
<b>WASHINGTON</b>			
Seattle-Bellevue-Everett, WA	42644	Full-Scope	
Bellingham, WA	13380	Limited-Scope	
Bremerton-Silverdale, WA	14740	Limited-Scope	

Kennewick-Pasco-Richland, WA	28420	Limited-Scope	
Lewiston, WA	30300	Limited-Scope	Asotin County (WA) only
Longview, WA	31020	Limited-Scope	
Mount Vernon-Anacortes, WA	34580	Limited-Scope	
Olympia, WA	36500	Limited-Scope	
Spokane, WA	44060	Limited-Scope	
Tacoma, WA	45104	Limited-Scope	
Wenatchee-East Wenatchee, WA	48300	Limited-Scope	
Yakima, WA	49420	Limited-Scope	
Washington Non-MSA		Limited-Scope	

## Appendix B: Summary of Multistate Metropolitan Areas and State Ratings

RATINGS - BANK OF AMERICA, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Rating
BANK OF AMERICA, N.A.	High Satisfactory	Outstanding	Outstanding	Satisfactory
Multistate Metropolitan Area (MA):				
Allentown-Bethlehem-Easton (PA-NJ)	High Satisfactory	Outstanding	Outstanding	Outstanding
Augusta-Richmond County (GA-SC)	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
Boston-Cambridge-Quincy (MA-NH)	High Satisfactory	Outstanding	Outstanding	Outstanding
Charlotte-Gastonia-Rock Hill (NC-SC)	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
Kansas City (MO-KS)	High Satisfactory	Outstanding	Outstanding	Outstanding
Kingsport-Bristol-Bristol (TN-VA)	High Satisfactory	Outstanding	Outstanding	Outstanding
New York-Northern NJ-Long Island (NY-NJ)	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Philadelphia-Camden-Wilmington (PA-NJ-DE)	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Portland-Vancouver-Hillsboro (OR-WA)	Outstanding	High Satisfactory	Outstanding	Outstanding
Providence-New Bedford-Fall River (RI-MA)	Outstanding	Outstanding	Outstanding	Outstanding
South Bend-Mishawaka (IN-MI)	High Satisfactory	Outstanding	Outstanding	Outstanding
St. Louis (MO-IL)	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Washington-Arlington-Alexandria (DC-VA-MD)	High Satisfactory	Outstanding	Outstanding	Outstanding
State:				
Arizona	High Satisfactory	Outstanding	Outstanding	Outstanding
Arkansas	Low Satisfactory	Outstanding	Outstanding	Satisfactory
California	High Satisfactory	Outstanding	Outstanding	Outstanding
Colorado	Outstanding	Outstanding	Low Satisfactory	Outstanding
Connecticut	High Satisfactory	Outstanding	Outstanding	Outstanding
Delaware	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Florida	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Georgia	High Satisfactory	Outstanding	Outstanding	Outstanding
Idaho	High Satisfactory	Outstanding	Outstanding	Outstanding
Illinois	High Satisfactory	Outstanding	Outstanding	Outstanding
Indiana	High Satisfactory	Outstanding	Outstanding	Outstanding
Iowa	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Kansas	High Satisfactory	Outstanding	Outstanding	Outstanding
Maine	High Satisfactory	Outstanding	Outstanding	Outstanding
Maryland	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Massachusetts	Outstanding	Outstanding	Outstanding	Outstanding
Michigan	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Minnesota	Outstanding	Outstanding	Low Satisfactory	Outstanding
Missouri	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Nevada	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Rating
<b>State (continued):</b>				
New Hampshire	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
New Jersey	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
New Mexico	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
New York	High Satisfactory	Outstanding	Outstanding	Outstanding
North Carolina	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Ohio	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Oklahoma	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
Oregon	High Satisfactory	Outstanding	Outstanding	Outstanding
Pennsylvania	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
South Carolina	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
Tennessee	High Satisfactory	Outstanding	Outstanding	Outstanding
Texas	Low Satisfactory	Outstanding	Outstanding	Satisfactory
Virginia	High Satisfactory	Outstanding	Outstanding	Outstanding
Washington	High Satisfactory	Outstanding	Outstanding	Outstanding

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## Appendix C: Market Profiles for Full-Scope Areas

### Boston-Quincy MD

Demographic Information for Full-scope Area: Boston-Quincy MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	388	10.05	23.97	39.18	26.29	0.52
Population by Geography	1,812,937	7.06	23.54	40.00	29.24	0.16
Owner-Occupied Housing by Geography	395,204	1.97	14.35	46.50	37.18	0.00
Business by Geography	193,125	9.17	14.83	35.58	40.40	0.01
Farms by Geography	2,545	1.81	8.49	49.23	40.47	0.00
Family Distribution by Income Level	430,748	21.69	17.14	21.61	39.56	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	167,262	12.60	32.98	38.61	15.80	0.00
Median Family Income		62,948	Median Housing Value	224,547		
HUD Adjusted Median Family Income for 2011		87,600	Unemployment Rate	2.55%		
Households Below Poverty Level		11%	(2000 US Census)			

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

Source: 2000 US Census and 2011 HUD updated MFI

The Boston-Quincy MD comprises Norfolk, Plymouth and Suffolk counties. As of June 30, 2011, BANA deposits in the MD comprised approximately 4.1 percent of the total deposits of the bank.

Competition is strong with over 77 direct competitors operating more than 632 offices in the MD. BANA operates 92 branches in the MD and has a 29.81 percent market share, which ranks first among all institutions. Major competitors include State Street Bank and Trust with a 22 percent market share, RBS Citizen's N.A. with a 14.98 percent market share, Sovereign Bank with a 5.85 percent market share, and The Bank of New York Mellon with a market share of 5.44 percent.

The Boston-Quincy MD has a well-diversified economy. Key sectors of the economy include Education and Health Services, Government, Professional and Business Services and Finance. Major employers in the AA include Brigham and Women's Hospital, Mass General Hospital, Beth Israel Deaconess Medical Center, Boston University, and Fidelity Investments. Based on data from the Bureau of Labor Statistics, the unemployment rates in Norfolk, Plymouth, and Suffolk counties during April 2009 were 6.8 percent, 7.7 percent, and 6.8 percent, respectively. During December 2011, the unemployment rate in the aforementioned counties decreased to 5.5 percent, 7.0 percent, and 6.4 percent, respectively.

The National Association of Realtors reports that the median price of a home at December 31, 2009, was \$332,600 for the full Boston-Cambridge-Quincy MSA. As of December 31, 2011, this value rose to \$346,200, given the overall high median value home price, housing affordability continues to be a significant issue in the assessment area.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable rental housing
- Neighborhood stabilization efforts due to growing foreclosures
- Financial literacy/education
- Credit counseling

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development
- Supporting community development services such as financial literacy
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

**Charlotte-Gastonia-Rock Hill MSA**

Demographic Information for Full-scope Area: Charlotte-Gastonia-Rock Hill MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	267	5.99	27.34	42.70	23.22	0.75
Population by Geography	1,330,448	3.20	22.69	48.82	25.14	0.14
Owner-Occupied Housing by Geography	344,864	1.23	18.14	51.31	29.32	0.00
Business by Geography	193,689	2.67	15.31	45.13	36.79	0.11
Farms by Geography	4,039	1.04	14.78	58.18	25.95	0.05
Family Distribution by Income Level	353,333	19.43	18.53	22.93	39.11	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	134,114	5.82	34.05	49.13	11.00	0.00
Median Family Income		54,850	Median Housing Value		129,322	
HUD Adjusted Median Family Income for 2011		67,500	Unemployment Rate		2.81%	
Households Below Poverty Level		9%	(2000 US Census)			

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

Source: 2000 US Census and 2011 HUD updated MFI

The Charlotte-Gastonia-Rock Hill MSA is a multi-state MSA comprising Anson, Cabarrus, Gaston, Mecklenburg, and Union counties in North Carolina and York County in South Carolina. Mecklenburg County, with a 2011-estimated population of 944,373, is the most populous county in the MSA. The largest municipality in the MSA is the City of Charlotte, with an estimated population of 751,087. As of June 30, 2011, BANA deposits in the MSA comprised approximately 13.5 percent of the total deposits of the bank.

Banking competition is moderate with 48 banking institutions operating in the MSA. According to the FDIC, BANA has the greatest market share of deposits at 75.6 percent, followed by Wells Fargo Bank, N.A. at 11.4 percent. BB&T had the third greatest market share with 2.5 percent. No other banking institution has a deposit market share greater than 1 percent. BANA had 60 branch offices in the assessment area.

Historically, the region has been perceived as a textile center and more recently a banking center. Today, the region has a balanced economy that includes many sectors, including trade, transportation, and utilities, professional and business services, government, education and health services, and leisure and hospitality. The area is home to a number of Fortune 500 corporations, including Bank of America, Duke Energy, Family Dollar, Goodrich, Nucor, Sonic Automotive, and SPX. Smaller companies are just as important to the local economy. Entrepreneur and Fortune magazines have named the City of Charlotte as one of the nation's best large cities for entrepreneurs to start and operate a business.

Some of the largest employers in the region include Carolinas Healthcare System, Wells Fargo & Company, Charlotte-Mecklenburg Schools, Bank of America, and Wal-Mart Stores. The Charlotte Douglas International Airport is also a major employer, with nearly 18,000 employees. The airport is the sixth busiest airport in the U.S. It also serves as the largest hub for US Airways. The financial crisis of 2008 and the current economic recession, has

been experienced in the region as in other parts of the country. According to the Bureau of Labor Statistics, the unemployment rate in the MSA showed a marginal decreasing trend during the evaluation period. During April 2009, the unemployment rate in the MSA was 10.5 percent, increasing to 11.9 percent in April 2010, and decreasing to 10.4 percent in December 2011.

The National Association of Realtors details the decline in the median sales price of homes during the evaluation period. For 2009, the median sales price of a home in the MSA was \$189,100. This increased to \$211,100 during the second quarter of 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Small business financing
- Affordable housing financing
- Foreclosure prevention counseling
- Programs to attract new businesses to the assessment area to spur job growth
- Financial Support of housing programs targeting LMI persons;

Opportunities for participation by financial institutions include the following:

- Working with local, statewide and regional CDFIs to offer community development investments, loans and services
- Working with non-profits focused on community development activities
- Working with state government agencies focused on affordable housing for lending and investment opportunities

**New York-White Plains-Wayne MD**

Demographic Information for Full-scope Area: New York-White Plains-Wayne MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,921	11.64	24.58	28.48	33.07	2.23
Population by Geography	11,296,377	12.39	26.06	26.15	35.24	0.16
Owner-Occupied Housing by Geography	1,592,309	2.00	11.78	26.47	59.75	0.00
Business by Geography	1,089,046	6.65	18.35	22.15	51.85	1.01
Farms by Geography	7,556	2.50	8.22	18.09	70.91	0.28
Family Distribution by Income Level	2,705,548	25.76	15.40	16.77	42.07	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	1,113,466	22.20	36.69	25.23	15.87	0.00
Median Family Income		49,461	Median Housing Value		238,567	
HUD Adjusted Median Family Income for 2011		67,400	Unemployment Rate		3.85%	
Households Below Poverty Level		17%	(2000 US Census)			

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

Source: 2000 US Census and 2011 HUD updated MFI

The New York-White Plains-Wayne MD is a multi-state MD comprising Bronx, Kings, New York, Putnam, Queens, Richmond, Rockland, and Westchester counties in New York, and Bergen, Hudson, and Passaic counties in New Jersey. The AA includes the five boroughs of New York City (NYC). As of June 30, 2011, BANA deposits in the AA comprised approximately 8.2 percent of the total deposits of the bank.

Banking competition is very strong with over 173 financial institutions operating almost 3,097 branches in the AA. According to the FDIC's Deposit Market Share Report, as of June 30, 2011, BANA ranked third with a deposit market share of 9.1 percent and it operates 223 offices. Major banking competitors include JP Morgan Chase, Bank of New York Mellon, Citibank, and HSBC with deposit market shares of 38.9 percent, 10.8 percent, 6.3 percent, and 6 percent, respectively.

NYC is home to a diversified mix of businesses including the headquarters of many national and international corporations. Historically, the downtown area of Manhattan (lower Manhattan) has been dominated by the financial services industry, while midtown Manhattan has been home to advertising, publishing, and garment production. The retail sector is a major employer along with health and social care, and finance and insurance. In addition, light manufacturing and wholesale trades provide a significant level of job opportunities in the Bronx. Some of the largest employers in NYC include New York Presbyterian Healthcare Systems, Citigroup, JP Morgan Chase, Verizon, and Federated Department Stores.

Unemployment has increased in the region due to the current economic recession and financial crisis of 2008. According to the U.S. Bureau of Labor Statistics, the unemployment rate in the AA for April 2009 was 8.6 percent, which is consistent with the national unemployment rate of 8.9 percent and the state of New Jersey at 8.7 percent.

However, the unemployment rate was higher than the 8.1 percent rate for the state of New York. During December 2011, the unemployment rate in the AA was 9 percent, showing a moderate increase from the start of the evaluation period whereas the national rate was 8.5 percent, showing a moderate decrease from the start of the evaluation period. In December 2011, the unemployment rates for the states of New Jersey and New York were 9.1 percent and 8.2 percent, respectively. The unemployment rates were a fair increase in New York and a moderate decrease in New Jersey from the start of the evaluation period.

The housing market began deteriorating in late 2008 and contributed to the current economic recession. The National Association of Realtors has estimated the median price of housing in the AA at \$442,600 as of December 31, 2011. Home ownership continues to be very difficult for most LMI families.

Community contacts have identified the following credit and community development needs for this assessment area:

- Commercial lending to fund various revitalization projects
- Financing the development of commercial, industrial, and residential units
- Lines of credit for non-profits
- Loan to small businesses
- Grants
- Additional access to financial services (e.g., more branches)
- Small business training regarding financing and regulation
- Financial literacy
- Subsidies for affordable housing
- Foreclosure prevention assistance
- Programs to assist LMI first time homebuyers

Good opportunities exist to make community development investments and loans in the assessment area. At least 46 CDFIs are actively operating in NYC. Most are large CDFIs and offer various community development opportunities.

Opportunities for participation by financial institutions include the following:

- Working with various non-profits on affordable housing financing
- Grants to community development non-profit organizations
- Working with local government to assist LMI individuals with affordable housing and small business lending

## State of California

### Los Angeles-Long Beach-Glendale MD

Demographic Information for Full-scope Area: Los Angeles-Long Beach-Glendale MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,054	8.71	28.29	27.99	34.23	0.78
Population by Geography	9,519,338	8.00	29.44	30.88	31.58	0.10
Owner-Occupied Housing by Geography	1,499,694	1.91	15.46	31.30	51.33	0.00
Business by Geography	1,035,293	6.47	18.72	26.40	47.64	0.78
Farms by Geography	8,187	3.09	15.57	30.85	49.93	0.55
Family Distribution by Income Level	2,154,311	23.87	16.49	17.40	42.24	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	869,463	13.65	41.46	28.95	15.94	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		46,509 64,000 15%	Median Housing Value Unemployment Rate (2000 US Census)	240,248 3.72%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Los Angeles-Long Beach-Glendale (LLG) MD is comprised of Los Angeles County: a diverse urban area that includes more than 80 cities and a number of unincorporated areas. It is the most populous county in the state with more than 9.9 million residents, a 400,000 increase since 2009. Contractions in aerospace manufacturing and weak overall employment growth are delaying Los Angeles' transition from recovery to expansion. The housing market is cooling, with house prices and sales falling following the end of federal and state housing supports. While a reduction in defense and civilian contracts has resulted in the loss of jobs in the area, planned aerospace sales to foreign countries will help to offset the impact. Public infrastructure construction has a more positive outlook with construction plans for more than 15 miles of light rail and other transportation infrastructure projects such as high-speed rail service, scheduled over the next 10 years. The outlook for commercial construction will be slower to improve; however, a \$1 billion hotel and office complex and a National Football League (NFL) stadium are among the projects being considered in downtown Los Angeles. As of June 30, 2011, BANA deposits in the AA comprised approximately 5.3 percent of the total deposits of the bank.

Competition is strong in Los Angeles County with over 126 financial institutions operating more than 1,766 offices in the county. BANA has \$50.7 billion in deposits distributed among 256 offices. According to the FDIC's June 30, 2011 Summary of Deposits report, BANA is the number one institution with 20 percent of the market share, followed by Wells Fargo Bank, N.A., Union Bank, N.A., and JP Morgan Chase Bank, N.A. with 14.8 percent, 10.9 percent, and 8.8 percent of the market, respectively.

According to the U.S. Bureau of Labor Statistics, the unemployment rate increased from 10.6 percent in April 2009 to 11.6 percent in December 2011. The local unemployment

rate is similar to the 10.9 percent and 11.2 percent unemployment rate for the state of California during the same period, but significantly higher than the national unemployment rates of 8.9 percent and 8.5 percent. Los Angeles and Long Beach are home to the two busiest shipping ports in the country, and are considered a gateway to Pacific Rim business interests. In addition to the trade sectors, leading business sectors include government, the motion picture and video industries, restaurants, and other tourism-related businesses. Major employers include the University of California - Los Angeles, Kaiser Permanente, Northrop Grumman, and Boeing. LLG has several federal and state designations aimed at stimulating economic development including an Empowerment Zone, and Enterprise Zones. Over \$17 billion in tax incentives are tied to the designations.

Although affordability continues to be a significant issue, housing values in the region continue to decline. According to the National Association of Realtors, the median housing price in the Los Angeles MSA was \$333,900 in 2009 and \$307,700 in 2011, thus increasing affordability. According to the California Association of Realtors, the Housing Affordability Index for December 2011 indicates that 48 percent of the households in LLG can afford to purchase a median priced home. LLG has been heavily impacted by foreclosures, especially in the northwestern area of the county in the Palmdale and Lancaster communities where high amounts of new housing development took place in the early years of the decade. The foreclosures have exacerbated the need for residential rental units, resulting in long waiting lists for affordable rentals. The Los Angeles Housing Authority reports waiting lists for subsidized properties with more than 1,000 names.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing
- Multi-family housing that can accommodate large families
- Small business financing including micro loans
- Financial services; particularly branches in the unbanked and under-banked communities in the AA
- Foreclosure prevention counseling
- Job training/work force development
- Basic literacy and education skills

Opportunities for participation by financial institutions include the following:

- Participate in community based loan funds
- Support community development services through community development organizations
- Loan, investment, and service opportunities through local CDFIs and CDCs
- Support businesses through loans and investments in the areas targeted for economic development

## State of California

### Riverside-San Bernardino-Ontario MSA

Demographic Information for Full-scope Area: Riverside-San Bernardino-Ontario MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	587	4.60	28.79	41.06	24.87	0.68
Population by Geography	3,254,821	3.53	28.54	41.16	26.73	0.04
Owner-Occupied Housing by Geography	689,493	1.49	21.74	43.33	33.44	0.00
Business by Geography	317,979	2.64	23.99	41.13	32.18	0.07
Farms by Geography	5,849	1.81	24.07	41.84	32.26	0.02
Family Distribution by Income Level	782,412	21.73	17.48	20.23	40.56	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	306,792	5.90	39.74	41.18	13.19	0.00
Median Family Income		47,448	Median Housing Value		130,941	
HUD Adjusted Median Family Income for 2011		62,500	Unemployment Rate		3.35%	
Households Below Poverty Level		13%	(2000 US Census)			

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

Source: 2000 US Census and 2011 HUD updated MFI

The Riverside-San Bernardino-Ontario MSA is comprised of Riverside and San Bernardino counties. The AA was the fastest growing area in the state from 2000 to 2004 fueled by lower housing costs and more jobs resulting from businesses that were established or relocated from neighboring Orange and Los Angeles counties. The population continued to grow from 4,169,800 in 2008 to an estimated 4,304,997 in 2011. As of June 30, 2011, BANA deposits in the AA comprised approximately 0.9 percent of the total deposits of the bank.

Banking competition is strong with 62 financial institutions operating 604 offices within the two counties. According to the FDIC's June 30, 2011 Summary of Deposits Report, BANA has the largest market share with 23.1 percent of the deposits and 96 offices in the assessment area. Banks with more than 5 percent of the deposits include Wells Fargo Bank, N.A., JP Morgan Chase Bank, N.A., and US Bank N.A. with 17.5 percent, 10.5 percent, and 7.3 percent, respectively.

The AA's leading industries include state and local government, employment services, restaurants, and hospitals. There are also substantial agricultural and tourism sectors within Riverside County. The area's main employers include the U.S. Marine Corps Air Ground Combat Center, Loma Linda University Adventist Health Sciences Center, Stater Brothers Markets, and the Ontario International Airport. Unemployment in the area was 11.9 percent in April 2009 and reached 12.2 percent in December 2011, according to the U.S. Bureau of Labor Statistics.

The assessment area was severely impacted by the foreclosure crisis beginning in 2007. According to the National Association of Realtors, median housing values in the

assessment area increased slightly from \$169,700 in 2009 to \$172.300 in 2011. Foreclosed properties now amount to two-thirds of all sales in the area.

There are a limited number of community development corporations operating within the AA. Although capacity is limited, there are still opportunities for banks to participate in financial education and lending initiatives sponsored by local and statewide organizations such as in Riverside County, which has been designated as an Empowerment Zone.

A review of community contacts indicated that the following are identified needs within the community:

- Financial education including Earned Income Tax Credit programs
- Foreclosure counseling
- Affordable housing
- Small business financing

Opportunities for participation by financial institutions include the following:

- Participate with local organizations to provide financial education
- Participate in lending initiatives sponsored by local and statewide organizations
- Provide financial support for community development-related programs

## State of California

### Sacramento-Arden-Arcade-Roseville MSA

Demographic Information for Full-scope Area: Sacramento-Arden-Arcade-Roseville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	403	7.20	24.57	39.70	28.54	0.00
Population by Geography	1,796,857	6.61	25.18	38.80	29.41	0.00
Owner-Occupied Housing by Geography	407,721	3.32	18.33	42.14	36.21	0.00
Business by Geography	208,161	5.91	19.05	38.18	36.86	0.00
Farms by Geography	4,647	3.38	16.74	46.63	33.25	0.00
Family Distribution by Income Level	449,157	20.59	18.32	21.00	40.09	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	174,764	10.51	35.51	38.49	15.50	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		53,805 75,100 11%	Median Housing Value Unemployment Rate (2000 US Census)	164,745 3.01%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Sacramento-Arden-Arcade-Roseville MSA is comprised of El Dorado, Placer, Sacramento, and Yolo counties. Sacramento is the state capital and state government remains its largest employer. The MSA has experienced significant population growth and remains the fourth largest population center in the State. Two primary reasons for this growth are immigration from other countries and people from the San Francisco- Bay area seeking more affordable housing and better quality of life. As of June 30, 2011, BANA deposits in the AA comprised approximately 0.06 percent of the total deposits of the bank.

Banking competition is strong with 62 financial institutions operating 425 offices within the AA. According to the FDIC's June 30, 2011 Summary of Deposits Report, BANA has the second largest market share with 18.5 percent of the deposits and 55 offices in the AA. Banks with more than 5 percent of the deposits include Wells Fargo Bank, N.A., US Bank N.A., and JP Morgan Chase Bank, N.A., with 25.1 percent, 13.7 percent, and 6.9 percent, respectively.

Approximately 26 percent of all jobs are associated with the government. Until the recent state budget crisis, the presence of this significant workforce in addition to local government and some federal agencies provided stability and continuity for the economy. But with the state facing a multi- billion dollar shortfall in 2011, there have been large cuts in services, mandatory hiring freeze on state employment, and mandatory unpaid days off for state workers. These steps have taken a further toll on the local economy that was already suffering from the impact of the issues underlying the national recession.

The AA's leading industries include state and local government, services, finance insurance and real estate, retail, and healthcare; the area is also a large agricultural center.

Unemployment in the area was 10.1 percent in April 2009 and rose to 10.9 percent in December 2011, according to the U.S. Bureau of Labor Statistics.

The assessment area was severely impacted by the foreclosure crisis beginning in 2007. According to the National Association of Realtors, median housing values in the assessment area continued to decline, falling from \$180,500 in 2009 to \$167,100 in 2011. According to the California Association of Realtors' Affordable Housing Index, 74 percent of homes in Sacramento County and 67 percent in Placer County are affordable at the median sales price.

There are a number of community development opportunities within the AA. The City of Sacramento has three Urban Enterprise Zones

A review of community contacts indicated that the following are identified needs within the community:

- Financial education including Earned Income Tax Credit programs
- Foreclosure counseling
- Affordable housing
- Financial support for aging housing stock repairs
- Economic Development

Opportunities for participation by financial institutions include the following:

- Support local nonprofit organizations that can benefit from grants, direct investment, and technical advice on financial services.
- Participate in state and local incentives that encourage business investment and promote job creation
- Provide financial support for community development-related programs
- Support nonprofit groups that use New Market Tax Credits to help fund development and revitalization projects
- Participate in programs that assist affordable housing development and LMI homeownership.

## State of California

### San Francisco-San Mateo-Redwood City MD

Demographic Information for Full-scope Area: San Francisco-San Mateo-Redwood City MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	382	7.33	21.47	39.01	31.68	0.52
Population by Geography	1,731,183	7.21	21.80	42.21	28.77	0.00
Owner-Occupied Housing by Geography	335,597	1.54	12.79	45.12	40.55	0.00
Business by Geography	232,159	13.61	17.37	34.98	33.97	0.07
Farms by Geography	2,559	6.21	14.85	42.91	36.03	0.00
Family Distribution by Income Level	381,072	21.33	17.59	19.98	41.11	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	148,300	11.85	28.05	42.49	17.60	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		75,188 101,600 8%	Median Housing Value Unemployment Rate (2000 US Census)		501,526 2.12%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The San Francisco-San Mateo-Redwood City (SSR) MD consists of the counties of Marin, San Francisco, and San Mateo. The 2011-estimated population was 1.8 million, a moderate increase of 100,000 over the last 11 years. Despite the expense associated with living in the area, the housing boom and growth in the life sciences and research and development sectors drove growth in employment in the area. According to the National Association of Realtors, housing values have declined slightly from a \$493,300 in 2009 to \$483,400 in 2011. As of June 30, 2011, BANA deposits in the AA comprised approximately 9.2 percent of the total deposits of the bank.

Banking competition is strong with 61 financial institutions operating 538 offices in the AA. According to the FDIC's June 30, 2011 Deposit Market Share Report, BANA ranked first with 46 percent of the area's deposits and 79 offices. Banks with more than 4 percent of the market share include Wells Fargo Bank, N.A., Citibank, N.A., First Republic Bank, and Bank of America California, N.A., with 19.1 percent, 7.7 percent, 4.6 percent, and 4.5 percent market shares, respectively.

Employment in the area has been impacted as in other areas of the state. In the San Francisco-Oakland-Fremont MSA (of which the AA is a part) as of April 2009, the unemployment rate was 8.9 percent and fell slightly to 8.4 percent in December 2011. The level is slightly lower when compared with other areas in the state. After state and local government, the area's leading industries are traveler services and restaurants, computer systems design and related services, and general medical and surgical hospitals. Major employers include the University of California-San Francisco, United Airlines, Inc., Wells Fargo Bank, N.A., and Kaiser Permanente.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing
- Small business access to credit
- Financial counseling
- Support of non-profit organizations addressing homeownership preservation
- Foreclosure prevention and mitigation and disposition of foreclosed properties;
- Support for programs that help create jobs and technical assistance to small businesses

The San Francisco area is known for its community development and philanthropic entities that provide assistance to organizations throughout northern California. There are numerous opportunities for financial institutions to become involved in activities that benefit LMI neighborhoods and individuals.

## State of Florida

### Ft. Lauderdale-Pompano Beach-Deerfield Beach MD

Demographic Information for Full-scope Area: Ft. Lauderdale-Pompano Beach-Deerfield Beach MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	279	4.66	25.45	41.94	27.96	0.00
Population by Geography	1,623,018	3.57	26.43	43.13	26.88	0.00
Owner-Occupied Housing by Geography	454,625	1.16	23.67	45.93	29.24	0.00
Business by Geography	344,625	4.01	19.65	41.33	35.01	0.00
Farms by Geography	4,366	3.30	21.23	42.51	32.96	0.00
Family Distribution by Income Level	413,958	20.85	18.17	20.48	40.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	161,511	5.81	38.36	42.71	13.12	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		50,570 61,800 11%	Median Housing Value Unemployment Rate (2000 US Census)	115,192 2.64%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Ft. Lauderdale-Pompano Beach-Deerfield Beach MD consists of Broward County, FL, located north of Miami's Dade County. As of June 30, 2011, BANA deposits in the AA comprised approximately 1 percent of the total deposits of the bank. Competition is strong with 62 institutions operating 478 offices within the AA. BANA operates 74 offices within the AA and has the highest market share at 25.1 percent. Major competitors include Wells Fargo Bank, N.A., SunTrust Bank, JP Morgan Chase Bank, N.A., and Citibank, N.A., with 17.7 percent, 7.4 percent, 5.2 percent, and 4.5 percent market share, respectively.

Broward County has a well-diversified economy; key economic sectors include trade, transportation and utilities, professional and business services, government, and education and health services. The area's largest employers are Nova Southeastern University, American Express, Kaplan Higher Education, and The Answer Group. Broward County has several areas designated for economic development including The Broward County Brownfield Redevelopment Program, The Broward County Enterprise Zone, The Urban Job Tax Credit Program (UJTC), and The Broward County Historically Underutilized Business Zone (HUB Zones).

In April 2009, the unemployment rate in the Broward County was 8.1 percent and moderately increased by December 2011 to 8.5 percent. The National Association of Realtors reports significant decline in housing prices; the median sales price of existing single-family homes in the Miami-Ft. Lauderdale-Miami Beach MSA which encompasses the AA was \$211,200 in 2009 and \$181,100 in 2011. One community contact noted that the nationwide foreclosure problem has increased the number of people in the local rental market and that rents are increasing. In addition, there is a growing problem with the homeless in downtown Ft. Lauderdale.

A review of community contacts indicated that the following are identified needs within the community:

- Employment opportunities and career development
- Access to credit for individuals and businesses
- Loan modification
- Affordable rental housing and affordable housing rehabilitation
- Grants for nonprofit community service organizations
- Financial literacy for consumers and businesses

Opportunities for participation by financial institutions include the following:

- Participate in affordable housing initiatives through lending and investment
- Provide or participate in foreclosure prevention programs and education
- Work with economic development organizations to provide small business lending
- Develop lending products for small businesses
- Support community service organizations with funding and or technical services
- Support of projects in the economic development zones

## State of Florida

### Jacksonville MSA

Demographic Information for Full-scope Area: Jacksonville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	201	5.47	25.87	51.74	16.92	0.00
Population by Geography	1,122,750	3.22	20.31	53.75	22.72	0.00
Owner-Occupied Housing by Geography	292,186	1.98	16.44	54.98	26.60	0.00
Business by Geography	180,018	3.64	18.32	50.65	27.40	0.00
Farms by Geography	4,238	1.51	15.57	60.48	22.44	0.00
Family Distribution by Income Level	299,459	19.42	18.51	23.14	38.94	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	113,570	5.57	28.91	53.96	11.56	0.00
Median Family Income		50,048	Median Housing Value		101,212	
HUD Adjusted Median Family Income for 2011		66,400	Unemployment Rate		2.33%	
Households Below Poverty Level		10%	(2000 US Census)			

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Jacksonville MSA comprises the counties of Baker, Clay, Duval, Nassau, and St. Johns. The city has established targeted distressed neighborhoods known as Neighborhood Action Plan Areas, which is a comprehensive long-term approach to community revitalization. The program focuses on community assets as a means of stimulating market driven redevelopment. HUD recognizes these neighborhoods as Neighborhood Revitalization Strategy Areas.

As of June 30, 2011, BANA deposits in the MSA comprised approximately 2.3 percent of the total deposits of the bank. Competition is moderate with 42 institutions operating 319 offices within the Jacksonville MSA. BANA operates 37 offices within the AA and has the highest market share of deposits with a 47.1 percent market share. Major competitors include Everbank, Wells Fargo Bank, N.A., and SunTrust Bank with market shares of 19.3 percent, 13.2 percent, and 3.9 percent, respectively.

The Jacksonville MSA has a well-diversified economy. Key economic sectors include trade, transportation and utilities, professional and business services, education and health services, and government. The area's largest employer is the U.S. Navy with approximately 23,000 employees at its two Naval Air stations in the area. Other large employers include Blue Cross & Blue Shield of Florida, Publix Supermarkets, Winn-Dixie Stores, and Baptist Health Systems. The AA has also shown an increasing unemployment level during the evaluation period. In April 2009, the unemployment rate in the Jacksonville MSA was 8.9 percent. By December 2011, the rate had increased to 9.2 percent.

The National Association of Realtors reports significant decline in housing prices in the Jacksonville MSA, falling from a median sales price of existing single-family homes of \$145,900 in 2009 to \$123,600 in 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Small business financing, particularly for minority businesses
- Foreclosure prevention and Loan modification programs
- Affordable housing for owners and renters
- Grants for nonprofit organizations that support affordable housing initiatives
- Financial literacy programs

Opportunities for participation by financial institutions include the following:

- Participate in affordable housing loan pools
- Provide construction financing
- Support foreclosure prevention programs and activities
- Support community services organization
- Work with economic development organizations for provide small business capital
- Support activity in the city's Neighborhood Action Plan Areas

## State of Florida

### Miami-Miami Beach-Kendall MD

Demographic Information for Full-scope Area: Miami-Miami Beach-Kendall MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	347	7.78	28.53	32.85	29.97	0.86
Population by Geography	2,253,362	4.89	28.61	35.68	30.79	0.02
Owner-Occupied Housing by Geography	449,333	1.69	19.82	36.99	41.51	0.00
Business by Geography	454,418	3.98	19.56	32.37	43.51	0.59
Farms by Geography	5,069	2.39	18.13	35.10	44.19	0.20
Family Distribution by Income Level	552,484	23.00	16.98	18.53	41.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	220,856	8.31	40.20	35.41	16.08	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		40,266 51,900 18%	Median Housing Value Unemployment Rate (2000 US Census)	123,974 3.92%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Miami-Miami Beach-Kendall MD consists of Miami-Dade County. Incorporated municipalities include Miami, Miami-Beach, North Miami Beach, Coral Gables, Homestead, South Miami, and Kendall. Miami-Dade County is a densely populated urban center with the greatest concentration of LMI geographies found in Miami. Miami is a very high cost area in which to live compared to most other areas of Florida. Housing is very difficult to afford for LMI individuals without large subsidies. Miami-Dade County, particularly the city of Miami, has been severely impacted by the housing crisis. The state of Florida consistently ranks among the top five states in the nation for the number of home foreclosures. The high foreclosure rate puts additional stress on the affordable rental market and the stability of communities. The area includes a federally designated Enterprise Zone, which targets economic development with the goal of stimulating and retaining jobs. There are 20 areas designated as Targeted Urban Areas ("TAU") that are the focus for the Urban Economic Revitalization Plan for Miami-Dade County.

As of June 30, 2011, BANA deposits in the MSA comprised approximately 1 percent of the total deposits of the bank. Competition is strong with over 70 institutions operating 660 offices within Miami-Dade County. BANA operates 73 offices within the AA and has the second highest market share of deposits with 11.5 percent market share. Major competitors include Wells Fargo Bank, N.A., Citibank, N.A., and SunTrust Bank with market shares of 12.8 percent, 9.6 percent, and 7 percent, respectively.

The AA has a well-diversified economy. Key economic sectors include trade, transportation and utilities, education and health services, government, retail trade, and professional and business services. The area's largest employers include the University of Miami, Publix Supermarkets, Baptist Health Systems of South Florida, American Airlines, and Winn Dixie

Stores. During April 2009, the unemployment rate stood at 10.8 percent and fell moderately to 10.2 percent in December 2011.

The National Association of Realtors reports significant decline in housing prices; the median sales price of existing single-family homes in the Miami-Ft. Lauderdale-Miami Beach MSA, which encompasses the AA was \$211,200 in 2009 and \$181,100 in 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing for renters and owners
- Job creation and career development
- Small business financing including micro lending
- Foreclosure prevention programs
- Lease purchase program for housing
- Loan modification
- Neighborhood revitalization and development

Opportunities for participation by financial institutions include the following:

- Grants to small businesses and non-profit organizations
- Fund raising for small businesses and non-profit organizations
- Grants to affordable housing non-profit organizations
- Financial literacy education and counseling
- Support activities in the areas targeted for development
- Partner with CDCs and other community focused organizations to provide lending and investment

## State of Florida

### Orlando-Kissimmee-Sanford MD

Demographic Information for Full-scope Area: Orlando-Kissimmee-Sanford MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	328	2.44	23.17	46.04	28.35	0.00
Population by Geography	1,644,561	1.63	22.82	48.22	27.33	0.00
Owner-Occupied Housing by Geography	414,548	0.62	17.95	49.89	31.54	0.00
Business by Geography	340,598	1.07	18.40	46.78	33.75	0.00
Farms by Geography	7,752	0.85	17.54	55.52	26.08	0.00
Family Distribution by Income Level	428,378	18.74	18.84	22.70	39.72	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	160,974	2.80	32.81	50.01	14.38	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		47,851 57,400 10%	Median Housing Value Unemployment Rate (2000 US Census)		105,369 2.34%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Orlando-Kissimmee-Sanford MD comprises Lake, Orange, Osceola, and Seminole counties. As of June 30, 2011, BANA deposits in the MSA comprised approximately 0.74 percent of the total deposits of the bank.

Competition is moderate with over 51 institutions operating 611 offices within the MSA. BANA operates 68 offices within the AA and has the second highest market share of deposits at 20 percent. Major competitors include SunTrust Bank with a market share of 23.4 percent and Wells Fargo Bank, N.A. with a market share of 14.2 percent.

The AA has a well-diversified economy. Key economic sectors include leisure and hospitality, trade, transportation and utilities, professional and business services, education and health services, and government. The area's largest employers include Walt Disney, Orange county Public Schools, and Florida Hospital. The unemployment rate in the AA rose slightly from 9.3 percent in April 2009, to 9.6 percent in December 2011.

The National Association of Realtors reports significant decline in housing prices in the AA. In 2009, the median sales price of existing single-family homes in the Orlando-Kissimmee FL MSA was \$147,400 and fell to \$124,900 in 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Multifamily housing rehabilitation
- Owner-occupied housing rehabilitation

- Affordable workforce housing
- Foreclosure assistance
- Transitional and emergency housing for the homeless

Opportunities for participation by financial institutions include the following:

- Participation in mortgage revenue bond programs for multifamily housing
- Provide credit counseling
- Investments in loan pools developed by non-profit CDFIs
- Investments in Low Income Housing Tax Credits

## State of Florida

### Tampa-St. Petersburg-Clearwater MSA

Demographic Information for Full-scope Area: Tampa-St. Petersburg-Clearwater MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	547	2.93	25.78	45.34	25.96	0.00
Population by Geography	2,395,997	2.35	24.27	46.05	27.32	0.00
Owner-Occupied Housing by Geography	714,394	0.77	21.94	48.28	29.01	0.00
Business by Geography	408,247	1.41	21.26	42.74	34.58	0.00
Farms by Geography	8,763	0.59	23.12	48.74	27.55	0.00
Family Distribution by Income Level	641,369	18.87	19.12	22.01	40.01	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	243,610	3.64	34.28	47.50	14.58	0.00
Median Family Income		45,339	Median Housing Value		92,588	
HUD Adjusted Median Family Income for 2011		55,700	Unemployment Rate		2.36%	
Households Below Poverty Level		10%	(2000 US Census)			

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

Source: 2000 US Census and 2011 HUD updated MFI

The Tampa-St. Petersburg-Clearwater MSA comprises Hernando, Hillsborough, Pasco, and Pinellas counties. There are several areas targeted for development and revitalization including the brown fields in the City of Tampa, and the enterprise zones in the City of Tampa and Hillsborough County. As of June 30, 2011, BANA deposits in the MSA comprised approximately 1 percent of the total deposits of the bank. Competition is strong with 74 institutions as direct competitors operating 788 offices within the MSA. BANA operates 102 offices within the MSA and has the top deposit market share at 17.2 percent. Major competitors include Wells Fargo Bank N.A., SunTrust Bank, and Raymond James Bank F.S.B., with market shares of 16.2 percent, 13.6 percent, and 12.1 percent, respectively.

The Tampa-St. Petersburg-Clearwater MSA has a diversified economy. Major employment sectors include trade, transportation and utilities, professional and business services, education and health services, government, and leisure and hospitality. The area's largest employers include Hillsborough County Public Schools, Mac Dill Air Force Base, Hillsborough County Government, University of South Florida, and Tampa International Airport. Based on data from the Bureau of Labor Statistics, the unemployment rate in the MSA increased from 9.7 percent in April 2009 to 10.1 percent in December 2011.

According to the National Association of Realtors, the median sales price of existing single-family homes for the Tampa-St. Petersburg-Clearwater MSA declined from \$140,700 in 2009 to \$127,800 in 2011.

A review of community contacts indicated that the following are identified needs within the community:

- Community development financing
- Foreclosure prevention assistance
- Lease purchase programs
- Affordable housing for renters and owners
- Career Development

Opportunities for participation by financial institutions include the following:

- Participate in loan pools for affordable housing
- Participate in first time homebuyer programs
- Support consumer financial education and counseling
- Support activities in areas targeted for development and revitalization
- Work with local government and organizations that provide community services

## State of Texas

### Dallas-Plano-Irving MD

Demographic Information for Full-scope Area: Dallas-Plano-Irving MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	689	9.14	29.61	31.79	28.88	0.58
Population by Geography	3,451,226	7.60	27.39	34.04	30.98	0.00
Owner-Occupied Housing by Geography	733,873	2.57	20.21	36.31	40.91	0.00
Business by Geography	537,784	3.24	18.97	32.71	43.99	1.09
Farms by Geography	9,589	2.11	16.79	42.98	37.78	0.34
Family Distribution by Income Level	866,920	21.32	18.00	20.39	40.30	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	340,820	13.13	39.16	33.89	13.82	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		56,313 69,600 10%	Median Housing Value Unemployment Rate (2000 US Census)	120,250 2.53%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Dallas-Plano-Irving MD is a large geographic area that includes eight counties (Collin, Dallas, Delta, Denton, Ellis, Hunt, Kaufman, and Rockwall). Situated within the nation's Sun Belt, Dallas has attracted people and businesses from colder regions for a number of years. The Dallas/Fort Worth area went from the nation's ninth most populated metropolitan area in 2000 to the fourth largest metropolitan area in 2010. As of June 30, 2011, BANA deposits in the MD comprised approximately 5.6 percent of the total deposits of the bank.

Competition is strong in the AA with 180 financial institutions operating 1,717 branches. BANA ranks first in the market, with a deposit market share of 32 percent. It has \$53 billion in deposits and 159 branch offices. Its largest competitor is JP Morgan Chase, with a 20 percent market share, \$33 billion in deposits, and 255 branches. Wells Fargo is the third largest financial institution, with 9 percent market share, \$15 billion in deposits, and 208 branches. No other financial institution has greater than 4 percent of deposits.

The Dallas area has well diversified economy. Key sectors of the economy include professional and business services, government, educational and health services, and retail trade. Major employers include American Airlines, Bank of America, Texas Health Resources, and Dallas Independent School District. Like the rest of the nation, the Dallas area has not been immune to the economic recession. According to the U.S. Bureau of Labor Statistics, the area unemployment rate at December 2011 was 7.0 percent.

Dallas has experienced tremendous growth since the early 1990s, attracting many high technology firms that have added to its base of finance, insurance, real estate,

telecommunications, and other non-manufacturing operations. The area has a strong service-based economy. Economic projections indicate continued growth at a slower rate because of higher costs and a stabilization of wages. The median cost of a home has risen to \$120,250. Thus, Dallas is experiencing the same affordable housing and small business challenges as other large urban areas in the nation.

Geographically, the northern percentages of the MD are expanding with many communities occupying what was once farming land. Development includes housing, office, commercial, and retail properties. The areas south and east of downtown Dallas have not benefited from the economic boom. An area approximately 30 square miles separated from the north by Interstate 30 is home to a large LMI population, with a per capita income that averages \$5,000 less than that of its neighbors to the north. For-profit developers dominate the northern part of the MSA, while non-profits do most of the development in the LMI areas.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing financing
- Down payment and closing cost assistance
- Financial literacy education
- Micro lending to small businesses, particularly loans less than \$25,000

Opportunities for participation by financial institutions include the following:

- Partner with non-profit organizations in providing affordable housing and small business financing and technical assistance
- Partner with local government through participation in local housing trust funds

## State of Texas

### Ft. Worth-Arlington MD

Demographic Information for Full-scope Area: Ft. Worth-Arlington MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	357	6.72	26.33	40.06	26.89	0.00
Population by Geography	1,710,318	5.10	24.80	41.72	28.37	0.00
Owner-Occupied Housing by Geography	398,229	3.14	18.57	43.89	34.39	0.00
Business by Geography	248,081	2.49	18.62	40.58	38.31	0.00
Farms by Geography	5,470	1.30	13.67	53.13	31.90	0.00
Family Distribution by Income Level	444,129	19.56	18.78	21.95	39.71	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	170,261	8.71	35.85	42.24	13.21	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		53,268 68,200 10%	Median Housing Value Unemployment Rate (2000 US Census)	98,851 2.33%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Fort Worth-Arlington MD consists of four contiguous counties in north central Texas (Johnson, Parker, Tarrant, and Wise counties). The eastern counties in the Fort Worth-Arlington MD are contiguous with the western counties of the Dallas-Plano-Irving MD. The Fort Worth-Arlington MD is the third most populous metropolitan area in Texas behind Dallas and Houston. As of June 30, 2011, BANA deposits in the MD comprised approximately 0.35 percent of the total deposits of the bank. BANA has \$3.3 billion in deposits and 42 branch offices.

Between 2000 and 2010, the population level increased by 39 percent to 741,206. The percentage of households below the poverty level is 10 percent and equals the national average. During this same period, the median housing price was \$98,851 and the median family income was \$68,200.

The Fort Worth economy is showing strong, above average growth, adding jobs at twice the national average. Increased employment is broad-based, but shows the most significant increases in transportation and warehousing. Federal defense spending is an important economic sector. Lockheed Martin, one of Fort Worth's largest employers, is benefiting from a contract to construct the F-35 Joint Strike Fighter. Well-paid aerospace jobs carry a high multiplier effect providing positive indirect economic benefit for the entire local economy.

Currently there are a number of Neighborhood Empowerment Zones and one Texas State Enterprise Zone designated by the City of Fort Worth active in the MSA. While not specifically targeting LMI individuals or geographies, these state and city programs promote economic development by providing tax incentives. They may also support community development if they are targeted to low-and moderate-income geographies or individuals.

There is a significant need for additional affordable housing in the Fort Worth-Arlington MD due to an aging housing stock in the central city. While affordable housing continues to be developed and funded through programs like the City of Fort Worth Development Corporation and the Low Income Housing Tax Credit program, much of the current stock of affordable housing is substandard and deteriorating. With recent increases in the Fort Worth-Arlington MD economy, the demand for affordable rental housing will increase.

With increases in employment in transportation, warehousing, and federal defense contracting, opportunities to develop small businesses will continue to increase. The need to provide technical assistance and non-traditional sources of funding for small business will also continue to increase. Based on community contacts, banks are generally considered effective in meeting the credit needs of the community. Financial literacy initiatives and services to combat predatory and payday lending by non-bank service corporations are considered high priority needs in the assessment area.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing financing
- Down payment and closing cost assistance
- Financial literacy education
- Micro lending to small businesses, particularly loans less than \$25,000

Opportunities for participation by financial institutions include the following:

- Partner with non-profit organizations in providing affordable housing and small business financing and technical assistance
- Partner with local government through participation in local housing trust funds

## State of Texas

### San Antonio-New Braunfels MSA

Demographic Information for Full-scope Area: San Antonio-New Braunfels MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	339	3.54	35.99	36.58	23.01	0.88
Population by Geography	1,711,703	2.45	35.31	35.83	26.41	0.01
Owner-Occupied Housing by Geography	387,777	1.49	28.43	37.16	32.91	0.01
Business by Geography	196,665	1.30	22.41	34.76	41.34	0.19
Farms by Geography	5,154	0.58	14.67	45.67	38.90	0.17
Family Distribution by Income Level	435,019	21.16	17.99	20.54	40.31	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	170,321	3.98	49.86	34.54	11.62	0.00
Median Family Income		44,591	Median Housing Value		83,454	
HUD Adjusted Median Family Income for 2011		59,900	Unemployment Rate		2.58%	
Households Below Poverty Level		14%	(2000 US Census)			

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

Source: 2000 US Census and 2011 HUD updated MFI

The San Antonio-New Braunfels MSA is a large geographic area that includes eight counties (Atascosa, Bandera, Bexar, Comal, Guadalupe, Kendall, Medina, and Wilson) situated in the southwest, in south central Texas, and on the southwestern corner of the Texas Triangle. San Antonio-New Braunfels is the third-largest metropolitan area in Texas, after Dallas-Fort Worth-Arlington and Houston-Sugar Land-Baytown. As of June 30, 2011, BANA deposits in the MSA comprised of 0.35 percent of the total deposits of the bank.

Competition is strong in the San Antonio-New Braunfels MSA with 61 financial institutions operating 475 offices in the AA. BANA ranks third in the market, with a deposit market share of 4.93 percent. It has \$3.3 billion in deposits and 41 branch offices. Its largest competitor is USAA Federal Savings Bank, with a 66 percent market share, \$44 billion in deposits, and 11 branches. Frost National Bank is the second largest financial institution, with a 9 percent market share, \$5.8 billion in deposits, and 28 branches.

The San Antonio area has a well-diversified economy. Key sectors of the economy include manufacturing, trade, and professional and business services. Major employers are USAA Federal Savings Bank, H-E-B, Bill Miller Bar B-Q, Cullen/ Frost Bankers, Valero Energy, Southwest Research Institute, and Harland Clarke. According to the U.S. Bureau of Labor Statistics, the area unemployment rate was 6.7 percent at December 2011.

From 2000 to 2010, the population level increased by 16 percent to 1.3 million. The percentage of households below the poverty level is 14 percent and higher than the national average. Also during this period, the median housing price was \$83,454 and the median family income was \$44,591.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing financing
- Down payment and closing cost assistance
- Small business financing including micro lending

Opportunities for participation by financial institutions include the following:

- Participate in first time homebuyer programs
- Support consumer financial education and counseling

## Appendix D: Tables of Performance Data

### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the

bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the

percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

## Tables of Performance Data

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Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: BOSTON MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Boston-Quincy, MA MD	38.49	31,027	9,036,221	6,077	419,363	14	127	20	120,864	37,138	9,576,575	79.69
<b>Limited Review:</b>												
Cambridge-Newton-Framingham, MA MD	38.04	30,618	9,172,897	6,073	335,609	10	75	3	21,454	36,704	9,530,035	16.33
Peabody, MA MD	15.28	12,953	3,428,910	1,776	72,688	8	77	4	15,116	14,741	3,516,791	2.59
Rockingham County-Strafford County, NH MD	8.18	6,494	1,479,438	1,387	94,165	14	82	0	0	7,895	1,573,685	1.39

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: BOSTON MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						% of Rated Area Deposits in AA***		
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**			Other Secured Consumer**	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		#	\$ (000's)
<b>Full Review:</b>														
Boston-Quincy, MA MD	100.00	1	5,370	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	79.69
<b>Limited Review:</b>														
Cambridge-Newton-Framingham, MA MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	16.33
Peabody, MA MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.59
Rockingham County-Strafford County, NH MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.39

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: BOSTON MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boston-Quincy, MA MD	8,907	39.21	1.97	4.01	14.35	18.92	46.50	45.62	37.18	31.46	15.12	13.81	17.49	15.63	13.53
<b>Limited Review:</b>															
Cambridge-Newton-Framingham, MA MD	7,788	34.28	0.94	2.07	14.92	19.70	53.92	53.48	30.23	24.76	15.81	16.67	16.91	16.60	13.66
Peabody, MA MD	4,013	17.66	1.66	4.44	11.05	18.54	55.92	53.00	31.37	24.02	16.24	20.16	18.49	15.72	15.31
Rockingham County-Strafford County, NH MD	2,011	8.85	0.00	0.00	16.82	17.11	63.78	63.50	19.40	19.39	14.66	0.00	16.02	14.47	14.17

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: BOSTON MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boston-Quincy, MA MD	480	38.74	1.97	1.46	14.35	10.00	46.50	41.04	37.18	47.50	7.33	4.65	9.80	6.95	7.25
<b>Limited Review:</b>															
Cambridge-Newton-Framingham, MA MD	474	38.26	0.94	0.84	14.92	8.86	53.92	54.64	30.23	35.65	7.81	5.88	5.62	8.01	8.44
Peabody, MA MD	194	15.66	1.66	1.55	11.05	8.25	55.92	50.00	31.37	40.21	7.66	8.33	6.52	6.72	9.43
Rockingham County-Strafford County, NH MD	91	7.34	0.00	0.00	16.82	8.79	63.78	68.13	19.40	23.08	5.90	0.00	3.15	6.38	6.71

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: BOSTON MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Boston-Quincy, MA MD	21,640	37.88	1.97	2.57	14.35	11.80	46.50	40.30	37.18	45.33	13.61	17.82	17.22	13.65	12.79									
<b>Limited Review:</b>																								
Cambridge-Newton-Framingham, MA MD	22,356	39.13	0.94	0.59	14.92	11.76	53.92	52.84	30.23	34.81	14.09	19.78	15.92	14.48	13.04									
Peabody, MA MD	8,746	15.31	1.66	1.19	11.05	7.91	55.92	51.20	31.37	39.70	13.09	31.61	15.49	13.20	12.40									
Rockingham County-Strafford County, NH MD	4,392	7.69	0.00	0.00	16.82	10.75	63.78	64.48	19.40	24.77	12.60	0.00	13.40	12.69	12.10									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: BOSTON MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Boston-Quincy, MA MD	0	0.00	13.39	0.00	29.57	0.00	31.06	0.00	25.97	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Cambridge-Newton-Framingham, MA MD	0	0.00	7.40	0.00	30.67	0.00	48.78	0.00	13.16	0.00	0.00	0.00	0.00	0.00	0.00	
Peabody, MA MD	0	0.00	14.41	0.00	28.40	0.00	46.94	0.00	10.24	0.00	0.00	0.00	0.00	0.00	0.00	
Rockingham County-Strafford County, NH MD	0	0.00	0.00	0.00	30.35	0.00	64.88	0.00	4.78	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: BOSTON MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Boston-Quincy, MA MD	6,077	39.69	9.17	6.47	14.83	10.88	35.58	34.80	40.41	47.85	7.31	6.53	5.98	6.73	8.40									
<b>Limited Review:</b>																								
Cambridge-Newton-Framingham, MA MD	6,073	39.66	2.86	2.19	16.58	12.89	50.74	50.67	29.82	34.25	8.24	6.83	6.58	8.06	9.50									
Peabody, MA MD	1,776	11.60	5.36	3.15	13.89	10.19	50.29	46.17	30.46	40.48	5.46	4.20	4.97	5.01	6.47									
Rockingham County-Strafford County, NH MD	1,387	9.06	0.00	0.00	16.31	11.46	66.91	70.44	16.78	18.10	6.96	0.00	6.46	7.12	6.71									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: BOSTON MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography <sup>*</sup>				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
Boston-Quincy, MA MD	14	30.43	1.81	0.00	8.49	0.00	49.23	50.00	40.47	50.00	10.71	0.00	0.00	8.33	18.18	
<b>Limited Review:</b>																
Cambridge-Newton-Framingham, MA MD	10	21.74	0.97	0.00	10.99	0.00	54.13	30.00	33.91	70.00	6.00	0.00	0.00	3.45	11.11	
Peabody, MA MD	8	17.39	1.29	0.00	8.57	0.00	53.26	37.50	36.87	62.50	16.67	0.00	0.00	9.09	33.33	
Rockingham County-Strafford County, NH MD	14	30.43	0.00	0.00	10.42	28.57	68.73	57.14	20.84	14.29	13.95	0.00	40.00	6.06	40.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: BOSTON MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families*	% BANK Loans****	% Familie**	% BANK Loans*** *	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Boston-Quincy, MA MD	8,907	39.21	21.69	8.15	17.14	29.86	21.61	26.60	39.56	35.40	17.47	18.06	19.11	18.38	15.87	
<b>Limited Review:</b>																
Cambridge-Newton-Framingham, MA MD	7,788	34.28	19.32	14.80	18.26	26.84	22.74	28.12	39.69	30.25	18.19	21.33	20.34	19.09	15.57	
Peabody, MA MD	4,013	17.66	20.76	12.78	17.43	32.69	21.99	26.66	39.82	27.87	18.29	19.96	19.69	19.10	16.02	
Rockingham County-Strafford County, NH MD	2,011	8.85	16.53	10.84	19.79	33.23	26.38	29.59	37.30	26.34	16.63	18.28	18.51	17.12	13.75	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: BOSTON MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Boston-Quincy, MA MD	480	38.74	21.69	9.32	17.14	22.46	21.61	27.33	39.56	40.89	7.59	8.11	7.77	7.42	7.54	
<b>Limited Review:</b>																
Cambridge-Newton-Framingham, MA MD	474	38.26	19.32	10.00	18.26	22.98	22.74	27.87	39.69	39.15	8.15	7.08	6.47	8.73	8.75	
Peabody, MA MD	194	15.66	20.76	5.26	17.43	19.47	21.99	25.79	39.82	49.47	7.86	3.70	6.01	8.75	8.70	
Rockingham County-Strafford County, NH MD	91	7.34	16.53	9.89	19.79	21.98	26.38	24.18	37.30	43.96	6.11	4.44	7.19	5.69	6.35	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Boston Multistate MSA					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Boston-Quincy, MA MD	21,640	37.88	21.69	5.41	17.14	16.95	21.61	26.07	39.56	51.57	14.95	19.83	16.58	15.25	14.13	
<b>Limited Review:</b>																
Cambridge-Newton-Framingham, MA MD	22,356	39.13	19.32	7.24	18.26	19.23	22.74	30.82	39.69	42.71	15.62	18.77	16.97	15.88	14.85	
Peabody, MA MD	8,746	15.31	20.76	6.76	17.43	18.01	21.99	26.72	39.82	48.51	14.50	18.87	15.89	15.07	13.59	
Rockingham County-Strafford County, NH MD	4,392	7.69	16.53	8.51	19.79	21.78	26.38	29.72	37.30	39.98	13.43	17.18	13.64	14.15	12.39	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 7.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses		Geography: Boston Multistate MSA			Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Boston-Quincy, MA MD	6,077	39.69	65.85	51.41	87.12	4.94	7.95	7.18	15.06
<b>Limited Review:</b>									
Cambridge-Newton-Framingham, MA MD	6,073	39.66	66.76	56.15	89.43	4.40	6.17	8.12	16.37
Peabody, MA MD	1,776	11.60	69.24	56.98	92.57	3.21	4.22	5.38	10.15
Rockingham County-Strafford County, NH MD	1,387	9.06	70.44	52.05	88.03	5.26	6.71	6.81	10.48

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 27.51% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: BOSTON MULTISTATE MSA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Boston-Quincy, MA MD	14	30.43	95.52	57.14	100.00	0.00	0.00	10.71	6.45
<b>Limited Review:</b>									
Cambridge-Newton-Framingham, MA MD	10	21.74	95.51	80.00	100.00	0.00	0.00	5.77	6.90
Peabody, MA MD	8	17.39	96.59	87.50	100.00	0.00	0.00	16.22	20.00
Rockingham County-Strafford County, NH MD	14	30.43	97.67	78.57	100.00	0.00	0.00	13.33	17.86

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 26.09% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		GEOGRAPHY: BOSTON MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Boston-Quincy, MA MD	150	176,944	271	226,093	421	403,038	80.32	15	94,895
<b>Limited Review:</b>									
Cambridge-Newton-Framingham, MA MD	33	42,808	79	16,516	112	59,325	11.82	1	2,289
Peabody, MA MD	13	26,253	32	10,468	45	36,721	7.32	2	959
Rockingham County-Strafford County, NH MD	7	1,073	38	1,615	45	2,688	0.54	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: BOSTON MULTISTATE MSA																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Boston-Quincy, MA MD	79.69	91	46.43	12.09	17.58	28.57	41.76	0	7	2	-2	0	-3	7.06	23.54	40.00	29.24
<b>Limited Review:</b>																	
Cambridge-Newton-Framingham, MA MD	16.33	70	35.71	0.00	18.57	42.86	38.57	0	8	0	0	-6	-2	3.46	22.32	49.69	24.54
Peabody, MA MD	2.59	20	10.20	10.00	15.00	55.00	20.00	0	3	0	0	-1	-2	6.49	18.99	49.28	25.25
Rockingham County-Strafford County, NH MD	1.39	15	7.65	0.00	20.00	73.33	6.67	0	0	0	0	0	0	0.00	19.21	63.51	17.27

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: NEW YORK MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
New York-White Plains-Wayne, NY/NJ MD	40.27	47,369	16,576,980	20,122	1,173,814	26	514	60	211,015	67,577	17,962,323	80.22
<b>Limited Review:</b>												
Edison-New Brunswick, NJ MD	26.18	35,741	9,639,999	8,152	479,435	41	332	5	37,393	43,939	10,157,159	7.50
Nassau-Suffolk, NY MD	15.04	16,805	5,440,241	8,399	499,633	31	370	9	41,400	25,244	5,981,644	5.99
Newark-Union, NJ MD	18.52	24,725	7,356,509	6,309	371,025	30	577	8	35,908	31,072	7,764,019	6.29

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: NEW YORK MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
New York-White Plains-Wayne, NY/NJ MD	100.00	18	395,099	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	80.22
<b>Limited Review:</b>														
Edison-New Brunswick, NJ MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	7.50
Nassau-Suffolk, NY MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	5.99
Newark-Union, NJ MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	6.29

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NEW YORK MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
<b>Full Review:</b>																
New York-White Plains-Wayne, NY/NJ MD	20,552	44.12	2.00	3.30	11.78	15.64	26.48	26.36	59.75	54.70	13.46	14.90	14.91	13.28	13.07	
<b>Limited Review:</b>																
Edison-New Brunswick, NJ MD	10,401	22.33	3.50	2.26	14.87	15.76	51.71	52.33	29.93	29.65	15.38	12.97	16.19	15.88	14.39	
Nassau-Suffolk, NY MD	7,578	16.27	0.22	0.30	12.21	17.71	66.17	66.30	21.40	15.69	12.37	9.62	14.09	12.67	10.00	
Newark-Union, NJ MD	8,048	17.28	3.15	10.09	12.31	18.51	35.02	34.49	49.52	36.90	15.51	23.93	20.91	16.54	12.09	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT			GEOGRAPHY: NEW YORK MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
New York-White Plains-Wayne, NY/NJ MD	728	38.46	2.00	2.61	11.78	11.26	26.48	25.00	59.75	61.13	7.47	12.05	7.85	8.88	6.78	
<b>Limited Review:</b>																
Edison-New Brunswick, NJ MD	430	22.72	3.50	1.40	14.87	11.16	51.71	56.51	29.93	30.93	4.95	2.70	3.58	5.42	4.80	
Nassau-Suffolk, NY MD	479	25.30	0.22	0.42	12.21	9.81	66.17	71.82	21.40	17.95	7.20	0.00	4.46	8.16	6.10	
Newark-Union, NJ MD	256	13.52	3.15	1.95	12.31	8.59	35.02	33.98	49.52	55.47	4.18	4.55	2.49	3.75	4.78	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: NEW YORK MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
New York-White Plains-Wayne, NY/NJ MD	25,970	34.15	2.00	1.74	11.78	11.16	26.48	22.34	59.75	64.76	11.00	16.40	15.87	12.86	9.95	
<b>Limited Review:</b>																
Edison-New Brunswick, NJ MD	24,910	32.76	3.50	0.96	14.87	11.54	51.71	54.73	29.93	32.77	13.37	12.58	15.43	14.54	11.42	
Nassau-Suffolk, NY MD	8,747	11.50	0.22	0.17	12.21	13.34	66.17	66.75	21.40	19.73	8.50	10.42	11.18	8.65	6.94	
Newark-Union, NJ MD	16,421	21.59	3.15	3.39	12.31	11.31	35.02	34.30	49.52	51.00	11.97	28.03	23.07	13.18	10.14	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: NEW YORK MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
New York-White Plains-Wayne, NY/NJ MD	14	93.33	17.72	21.43	29.34	57.14	21.19	7.14	31.74	14.29	0.49	0.68	1.15	0.00	0.14	
<b>Limited Review:</b>																
Edison-New Brunswick, NJ MD	0	0.00	7.81	0.00	24.08	0.00	53.46	0.00	14.66	0.00	0.00	0.00	0.00	0.00	0.00	
Nassau-Suffolk, NY MD	1	6.67	3.51	0.00	27.94	0.00	58.07	100.00	10.49	0.00	0.00	0.00	0.00	0.00	0.00	
Newark-Union, NJ MD	0	0.00	25.36	0.00	33.76	0.00	25.56	0.00	15.32	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: NEW YORK MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
New York-White Plains-Wayne, NY/NJ MD	20,122	46.81	6.65	3.96	18.35	13.35	22.15	22.04	52.86	60.66	3.37	3.29	3.12	3.68	3.33									
<b>Limited Review:</b>																								
Edison-New Brunswick, NJ MD	8,152	18.97	3.04	1.64	13.68	9.61	51.01	48.93	32.28	39.82	6.43	4.04	5.44	6.50	6.77									
Nassau-Suffolk, NY MD	8,399	19.54	0.58	0.25	12.84	13.13	62.87	62.26	23.72	24.36	4.33	3.24	5.40	4.35	3.86									
Newark-Union, NJ MD	6,309	14.68	8.92	4.07	16.51	10.78	31.46	30.84	43.11	54.30	5.75	5.79	5.93	5.62	5.79									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: NEW YORK MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography <sup>*</sup>				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
New York-White Plains-Wayne, NY/NJ MD	26	20.31	2.50	0.00	8.22	0.00	18.09	3.85	71.19	96.15	0.93	0.00	0.00	0.00	1.69	
<b>Limited Review:</b>																
Edison-New Brunswick, NJ MD	41	32.03	1.04	0.00	9.20	12.20	53.74	34.15	36.02	53.66	12.79	0.00	16.67	9.76	16.13	
Nassau-Suffolk, NY MD	31	24.22	0.34	0.00	17.96	35.48	65.40	54.84	16.29	9.68	10.83	0.00	15.38	10.26	6.25	
Newark-Union, NJ MD	30	23.44	1.18	3.33	6.55	0.00	36.42	40.00	55.85	56.67	12.90	0.00	0.00	18.52	12.50	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NEW YORK MULTISTATE MSA						EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Familie**	% BANK Loans*** *	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
New York-White Plains-Wayne, NY/NJ MD	20,603	44.18	25.76	1.02	15.40	8.37	16.77	25.18	42.07	65.43	14.35	15.28	14.19	15.17	14.08
<b>Limited Review:</b>															
Edison-New Brunswick, NJ MD	10,401	22.31	19.11	9.61	18.58	30.36	22.73	30.17	39.58	29.87	16.61	17.90	18.55	18.30	13.72
Nassau-Suffolk, NY MD	7,578	16.25	18.03	7.15	18.61	29.89	24.19	35.02	39.18	27.94	13.08	14.06	13.78	14.50	11.16
Newark-Union, NJ MD	8,048	17.26	22.05	5.91	16.60	27.11	20.25	31.98	41.11	35.00	16.75	19.20	18.83	19.02	13.89

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NEW YORK MULTISTATE MSA						EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
New York-White Plains-Wayne, NY/NJ MD	729	38.49	25.76	2.43	15.40	9.99	16.77	23.54	42.07	64.05	7.46	2.34	6.47	8.59	7.55
<b>Limited Review:</b>															
Edison-New Brunswick, NJ MD	430	22.70	19.11	7.45	18.58	28.37	22.73	30.29	39.58	33.89	4.94	2.48	6.56	5.42	4.31
Nassau-Suffolk, NY MD	479	25.29	18.03	6.32	18.61	24.84	24.19	37.05	39.18	31.79	7.45	4.66	8.37	8.26	6.96
Newark-Union, NJ MD	256	13.52	22.05	6.58	16.60	22.22	20.25	24.69	41.11	46.50	3.99	2.56	5.31	2.68	4.35

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: New York Multistate MSA					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
New York-White Plains-Wayne, NY/NJ MD	26,023	34.20	25.76	1.64	15.40	7.33	16.77	20.14	42.07	70.89	11.31	12.66	13.69	13.82	10.64	
<b>Limited Review:</b>																
Edison-New Brunswick, NJ MD	24,910	32.73	19.11	8.02	18.58	22.85	22.73	29.30	39.58	39.83	13.97	20.27	17.52	15.09	11.54	
Nassau-Suffolk, NY MD	8,747	11.49	18.03	6.56	18.61	24.76	24.19	32.50	39.18	36.18	8.65	10.25	10.87	9.46	7.00	
Newark-Union, NJ MD	16,421	21.58	22.05	4.52	16.60	17.29	20.25	27.03	41.11	51.17	12.42	16.75	17.12	14.46	10.58	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.4% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: NEW YORK MULTISTATE MSA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
New York-White Plains-Wayne, NY/NJ MD	20,122	46.81	66.04	56.27	88.98	4.57	6.46	3.33	9.71
<b>Limited Review:</b>									
Edison-New Brunswick, NJ MD	8,152	18.97	68.77	53.13	88.47	5.31	6.22	6.31	12.69
Nassau-Suffolk, NY MD	8,399	19.54	70.83	51.17	88.09	5.51	6.39	4.23	11.87
Newark-Union, NJ MD	6,309	14.68	68.32	53.38	88.65	4.88	6.47	5.63	12.04

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 26.53% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: NEW YORK MULTISTATE MSA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
New York-White Plains-Wayne, NY/NJ MD	26	20.31	96.43	65.38	96.15	3.85	0.00	0.89	0.82
<b>Limited Review:</b>									
Edison-New Brunswick, NJ MD	41	32.03	96.09	73.17	100.00	0.00	0.00	12.36	13.79
Nassau-Suffolk, NY MD	31	24.22	96.73	67.74	100.00	0.00	0.00	9.63	11.27
Newark-Union, NJ MD	30	23.44	96.80	66.67	96.67	0.00	3.33	12.24	12.77

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 24.81% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: NEW YORK MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
New York-White Plains-Wayne, NY/NJ MD	250	303,471	333	277,251	583	580,722	79.21	16	141,048
<b>Limited Review:</b>									
Edison-New Brunswick, NJ MD	20	45,939	61	18,559	81	64,498	8.80	0	0
Nassau-Suffolk, NY MD	11	23,604	85	11,364	96	34,968	4.77	0	0
Newark-Union, NJ MD	61	33,475	111	19,494	172	52,969	7.22	1	5,275

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: NEW YORK MULTISTATE MSA																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
New York-White Plains-Wayne, NY/NJ MD	80.22	218	45.13	6.42	16.51	21.10	55.96	19	24	2	3	-4	-6	12.39	26.06	26.15	35.24
<b>Limited Review:</b>																	
Edison-New Brunswick, NJ MD	7.50	99	20.50	2.02	19.19	50.51	28.28	1	21	0	-3	-10	-7	3.91	17.20	51.81	26.93
Nassau-Suffolk, NY MD	5.99	77	15.94	1.30	11.69	70.13	16.88	2	10	0	-1	-7	0	0.76	16.02	64.36	18.86
Newark-Union, NJ MD	6.29	89	18.43	11.24	15.73	38.20	34.83	2	9	0	-1	-2	-4	11.19	22.22	30.44	36.15

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: PHILADELPHIA MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Philadelphia, PA MD	57.28	38,330	8,209,259	6,563	285,029	36	302	1	4,975	44,930	8,499,565	85.48
<b>Limited Review:</b>												
Camden, NJ MD	28.98	20,388	4,055,914	2,321	136,014	22	338	4	4,256	22,735	4,196,522	13.60
Wilmington, DE MD	13.74	9,722	1,840,296	1,046	21,796	7	86	0	0	10,775	1,862,178	0.92

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: PHILADELPHIA MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Philadelphia, PA MD	13,107	53.57	8.68	5.33	18.44	20.61	33.17	38.86	39.71	35.19	11.32	12.23	12.64	12.82	9.54
<b>Limited Review:</b>															
Camden, NJ MD	6,638	27.13	3.02	1.79	9.38	8.36	62.69	66.35	24.91	23.50	16.51	25.54	17.24	17.20	14.25
Wilmington, DE MD	4,722	19.30	1.53	1.95	14.54	22.00	51.24	56.73	32.69	19.31	24.20	25.53	33.33	26.07	15.24

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT			GEOGRAPHY: PHILADELPHIA MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Philadelphia, PA MD	491	61.99	8.68	4.89	18.44	13.85	33.17	30.75	39.71	50.51	2.44	1.26	1.79	2.21	3.19	
<b>Limited Review:</b>																
Camden, NJ MD	206	26.01	3.02	1.94	9.38	8.74	62.69	65.05	24.91	24.27	2.87	5.56	2.69	2.51	3.64	
Wilmington, DE MD	95	11.99	1.53	2.11	14.54	10.53	51.24	51.58	32.69	35.79	4.88	9.09	3.03	3.91	6.79	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE			GEOGRAPHY: PHILADELPHIA MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Philadelphia, PA MD	24,722	57.27	8.68	2.35	18.44	12.30	33.17	35.81	39.71	49.54	9.70	11.23	13.16	11.23	8.37	
<b>Limited Review:</b>																
Camden, NJ MD	13,544	31.37	3.02	0.80	9.38	6.95	62.69	66.53	24.91	25.72	14.82	35.20	19.65	16.32	11.40	
Wilmington, DE MD	4,905	11.36	1.53	1.00	14.54	12.31	51.24	51.70	32.69	34.98	13.81	25.32	18.01	15.99	10.62	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: PHILADELPHIA MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Philadelphia, PA MD	0	0.00	7.67	0.00	21.08	0.00	39.16	0.00	32.08	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Camden, NJ MD	0	0.00	6.64	0.00	24.73	0.00	57.35	0.00	11.28	0.00	0.00	0.00	0.00	0.00	0.00
Wilmington, DE MD	0	0.00	5.53	0.00	21.17	0.00	53.68	0.00	19.62	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: PHILADELPHIA MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Philadelphia, PA MD	6,563	66.09	7.35	3.35	15.75	9.87	29.30	30.40	47.60	56.38	4.69	4.19	4.05	4.80	4.80									
<b>Limited Review:</b>																								
Camden, NJ MD	2,321	23.37	3.82	2.15	9.81	8.70	58.79	54.24	27.57	34.90	5.15	7.66	5.78	5.26	4.72									
Wilmington, DE MD	1,046	10.53	11.34	8.99	13.74	13.19	46.27	42.26	28.65	35.56	5.76	7.13	5.79	6.22	4.84									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: PHILADELPHIA MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography <sup>*</sup>				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
Philadelphia, PA MD	36	55.38	1.56	0.00	5.23	2.78	35.78	36.11	57.44	61.11	3.93	0.00	0.00	0.88	10.71	
<b>Limited Review:</b>																
Camden, NJ MD	22	33.85	0.65	0.00	6.90	0.00	61.56	27.27	30.89	72.73	15.87	0.00	0.00	6.67	26.67	
Wilmington, DE MD	7	10.77	2.51	0.00	12.07	0.00	51.14	57.14	34.28	42.86	17.39	0.00	0.00	14.29	25.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: PHILADELPHIA MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families*	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Philadelphia, PA MD	13,112	53.58	22.16	16.25	17.16	30.21	20.53	25.95	40.14	27.58	12.51	14.26	14.87	13.77	9.67	
<b>Limited Review:</b>																
Camden, NJ MD	6,638	27.12	18.85	14.90	18.50	36.42	24.62	28.50	38.03	20.18	18.84	20.65	19.53	20.64	15.36	
Wilmington, DE MD	4,722	19.30	18.53	25.94	17.33	42.02	23.55	20.70	40.59	11.34	25.90	33.49	31.56	23.99	14.09	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: PHILADELPHIA MULTISTATE MSA						EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Philadelphia, PA MD	491	61.99	22.16	12.21	17.16	24.00	20.53	25.26	40.14	38.53	2.43	1.23	2.73	2.78	2.56
<b>Limited Review:</b>															
Camden, NJ MD	206	26.01	18.85	13.43	18.50	30.85	24.62	32.84	38.03	22.89	2.85	3.56	3.54	3.61	1.60
Wilmington, DE MD	95	11.99	18.53	10.59	17.33	27.06	23.55	30.59	40.59	31.76	4.54	3.20	3.78	5.13	5.26

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: PHILADELPHIA MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share *				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Philadelphia, PA MD	24,727	57.27	22.16	9.18	17.16	20.71	20.53	25.97	40.14	44.14	9.84	15.66	12.49	10.74	8.23	
<b>Limited Review:</b>																
Camden, NJ MD	13,544	31.37	18.85	9.36	18.50	27.01	24.62	31.90	38.03	31.73	15.55	19.37	19.13	16.42	12.74	
Wilmington, DE MD	4,905	11.36	18.53	11.84	17.33	25.60	23.55	28.84	40.59	33.72	14.20	17.56	18.21	14.76	11.32	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.9% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: PHILADELPHIA MULTISTATE MSA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Philadelphia, PA MD	6,563	66.09	64.12	52.69	92.35	2.74	4.91	4.59	7.54
<b>Limited Review:</b>									
Camden, NJ MD	2,321	23.37	67.46	51.23	88.58	4.48	6.94	5.03	7.54
Wilmington, DE MD	1,046	10.53	66.23	57.07	97.51	0.86	1.63	5.66	8.42

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 27.16% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: Philadelphia Multistate MSA			Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Philadelphia, PA MD	36	55.38	95.60	55.56	100.00	0.00	0.00	3.89	1.91
<b>Limited Review:</b>									
Camden, NJ MD	22	33.85	95.92	59.09	100.00	0.00	0.00	15.38	15.00
Wilmington, DE MD	7	10.77	95.10	28.57	100.00	0.00	0.00	17.39	6.67

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 33.33% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		GEOGRAPHY: PHILADELPHIA MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Philadelphia, PA MD	38	37,457	173	40,350	211	77,807	64.17	1	4,416
<b>Limited Review:</b>									
Camden, NJ MD	63	35,549	70	6,580	133	42,128	34.74	0	0
Wilmington, DE MD	8	528	11	786	19	1,315	1.08	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: PHILADELPHIA MULTISTATE MSA																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Philadelphia, PA MD	85.48	65	66.33	4.62	16.92	33.85	44.62	6	22	0	-3	-8	-5	12.19	20.88	31.83	34.94
<b>Limited Review:</b>																	
Camden, NJ MD	13.60	30	30.61	6.67	13.33	66.67	13.33	1	10	0	0	-7	-2	6.00	12.38	59.47	22.13
Wilmington, DE MD	0.92	3	3.06	33.33	0.00	0.00	66.67	2	1	0	0	0	1	4.17	17.63	50.63	27.58

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: WASHINGTON MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Washington-Arlington-Alexandria DC/VA/MD MD	77.78	77,154	23,550,700	10,340	567,855	49	1,740	25	119,170	87,568	24,239,465	74.10
<b>Limited Review:</b>												
Bethesda-Rockville-Frederick, MD MD	22.22	21,206	6,666,685	3,776	178,831	28	206	4	26,112	25,014	6,871,834	25.90

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: WASHINGTON MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Washington-Arlington-Alexandria DC/VA/MD MD	69.23	9	26,839	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	74.10
<b>Limited Review:</b>														
Bethesda-Rockville-Frederick, MD MD	30.77	4	15,496	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	25.90

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															GEOGRAPHY: WASHINGTON MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Washington-Arlington-Alexandria DC/VA/MD MD	32,688	81.12	2.12	3.41	16.26	17.23	44.00	45.08	37.61	34.28	14.71	15.36	15.76	14.93	13.93									
<b>Limited Review:</b>																								
Bethesda-Rockville-Frederick, MD MD	7,608	18.88	0.57	0.84	16.20	19.73	49.83	60.69	33.40	18.74	14.70	14.71	16.10	16.27	10.44									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: WASHINGTON MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Washington-Arlington-Alexandria DC/VA/MD MD	727	74.64	2.12	3.85	16.26	20.08	44.00	42.23	37.61	33.84	5.22	7.20	7.85	4.82	4.57
<b>Limited Review:</b>															
Bethesda-Rockville-Frederick, MD MD	247	25.36	0.57	0.40	16.20	13.36	49.83	51.82	33.40	34.41	8.09	20.00	6.25	9.08	7.21

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE			GEOGRAPHY: WASHINGTON MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Washington-Arlington-Alexandria DC/VA/MD MD	43,736	76.61	2.12	2.96	16.26	13.56	44.00	39.30	37.61	44.19	13.00	18.98	16.78	13.97	11.40	
<b>Limited Review:</b>																
Bethesda-Rockville-Frederick, MD MD	13,351	23.39	0.57	0.43	16.20	14.52	49.83	50.87	33.40	34.18	11.12	10.98	14.67	12.21	9.10	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: WASHINGTON MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Washington-Arlington-Alexandria DC/VA/MD MD	0	0.00	12.45	0.00	37.50	0.00	29.17	0.00	20.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
<b>Limited Review:</b>																								
Bethesda-Rockville-Frederick, MD MD	0	0.00	1.69	0.00	44.59	0.00	41.98	0.00	11.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: WASHINGTON MULTISTATE MSA						EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Washington-Arlington-Alexandria DC/VA/MD MD	10,340	73.25	4.39	2.79	15.09	11.72	39.34	37.41	41.19	48.08	6.59	5.10	6.33	6.60	6.76
<b>Limited Review:</b>															
Bethesda-Rockville-Frederick, MD MD	3,776	26.75	1.00	0.77	20.90	18.43	46.97	46.98	31.13	33.82	7.11	5.71	7.61	7.32	6.60

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: WASHINGTON MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>													
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Washington-Arlington-Alexandria DC/VA/MD MD	49	63.64	1.39	4.08	13.05	12.24	51.27	48.98	34.29	34.69	7.95	0.00	9.52	8.11	7.14									
<b>Limited Review:</b>																								
Bethesda-Rockville-Frederick, MD MD	28	36.36	0.83	0.00	18.77	7.14	56.62	50.00	23.79	42.86	14.04	0.00	11.11	17.65	7.14									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: WASHINGTON MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families*	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Washington-Arlington-Alexandria DC/VA/MD MD	32,688	81.12	20.06	16.48	17.74	28.99	22.20	27.76	39.99	26.77	16.14	17.70	17.39	17.37	13.58	
<b>Limited Review:</b>																
Bethesda-Rockville-Frederick, MD MD	7,608	18.88	18.47	17.75	19.10	30.15	23.46	26.17	38.97	25.93	16.10	17.30	17.82	16.62	13.77	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: WASHINGTON MULTISTATE MSA						EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Washington-Arlington-Alexandria DC/VA/MD MD	727	74.64	20.06	15.66	17.74	25.86	22.20	25.29	39.99	33.19	5.14	5.40	6.50	5.05	4.44
<b>Limited Review:</b>															
Bethesda-Rockville-Frederick, MD MD	247	25.36	18.47	15.68	19.10	21.61	23.46	28.81	38.97	33.90	8.25	4.96	8.82	9.14	8.23

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.3% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: WASHINGTON MULTISTATE MSA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Washington-Arlington-Alexandria DC/VA/MD MD	43,739	76.61	20.06	10.19	17.74	20.41	22.20	27.53	39.99	41.88	13.72	20.12	17.47	14.73	11.48
<b>Limited Review:</b>															
Bethesda-Rockville-Frederick, MD MD	13,351	23.39	18.47	11.43	19.10	21.07	23.46	27.70	38.97	39.80	11.83	17.45	14.52	12.56	9.80

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.4% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: WASHINGTON MULTISTATE MSA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Washington-Arlington-Alexandria DC/VA/MD MD	10,340	73.25	67.42	58.20	89.01	4.24	6.75	6.47	12.48
<b>Limited Review:</b>									
Bethesda-Rockville-Frederick, MD MD	3,776	26.75	66.44	58.95	89.80	5.24	4.95	7.03	14.44

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 24.36% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: WASHINGTON MULTISTATE MSA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>7</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Washington-Arlington-Alexandria DC/VA/MD MD	49	63.64	95.90	65.31	87.76	10.20	2.04	7.69	5.49
<b>Limited Review:</b>									
Bethesda-Rockville-Frederick, MD MD	28	36.36	95.77	75.00	100.00	0.00	0.00	13.11	15.38

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 22.67% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		GEOGRAPHY: WASHINGTON MULTISTATE MSA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Washington-Arlington-Alexandria DC/VA/MD MD	88	74,349	196	91,409	284	165,758	84.38	1	4,336
<b>Limited Review:</b>									
Bethesda-Rockville-Frederick, MD MD	11	13,018	49	17,674	60	30,692	15.62	1	421

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: WASHINGTON MULTISTATE MSA																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Washington-Arlington-Alexandria DC/VA/MD MD	74.10	138	78.86	9.42	19.57	39.13	31.88	4	9	0	-4	0	-1	5.98	22.96	40.33	30.57
<b>Limited Review:</b>																	
Bethesda-Rockville-Frederick, MD MD	25.90	37	21.14	0.00	40.54	35.14	24.32	1	0	0	0	1	0	1.30	24.13	46.78	27.78

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: OTHER MULTISTATE MSAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Allentown-Bethlehem-Easton, PA/NJ MSA	100.00	10,163	1,821,008	1,258	43,464	8	53	0	0	11,429	1,864,525	100.00
Augusta-Richmond County, GA/SC MSA	100.00	4,966	727,547	775	26,404	19	154	0	0	5,760	754,105	100.00
Charlotte-Gastonia-Rock Hill, NC/SC MSA	100.00	31,833	5,843,463	4,665	245,989	15	624	10	40,894	36,523	6,130,970	100.00
Kansas City, MO/KS MSA	100.00	28,979	4,537,438	3,690	149,841	131	7,811	3	22,667	32,803	4,717,757	100.00
Kingsport-Bristol-Bristol, TN/VA MSA	100.00	1,731	228,951	304	4,649	9	246	0	0	2,044	233,846	100.00
Portland-Vancouver-Hillsboro, OR/WA MSA	100.00	39,747	8,754,998	6,745	250,878	106	4,572	31	34,367	46,629	9,044,815	100.00
Providence-New Bedford-Fall River, RI/MA MSA	100.00	16,231	3,573,709	4,800	446,111	38	283	14	141,118	21,083	4,161,221	100.00
South Bend-Mishawaka, IN/MI MSA	100.00	1,976	246,592	336	17,764	16	2,557	0	0	2,328	266,913	100.00
St. Louis, MO/IL MSA	100.00	48,830	8,054,302	5,847	235,553	89	1,394	11	22,756	54,777	8,314,005	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: OTHER MULTISTATE MSA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Allentown-Bethlehem-Easton, PA/NJ MSA	100.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.00
Augusta-Richmond County, GA/SC MSA	100.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.00
Charlotte-Gastonia-Rock Hill, NC/SC MSA	100.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.00
Kansas City, MO/KS MSA	100.00	2	7,239	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.00
Kingsport-Bristol-Bristol, TN/VA MSA	100.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.00
Portland-Vancouver-Hillsboro, OR/WA MSA	100.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.00
Providence-New Bedford-Fall River, RI/MA MSA	100.00	2	6,603	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.00
South Bend-Mishawaka, IN/MI MSA	100.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.00
St. Louis, MO/IL MSA	100.00	3	25,673	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: OTHER MULTISTATE MSAS						EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Allentown-Bethlehem-Easton, PA/NJ MSA	4,204	100.00	1.17	1.52	16.64	23.67	50.09	47.29	32.10	27.52	17.26	23.39	24.33	17.04	13.79
Augusta-Richmond County, GA/SC MSA	2,425	100.00	4.06	0.95	15.01	6.76	55.01	59.63	25.92	32.66	11.43	15.58	11.05	12.81	9.38
Charlotte-Gastonia-Rock Hill, NC/SC MSA	13,896	100.00	1.23	0.63	18.14	9.16	51.31	49.19	29.32	41.02	21.00	17.03	19.61	22.24	20.03
Kansas City, MO/KS MSA	10,127	100.00	2.94	0.74	18.06	10.82	47.91	47.32	31.08	41.12	12.67	16.58	13.57	13.63	11.45
Kingsport-Bristol-Bristol, TN/VA MSA	564	100.00	0.00	0.00	11.96	8.51	70.73	68.97	17.30	22.52	8.18	0.00	7.98	8.71	6.79
Portland-Vancouver-Hillsboro, OR/WA MSA	14,142	100.00	0.71	1.00	15.43	17.05	55.69	54.01	28.18	27.95	16.52	18.47	16.65	17.25	15.14
Providence-New Bedford-Fall River, RI/MA MSA	5,528	100.00	2.94	4.16	10.87	14.85	50.84	49.84	35.35	31.15	14.07	14.54	17.21	14.40	12.42
South Bend-Mishawaka, IN/MI MSA	783	100.00	1.06	0.51	18.80	16.73	57.51	56.32	22.63	26.44	6.64	6.67	8.21	7.15	5.14
St. Louis, MO/IL MSA	14,817	100.00	2.98	1.36	17.61	12.22	52.76	56.02	26.65	30.40	13.96	12.77	13.70	14.20	13.68

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: OTHER MULTISTATE MSAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Allentown-Bethlehem-Easton, PA/NJ MSA	134	100.00	1.17	2.24	16.64	19.40	50.09	46.27	32.10	32.09	2.79	0.00	4.41	2.44	2.65
Augusta-Richmond County, GA/SC MSA	77	100.00	4.06	1.30	15.01	11.69	55.01	51.95	25.92	35.06	4.83	0.00	7.14	4.80	4.38
Charlotte-Gastonia-Rock Hill, NC/SC MSA	256	100.00	1.23	1.17	18.14	10.94	51.31	39.84	29.32	48.05	8.47	25.00	5.95	6.16	12.14
Kansas City, MO/KS MSA	355	100.00	2.94	1.41	18.06	10.70	47.91	40.00	31.08	47.89	5.70	4.88	3.83	5.38	6.64
Kingsport-Bristol-Bristol, TN/VA MSA	20	100.00	0.00	0.00	11.96	0.00	70.73	80.00	17.30	20.00	0.79	0.00	0.00	1.12	0.00
Portland-Vancouver-Hillsboro, OR/WA MSA	587	100.00	0.71	1.19	15.43	13.63	55.69	50.77	28.18	34.41	10.54	33.33	9.74	9.60	11.83
Providence-New Bedford-Fall River, RI/MA MSA	264	100.00	2.94	1.14	10.87	9.09	50.84	45.83	35.35	43.94	4.22	4.55	2.43	3.73	5.24
South Bend-Mishawaka, IN/MI MSA	16	100.00	1.06	12.50	18.80	18.75	57.51	50.00	22.63	18.75	3.21	40.00	5.88	2.82	0.00
St. Louis, MO/IL MSA	484	100.00	2.98	1.24	17.61	11.78	52.76	45.66	26.65	41.32	5.80	7.27	3.35	4.71	10.29

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: OTHER MULTISTATE MSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Allentown-Bethlehem-Easton, PA/NJ MSA	5,825	100.00	1.17	0.67	16.64	13.85	50.09	47.42	32.10	38.06	11.96	18.99	17.47	12.83	9.98	
Augusta-Richmond County, GA/SC MSA	2,464	100.00	4.06	0.85	15.01	7.10	55.01	51.30	25.92	40.75	9.33	8.60	9.69	9.82	8.78	
Charlotte-Gastonia-Rock Hill, NC/SC MSA	17,680	100.00	1.23	0.57	18.14	7.26	51.31	42.27	29.32	49.91	14.50	24.73	14.92	15.67	13.39	
Kansas City, MO/KS MSA	18,495	100.00	2.94	0.54	18.06	7.83	47.91	43.36	31.08	48.27	11.50	12.36	15.16	13.05	10.08	
Kingsport-Bristol-Bristol, TN/VA MSA	1,147	100.00	0.00	0.00	11.96	7.59	70.73	70.44	17.30	21.97	9.86	0.00	11.76	10.07	8.74	
Portland-Vancouver-Hillsboro, OR/WA MSA	25,017	100.00	0.71	0.69	15.43	14.39	55.69	52.42	28.18	32.50	13.30	17.04	15.91	13.52	12.03	
Providence-New Bedford-Fall River, RI/MA MSA	10,439	100.00	2.94	2.05	10.87	7.57	50.84	46.78	35.35	43.61	10.66	15.40	13.97	11.36	9.54	
South Bend-Mishawaka, IN/MI MSA	1,177	100.00	1.06	0.42	18.80	7.82	57.51	58.71	22.63	33.05	7.19	0.00	9.62	7.37	6.51	
St. Louis, MO/IL MSA	33,514	100.00	2.98	0.84	17.61	8.37	52.76	50.28	26.65	40.51	12.87	15.96	14.67	12.94	12.50	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: OTHER MULTISTATE MSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Allentown-Bethlehem-Easton, PA/NJ MSA	0	0.00	7.30	0.00	27.94	0.00	48.77	0.00	15.99	0.00	0.00	0.00	0.00	0.00	0.00	
Augusta-Richmond County, GA/SC MSA	0	0.00	14.05	0.00	19.01	0.00	46.88	0.00	20.06	0.00	0.00	0.00	0.00	0.00	0.00	
Charlotte-Gastonia-Rock Hill, NC/SC MSA	0	0.00	3.38	0.00	25.80	0.00	46.15	0.00	24.67	0.00	0.00	0.00	0.00	0.00	0.00	
Kansas City, MO/KS MSA	0	0.00	7.16	0.00	28.18	0.00	45.97	0.00	18.69	0.00	0.00	0.00	0.00	0.00	0.00	
Kingsport-Bristol-Bristol, TN/VA MSA	0	0.00	0.00	0.00	22.71	0.00	57.58	0.00	19.71	0.00	0.00	0.00	0.00	0.00	0.00	
Portland-Vancouver-Hillsboro, OR/WA MSA	1	100.00	3.45	0.00	34.95	100.00	43.30	0.00	18.31	0.00	0.00	0.00	0.00	0.00	0.00	
Providence-New Bedford-Fall River, RI/MA MSA	0	0.00	16.04	0.00	28.43	0.00	38.62	0.00	16.91	0.00	0.00	0.00	0.00	0.00	0.00	
South Bend-Mishawaka, IN/MI MSA	0	0.00	2.17	0.00	32.92	0.00	41.29	0.00	23.62	0.00	0.00	0.00	0.00	0.00	0.00	
St. Louis, MO/IL MSA	0	0.00	10.64	0.00	20.21	0.00	48.17	0.00	20.98	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES																
GEOGRAPHY: OTHER MULTISTATE MSAS																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Allentown-Bethlehem-Easton, PA/NJ MSA	1,258	100.00	3.68	2.86	15.69	13.04	45.67	46.18	34.96	37.92	3.90	4.26	3.07	4.18	3.83	
Augusta-Richmond County, GA/SC MSA	775	100.00	6.91	3.74	13.67	12.52	49.38	41.42	30.05	42.32	5.96	4.02	5.33	6.20	6.24	
Charlotte-Gastonia-Rock Hill, NC/SC MSA	4,665	100.00	2.67	2.79	15.31	11.25	45.13	38.84	36.89	47.12	7.48	6.94	5.76	6.32	9.45	
Kansas City, MO/KS MSA	3,690	100.00	2.94	2.11	15.66	13.85	42.60	37.94	38.80	46.10	5.34	3.73	5.09	5.23	5.62	
Kingsport-Bristol-Bristol, TN/VA MSA	304	100.00	0.00	0.00	14.10	14.47	68.15	62.83	17.75	22.70	3.43	0.00	2.60	3.10	5.18	
Portland-Vancouver-Hillsboro, OR/WA MSA	6,745	100.00	3.86	3.63	19.33	19.97	47.74	43.31	29.07	33.09	6.38	5.54	6.50	6.26	6.59	
Providence-New Bedford-Fall River, RI/MA MSA	4,800	100.00	7.21	6.60	15.19	12.29	43.91	45.08	33.68	36.02	7.32	6.41	6.79	7.22	7.83	
South Bend-Mishawaka, IN/MI MSA	336	100.00	1.30	1.19	24.10	20.83	51.87	56.85	22.73	21.13	4.66	5.88	4.12	4.90	4.61	
St. Louis, MO/IL MSA	5,847	100.00	3.83	2.41	16.17	11.61	47.82	45.25	32.18	40.72	5.94	4.56	5.07	5.94	6.34	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: OTHER MULTISTATE MSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography <sup>*</sup>				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
Allentown-Bethlehem-Easton, PA/NJ MSA	8	100.00	0.52	0.00	6.79	25.00	48.06	50.00	44.63	25.00	1.35	0.00	0.00	2.17	0.00	
Augusta-Richmond County, GA/SC MSA	19	100.00	3.50	0.00	20.47	31.58	55.70	57.89	20.33	10.53	5.47	0.00	5.88	5.88	0.00	
Charlotte-Gastonia-Rock Hill, NC/SC MSA	15	100.00	1.04	0.00	14.78	13.33	58.18	53.33	26.00	33.33	4.20	0.00	0.00	4.05	10.00	
Kansas City, MO/KS MSA	131	100.00	0.74	0.00	17.00	44.27	53.54	48.85	28.72	6.87	8.23	0.00	12.44	6.87	4.00	
Kingsport-Bristol-Bristol, TN/VA MSA	9	100.00	0.00	0.00	10.15	22.22	77.35	77.78	12.50	0.00	2.17	0.00	2.70	2.16	0.00	
Portland-Vancouver-Hillsboro, OR/WA MSA	106	100.00	1.68	0.94	10.43	11.32	63.03	63.21	24.87	24.53	11.02	0.00	20.83	9.72	12.50	
Providence-New Bedford-Fall River, RI/MA MSA	38	100.00	3.05	5.26	6.63	2.63	45.08	47.37	45.24	44.74	18.57	0.00	0.00	22.58	17.65	
South Bend-Mishawaka, IN/MI MSA	16	100.00	0.10	0.00	6.98	0.00	78.97	100.00	13.95	0.00	2.52	0.00	0.00	2.70	0.00	
St. Louis, MO/IL MSA	89	100.00	0.80	0.00	11.18	12.36	68.41	73.03	19.62	14.61	3.51	0.00	6.25	2.90	7.25	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: OTHER MULTISTATE MSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Allentown-Bethlehem-Easton, PA/NJ MSA	4,204	100.00	18.44	16.28	19.24	31.46	23.54	28.95	38.78	23.31	18.84	26.12	20.57	19.66	14.59	
Augusta-Richmond County, GA/SC MSA	2,425	100.00	22.37	9.65	16.64	26.09	20.78	28.96	40.21	35.29	13.66	12.38	15.80	14.95	11.88	
Charlotte-Gastonia-Rock Hill, NC/SC MSA	13,897	100.00	19.43	16.49	18.53	31.57	22.93	23.79	39.11	28.15	22.28	24.08	25.96	24.09	17.33	
Kansas City, MO/KS MSA	10,128	100.00	18.55	20.90	18.98	31.72	23.75	24.96	38.72	22.43	15.24	18.06	17.62	16.00	11.15	
Kingsport-Bristol-Bristol, TN/VA MSA	564	100.00	19.41	10.99	18.61	28.90	23.07	31.21	38.90	28.90	8.94	11.72	8.73	11.27	6.75	
Portland-Vancouver-Hillsboro, OR/WA MSA	14,142	100.00	18.37	8.75	19.20	32.15	23.62	29.21	38.81	29.89	18.28	19.84	21.05	19.05	15.31	
Providence-New Bedford-Fall River, RI/MA MSA	5,528	100.00	21.48	11.05	17.23	34.49	22.00	28.54	39.28	25.93	15.68	15.78	18.39	16.02	13.07	
South Bend-Mishawaka, IN/MI MSA	783	100.00	18.66	21.11	18.94	37.45	23.72	17.37	38.68	24.07	8.13	10.32	11.15	6.62	4.91	
St. Louis, MO/IL MSA	14,826	100.00	19.63	17.84	18.60	33.06	22.66	24.77	39.11	24.32	16.29	17.85	18.62	17.18	12.87	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: Other Multistate MSAs						Evaluation Period: April 1, 2009 to December 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Allentown-Bethlehem-Easton, PA/NJ MSA	134	100.00	18.44	11.45	19.24	31.30	23.54	34.35	38.78	22.90	2.83	1.31	4.17	3.68	1.97
Augusta-Richmond County, GA/SC MSA	77	100.00	22.37	9.59	16.64	10.96	20.78	32.88	40.21	46.58	4.86	2.00	3.49	6.67	5.17
Charlotte-Gastonia-Rock Hill, NC/SC MSA	256	100.00	19.43	10.04	18.53	22.71	22.93	19.65	39.11	47.60	7.59	3.62	7.05	6.47	9.97
Kansas City, MO/KS MSA	355	100.00	18.55	14.25	18.98	20.23	23.75	31.34	38.72	34.19	6.47	8.71	4.41	6.99	6.51
Kingsport-Bristol-Bristol, TN/VA MSA	20	100.00	19.41	0.00	18.61	25.00	23.07	35.00	38.90	40.00	0.82	0.00	0.00	0.85	1.60
Portland-Vancouver-Hillsboro, OR/WA MSA	587	100.00	18.37	6.16	19.20	21.13	23.62	28.87	38.81	43.84	10.89	11.45	10.61	10.62	11.10
Providence-New Bedford-Fall River, RI/MA MSA	264	100.00	21.48	10.08	17.23	22.87	22.00	29.07	39.28	37.98	4.46	3.15	5.14	4.06	4.73
South Bend-Mishawaka, IN/MI MSA	16	100.00	18.66	25.00	18.94	12.50	23.72	25.00	38.68	37.50	3.44	7.14	2.94	3.23	2.22
St. Louis, MO/IL MSA	484	100.00	19.63	10.20	18.60	25.81	22.66	25.38	39.11	38.61	6.01	4.06	7.31	5.40	6.33

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Other Multistate MSAs					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Allentown-Bethlehem-Easton, PA/NJ MSA	5,825	100.00	18.44	9.58	19.24	23.23	23.54	28.67	38.78	38.52	11.95	14.24	15.08	13.32	9.91	
Augusta-Richmond County, GA/SC MSA	2,464	100.00	22.37	7.84	16.64	19.31	20.78	25.99	40.21	46.86	10.43	10.90	14.07	11.39	8.98	
Charlotte-Gastonia-Rock Hill, NC/SC MSA	17,680	100.00	19.43	7.83	18.53	18.19	22.93	23.17	39.11	50.81	14.15	19.34	16.76	15.68	12.15	
Kansas City, MO/KS MSA	18,496	100.00	18.55	10.20	18.98	22.09	23.75	28.37	38.72	39.35	13.23	18.43	16.28	14.02	11.08	
Kingsport-Bristol-Bristol, TN/VA MSA	1,147	100.00	19.41	6.18	18.61	20.63	23.07	29.53	38.90	43.66	9.98	10.27	11.94	11.72	8.29	
Portland-Vancouver-Hillsboro, OR/WA MSA	25,017	100.00	18.37	7.88	19.20	21.68	23.62	28.74	38.81	41.70	14.07	18.41	16.63	14.75	12.27	
Providence-New Bedford-Fall River, RI/MA MSA	10,439	100.00	21.48	6.56	17.23	20.28	22.00	28.77	39.28	44.38	10.80	12.37	12.62	11.45	9.77	
South Bend-Mishawaka, IN/MI MSA	1,177	100.00	18.66	11.18	18.94	23.32	23.72	26.52	38.68	38.98	7.04	11.51	8.98	7.17	5.53	
St. Louis, MO/IL MSA	33,520	100.00	19.63	8.67	18.60	21.53	22.66	26.55	39.11	43.25	13.55	17.03	16.28	14.62	11.79	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.5% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: OTHER MULTISTATE MSAS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>7</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Allentown-Bethlehem-Easton, PA/NJ MSA	1,258	100.00	66.51	59.14	93.40	3.66	2.94	3.81	5.36
Augusta-Richmond County, GA/SC MSA	775	100.00	68.79	52.26	93.29	3.48	3.23	5.79	6.62
Charlotte-Gastonia-Rock Hill, NC/SC MSA	4,665	100.00	66.64	56.87	89.50	3.92	6.58	7.26	9.97
Kansas City, MO/KS MSA	3,690	100.00	66.43	58.54	92.11	3.82	4.07	5.19	9.28
Kingsport-Bristol-Bristol, TN/VA MSA	304	100.00	68.96	58.22	98.03	0.99	0.99	3.33	3.04
Portland-Vancouver-Hillsboro, OR/WA MSA	6,745	100.00	66.83	56.56	93.21	2.89	3.90	6.07	7.35
Providence-New Bedford-Fall River, RI/MA MSA	4,800	100.00	66.97	45.06	80.40	8.52	11.08	7.17	11.60
South Bend-Mishawaka, IN/MI MSA	336	100.00	66.61	55.06	90.18	3.57	6.25	4.49	6.06
St. Louis, MO/IL MSA	5,847	100.00	65.91	57.33	92.37	3.40	4.22	5.83	7.68

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 26.87% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: OTHER MULTISTATE MSAS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>7</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Allentown-Bethlehem-Easton, PA/NJ MSA	8	100.00	97.30	87.50	100.00	0.00	0.00	1.35	0.00
Augusta-Richmond County, GA/SC MSA	19	100.00	97.87	47.37	100.00	0.00	0.00	5.43	3.03
Charlotte-Gastonia-Rock Hill, NC/SC MSA	15	100.00	96.91	46.67	93.33	0.00	6.67	4.17	3.70
Kansas City, MO/KS MSA	131	100.00	97.55	33.59	83.21	11.45	5.34	8.06	8.57
Kingsport-Bristol-Bristol, TN/VA MSA	9	100.00	97.76	66.67	100.00	0.00	0.00	2.17	1.70
Portland-Vancouver-Hillsboro, OR/WA MSA	106	100.00	96.20	50.00	90.57	1.89	7.55	10.13	7.17
Providence-New Bedford-Fall River, RI/MA MSA	38	100.00	97.30	71.05	100.00	0.00	0.00	17.81	17.02
South Bend-Mishawaka, IN/MI MSA	16	100.00	97.17	68.75	37.50	43.75	18.75	2.48	3.45
St. Louis, MO/IL MSA	89	100.00	97.83	57.30	98.88	0.00	1.12	3.49	2.37

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 37.82% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: OTHER MULTISTATE MSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Allentown-Bethlehem-Easton, PA/NJ MSA	16	2,814	40	4,894	56	7,708	100.00	0	0
Augusta-Richmond County, GA/SC MSA	12	1,343	59	3,585	71	4,928	100.00	0	0
Charlotte-Gastonia-Rock Hill, NC/SC MSA	78	50,552	368	216,098	446	266,649	100.00	3	3,276
Kansas City, MO/KS MSA	50	31,339	129	42,565	179	73,904	100.00	0	0
Kingsport-Bristol-Bristol, TN/VA MSA	8	617	20	1,085	28	1,702	100.00	0	0
Portland-Vancouver-Hillsboro, OR/WA MSA	40	15,017	86	42,720	126	57,738	100.00	3	15,973
Providence-New Bedford-Fall River, RI/MA MSA	41	31,153	145	66,553	186	97,706	100.00	3	54,344
South Bend-Mishawaka, IN/MI MSA	3	174	25	10,124	28	10,298	100.00	1	2,660
St. Louis, MO/IL MSA	100	70,035	138	51,412	238	121,447	100.00	4	13,347

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: OTHER MULTISTATE MSAS																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Allentown-Bethlehem-Easton, PA/NJ MSA	100.00	21	100.00	4.76	23.81	47.62	23.81	0	7	0	-1	-4	-2	3.57	20.22	47.76	28.44
Augusta-Richmond County, GA/SC MSA	100.00	10	100.00	20.00	0.00	50.00	30.00	0	0	0	0	0	0	6.48	16.62	54.62	22.28
Charlotte-Gastonia-Rock Hill, NC/SC MSA	100.00	60	100.00	3.33	25.00	30.00	41.67	5	6	0	0	-3	2	3.20	22.69	48.82	25.14
Kansas City, MO/KS MSA	100.00	50	100.00	4.00	24.00	38.00	34.00	0	5	0	-1	-1	-3	4.75	21.25	46.64	27.34
Kingsport-Bristol-Bristol, TN/VA MSA	100.00	5	100.00	0.00	20.00	80.00	0.00	1	1	0	1	-1	0	0.00	13.60	69.84	16.56
Portland-Vancouver-Hillsboro, OR/WA MSA	100.00	61	100.00	4.92	27.87	49.18	18.03	0	4	0	0	-3	-1	1.57	21.02	53.57	23.83
Providence-New Bedford-Fall River, RI/MA MSA	100.00	62	100.00	11.29	20.97	41.94	25.81	0	14	0	-2	-8	-4	8.14	18.16	44.55	29.15
South Bend-Mishawaka, IN/MI MSA	100.00	5	100.00	0.00	40.00	40.00	20.00	0	1	0	-1	0	0	1.54	23.30	54.91	20.24
St. Louis, MO/IL MSA	100.00	60	100.00	1.67	25.00	35.00	38.33	1	3	0	-1	-1	0	5.61	20.31	49.84	24.24

Table 1. Lending Volume

LENDING VOLUME												
GEOGRAPHY: ARIZONA												
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Phoenix-Mesa-Glendale, AZ MSA	69.56	70,782	12,268,779	9,128	508,247	44	1,181	8	19,341	79,962	12,797,548	80.21
Tucson, AZ MSA	15.91	16,605	2,800,878	1,675	63,299	10	73	1	6,078	18,291	2,870,328	11.09
<b>Limited Review:</b>												
Flagstaff, AZ MSA	2.06	2,073	473,538	294	9,064	5	28	0	0	2,372	482,630	0.72
Lake Havasu City-Kingman, AZ MSA	2.64	2,748	391,108	284	10,829	3	13	0	0	3,035	401,950	1.67
Prescott, AZ MSA	3.74	3,842	690,408	450	12,262	5	35	0	0	4,297	702,705	2.25
Yuma, AZ MSA	1.88	2,019	305,024	141	4,228	4	23	1	4,105	2,165	313,380	0.73
Arizona Non-MSA	4.20	4,228	681,463	569	21,535	26	1,538	3	10,796	4,826	715,332	3.33

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: ARIZONA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	80.21	
Tucson, AZ MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	11.09	
<b>Limited Review:</b>															
Flagstaff, AZ MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.72	
Lake Havasu City-Kingman, AZ MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.67	
Prescott, AZ MSA	100.00	1	2,017	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.25	
Yuma, AZ MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.73	
Arizona Non-MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3.33	

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: ARIZONA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Phoenix-Mesa-Glendale, AZ MSA	41,125	74.96	1.63	0.51	24.02	18.95	39.20	46.30	35.14	34.24	17.06	15.78	17.58	17.69	16.06	
Tucson, AZ MSA	7,567	13.79	2.25	2.21	24.74	18.54	36.40	40.65	36.61	38.60	18.19	19.01	18.69	21.03	15.46	
<b>Limited Review:</b>																
Flagstaff, AZ MSA	730	1.33	1.04	2.60	18.90	3.29	51.74	60.82	28.33	33.29	15.63	15.38	12.36	14.87	17.83	
Lake Havasu City-Kingman, AZ MSA	1,224	2.23	0.00	0.00	9.84	4.98	74.76	78.51	15.40	16.50	16.08	0.00	7.30	16.85	14.92	
Prescott, AZ MSA	1,665	3.03	0.00	0.00	2.46	0.96	76.79	78.86	20.76	20.18	18.64	0.00	17.24	18.58	18.92	
Yuma, AZ MSA	1,108	2.02	0.00	0.00	14.76	12.45	58.74	36.91	26.50	50.63	19.18	0.00	18.36	17.65	20.77	
Arizona Non-MSA	1,435	2.63	3.21	0.00	22.28	4.02	52.12	51.21	22.40	44.77	13.76	0.00	18.60	14.51	12.56	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: ARIZONA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	456	58.99	1.63	0.88	24.02	12.72	39.20	33.77	35.14	52.63	11.46	11.11	8.60	11.63	12.23
Tucson, AZ MSA	135	17.46	2.25	0.00	24.74	21.48	36.40	26.67	36.61	51.85	8.14	0.00	8.43	6.34	9.28
<b>Limited Review:</b>															
Flagstaff, AZ MSA	17	2.20	1.04	0.00	18.90	11.76	51.74	58.82	28.33	29.41	9.84	0.00	20.00	8.57	6.25
Lake Havasu City-Kingman, AZ MSA	32	4.14	0.00	0.00	9.84	3.13	74.76	78.13	15.40	18.75	15.05	0.00	0.00	12.33	27.78
Prescott, AZ MSA	36	4.66	0.00	0.00	2.46	0.00	76.79	63.89	20.76	36.11	6.80	0.00	0.00	6.67	7.41
Yuma, AZ MSA	24	3.10	0.00	0.00	14.76	20.83	58.74	33.33	26.50	45.83	4.76	0.00	10.53	2.44	4.44
Arizona Non-MSA	73	9.44	3.21	0.00	22.28	4.11	52.12	50.68	22.40	45.21	8.52	0.00	0.00	10.17	7.87

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: ARIZONA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Phoenix-Mesa-Glendale, AZ MSA	29,189	62.55	1.63	0.42	24.02	12.44	39.20	38.64	35.14	48.49	16.37	23.64	21.47	18.52	14.29						
Tucson, AZ MSA	8,903	19.08	2.25	0.69	24.74	12.76	36.40	33.61	36.61	52.95	14.79	19.30	18.30	17.14	12.96						
<b>Limited Review:</b>																					
Flagstaff, AZ MSA	1,326	2.84	1.04	0.90	18.90	4.90	51.74	56.86	28.33	37.33	16.24	16.00	25.00	15.45	16.65						
Lake Havasu City-Kingman, AZ MSA	1,492	3.20	0.00	0.00	9.84	3.02	74.76	77.08	15.40	19.91	21.96	0.00	24.32	22.60	19.38						
Prescott, AZ MSA	2,141	4.59	0.00	0.00	2.46	1.07	76.79	71.51	20.76	27.42	18.50	0.00	25.81	18.56	18.18						
Yuma, AZ MSA	887	1.90	0.00	0.00	14.76	9.47	58.74	47.91	26.50	42.62	17.32	0.00	22.30	16.33	17.65						
Arizona Non-MSA	2,720	5.84	3.21	0.00	22.28	4.88	52.12	48.37	22.40	46.75	16.72	0.00	20.90	17.93	15.49						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: ARIZONA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Phoenix-Mesa-Glendale, AZ MSA	0	0.00	6.87	0.00	41.48	0.00	36.08	0.00	15.57	0.00	0.00	0.00	0.00	0.00	0.00									
Tucson, AZ MSA	0	0.00	5.05	0.00	38.28	0.00	38.41	0.00	18.26	0.00	0.00	0.00	0.00	0.00	0.00									
<b>Limited Review:</b>																								
Flagstaff, AZ MSA	0	0.00	15.67	0.00	8.84	0.00	56.32	0.00	19.17	0.00	0.00	0.00	0.00	0.00	0.00									
Lake Havasu City-Kingman, AZ MSA	0	0.00	0.00	0.00	2.08	0.00	83.28	0.00	14.64	0.00	0.00	0.00	0.00	0.00	0.00									
Prescott, AZ MSA	0	0.00	0.00	0.00	13.37	0.00	66.24	0.00	20.39	0.00	0.00	0.00	0.00	0.00	0.00									
Yuma, AZ MSA	0	0.00	0.00	0.00	18.08	0.00	58.69	0.00	23.23	0.00	0.00	0.00	0.00	0.00	0.00									
Arizona Non-MSA	0	0.00	0.43	0.00	16.24	0.00	47.94	0.00	35.39	0.00	0.00	0.00	0.00	0.00	0.00									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: ARIZONA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Phoenix-Mesa-Glendale, AZ MSA	9,128	72.79	3.46	3.20	19.49	16.79	32.55	29.86	44.50	50.14	4.42	4.03	4.11	4.52	4.49						
Tucson, AZ MSA	1,675	13.36	3.07	2.21	24.95	21.79	33.33	29.79	38.65	46.21	3.82	2.80	3.36	3.75	4.20						
<b>Limited Review:</b>																					
Flagstaff, AZ MSA	294	2.34	6.05	6.46	10.49	3.06	55.49	59.18	27.96	31.29	4.61	4.86	3.75	4.90	4.25						
Lake Havasu City-Kingman, AZ MSA	284	2.26	0.00	0.00	5.03	2.82	78.62	79.58	16.35	17.61	4.45	0.00	2.25	4.60	4.23						
Prescott, AZ MSA	450	3.59	0.00	0.00	5.99	5.56	70.51	66.89	23.50	27.56	3.59	0.00	4.56	3.55	3.44						
Yuma, AZ MSA	141	1.12	0.00	0.00	20.41	14.18	44.65	49.65	34.95	36.17	2.72	0.00	1.48	3.41	2.55						
Arizona Non-MSA	569	4.54	0.43	0.00	13.17	12.30	59.53	64.50	26.87	23.20	4.54	0.00	6.56	4.98	2.97						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS																
GEOGRAPHY: ARIZONA																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>†</sup>					
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Phoenix-Mesa-Glendale, AZ MSA	44	45.36	2.15	0.00	23.70	22.73	35.73	38.64	38.42	38.64	6.52	0.00	5.62	6.72	7.21	
Tucson, AZ MSA	10	10.31	2.45	0.00	24.42	30.00	35.01	30.00	38.13	40.00	8.82	0.00	6.67	7.69	11.54	
<b>Limited Review:</b>																
Flagstaff, AZ MSA	5	5.15	4.51	0.00	9.84	0.00	52.46	80.00	33.20	20.00	15.38	0.00	0.00	16.67	0.00	
Lake Havasu City-Kingman, AZ MSA	3	3.09	0.00	0.00	8.77	33.33	77.89	66.67	13.33	0.00	15.38	0.00	0.00	20.00	0.00	
Prescott, AZ MSA	5	5.15	0.00	0.00	4.55	0.00	68.78	100.00	26.67	0.00	5.13	0.00	0.00	7.41	0.00	
Yuma, AZ MSA	4	4.12	0.00	0.00	16.11	0.00	48.33	100.00	35.56	0.00	4.17	0.00	0.00	6.90	0.00	
Arizona Non-MSA	26	26.80	0.18	0.00	8.68	11.54	65.38	65.38	25.77	23.08	5.94	0.00	5.88	3.95	25.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: ARIZONA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families*	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Phoenix-Mesa-Glendale, AZ MSA	41,137	74.98	19.62	14.39	18.79	29.26	21.81	24.33	39.78	32.02	19.19	18.76	20.92	20.57	17.25	
Tucson, AZ MSA	7,567	13.79	20.12	11.80	18.51	28.72	21.13	27.31	40.24	32.17	22.64	23.60	26.92	24.30	18.36	
<b>Limited Review:</b>																
Flagstaff, AZ MSA	730	1.33	22.42	3.99	16.91	17.33	20.66	25.72	40.01	52.96	17.78	23.21	19.68	15.68	17.79	
Lake Havasu City-Kingman, AZ MSA	1,224	2.23	16.72	8.37	19.88	21.26	23.98	21.92	39.42	48.44	17.99	14.81	17.64	19.93	17.72	
Prescott, AZ MSA	1,665	3.03	17.21	9.38	20.02	24.62	23.60	24.56	39.17	41.44	20.58	21.43	21.42	20.95	19.89	
Yuma, AZ MSA	1,108	2.02	19.11	5.51	18.62	22.31	21.71	27.91	40.55	44.26	22.07	20.88	22.39	23.03	21.52	
Arizona Non-MSA	1,435	2.62	23.54	3.64	17.49	12.45	19.30	23.08	39.67	60.84	16.24	16.55	13.10	17.82	16.38	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: ARIZONA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share *				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total **	% Families **	% BANK Loans ****	% Families **	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****						
<b>Full Review:</b>																
Phoenix-Mesa-Glendale, AZ MSA	456	58.99	19.62	10.16	18.79	23.25	21.81	27.77	39.78	38.83	11.85	17.71	11.39	15.09	9.48	
Tucson, AZ MSA	135	17.46	20.12	8.66	18.51	15.75	21.13	29.13	40.24	46.46	8.29	9.09	8.64	10.00	7.04	
<b>Limited Review:</b>																
Flagstaff, AZ MSA	17	2.20	22.42	6.67	16.91	6.67	20.66	26.67	40.01	60.00	7.27	20.00	0.00	15.38	3.33	
Lake Havasu City-Kingman, AZ MSA	32	4.14	16.72	6.25	19.88	21.88	23.98	37.50	39.42	34.38	15.05	0.00	6.67	19.35	17.07	
Prescott, AZ MSA	36	4.66	17.21	8.57	20.02	31.43	23.60	25.71	39.17	34.29	7.14	0.00	10.81	0.00	9.09	
Yuma, AZ MSA	24	3.10	19.11	12.50	18.62	16.67	21.71	25.00	40.55	45.83	4.85	11.11	12.50	0.00	3.57	
Arizona Non-MSA	73	9.44	23.54	7.35	17.49	25.00	19.30	19.12	39.67	48.53	8.06	7.69	12.50	11.11	5.79	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance																
GEOGRAPHY: ARIZONA																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Phoenix-Mesa-Glendale, AZ MSA	29,189	62.56	19.62	8.96	18.79	19.06	21.81	23.22	39.78	48.76	15.97	21.02	19.25	17.09	14.00	
Tucson, AZ MSA	8,903	19.08	20.12	7.69	18.51	18.84	21.13	25.39	40.24	48.08	17.20	18.46	21.78	19.41	15.04	
<b>Limited Review:</b>																
Flagstaff, AZ MSA	1,326	2.84	22.42	5.35	16.91	13.58	20.66	23.17	40.01	57.89	17.78	25.97	21.46	18.55	16.46	
Lake Havasu City-Kingman, AZ MSA	1,492	3.20	16.72	8.26	19.88	17.73	23.98	22.95	39.42	51.06	25.30	24.77	24.68	26.68	25.02	
Prescott, AZ MSA	2,141	4.59	17.21	8.76	20.02	21.22	23.60	23.45	39.17	46.57	19.92	24.31	24.35	19.26	18.37	
Yuma, AZ MSA	887	1.90	19.11	4.07	18.62	14.01	21.71	21.08	40.55	60.84	19.37	32.61	22.56	21.90	17.56	
Arizona Non-MSA	2,720	5.83	23.54	4.90	17.49	11.42	19.30	19.78	39.67	63.89	19.60	27.98	20.66	17.83	19.44	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 25.1% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: ARIZONA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Phoenix-Mesa-Glendale, AZ MSA	9,128	72.79	66.61	58.18	88.78	4.98	6.23	4.27	6.60
Tucson, AZ MSA	1,675	13.36	66.16	61.79	93.55	2.63	3.82	3.68	5.95
<b>Limited Review:</b>									
Flagstaff, AZ MSA	294	2.34	67.99	61.22	93.54	4.42	2.04	4.18	6.26
Lake Havasu City-Kingman, AZ MSA	284	2.26	72.32	56.34	91.20	5.63	3.17	4.10	5.39
Prescott, AZ MSA	450	3.59	70.45	63.33	94.00	4.44	1.56	3.27	5.57
Yuma, AZ MSA	141	1.12	69.00	65.25	95.04	0.71	4.26	2.51	5.23
Arizona Non-MSA	569	4.54	66.18	56.06	92.44	3.16	4.39	3.69	4.25

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 26.24% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: ARIZONA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Phoenix-Mesa-Glendale, AZ MSA	44	45.36	95.11	61.36	93.18	2.27	4.55	5.82	6.01
Tucson, AZ MSA	10	10.31	96.63	50.00	100.00	0.00	0.00	8.33	4.88
<b>Limited Review:</b>									
Flagstaff, AZ MSA	5	5.15	96.72	100.00	100.00	0.00	0.00	14.29	25.00
Lake Havasu City-Kingman, AZ MSA	3	3.09	97.19	66.67	100.00	0.00	0.00	12.50	10.00
Prescott, AZ MSA	5	5.15	98.54	80.00	100.00	0.00	0.00	4.44	4.00
Yuma, AZ MSA	4	4.12	86.19	50.00	100.00	0.00	0.00	3.39	2.63
Arizona Non-MSA	26	26.80	96.67	53.85	84.62	7.69	7.69	4.03	4.94

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 24.74% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: ARIZONA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Phoenix-Mesa-Glendale, AZ MSA	106	86,015	203	95,682	309	181,698	82.49	1	6,588
Tucson, AZ MSA	20	3,504	69	9,119	89	12,623	5.73	1	2,251
<b>Limited Review:</b>									
Flagstaff, AZ MSA	4	938	21	407	25	1,345	0.61	0	0
Lake Havasu City-Kingman, AZ MSA	3	664	11	579	14	1,243	0.56	0	0
Prescott, AZ MSA	4	7,854	13	715	17	8,570	3.89	0	0
Yuma, AZ MSA	5	446	12	454	17	901	0.41	0	0
Arizona Non-MSA	13	12,507	30	1,087	43	13,594	6.17	0	0
Statewide investments with potential benefit to one or more AAs	0	0	16	294	16	294	0.13	0	0
Statewide investments with no potential to benefit one or more AAs	0	0	3	5	3	5	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: ARIZONA																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Phoenix-Mesa-Glendale, AZ MSA	80.21	115	68.45	2.61	22.61	35.65	39.13	5	10	0	2	-4	-3	4.89	30.55	36.18	28.37
Tucson, AZ MSA	11.09	27	16.07	11.11	22.22	18.52	48.15	0	0	0	0	0	0	4.41	33.94	33.03	28.62
<b>Limited Review:</b>																	
Flagstaff, AZ MSA	0.72	3	1.79	0.00	0.00	100.0	0.00	0	0	0	0	0	0	6.44	21.16	51.31	21.08
Lake Havasu City-Kingman, AZ MSA	1.67	4	2.38	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	10.22	75.87	13.91
Prescott, AZ MSA	2.25	5	2.98	0.00	0.00	60.00	40.00	0	0	0	0	0	0	0.00	4.22	77.74	18.04
Yuma, AZ MSA	0.73	2	1.19	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	21.42	53.86	24.72
Arizona Non-MSA	3.33	12	7.14	0.00	16.67	75.00	8.33	0	1	0	0	-1	0	4.31	26.93	50.49	18.27

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: ARKANSAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Little Rock-North Little Rock-Conway, AR MSA	56.65	12,036	1,845,890	1,150	48,483	9	102	0	0	13,195	1,894,475	77.27
<b>Limited Review:</b>												
Fayetteville-Springdale-Rogers, AR MSA	21.87	4,628	712,337	454	17,071	11	138	1	750	5,094	730,296	7.87
Hot Springs, AR MSA	5.47	1,042	151,397	224	6,955	7	54	0	0	1,273	158,406	5.61
Jonesboro, AR MSA	6.52	1,353	171,513	159	1,946	6	53	0	0	1,518	173,512	2.83
Pine Bluff, AR MSA	2.19	452	52,197	56	2,373	3	14	0	0	511	54,584	2.36
Arkansas Non-MSA	7.30	1,458	181,494	232	3,568	10	558	0	0	1,700	185,620	4.06

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: ARKANSAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Little Rock-North Little Rock-Conway, AR MSA	6,217	60.57	1.46	0.51	14.97	5.76	55.35	59.18	28.23	34.55	17.08	16.67	15.55	16.89	17.73	
<b>Limited Review:</b>																
Fayetteville-Springdale-Rogers, AR MSA	2,334	22.74	0.24	0.43	7.55	2.96	74.86	74.25	17.35	22.37	11.71	16.67	13.64	11.51	12.14	
Hot Springs, AR MSA	379	3.69	0.00	0.00	15.07	13.46	71.45	68.87	13.48	17.68	11.31	0.00	16.88	10.78	10.27	
Jonesboro, AR MSA	726	7.07	0.79	0.41	4.88	1.79	76.59	59.64	17.73	38.15	14.13	4.17	9.43	13.75	15.49	
Pine Bluff, AR MSA	184	1.79	0.00	0.00	27.93	11.96	46.02	40.22	26.05	47.83	8.52	0.00	11.46	7.99	8.37	
Arkansas Non-MSA	424	4.13	0.00	0.00	0.00	0.00	84.50	74.53	15.50	25.47	7.80	0.00	0.00	8.04	7.09	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: ARKANSAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Little Rock-North Little Rock-Conway, AR MSA	163	58.84	1.46	0.61	14.97	11.04	55.35	43.56	28.23	44.79	5.49	8.33	4.20	4.78	7.14
<b>Limited Review:</b>															
Fayetteville-Springdale-Rogers, AR MSA	37	13.36	0.24	0.00	7.55	8.11	74.86	67.57	17.35	24.32	1.96	0.00	3.85	1.45	3.41
Hot Springs, AR MSA	20	7.22	0.00	0.00	15.07	10.00	71.45	80.00	13.48	10.00	8.89	0.00	10.00	8.60	9.09
Jonesboro, AR MSA	10	3.61	0.79	0.00	4.88	0.00	76.59	70.00	17.73	30.00	1.03	0.00	0.00	1.48	0.00
Pine Bluff, AR MSA	7	2.53	0.00	0.00	27.93	14.29	46.02	42.86	26.05	42.86	1.63	0.00	0.00	3.64	0.00
Arkansas Non-MSA	40	14.44	0.00	0.00	0.00	0.00	84.50	82.50	15.50	17.50	3.39	0.00	0.00	3.91	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: ARKANSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Little Rock-North Little Rock-Conway, AR MSA	5,656	54.24	1.46	0.46	14.97	5.06	55.35	53.70	28.23	40.79	13.58	21.21	14.30	13.73	13.26									
<b>Limited Review:</b>																								
Fayetteville-Springdale-Rogers, AR MSA	2,257	21.64	0.24	0.18	7.55	3.94	74.86	76.12	17.35	19.76	8.19	20.00	10.15	8.77	6.22									
Hot Springs, AR MSA	643	6.17	0.00	0.00	15.07	6.38	71.45	71.54	13.48	22.08	12.29	0.00	12.68	11.64	14.38									
Jonesboro, AR MSA	617	5.92	0.79	0.00	4.88	1.62	76.59	62.24	17.73	36.14	8.70	0.00	13.16	9.19	8.03									
Pine Bluff, AR MSA	261	2.50	0.00	0.00	27.93	9.58	46.02	37.55	26.05	52.87	10.03	0.00	14.89	10.17	9.06									
Arkansas Non-MSA	994	9.53	0.00	0.00	0.00	0.00	84.50	81.19	15.50	18.81	10.07	0.00	0.00	10.14	9.81									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: ARKANSAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Little Rock-North Little Rock-Conway, AR MSA	0	0.00	7.12	0.00	16.28	0.00	46.77	0.00	29.83	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Fayetteville-Springdale-Rogers, AR MSA	0	0.00	18.48	0.00	13.73	0.00	52.96	0.00	14.83	0.00	0.00	0.00	0.00	0.00	0.00	
Hot Springs, AR MSA	0	0.00	0.00	0.00	49.40	0.00	41.51	0.00	9.09	0.00	0.00	0.00	0.00	0.00	0.00	
Jonesboro, AR MSA	0	0.00	23.04	0.00	3.96	0.00	62.10	0.00	10.90	0.00	0.00	0.00	0.00	0.00	0.00	
Pine Bluff, AR MSA	0	0.00	0.00	0.00	37.23	0.00	47.07	0.00	15.70	0.00	0.00	0.00	0.00	0.00	0.00	
Arkansas Non-MSA	0	0.00	0.00	0.00	0.00	0.00	86.55	0.00	13.45	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: ARKANSAS		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*														
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp										
<b>Full Review:</b>																									
Little Rock-North Little Rock-Conway, AR MSA	1,150	50.55	5.17	4.26	16.38	12.70	51.05	45.65	27.39	37.39	4.50	3.15	4.54	4.15	5.23										
<b>Limited Review:</b>																									
Fayetteville-Springdale-Rogers, AR MSA	454	19.96	0.78	0.66	11.10	12.56	68.34	65.20	19.78	21.59	3.03	6.67	2.51	3.02	3.20										
Hot Springs, AR MSA	224	9.85	0.00	0.00	23.49	28.57	63.20	55.80	13.31	15.63	6.63	0.00	5.84	6.82	7.18										
Jonesboro, AR MSA	159	6.99	1.57	3.14	4.24	0.00	71.01	67.92	23.18	28.93	4.92	5.88	0.00	5.01	5.16										
Pine Bluff, AR MSA	56	2.46	0.00	0.00	28.27	23.21	46.52	48.21	25.22	28.57	3.32	0.00	2.28	4.12	3.48										
Arkansas Non-MSA	232	10.20	0.00	0.00	0.00	0.00	86.14	77.59	13.86	22.41	4.71	0.00	0.00	4.15	7.62										

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: ARKANSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>†</sup>													
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Little Rock-North Little Rock-Conway, AR MSA	9	19.57	1.77	0.00	14.29	11.11	60.11	66.67	23.82	22.22	0.85	0.00	4.17	0.56	0.00									
<b>Limited Review:</b>																								
Fayetteville-Springdale-Rogers, AR MSA	11	23.91	0.31	0.00	8.92	0.00	76.02	63.64	14.75	36.36	0.75	0.00	0.00	0.52	6.90									
Hot Springs, AR MSA	7	15.22	0.00	0.00	8.89	0.00	75.93	85.71	15.19	14.29	22.22	0.00	0.00	25.00	0.00									
Jonesboro, AR MSA	6	13.04	0.12	0.00	3.46	0.00	76.21	83.33	20.21	16.67	0.41	0.00	0.00	0.53	0.00									
Pine Bluff, AR MSA	3	6.52	0.00	0.00	36.39	0.00	50.76	100.00	12.84	0.00	0.50	0.00	0.00	1.28	0.00									
Arkansas Non-MSA	10	21.74	0.00	0.00	0.00	0.00	87.50	60.00	12.50	40.00	2.08	0.00	0.00	1.83	3.57									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE															GEOGRAPHY: ARKANSAS		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*														
	#	% of Total**	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp										
<b>Full Review:</b>																									
Little Rock-North Little Rock-Conway, AR MSA	6,217	60.57	19.80	11.71	18.14	29.34	22.49	27.63	39.58	31.31	19.97	18.98	20.55	21.25	18.93										
<b>Limited Review:</b>																									
Fayetteville-Springdale-Rogers, AR MSA	2,334	22.74	17.84	10.63	18.39	24.91	24.15	26.08	39.61	38.38	13.20	10.61	14.04	15.16	12.38										
Hot Springs, AR MSA	379	3.69	19.07	7.98	18.11	24.73	23.06	21.54	39.75	45.74	12.37	13.46	12.94	14.76	10.91										
Jonesboro, AR MSA	726	7.07	21.44	12.71	17.48	31.35	21.76	26.93	39.32	29.01	16.62	18.46	21.44	18.20	11.99										
Pine Bluff, AR MSA	184	1.79	23.29	5.98	16.31	29.35	20.57	23.37	39.83	41.30	10.03	6.67	8.45	10.57	11.51										
Arkansas Non-MSA	424	4.13	16.22	4.01	17.35	20.05	23.25	21.70	43.18	54.25	8.68	3.95	8.25	7.07	10.79										

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: ARKANSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Little Rock-North Little Rock-Conway, AR MSA	163	58.84	19.80	3.80	18.14	17.72	22.49	29.11	39.58	49.37	5.54	1.94	4.05	6.94	6.21	
<b>Limited Review:</b>																
Fayetteville-Springdale-Rogers, AR MSA	37	13.36	17.84	15.15	18.39	12.12	24.15	24.24	39.61	48.48	1.43	1.82	1.56	2.27	0.94	
Hot Springs, AR MSA	20	7.22	19.07	10.00	18.11	10.00	23.06	20.00	39.75	60.00	9.38	20.00	15.38	5.88	8.45	
Jonesboro, AR MSA	10	3.61	21.44	0.00	17.48	30.00	21.76	10.00	39.32	60.00	1.10	0.00	1.89	1.92	0.80	
Pine Bluff, AR MSA	7	2.53	23.29	0.00	16.31	28.57	20.57	14.29	39.83	57.14	1.74	0.00	4.76	0.00	1.75	
Arkansas Non-MSA	40	14.44	16.22	5.13	17.35	10.26	23.25	25.64	43.18	58.97	3.38	0.00	3.23	3.13	4.46	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.6% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Arkansas					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Little Rock-North Little Rock-Conway, AR MSA	5,656	54.24	19.80	5.87	18.14	18.66	22.49	26.21	39.58	49.26	15.79	16.62	17.96	17.05	14.66	
<b>Limited Review:</b>																
Fayetteville-Springdale-Rogers, AR MSA	2,257	21.64	17.84	8.67	18.39	19.23	24.15	23.78	39.61	48.32	8.60	10.36	10.38	10.44	7.37	
Hot Springs, AR MSA	643	6.17	19.07	5.93	18.11	16.75	23.06	21.29	39.75	56.02	12.71	16.47	18.22	12.81	11.17	
Jonesboro, AR MSA	617	5.92	21.44	6.12	17.48	16.33	21.76	25.23	39.32	52.32	10.09	9.57	10.19	12.50	9.31	
Pine Bluff, AR MSA	261	2.50	23.29	3.18	16.31	10.91	20.57	19.09	39.83	66.82	9.98	4.35	6.86	8.67	11.25	
Arkansas Non-MSA	994	9.53	16.22	4.83	17.35	18.55	23.25	25.25	43.18	51.37	11.30	11.11	13.64	13.96	9.55	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 11.2% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: ARKANSAS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>7</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Little Rock-North Little Rock-Conway, AR MSA	1,150	50.55	69.40	55.65	91.13	3.74	5.13	4.38	4.95
<b>Limited Review:</b>									
Fayetteville-Springdale-Rogers, AR MSA	454	19.96	69.17	59.03	94.27	2.42	3.30	2.95	2.81
Hot Springs, AR MSA	224	9.85	69.18	61.61	95.54	1.34	3.13	6.47	8.27
Jonesboro, AR MSA	159	6.99	68.05	54.72	100.00	0.00	0.00	4.67	5.38
Pine Bluff, AR MSA	56	2.46	71.92	60.71	92.86	1.79	5.36	3.18	3.50
Arkansas Non-MSA	232	10.20	71.91	60.78	96.98	2.59	0.43	4.52	5.34

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 27.58% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: Arkansas			Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Little Rock-North Little Rock-Conway, AR MSA	9	19.57	97.06	100.00	100.00	0.00	0.00	0.84	1.03
<b>Limited Review:</b>									
Fayetteville-Springdale-Rogers, AR MSA	11	23.91	97.40	54.55	100.00	0.00	0.00	0.75	0.62
Hot Springs, AR MSA	7	15.22	97.41	57.14	100.00	0.00	0.00	22.22	40.00
Jonesboro, AR MSA	6	13.04	97.11	66.67	100.00	0.00	0.00	0.40	0.00
Pine Bluff, AR MSA	3	6.52	97.86	100.00	100.00	0.00	0.00	0.47	0.53
Arkansas Non-MSA	10	21.74	98.63	30.00	80.00	20.00	0.00	2.07	1.23

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 32.61% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: ARKANSAS									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Little Rock-North Little Rock-Conway, AR MSA	23	6,852	106	22,586	129	29,438	70.82	1	10,220
<b>Limited Review:</b>									
Fayetteville-Springdale-Rogers, AR MSA	4	658	54	1,212	58	1,870	4.50	0	0
Hot Springs, AR MSA	3	2,381	11	380	14	2,761	6.64	0	0
Jonesboro, AR MSA	2	89	4	132	6	222	0.53	0	0
Pine Bluff, AR MSA	4	654	8	169	12	823	1.98	0	0
Arkansas Non-MSA	2	3,406	29	377	31	3,782	9.10	0	0
Statewide investments with potential benefit to one or more AAs	0	0	17	110	17	110	0.26	0	0
Statewide investments with no potential to benefit one or more AAs	14	2,512	27	48	41	2,561	6.16	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: ARKANSAS								EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Little Rock-North Little Rock-Conway, AR MSA	77.27	16	39.02	6.25	25.00	31.25	37.50	0	3	0	-1	-1	-1	2.78	19.75	53.63	23.84
<b>Limited Review:</b>																	
Fayetteville-Springdale-Rogers, AR MSA	7.87	9	21.95	0.00	44.44	44.44	11.11	0	0	0	0	0	0	2.99	8.90	71.89	16.22
Hot Springs, AR MSA	5.61	7	17.07	0.00	42.86	28.57	28.57	0	1	0	0	-1	0	0.00	21.35	65.29	13.36
Jonesboro, AR MSA	2.83	2	4.88	0.00	0.00	100.00	0.00	0	2	0	0	-2	0	5.22	5.91	73.30	15.57
Pine Bluff, AR MSA	2.36	2	4.88	0.00	50.00	50.00	0.00	0	1	0	0	-1	0	0.00	34.61	43.45	21.94
Arkansas Non-MSA	4.06	5	12.20	0.00	0.00	100.00	0.00	0	2	0	0	-2	0	0.00	0.00	84.46	15.54

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: CALIFORNIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Los Angeles-Long Beach-Glendale, CA MD	22.20	132,731	44,265,745	27,163	1,315,833	53	842	153	474,052	160,100	46,056,472	22.37
Riverside-San Bernardino-Ontario, CA MSA	12.80	85,675	18,202,668	6,581	271,456	59	2,273	22	60,770	92,337	18,537,167	3.74
Sacramento-Arden-Arcade-Roseville, CA MSA	6.74	44,276	10,329,179	4,284	154,753	73	1,991	14	56,287	48,647	10,542,210	2.62
San Francisco-San Mateo-Redwood City, CA MD	5.38	31,235	15,135,802	7,520	345,975	29	888	15	76,271	38,799	15,558,936	38.33
<b>Limited Review:</b>												
Bakersfield-Delano, CA MSA	1.96	12,779	2,142,590	1,291	48,589	68	3,890	3	1,175	14,141	2,196,244	0.70
Chico, CA MSA	0.52	3,389	663,887	309	10,058	27	424	0	0	3,725	674,369	0.24
El Centro, CA MSA	0.25	1,714	257,426	115	3,132	10	69	0	0	1,839	260,627	0.14
Fresno, CA MSA	1.71	10,942	2,053,245	1,264	66,285	147	18,451	3	1,678	12,356	2,139,659	0.95
Hanford-Corcoran, CA MSA	0.22	1,480	251,523	114	2,721	20	1,780	2	225	1,616	256,249	0.09
Madera-Chowchilla, CA MSA	0.29	1,891	297,244	189	8,120	17	1,688	2	1,611	2,099	308,663	0.10
Merced, CA MSA	0.48	3,214	470,438	226	9,846	51	7,813	1	28	3,492	488,125	0.14
Modesto, CA MSA	1.16	7,720	1,307,417	633	24,364	39	1,204	2	500	8,394	1,333,485	0.41
Napa, CA MSA	0.39	2,350	783,631	406	26,119	16	570	6	5,689	2,778	816,009	0.21

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: CALIFORNIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Limited Review:</b>												
Oakland-Fremont-Hayward, CA MD	8.28	52,638	18,677,316	7,021	337,346	38	1,048	23	59,189	59,720	19,074,899	6.08
Oxnard-Thousand Oaks-Ventura, CA MSA	2.66	16,947	5,647,968	2,202	95,484	39	553	17	30,094	19,205	5,774,099	1.41
Redding, CA MSA	0.41	2,660	511,083	310	13,381	4	16	0	0	2,974	524,480	0.17
Salinas, CA MSA	0.84	5,405	1,575,717	620	25,442	25	1,485	3	3,557	6,053	1,606,201	0.56
San Diego-Carlsbad-San Marcos, CA MSA	8.83	56,966	19,141,550	6,663	278,549	37	518	37	97,008	63,703	19,517,625	4.31
San Jose-Sunnyvale-Santa Clara, CA MSA	5.99	36,688	15,787,686	6,474	260,171	19	626	14	30,115	43,195	16,078,598	5.97
San Luis Obispo-Paso Robles, CA MSA	0.74	4,655	1,423,674	677	20,140	27	2,039	0	0	5,359	1,445,853	0.31
Santa Ana-Anaheim-Irvine, CA MD	9.51	58,009	21,608,101	10,535	538,013	18	190	37	87,881	68,599	22,234,185	7.27
Santa Barbara-Santa Maria-Goleta, CA MSA	0.91	5,670	2,037,553	869	48,884	25	416	3	3,450	6,567	2,090,303	0.59
Santa Cruz-Watsonville, CA MSA	0.59	3,514	1,253,732	687	15,425	19	722	1	197	4,221	1,270,076	0.38
Santa Rosa-Petaluma, CA MSA	1.38	8,762	2,597,061	1,136	39,755	30	1,859	4	684	9,932	2,639,359	0.60
Stockton, CA MSA	1.58	10,463	2,026,717	889	34,522	47	1,674	5	20,395	11,404	2,083,308	0.52
Vallejo-Fairfield, CA MSA	1.15	7,710	1,804,811	547	23,063	7	70	1	33	8,265	1,827,977	0.43
Visalia-Porterville, CA MSA	0.81	5,267	850,216	531	28,505	72	8,001	2	5,209	5,872	891,931	0.35
Yuba City, CA MSA	0.44	2,871	464,177	250	9,216	25	1,811	1	1	3,147	475,205	0.14
California Non-MSA	1.78	11,191	2,398,632	1,561	46,797	87	1,826	2	5,500	12,841	2,452,755	0.88

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: CALIFORNIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Los Angeles-Long Beach-Glendale, CA MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	22.37
Riverside-San Bernardino-Ontario, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3.74
Sacramento-Arden-Arcade-Roseville, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.62
San Francisco-San Mateo-Redwood City, CA MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	38.33
<b>Limited Review:</b>														
Bakersfield-Delano, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.70
Chico, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	.024
El Centro, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.14
Fresno, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.95
Hanford-Corcoran, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.09
Madera-Chowchilla, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.10
Merced, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.14
Modesto, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.41
Napa, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.21

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: CALIFORNIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Limited Review:</b>														
Oakland-Fremont-Hayward, CA MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	6.08
Oxnard-Thousand Oaks-Ventura, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.41
Redding, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.17
Salinas, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.56
San Diego-Carlsbad-San Marcos, CA MSA	100.00	2	11,542	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4.31
San Jose-Sunnyvale-Santa Clara, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	5.97
San Luis Obispo-Paso Robles, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.31
Santa Ana-Anaheim-Irvine, CA MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	7.27
Santa Barbara-Santa Maria-Goleta, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.59
Santa Cruz-Watsonville, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.38
Santa Rosa-Petaluma, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.60
Stockton, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.52
Vallejo-Fairfield, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.43
Visalia-Porterville, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.35
Yuba City, CA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.14
California Non-MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.88

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															
GEOGRAPHY: CALIFORNIA															
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Los Angeles-Long Beach-Glendale, CA MD	53,352	18.66	1.91	3.22	15.46	18.21	31.30	34.79	51.33	43.78	22.42	21.24	21.98	22.88	22.35
Riverside-San Bernardino-Ontario, CA MSA	54,465	19.05	1.49	0.94	21.74	19.46	43.33	48.52	33.44	31.08	25.12	25.00	25.36	25.38	24.57
Sacramento-Arden-Arcade-Roseville, CA MSA	22,499	7.87	3.32	2.97	18.33	14.42	42.14	43.20	36.21	39.40	22.41	22.68	22.73	23.19	21.49
San Francisco-San Mateo-Redwood City, CA MD	8,782	3.07	1.54	5.42	12.79	15.74	45.12	42.11	40.55	36.73	22.22	29.43	21.78	21.82	21.91
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	8,753	3.06	2.10	0.46	23.06	12.73	33.51	31.81	41.33	55.01	24.39	16.67	24.80	23.71	24.81
Chico, CA MSA	1,550	0.54	0.38	0.45	14.86	16.58	60.46	53.10	24.30	29.87	24.42	35.71	26.05	23.21	25.73
El Centro, CA MSA	1,305	0.46	0.00	0.00	23.53	8.81	42.36	41.69	34.11	49.50	23.37	0.00	20.69	25.86	21.99
Fresno, CA MSA	6,540	2.29	1.60	1.09	21.71	14.11	35.87	36.83	40.82	47.97	19.77	17.50	22.21	20.36	18.64
Hanford-Corcoran, CA MSA	936	0.33	0.00	0.00	22.35	13.14	39.08	32.26	38.57	54.59	23.94	0.00	24.58	23.12	24.29
Madera-Chowchilla, CA MSA	1,257	0.44	0.00	0.00	11.37	15.04	52.17	59.98	36.46	24.98	22.34	0.00	27.20	21.29	22.53
Merced, CA MSA	2,369	0.83	0.00	0.00	17.13	10.55	50.94	42.42	31.94	47.02	20.69	0.00	17.91	19.95	22.24
Modesto, CA MSA	5,110	1.79	1.12	0.45	14.63	11.45	53.88	59.45	30.36	28.65	21.33	20.00	18.97	21.67	21.67
Napa, CA MSA	959	0.34	0.00	0.00	13.85	28.26	60.87	60.48	25.28	11.26	22.36	0.00	28.03	21.46	16.59

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE																
GEOGRAPHY: CALIFORNIA																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid
<b>Limited Review:</b>																
Oakland-Fremont-Hayward, CA MD	22,413	7.84	3.49	4.20	13.07	15.40	43.58	46.00	39.86	34.40	22.58	21.82	22.13	23.38	21.85	
Oxnard-Thousand Oaks-Ventura, CA MSA	6,134	2.15	1.20	1.27	15.46	22.24	46.06	45.68	37.29	30.81	23.20	17.89	23.45	22.94	23.63	
Redding, CA MSA	1,195	0.42	0.00	0.00	12.78	16.49	70.92	62.09	16.30	21.42	21.54	0.00	23.10	20.83	22.83	
Salinas, CA MSA	3,092	1.08	0.00	0.00	13.83	16.88	45.09	53.62	41.08	29.50	22.56	0.00	21.15	24.50	20.14	
San Diego-Carlsbad-San Marcos, CA MSA	23,948	8.38	2.30	3.52	14.03	14.17	41.01	40.86	42.66	41.45	22.20	19.40	22.52	22.20	22.34	
San Jose-Sunnyvale-Santa Clara, CA MSA	11,940	4.18	1.13	3.43	16.54	25.08	47.80	44.84	34.53	26.65	20.82	22.38	20.56	20.86	20.81	
San Luis Obispo-Paso Robles, CA MSA	1,415	0.49	0.00	0.00	10.27	13.57	75.43	75.69	14.31	10.74	15.54	0.00	17.95	15.16	15.30	
Santa Ana-Anaheim-Irvine, CA MD	19,933	6.97	1.25	1.22	19.56	22.86	33.56	32.40	45.63	43.52	23.17	21.84	23.15	23.08	23.28	
Santa Barbara-Santa Maria-Goleta, CA MSA	2,073	0.73	0.97	0.92	17.42	23.72	39.94	47.35	41.68	28.01	19.61	15.00	20.21	19.46	19.64	
Santa Cruz-Watsonville, CA MSA	1,244	0.44	0.00	0.00	20.21	31.91	40.44	36.74	39.35	31.35	17.52	0.00	21.48	16.93	15.20	
Santa Rosa-Petaluma, CA MSA	3,458	1.21	0.00	0.00	9.17	11.68	71.27	71.05	19.56	17.26	20.03	0.00	20.63	20.13	19.22	
Stockton, CA MSA	6,858	2.40	1.80	0.87	19.48	10.06	39.28	34.98	39.43	54.08	20.70	11.86	19.19	21.65	20.55	
Vallejo-Fairfield, CA MSA	4,797	1.68	0.52	0.33	15.69	13.20	50.32	50.61	33.48	35.86	23.31	10.34	23.15	23.10	23.81	
Visalia-Porterville, CA MSA	3,363	1.18	0.00	0.00	22.02	11.27	38.85	40.71	39.13	48.02	23.48	0.00	20.23	23.30	24.67	
Yuba City, CA MSA	2,011	0.70	0.00	0.00	17.49	19.89	52.57	54.15	29.94	25.96	25.28	0.00	23.15	26.10	25.52	
California Non-MSA	4,156	1.45	0.00	0.00	12.66	8.21	64.61	63.11	22.74	28.68	19.04	0.00	20.00	19.38	18.13	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: CALIFORNIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography <sup>*</sup>				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
Los Angeles-Long Beach-Glendale, CA MD	2,474	27.71	1.91	1.37	15.46	12.81	31.30	28.74	51.33	57.07	14.75	16.67	16.77	14.49	14.42	
Riverside-San Bernardino-Ontario, CA MSA	709	7.94	1.49	0.71	21.74	14.67	43.33	37.09	33.44	47.53	13.63	6.67	11.99	12.47	15.18	
Sacramento-Arden-Arcade-Roseville, CA MSA	583	6.53	3.32	1.54	18.33	7.03	42.14	34.13	36.21	57.29	12.10	10.00	8.70	10.54	13.91	
San Francisco-San Mateo-Redwood City, CA MD	656	7.35	1.54	1.22	12.79	12.50	45.12	45.27	40.55	41.01	13.19	21.05	9.39	13.33	14.01	
<b>Limited Review:</b>																
Bakersfield-Delano, CA MSA	123	1.38	2.10	0.81	23.06	17.89	33.51	36.59	41.33	44.72	14.23	0.00	31.03	15.85	10.20	
Chico, CA MSA	37	0.41	0.38	0.00	14.86	5.41	60.46	59.46	24.30	35.14	10.56	0.00	7.69	10.53	11.32	
El Centro, CA MSA	10	0.11	0.00	0.00	23.53	10.00	42.36	50.00	34.11	40.00	12.12	0.00	0.00	20.00	6.67	
Fresno, CA MSA	110	1.23	1.60	0.00	21.71	15.45	35.87	32.73	40.82	51.82	8.22	0.00	14.63	9.00	6.67	
Hanford-Corcoran, CA MSA	10	0.11	0.00	0.00	22.35	10.00	39.08	50.00	38.57	40.00	2.08	0.00	0.00	2.27	2.44	
Madera-Chowchilla, CA MSA	19	0.21	0.00	0.00	11.37	10.53	52.17	36.84	36.46	52.63	7.14	0.00	0.00	5.41	10.53	
Merced, CA MSA	19	0.21	0.00	0.00	17.13	5.26	50.94	63.16	31.94	31.58	9.57	0.00	0.00	16.67	2.70	
Modesto, CA MSA	43	0.48	1.12	0.00	14.63	13.95	53.88	44.19	30.36	41.86	9.50	0.00	13.33	8.65	10.34	
Napa, CA MSA	34	0.38	0.00	0.00	13.85	5.88	60.87	52.94	25.28	41.18	11.11	0.00	13.33	13.33	6.67	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT															GEOGRAPHY: CALIFORNIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>												
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp								
<b>Limited Review:</b>																							
Oakland-Fremont-Hayward, CA MD	638	7.15	3.49	1.41	13.07	8.15	43.58	36.52	39.86	53.92	10.95	12.50	8.06	11.42	11.05								
Oxnard-Thousand Oaks-Ventura, CA MSA	335	3.75	1.20	0.90	15.46	10.45	46.06	40.00	37.29	48.66	18.05	0.00	16.18	15.91	20.18								
Redding, CA MSA	38	0.43	0.00	0.00	12.78	13.16	70.92	73.68	16.30	13.16	8.86	0.00	9.09	9.80	5.88								
Salinas, CA MSA	59	0.66	0.00	0.00	13.83	6.78	45.09	35.59	41.08	57.63	10.67	0.00	0.00	16.42	6.49								
San Diego-Carlsbad-San Marcos, CA MSA	706	7.91	2.30	2.12	14.03	8.36	41.01	34.56	42.66	54.96	10.96	14.89	12.50	11.28	10.29								
San Jose-Sunnyvale-Santa Clara, CA MSA	511	5.72	1.13	0.00	16.54	11.15	47.80	49.90	34.53	38.94	12.13	0.00	15.97	12.29	11.21								
San Luis Obispo-Paso Robles, CA MSA	93	1.04	0.00	0.00	10.27	8.60	75.43	76.34	14.31	15.05	11.38	0.00	9.68	11.36	12.82								
Santa Ana-Anaheim-Irvine, CA MD	910	10.19	1.25	0.66	19.56	14.51	33.56	33.63	45.63	51.21	13.34	8.33	17.08	14.76	11.72								
Santa Barbara-Santa Maria-Goleta, CA MSA	129	1.44	0.97	0.00	17.42	13.95	39.94	38.76	41.68	47.29	15.41	0.00	21.21	16.67	13.53								
Santa Cruz-Watsonville, CA MSA	47	0.53	0.00	0.00	20.21	21.28	40.44	42.55	39.35	36.17	5.47	0.00	3.85	6.74	4.65								
Santa Rosa-Petaluma, CA MSA	165	1.85	0.00	0.00	9.17	4.24	71.27	70.91	19.56	24.85	16.51	0.00	8.33	15.89	20.19								
Stockton, CA MSA	78	0.87	1.80	1.28	19.48	6.41	39.28	30.77	39.43	61.54	15.48	20.00	11.76	11.25	18.80								
Vallejo-Fairfield, CA MSA	73	0.82	0.52	1.37	15.69	10.96	50.32	52.05	33.48	35.62	10.50	100.00	19.05	10.09	7.25								
Visalia-Porterville, CA MSA	74	0.83	0.00	0.00	22.02	12.16	38.85	39.19	39.13	48.65	12.43	0.00	11.11	6.94	17.72								
Yuba City, CA MSA	18	0.20	0.00	0.00	17.49	5.56	52.57	50.00	29.94	44.44	7.89	0.00	0.00	6.82	12.00								
California Non-MSA	227	2.54	0.00	0.00	12.66	8.81	64.61	57.71	22.74	33.48	12.43	0.00	11.32	11.41	14.36								

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: CALIFORNIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Los Angeles-Long Beach-Glendale, CA MD	76,578	22.96	1.91	1.12	15.46	10.99	31.30	26.54	51.33	61.35	17.17	24.98	23.25	18.83	15.70									
Riverside-San Bernardino-Ontario, CA MSA	30,501	9.14	1.49	0.43	21.74	12.18	43.33	41.12	33.44	46.27	20.58	31.14	25.54	22.75	18.15									
Sacramento-Arden-Arcade-Roseville, CA MSA	21,192	6.35	3.32	1.77	18.33	8.64	42.14	36.81	36.21	52.78	17.24	21.76	20.59	18.27	16.09									
San Francisco-San Mateo-Redwood City, CA MD	21,750	6.52	1.54	2.57	12.79	11.27	45.12	39.77	40.55	46.38	14.77	20.88	16.53	14.56	14.33									
<b>Limited Review:</b>																								
Bakersfield-Delano, CA MSA	3,903	1.17	2.10	0.33	23.06	10.33	33.51	26.59	41.33	62.75	21.63	30.00	27.72	24.06	20.16									
Chico, CA MSA	1,802	0.54	0.38	0.94	14.86	10.82	60.46	46.45	24.30	41.79	18.28	28.21	21.65	17.26	18.49									
El Centro, CA MSA	399	0.12	0.00	0.00	23.53	9.27	42.36	33.33	34.11	57.39	21.79	0.00	15.38	20.91	23.20									
Fresno, CA MSA	4,292	1.29	1.60	0.42	21.71	8.15	35.87	26.96	40.82	64.47	16.90	23.81	18.95	20.16	15.71									
Hanford-Corcoran, CA MSA	534	0.16	0.00	0.00	22.35	11.05	39.08	33.15	38.57	55.81	14.34	0.00	15.38	15.14	13.79									
Madera-Chowchilla, CA MSA	615	0.18	0.00	0.00	11.37	5.85	52.17	49.59	36.46	44.55	16.89	0.00	26.53	17.19	15.79									
Merced, CA MSA	826	0.25	0.00	0.00	17.13	8.47	50.94	44.19	31.94	47.34	20.67	0.00	27.47	22.15	18.66									
Modesto, CA MSA	2,567	0.77	1.12	0.43	14.63	7.87	53.88	54.38	30.36	37.32	18.55	21.05	18.08	19.21	17.76									
Napa, CA MSA	1,357	0.41	0.00	0.00	13.85	14.74	60.87	59.54	25.28	25.72	15.50	0.00	18.40	16.46	12.36									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: CALIFORNIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Limited Review:</b>																								
Oakland-Fremont-Hayward, CA MD	29,575	8.87	3.49	1.51	13.07	7.78	43.58	34.96	39.86	55.76	13.82	21.24	17.71	14.85	12.73									
Oxnard-Thousand Oaks-Ventura, CA MSA	10,478	3.14	1.20	0.65	15.46	10.38	46.06	41.41	37.29	47.56	16.67	19.85	21.59	17.13	15.52									
Redding, CA MSA	1,427	0.43	0.00	0.00	12.78	13.67	70.92	62.51	16.30	23.83	16.32	0.00	23.64	15.37	15.87									
Salinas, CA MSA	2,253	0.68	0.00	0.00	13.83	7.55	45.09	43.54	41.08	48.91	15.14	0.00	23.66	17.48	12.87									
San Diego-Carlsbad-San Marcos, CA MSA	32,307	9.69	2.30	1.73	14.03	8.93	41.01	32.51	42.66	56.83	16.45	22.97	19.70	16.63	15.83									
San Jose-Sunnyvale-Santa Clara, CA MSA	24,235	7.27	1.13	0.80	16.54	12.00	47.80	44.56	34.53	42.64	13.07	19.73	17.84	13.01	11.99									
San Luis Obispo-Paso Robles, CA MSA	3,147	0.94	0.00	0.00	10.27	8.29	75.43	75.98	14.31	15.73	14.70	0.00	13.82	14.82	14.63									
Santa Ana-Anaheim-Irvine, CA MD	37,164	11.14	1.25	0.52	19.56	15.32	33.56	28.86	45.63	55.29	16.82	20.52	22.61	16.61	15.66									
Santa Barbara-Santa Maria-Goleta, CA MSA	3,467	1.04	0.97	0.63	17.42	13.91	39.94	37.39	41.68	48.07	15.19	15.38	20.37	14.88	14.35									
Santa Cruz-Watsonville, CA MSA	2,223	0.67	0.00	0.00	20.21	16.69	40.44	42.60	39.35	40.71	11.59	0.00	15.23	11.84	10.08									
Santa Rosa-Petaluma, CA MSA	5,137	1.54	0.00	0.00	9.17	7.09	71.27	70.53	19.56	22.39	13.75	0.00	16.73	13.78	12.90									
Stockton, CA MSA	3,526	1.06	1.80	0.94	19.48	6.83	39.28	31.28	39.43	60.95	19.25	25.53	23.14	19.85	18.56									
Vallejo-Fairfield, CA MSA	2,839	0.85	0.52	0.18	15.69	9.05	50.32	48.19	33.48	42.59	16.45	5.56	20.40	16.92	15.47									
Visalia-Porterville, CA MSA	1,830	0.55	0.00	0.00	22.02	8.96	38.85	39.18	39.13	51.86	20.29	0.00	22.99	21.38	19.21									
Yuba City, CA MSA	842	0.25	0.00	0.00	17.49	10.69	52.57	54.87	29.94	34.44	17.88	0.00	14.95	18.18	18.36									
California Non-MSA	6,808	2.04	0.00	0.00	12.66	6.48	64.61	60.72	22.74	32.80	16.74	0.00	18.36	17.54	15.23									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY																
GEOGRAPHY: CALIFORNIA																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Los Angeles-Long Beach-Glendale, CA MD	10	11.90	12.96	40.00	31.74	20.00	28.34	30.00	26.96	10.00	0.17	0.81	0.00	0.23	0.00	
Riverside-San Bernardino-Ontario, CA MSA	0	0.00	7.73	0.00	38.68	0.00	37.84	0.00	15.76	0.00	0.00	0.00	0.00	0.00	0.00	
Sacramento-Arden-Arcade-Roseville, CA MSA	2	2.38	10.57	0.00	36.09	0.00	35.54	100.00	17.80	0.00	0.56	0.00	0.00	2.94	0.00	
San Francisco-San Mateo-Redwood City, CA MD	47	55.95	19.98	14.89	23.42	12.77	31.54	29.79	25.05	42.55	4.22	5.21	2.00	2.76	8.61	
<b>Limited Review:</b>																
Bakersfield-Delano, CA MSA	0	0.00	5.58	0.00	33.58	0.00	31.60	0.00	29.24	0.00	0.00	0.00	0.00	0.00	0.00	
Chico, CA MSA	0	0.00	8.41	0.00	34.73	0.00	34.21	0.00	22.65	0.00	0.00	0.00	0.00	0.00	0.00	
El Centro, CA MSA	0	0.00	0.00	0.00	38.97	0.00	27.45	0.00	33.58	0.00	0.00	0.00	0.00	0.00	0.00	
Fresno, CA MSA	0	0.00	6.51	0.00	38.38	0.00	39.03	0.00	16.08	0.00	0.00	0.00	0.00	0.00	0.00	
Hanford-Corcoran, CA MSA	0	0.00	0.00	0.00	30.00	0.00	38.19	0.00	31.80	0.00	0.00	0.00	0.00	0.00	0.00	
Madera-Chowchilla, CA MSA	0	0.00	0.00	0.00	47.62	0.00	39.87	0.00	12.50	0.00	0.00	0.00	0.00	0.00	0.00	
Merced, CA MSA	0	0.00	0.00	0.00	39.39	0.00	42.53	0.00	18.09	0.00	0.00	0.00	0.00	0.00	0.00	
Modesto, CA MSA	0	0.00	3.38	0.00	26.24	0.00	49.18	0.00	21.20	0.00	0.00	0.00	0.00	0.00	0.00	
Napa, CA MSA	0	0.00	0.00	0.00	24.02	0.00	72.18	0.00	3.80	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															
GEOGRAPHY: CALIFORNIA															
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Limited Review:</b>															
Oakland-Fremont-Hayward, CA MD	10	11.90	13.31	10.00	27.95	40.00	45.36	40.00	13.38	10.00	1.54	0.00	1.54	2.61	0.00
Oxnard-Thousand Oaks-Ventura, CA MSA	0	0.00	3.57	0.00	34.60	0.00	47.43	0.00	14.41	0.00	0.00	0.00	0.00	0.00	0.00
Redding, CA MSA	0	0.00	0.00	0.00	44.43	0.00	47.48	0.00	8.09	0.00	0.00	0.00	0.00	0.00	0.00
Salinas, CA MSA	1	1.19	0.00	0.00	28.29	0.00	58.50	100.00	13.21	0.00	4.17	0.00	0.00	6.67	0.00
San Diego-Carlsbad-San Marcos, CA MSA	5	5.95	11.77	80.00	32.61	0.00	37.33	20.00	18.29	0.00	0.67	3.61	0.00	0.00	0.00
San Jose-Sunnyvale-Santa Clara, CA MSA	2	2.38	6.94	50.00	26.10	0.00	53.65	50.00	13.30	0.00	0.00	0.00	0.00	0.00	0.00
San Luis Obispo-Paso Robles, CA MSA	0	0.00	0.00	0.00	34.31	0.00	64.12	0.00	1.56	0.00	0.00	0.00	0.00	0.00	0.00
Santa Ana-Anaheim-Irvine, CA MD	2	2.38	6.27	0.00	41.07	50.00	33.61	50.00	19.05	0.00	0.29	0.00	0.00	1.19	0.00
Santa Barbara-Santa Maria-Goleta, CA MSA	1	1.19	12.99	100.00	41.94	0.00	28.08	0.00	16.99	0.00	0.00	0.00	0.00	0.00	0.00
Santa Cruz-Watsonville, CA MSA	0	0.00	0.00	0.00	43.78	0.00	44.77	0.00	11.45	0.00	0.00	0.00	0.00	0.00	0.00
Santa Rosa-Petaluma, CA MSA	2	2.38	0.00	0.00	29.86	50.00	65.54	50.00	4.60	0.00	1.82	0.00	0.00	2.63	0.00
Stockton, CA MSA	1	1.19	22.11	0.00	26.33	100.00	37.30	0.00	14.27	0.00	12.50	0.00	50.00	0.00	0.00
Vallejo-Fairfield, CA MSA	1	1.19	6.21	0.00	35.41	0.00	37.98	100.00	20.40	0.00	5.56	0.00	0.00	10.00	0.00
Visalia-Porterville, CA MSA	0	0.00	0.00	0.00	40.02	0.00	30.92	0.00	29.06	0.00	0.00	0.00	0.00	0.00	0.00
Yuba City, CA MSA	0	0.00	0.00	0.00	49.32	0.00	37.49	0.00	13.19	0.00	0.00	0.00	0.00	0.00	0.00
California Non-MSA	0	0.00	0.00	0.00	29.87	0.00	49.36	0.00	20.77	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: CALIFORNIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*												
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																							
Los Angeles-Long Beach-Glendale, CA MD	27,163	29.83	6.47	6.37	18.72	17.81	26.40	26.27	48.42	49.55	4.95	5.82	5.57	5.16	4.57								
Riverside-San Bernardino-Ontario, CA MSA	6,581	7.23	2.64	1.79	23.99	21.43	41.13	40.60	32.25	36.18	5.25	5.14	5.17	5.38	5.17								
Sacramento-Arden-Arcade-Roseville, CA MSA	4,284	4.70	5.91	5.37	19.05	17.79	38.18	35.95	36.86	40.90	4.41	4.55	4.71	4.56	4.15								
San Francisco-San Mateo-Redwood City, CA MD	7,520	8.26	13.61	12.55	17.37	18.75	34.98	36.20	34.04	32.50	4.89	5.56	5.17	4.87	4.57								
<b>Limited Review:</b>																							
Bakersfield-Delano, CA MSA	1,291	1.42	2.24	1.70	24.49	23.08	28.59	26.10	44.67	49.11	6.40	4.97	6.85	5.83	6.55								
Chico, CA MSA	309	0.34	0.40	0.00	24.05	22.65	48.49	44.66	27.05	32.69	2.88	0.00	3.47	2.68	2.83								
El Centro, CA MSA	115	0.13	0.00	0.00	30.30	35.65	38.43	35.65	31.27	28.70	3.54	0.00	4.45	3.14	3.16								
Fresno, CA MSA	1,264	1.39	5.43	5.54	23.64	20.57	32.26	32.20	38.67	41.69	4.25	4.71	4.05	4.49	4.14								
Hanford-Corcoran, CA MSA	114	0.13	0.00	0.00	35.40	29.82	31.28	31.58	33.32	38.60	3.58	0.00	4.00	2.48	4.41								
Madera-Chowchilla, CA MSA	189	0.21	0.00	0.00	12.98	7.94	54.52	65.08	32.49	26.98	4.69	0.00	3.75	4.87	4.68								
Merced, CA MSA	226	0.25	0.00	0.00	25.08	22.57	47.61	53.10	27.31	24.34	4.72	0.00	5.96	4.49	4.20								
Modesto, CA MSA	633	0.70	6.49	5.37	14.64	13.59	51.23	54.19	27.64	26.86	4.19	4.33	4.90	4.58	3.25								
Napa, CA MSA	406	0.45	0.00	0.00	23.35	20.44	56.42	56.16	20.24	23.40	4.95	0.00	5.45	4.81	4.93								

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: CALIFORNIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*												
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Limited Review:</b>																							
Oakland-Fremont-Hayward, CA MD	7,021	7.71	8.80	7.34	15.45	12.61	38.68	38.56	37.07	41.50	4.98	4.99	5.04	5.11	4.85								
Oxnard-Thousand Oaks-Ventura, CA MSA	2,202	2.42	2.90	1.95	16.34	13.35	48.21	46.59	32.55	38.10	4.51	3.70	3.86	4.85	4.37								
Redding, CA MSA	310	0.34	0.00	0.00	22.94	25.48	63.60	56.45	13.47	18.06	5.10	0.00	6.72	4.55	5.28								
Salinas, CA MSA	620	0.68	0.00	0.00	19.30	15.48	44.15	44.19	36.55	40.32	4.66	0.00	4.31	5.09	4.37								
San Diego-Carlsbad-San Marcos, CA MSA	6,663	7.32	4.29	2.69	18.44	16.84	36.62	34.29	40.65	46.18	3.73	3.11	4.03	3.71	3.69								
San Jose-Sunnyvale-Santa Clara, CA MSA	6,474	7.11	2.64	2.01	21.04	20.39	43.73	45.54	32.60	32.07	5.73	4.19	6.30	5.87	5.37								
San Luis Obispo-Paso Robles, CA MSA	677	0.74	0.00	0.00	18.67	14.48	67.54	70.90	13.80	14.62	4.95	0.00	4.72	5.21	4.14								
Santa Ana-Anaheim-Irvine, CA MD	10,535	11.57	2.38	2.23	25.49	23.94	33.63	32.62	38.50	41.21	4.87	4.54	4.91	4.97	4.79								
Santa Barbara-Santa Maria-Goleta, CA MSA	869	0.95	2.22	2.65	32.24	32.22	32.93	33.37	32.61	31.76	4.88	6.73	5.82	4.88	4.07								
Santa Cruz-Watsonville, CA MSA	687	0.75	0.00	0.00	20.73	19.07	45.71	44.83	33.56	36.10	4.62	0.00	5.02	4.74	4.27								
Santa Rosa-Petaluma, CA MSA	1,136	1.25	0.00	0.00	13.94	10.92	69.95	73.59	16.10	15.49	4.13	0.00	4.07	4.26	3.63								
Stockton, CA MSA	889	0.98	6.95	5.06	19.14	19.91	34.91	32.73	39.00	42.29	4.72	5.16	5.07	4.36	4.79								
Vallejo-Fairfield, CA MSA	547	0.60	2.16	1.28	21.22	20.84	46.30	42.78	30.32	35.10	4.60	2.22	5.78	4.49	4.26								
Visalia-Porterville, CA MSA	531	0.58	0.00	0.00	25.81	27.68	35.56	37.85	38.64	34.46	4.88	0.00	4.87	5.33	4.42								
Yuba City, CA MSA	250	0.27	0.00	0.00	26.73	26.40	46.64	39.20	26.63	34.40	5.34	0.00	6.49	4.99	5.08								
California Non-MSA	1,561	1.71	0.00	0.00	15.97	12.56	62.01	59.83	22.02	27.61	5.48	0.00	5.18	5.14	6.59								

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS																
GEOGRAPHY: CALIFORNIA																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Los Angeles-Long Beach-Glendale, CA MD	53	4.70	3.09	1.89	15.57	11.32	30.85	18.87	50.48	67.92	3.97	0.00	2.60	2.63	5.26	
Riverside-San Bernardino-Ontario, CA MSA	59	5.23	1.81	3.39	24.07	22.03	41.84	37.29	32.28	37.29	7.78	0.00	6.35	8.33	8.18	
Sacramento-Arden-Arcade-Roseville, CA MSA	73	6.47	3.38	2.74	16.74	16.44	46.63	41.10	33.25	39.73	7.07	20.00	6.56	4.69	11.11	
San Francisco-San Mateo-Redwood City, CA MD	29	2.57	6.21	6.90	14.85	6.90	42.91	31.03	36.03	55.17	6.34	0.00	0.00	7.02	8.47	
<b>Limited Review:</b>																
Bakersfield-Delano, CA MSA	68	6.03	1.42	0.00	31.37	36.76	33.82	20.59	33.38	42.65	13.78	0.00	15.28	10.29	15.48	
Chico, CA MSA	27	2.39	0.09	0.00	9.61	14.81	51.69	40.74	38.61	44.44	6.02	0.00	33.33	3.17	6.35	
El Centro, CA MSA	10	0.89	0.00	0.00	17.36	40.00	45.04	20.00	37.60	40.00	5.75	0.00	27.27	2.44	2.86	
Fresno, CA MSA	147	13.03	1.29	0.00	24.51	19.73	44.11	56.46	30.09	23.81	11.46	0.00	11.50	13.25	8.46	
Hanford-Corcoran, CA MSA	20	1.77	0.00	0.00	21.85	5.00	59.57	75.00	18.59	20.00	2.56	0.00	0.00	2.50	4.00	
Madera-Chowchilla, CA MSA	17	1.51	0.00	0.00	2.75	0.00	80.77	100.00	16.48	0.00	3.80	0.00	0.00	4.62	0.00	
Merced, CA MSA	51	4.52	0.00	0.00	12.71	11.76	73.28	80.39	14.01	7.84	5.38	0.00	16.67	4.74	4.44	
Modesto, CA MSA	39	3.46	1.83	0.00	12.09	12.82	62.56	56.41	23.52	30.77	3.61	0.00	6.67	2.77	4.88	
Napa, CA MSA	16	1.42	0.00	0.00	13.62	6.25	46.22	31.25	40.16	62.50	7.45	0.00	0.00	4.26	12.82	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS																
GEOGRAPHY: CALIFORNIA																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid
<b>Limited Review:</b>																
Oakland-Fremont-Hayward, CA MD	38	3.37	5.70	0.00	16.05	13.16	38.08	31.58	40.17	55.26	8.24	0.00	8.33	13.11	5.26	
Oxnard-Thousand Oaks-Ventura, CA MSA	39	3.46	4.08	2.56	20.68	15.38	54.25	74.36	20.99	7.69	8.45	0.00	5.56	12.20	2.56	
Redding, CA MSA	4	0.35	0.00	0.00	13.30	0.00	73.23	100.00	13.47	0.00	6.06	0.00	0.00	7.14	0.00	
Salinas, CA MSA	25	2.22	0.00	0.00	17.87	4.00	49.40	52.00	32.72	44.00	8.94	0.00	0.00	10.45	11.43	
San Diego-Carlsbad-San Marcos, CA MSA	37	3.28	3.47	0.00	16.73	5.41	40.79	54.05	39.01	40.54	5.19	0.00	0.00	9.24	2.86	
San Jose-Sunnyvale-Santa Clara, CA MSA	19	1.68	2.17	0.00	28.89	47.37	43.08	26.32	25.87	26.32	5.88	0.00	14.63	1.79	2.63	
San Luis Obispo-Paso Robles, CA MSA	27	2.39	0.00	0.00	12.97	0.00	72.75	70.37	14.28	29.63	7.19	0.00	0.00	7.69	7.41	
Santa Ana-Anaheim-Irvine, CA MD	18	1.60	2.48	5.56	26.03	5.56	32.87	22.22	38.62	66.67	4.09	0.00	2.63	3.64	5.33	
Santa Barbara-Santa Maria-Goleta, CA MSA	25	2.22	1.72	4.00	22.43	24.00	33.31	28.00	42.55	44.00	4.65	0.00	8.70	2.17	5.77	
Santa Cruz-Watsonville, CA MSA	19	1.68	0.00	0.00	21.99	26.32	39.46	42.11	38.55	31.58	9.72	0.00	8.70	13.33	5.26	
Santa Rosa-Petaluma, CA MSA	30	2.66	0.00	0.00	5.95	0.00	80.70	76.67	13.35	23.33	6.34	0.00	0.00	6.43	10.00	
Stockton, CA MSA	47	4.17	1.37	4.26	10.20	6.38	52.06	40.43	36.38	48.94	5.06	0.00	0.00	4.31	6.74	
Vallejo-Fairfield, CA MSA	7	0.62	0.73	0.00	11.23	0.00	57.26	57.14	30.77	42.86	0.00	0.00	0.00	0.00	0.00	
Visalia-Porterville, CA MSA	72	6.38	0.00	0.00	23.48	23.61	42.08	38.89	34.44	37.50	6.31	0.00	4.81	6.82	6.82	
Yuba City, CA MSA	25	2.22	0.00	0.00	6.70	4.00	63.15	72.00	30.15	24.00	4.52	0.00	0.00	6.80	1.43	
California Non-MSA	87	7.71	0.00	0.00	15.12	9.20	70.74	83.91	14.14	6.90	8.17	0.00	5.00	8.51	9.26	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE															GEOGRAPHY: CALIFORNIA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*										
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Los Angeles-Long Beach-Glendale, CA MD	53,548	18.72	23.87	2.97	16.49	15.33	17.40	27.78	42.24	53.92	24.64	21.28	23.50	25.37	24.77						
Riverside-San Bernardino-Ontario, CA MSA	54,465	19.04	21.73	8.81	17.48	22.36	20.23	30.12	40.56	38.71	27.51	25.44	27.36	29.20	26.86						
Sacramento-Arden-Arcade-Roseville, CA MSA	22,499	7.86	20.59	13.27	18.32	29.14	21.00	26.13	40.09	31.46	24.49	25.36	26.18	26.22	21.96						
San Francisco-San Mateo-Redwood City, CA MD	8,782	3.07	21.33	3.86	17.59	15.67	19.98	22.05	41.11	58.42	24.67	27.68	26.05	25.19	24.05						
<b>Limited Review:</b>																					
Bakersfield-Delano, CA MSA	8,753	3.06	23.46	9.15	16.67	22.91	18.13	29.38	41.75	38.56	26.92	24.88	25.67	28.30	27.11						
Chico, CA MSA	1,550	0.54	21.91	8.21	17.06	22.82	21.06	28.70	39.97	40.27	26.41	27.07	26.97	28.45	25.07						
El Centro, CA MSA	1,305	0.46	23.24	4.69	17.60	19.31	17.11	30.08	42.05	45.92	24.13	20.69	24.53	24.92	23.77						
Fresno, CA MSA	6,540	2.29	22.80	8.09	17.05	21.86	18.53	30.63	41.63	39.43	21.05	21.24	20.84	22.99	19.92						
Hanford-Corcoran, CA MSA	936	0.33	20.55	6.02	18.31	21.70	19.92	37.16	41.22	35.12	25.44	19.64	22.19	29.05	25.63						
Madera-Chowchilla, CA MSA	1,257	0.44	22.09	13.25	16.65	29.48	21.11	27.79	40.14	29.48	23.85	25.37	24.13	25.96	21.47						
Merced, CA MSA	2,369	0.83	20.72	9.46	18.32	25.75	19.88	27.11	41.08	37.68	22.46	15.62	21.25	24.50	23.94						
Modesto, CA MSA	5,110	1.79	21.74	13.92	17.27	29.02	20.71	27.35	40.28	29.71	22.99	20.66	22.73	23.91	23.53						
Napa, CA MSA	959	0.34	18.55	4.82	19.66	23.69	22.34	29.25	39.45	42.24	24.24	20.00	25.17	27.70	22.42						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE															
GEOGRAPHY: CALIFORNIA															
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Limited Review:</b>															
Oakland-Fremont-Hayward, CA MD	22,413	7.83	20.97	11.36	17.47	23.64	21.18	25.70	40.38	39.30	25.13	24.26	27.17	25.80	23.92
Oxnard-Thousand Oaks-Ventura, CA MSA	6,134	2.14	19.55	5.55	18.43	24.18	22.09	30.43	39.92	39.84	24.63	20.55	25.43	25.91	23.81
Redding, CA MSA	1,195	0.42	20.36	8.55	18.02	25.40	21.24	28.75	40.38	37.30	23.41	29.13	21.18	27.39	21.49
Salinas, CA MSA	3,092	1.08	19.70	7.60	18.38	26.75	21.52	27.37	40.40	38.28	24.83	27.22	26.71	23.62	24.20
San Diego-Carlsbad-San Marcos, CA MSA	23,948	8.37	21.02	3.95	17.91	17.92	20.09	28.13	40.98	50.01	24.48	25.07	25.13	24.71	24.09
San Jose-Sunnyvale-Santa Clara, CA MSA	11,940	4.17	20.54	5.91	18.11	19.47	21.70	27.99	39.66	46.63	23.23	21.80	24.67	23.84	22.49
San Luis Obispo-Paso Robles, CA MSA	1,415	0.49	18.57	3.49	18.88	13.68	22.65	28.56	39.90	54.27	16.84	16.33	13.84	17.50	17.36
Santa Ana-Anaheim-Irvine, CA MD	19,933	6.97	20.69	3.77	17.97	17.06	20.68	27.92	40.65	51.26	25.57	23.83	24.34	25.60	26.20
Santa Barbara-Santa Maria-Goleta, CA MSA	2,073	0.72	20.00	6.71	18.61	21.93	20.45	25.52	40.95	45.84	21.10	20.30	20.75	21.99	20.89
Santa Cruz-Watsonville, CA MSA	1,244	0.43	19.96	4.78	17.98	22.69	21.23	26.90	40.83	45.62	19.48	18.89	22.82	21.75	17.39
Santa Rosa-Petaluma, CA MSA	3,458	1.21	17.73	6.77	18.87	25.94	24.32	29.84	39.08	37.45	23.47	22.63	24.82	25.61	21.56
Stockton, CA MSA	6,858	2.40	22.77	13.42	16.48	27.48	19.80	26.63	40.95	32.47	22.33	22.49	21.84	23.80	21.58
Vallejo-Fairfield, CA MSA	4,797	1.68	19.26	12.70	18.51	31.67	23.45	27.32	38.79	28.31	25.34	25.06	25.80	25.25	25.10
Visalia-Porterville, CA MSA	3,363	1.18	22.23	7.19	17.27	24.05	19.30	30.49	41.20	38.27	24.28	20.91	23.09	25.52	24.73
Yuba City, CA MSA	2,011	0.70	20.84	10.96	18.18	29.13	20.53	30.88	40.46	29.03	27.98	28.15	29.99	26.97	27.18
California Non-MSA	4,156	1.45	20.58	5.19	17.83	18.00	21.26	27.57	40.33	49.24	21.07	21.87	22.38	23.14	19.58

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: CALIFORNIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Los Angeles-Long Beach-Glendale, CA MD	2,476	27.73	23.87	4.02	16.49	14.94	17.40	24.02	42.24	57.01	15.26	15.82	19.16	17.49	13.93	
Riverside-San Bernardino-Ontario, CA MSA	709	7.94	21.73	6.87	17.48	18.45	20.23	24.61	40.56	50.07	14.31	15.50	15.08	13.19	14.45	
Sacramento-Arden-Arcade-Roseville, CA MSA	583	6.53	20.59	8.54	18.32	18.99	21.00	26.83	40.09	45.64	12.60	11.67	16.26	12.71	11.43	
San Francisco-San Mateo-Redwood City, CA MD	656	7.35	21.33	8.21	17.59	23.06	19.98	28.91	41.11	39.81	13.33	13.51	17.31	15.10	10.90	
<b>Limited Review:</b>																
Bakersfield-Delano, CA MSA	123	1.38	23.46	4.39	16.67	21.93	18.13	23.68	41.75	50.00	13.50	15.38	17.07	14.29	11.81	
Chico, CA MSA	37	0.41	21.91	2.70	17.06	21.62	21.06	24.32	39.97	51.35	10.95	0.00	17.39	9.09	10.67	
El Centro, CA MSA	10	0.11	23.24	0.00	17.60	11.11	17.11	0.00	42.05	88.89	10.00	0.00	20.00	0.00	10.53	
Fresno, CA MSA	110	1.23	22.80	8.26	17.05	18.35	18.53	22.02	41.63	51.38	8.56	29.41	11.76	7.84	6.67	
Hanford-Corcoran, CA MSA	10	0.11	20.55	20.00	18.31	30.00	19.92	0.00	41.22	50.00	2.13	0.00	0.00	0.00	3.85	
Madera-Chowchilla, CA MSA	19	0.21	22.09	0.00	16.65	15.79	21.11	26.32	40.14	57.89	8.00	0.00	11.11	9.09	7.14	
Merced, CA MSA	19	0.21	20.72	0.00	18.32	10.53	19.88	31.58	41.08	57.89	10.47	0.00	9.09	7.69	13.95	
Modesto, CA MSA	43	0.48	21.74	9.76	17.27	9.76	20.71	21.95	40.28	58.54	10.74	5.88	0.00	14.81	12.94	
Napa, CA MSA	34	0.38	18.55	5.88	19.66	17.65	22.34	38.24	39.45	38.24	11.24	16.67	0.00	11.11	14.29	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.5% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: CALIFORNIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Limited Review:</b>																
Oakland-Fremont-Hayward, CA MD	638	7.14	20.97	9.37	17.47	19.06	21.18	27.63	40.38	43.94	11.20	14.66	12.13	10.71	10.73	
Oxnard-Thousand Oaks-Ventura, CA MSA	335	3.75	19.55	8.79	18.43	20.30	22.09	27.58	39.92	43.33	18.50	28.57	14.17	18.54	18.79	
Redding, CA MSA	38	0.43	20.36	5.71	18.02	14.29	21.24	31.43	40.38	48.57	9.09	0.00	14.29	13.04	7.50	
Salinas, CA MSA	59	0.66	19.70	5.08	18.38	11.86	21.52	23.73	40.40	59.32	11.51	25.00	0.00	8.70	12.50	
San Diego-Carlsbad-San Marcos, CA MSA	706	7.91	21.02	6.65	17.91	14.88	20.09	20.95	40.98	57.51	11.20	13.33	10.10	10.63	11.48	
San Jose-Sunnyvale-Santa Clara, CA MSA	511	5.72	20.54	8.93	18.11	19.25	21.70	26.19	39.66	45.63	12.35	13.64	13.00	14.10	11.03	
San Luis Obispo-Paso Robles, CA MSA	93	1.04	18.57	7.87	18.88	24.72	22.65	25.84	39.90	41.57	11.74	18.18	8.82	12.50	11.02	
Santa Ana-Anaheim-Irvine, CA MD	910	10.19	20.69	7.39	17.97	17.69	20.68	27.55	40.65	47.37	13.76	18.32	13.11	14.11	13.26	
Santa Barbara-Santa Maria-Goleta, CA MSA	129	1.44	20.00	5.56	18.61	11.11	20.45	28.57	40.95	54.76	16.27	11.11	10.00	23.08	14.86	
Santa Cruz-Watsonville, CA MSA	47	0.53	19.96	8.70	17.98	21.74	21.23	23.91	40.83	45.65	5.21	0.00	10.26	5.88	3.16	
Santa Rosa-Petaluma, CA MSA	165	1.85	17.73	11.25	18.87	23.13	24.32	29.38	39.08	36.25	17.47	20.69	20.25	19.80	14.52	
Stockton, CA MSA	78	0.87	22.77	5.41	16.48	16.22	19.80	24.32	40.95	54.05	16.74	4.55	21.43	12.77	19.35	
Vallejo-Fairfield, CA MSA	73	0.82	19.26	14.08	18.51	29.58	23.45	22.54	38.79	33.80	11.73	14.29	17.95	12.50	7.69	
Visalia-Porterville, CA MSA	74	0.83	22.23	12.50	17.27	22.22	19.30	25.00	41.20	40.28	12.58	25.00	20.83	7.32	10.98	
Yuba City, CA MSA	18	0.20	20.84	5.56	18.18	27.78	20.53	38.89	40.46	27.78	8.22	0.00	0.00	15.38	8.16	
California Non-MSA	227	2.54	20.58	6.05	17.83	17.67	21.26	25.12	40.33	51.16	12.40	16.13	11.39	15.15	10.95	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.5% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance															Geography: California					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Los Angeles-Long Beach-Glendale, CA MD	76,697	22.98	23.87	4.28	16.49	10.66	17.40	18.18	42.24	66.88	17.93	26.58	21.97	19.51	16.83									
Riverside-San Bernardino-Ontario, CA MSA	30,501	9.14	21.73	6.59	17.48	13.22	20.23	22.44	40.56	57.76	20.10	27.78	23.80	20.63	18.54									
Sacramento-Arden-Arcade-Roseville, CA MSA	21,192	6.35	20.59	7.53	18.32	17.40	21.00	24.68	40.09	50.39	17.05	23.94	19.77	17.22	15.78									
San Francisco-San Mateo-Redwood City, CA MD	21,750	6.52	21.33	5.99	17.59	13.34	19.98	19.78	41.11	60.88	15.92	21.58	16.44	14.99	15.79									
<b>Limited Review:</b>																								
Bakersfield-Delano, CA MSA	3,903	1.17	23.46	5.50	16.67	13.15	18.13	19.69	41.75	61.66	21.00	31.03	26.06	21.83	19.67									
Chico, CA MSA	1,802	0.54	21.91	4.61	17.06	16.28	21.06	23.59	39.97	55.53	19.76	19.80	20.36	22.25	18.82									
El Centro, CA MSA	399	0.12	23.24	3.54	17.60	12.20	17.11	14.96	42.05	69.29	19.88	7.69	29.41	20.00	18.96									
Fresno, CA MSA	4,292	1.29	22.80	5.29	17.05	11.79	18.53	21.17	41.63	61.74	17.25	24.02	21.73	20.48	15.62									
Hanford-Corcoran, CA MSA	534	0.16	20.55	6.41	18.31	16.63	19.92	23.04	41.22	53.92	15.84	27.08	25.62	19.88	11.98									
Madera-Chowchilla, CA MSA	615	0.18	22.09	8.14	16.65	15.24	21.11	23.80	40.14	52.82	17.32	23.40	17.70	19.63	16.01									
Merced, CA MSA	826	0.25	20.72	7.03	18.32	14.29	19.88	23.13	41.08	55.56	18.36	32.61	24.78	21.32	15.08									
Modesto, CA MSA	2,567	0.77	21.74	9.47	17.27	16.82	20.71	24.83	40.28	48.87	15.75	19.05	14.73	17.26	15.01									
Napa, CA MSA	1,357	0.41	18.55	7.10	19.66	15.03	22.34	24.94	39.45	52.93	16.16	18.49	18.21	17.54	15.00									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.5% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance															Geography: California					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Limited Review:</b>																								
Oakland-Fremont-Hayward, CA MD	29,577	8.86	20.97	6.60	17.47	13.44	21.18	20.95	40.38	59.01	14.01	19.37	15.65	13.31	13.61									
Oxnard-Thousand Oaks-Ventura, CA MSA	10,478	3.14	19.55	8.11	18.43	16.98	22.09	24.61	39.92	50.30	17.23	24.62	19.86	16.87	16.05									
Redding, CA MSA	1,427	0.43	20.36	7.38	18.02	16.33	21.24	23.63	40.38	52.65	16.64	19.51	15.85	14.33	17.52									
Salinas, CA MSA	2,253	0.68	19.70	5.03	18.38	12.27	21.52	18.93	40.40	63.77	15.46	21.16	20.92	17.13	14.19									
San Diego-Carlsbad-San Marcos, CA MSA	32,307	9.68	21.02	5.24	17.91	11.98	20.09	20.07	40.98	62.71	17.63	24.14	19.96	17.13	17.07									
San Jose-Sunnyvale-Santa Clara, CA MSA	24,235	7.26	20.54	5.54	18.11	12.09	21.70	22.63	39.66	59.74	13.80	20.27	15.34	13.44	13.32									
San Luis Obispo-Paso Robles, CA MSA	3,147	0.94	18.57	5.76	18.88	14.41	22.65	25.20	39.90	54.63	15.91	21.54	17.83	16.17	15.03									
Santa Ana-Anaheim-Irvine, CA MD	37,164	11.14	20.69	6.53	17.97	14.15	20.68	23.06	40.65	56.27	17.84	26.91	20.17	17.36	16.82									
Santa Barbara-Santa Maria-Goleta, CA MSA	3,467	1.04	20.00	5.24	18.61	10.80	20.45	19.32	40.95	64.63	16.30	20.22	19.79	16.45	15.56									
Santa Cruz-Watsonville, CA MSA	2,223	0.67	19.96	6.49	17.98	14.61	21.23	19.76	40.83	59.14	11.89	16.57	12.58	9.81	12.15									
Santa Rosa-Petaluma, CA MSA	5,137	1.54	17.73	7.91	18.87	18.45	24.32	25.66	39.08	47.98	14.91	18.64	16.29	15.51	13.83									
Stockton, CA MSA	3,526	1.06	22.77	7.86	16.48	17.23	19.80	23.67	40.95	51.23	17.12	21.51	21.63	17.72	15.44									
Vallejo-Fairfield, CA MSA	2,839	0.85	19.26	9.38	18.51	22.35	23.45	26.57	38.79	41.70	16.20	19.31	19.77	17.05	14.06									
Visalia-Porterville, CA MSA	1,830	0.55	22.23	6.54	17.27	14.23	19.30	19.39	41.20	59.84	19.90	29.06	22.19	23.04	18.11									
Yuba City, CA MSA	842	0.25	20.84	8.89	18.18	15.94	20.53	26.01	40.46	49.16	17.98	26.92	21.03	21.10	15.50									
California Non-MSA	6,808	2.04	20.58	5.19	17.83	14.04	21.26	21.85	40.33	58.92	17.98	23.49	20.68	18.55	17.02									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.5% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: CALIFORNIA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Los Angeles-Long Beach-Glendale, CA MD	27,163	29.83	67.79	59.76	90.56	4.07	5.37	4.85	8.19
Riverside-San Bernardino-Ontario, CA MSA	6,581	7.23	69.30	63.27	91.54	3.80	4.66	5.02	7.69
Sacramento-Arden-Arcade-Roseville, CA MSA	4,284	4.70	69.51	62.91	92.81	3.13	4.06	4.18	5.53
San Francisco-San Mateo-Redwood City, CA MD	7,520	8.26	66.90	62.21	91.22	3.80	4.97	4.72	6.36
<b>Limited Review:</b>									
Bakersfield-Delano, CA MSA	1,291	1.42	70.62	52.29	92.95	2.25	4.80	6.01	8.97
Chico, CA MSA	309	0.34	72.64	61.49	94.50	1.94	3.56	2.75	4.08
El Centro, CA MSA	115	0.13	62.07	61.74	96.52	0.00	3.48	3.17	4.79
Fresno, CA MSA	1,264	1.39	68.03	57.99	89.87	3.16	6.96	4.05	5.75
Hanford-Corcoran, CA MSA	114	0.13	69.30	63.16	95.61	1.75	2.63	3.33	5.95
Madera-Chowchilla, CA MSA	189	0.21	71.05	59.26	91.01	2.65	6.35	4.35	7.09
Merced, CA MSA	226	0.25	68.11	55.31	91.15	3.54	5.31	4.52	6.83
Modesto, CA MSA	633	0.70	69.91	61.61	92.89	2.69	4.42	3.96	5.47
Napa, CA MSA	406	0.45	70.32	58.87	87.68	3.20	9.11	4.65	6.34

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 20.73% of small loans to businesses originated and purchased by the bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: CALIFORNIA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
Oakland-Fremont-Hayward, CA MD	7,021	7.71	68.46	61.67	90.47	3.76	5.77	4.83	6.64
Oxnard-Thousand Oaks-Ventura, CA MSA	2,202	2.42	70.39	60.85	91.19	3.68	5.13	4.37	6.50
Redding, CA MSA	310	0.34	72.41	62.58	92.26	3.87	3.87	4.81	7.12
Salinas, CA MSA	620	0.68	69.55	59.03	92.74	3.06	4.19	4.13	5.79
San Diego-Carlsbad-San Marcos, CA MSA	6,663	7.32	66.93	64.18	92.12	3.35	4.53	3.61	5.70
San Jose-Sunnyvale-Santa Clara, CA MSA	6,474	7.11	66.93	62.99	92.29	3.34	4.37	5.59	8.10
San Luis Obispo-Paso Robles, CA MSA	677	0.74	70.96	57.90	94.53	2.66	2.81	4.66	5.86
Santa Ana-Anaheim-Irvine, CA MD	10,535	11.57	68.30	59.45	89.84	3.97	6.19	4.75	7.02
Santa Barbara-Santa Maria-Goleta, CA MSA	869	0.95	69.43	56.27	90.22	2.88	6.90	4.62	6.24
Santa Cruz-Watsonville, CA MSA	687	0.75	72.32	68.85	97.23	0.73	2.04	4.38	6.23
Santa Rosa-Petaluma, CA MSA	1,136	1.25	69.43	62.15	94.28	1.67	4.05	3.89	5.60
Stockton, CA MSA	889	0.98	68.69	63.89	91.79	3.94	4.27	4.48	6.41
Vallejo-Fairfield, CA MSA	547	0.60	71.00	64.72	92.14	2.19	5.67	4.44	5.99
Visalia-Porterville, CA MSA	531	0.58	70.32	51.79	90.02	3.20	6.78	4.57	6.19
Yuba City, CA MSA	250	0.27	68.61	65.20	94.00	2.80	3.20	4.89	6.99
California Non-MSA	1,561	1.71	71.23	62.59	93.72	3.40	2.88	4.75	6.41

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 20.73% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: CALIFORNIA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Los Angeles-Long Beach-Glendale, CA MD	53	4.70	95.03	62.26	98.11	1.89	0.00	3.73	3.01
Riverside-San Bernardino-Ontario, CA MSA	59	5.23	93.95	52.54	88.14	6.78	5.08	7.14	6.62
Sacramento-Arden-Arcade-Roseville, CA MSA	73	6.47	95.31	52.05	94.52	2.74	2.74	6.60	4.17
San Francisco-San Mateo-Redwood City, CA MD	29	2.57	94.37	65.52	93.10	3.45	3.45	5.88	7.22
<b>Limited Review:</b>									
Bakersfield-Delano, CA MSA	68	6.03	88.58	36.76	82.35	11.76	5.88	12.11	11.29
Chico, CA MSA	27	2.39	95.76	74.07	96.30	3.70	0.00	5.56	6.09
El Centro, CA MSA	10	0.89	82.85	50.00	100.00	0.00	0.00	5.49	5.00
Fresno, CA MSA	147	13.03	90.59	55.78	61.22	17.01	21.77	10.85	12.41
Hanford-Corcoran, CA MSA	20	1.77	88.87	55.00	80.00	0.00	20.00	2.40	3.08
Madera-Chowchilla, CA MSA	17	1.51	92.01	41.18	58.82	17.65	23.53	3.57	1.96
Merced, CA MSA	51	4.52	91.31	50.98	58.82	13.73	27.45	5.21	6.04
Modesto, CA MSA	39	3.46	92.95	56.41	94.87	2.56	2.56	3.69	3.90
Napa, CA MSA	16	1.42	92.91	62.50	93.75	0.00	6.25	6.60	6.17

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 24.84% of small loans to farms originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: CALIFORNIA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
Oakland-Fremont-Hayward, CA MD	38	3.37	94.67	71.05	94.74	0.00	5.26	7.69	7.69
Oxnard-Thousand Oaks-Ventura, CA MSA	39	3.46	90.79	53.85	100.00	0.00	0.00	7.59	5.95
Redding, CA MSA	4	0.35	96.13	50.00	100.00	0.00	0.00	5.41	4.35
Salinas, CA MSA	25	2.22	84.19	32.00	84.00	8.00	8.00	7.23	6.49
San Diego-Carlsbad-San Marcos, CA MSA	37	3.28	94.81	54.05	100.00	0.00	0.00	4.70	3.80
San Jose-Sunnyvale-Santa Clara, CA MSA	19	1.68	93.66	47.37	89.47	10.53	0.00	5.41	3.16
San Luis Obispo-Paso Robles, CA MSA	27	2.39	96.16	51.85	77.78	11.11	11.11	7.27	7.14
Santa Ana-Anaheim-Irvine, CA MD	18	1.60	93.72	72.22	100.00	0.00	0.00	3.85	3.67
Santa Barbara-Santa Maria-Goleta, CA MSA	25	2.22	91.16	44.00	100.00	0.00	0.00	4.20	2.53
Santa Cruz-Watsonville, CA MSA	19	1.68	92.77	26.32	94.74	5.26	0.00	8.33	7.69
Santa Rosa-Petaluma, CA MSA	30	2.66	94.66	53.33	80.00	16.67	3.33	5.75	5.56
Stockton, CA MSA	47	4.17	92.07	51.06	87.23	12.77	0.00	4.90	4.76
Vallejo-Fairfield, CA MSA	7	0.62	96.09	85.71	100.00	0.00	0.00	0.00	0.00
Visalia-Porterville, CA MSA	72	6.38	89.00	51.39	63.89	22.22	13.89	5.99	7.09
Yuba City, CA MSA	25	2.22	94.30	52.00	84.00	0.00	16.00	4.26	3.08
California Non-MSA	87	7.71	95.61	59.77	95.40	4.60	0.00	6.83	6.19

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 24.84% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: CALIFORNIA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Los Angeles-Long Beach-Glendale, CA MD	156	218,184	432	369,397	588	587,581	25.94	22	133,855
Riverside-San Bernardino-Ontario, CA MSA	47	42,100	157	29,770	204	71,870	3.17	1	60
Sacramento-Arden-Arcade-Roseville, CA MSA	27	37,514	100	43,641	127	81,155	3.58	2	13,861
San Francisco-San Mateo-Redwood City, CA MD	134	165,642	432	452,470	566	618,112	27.29	6	50,066
<b>Limited Review:</b>									
Bakersfield-Delano, CA MSA	18	22,599	43	2,986	61	25,585	1.13	0	0
Chico, CA MSA	4	3,352	23	1,074	27	4,426	0.20	0	0
El Centro, CA MSA	9	6,831	6	658	15	7,489	0.33	0	0
Fresno, CA MSA	10	9,850	57	4,074	67	13,924	0.61	0	0
Hanford-Corcoran, CA MSA	4	3,241	26	376	30	3,617	0.16	0	0
Madera-Chowchilla, CA MSA	3	131	24	2,770	27	2,900	0.13	1	4,519
Merced, CA MSA	5	9,070	19	694	24	9,764	0.43	0	0
Modesto, CA MSA	7	703	33	1,795	40	2,498	0.11	0	0
Napa, CA MSA	4	1,149	32	1,351	36	2,501	0.11	1	580

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: CALIFORNIA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Limited Review:</b>									
Oakland-Fremont-Hayward, CA MD	54	112,720	218	89,080	272	201,800	8.91	4	32,666
Oxnard-Thousand Oaks-Ventura, CA MSA	8	22,043	60	17,756	68	39,799	1.76	1	5,263
Redding, CA MSA	3	2,655	11	846	14	3,501	0.15	0	0
Salinas, CA MSA	16	9,664	39	2,643	55	12,307	0.54	0	0
San Diego-Carlsbad-San Marcos, CA MSA	54	70,733	157	75,268	211	146,002	6.45	3	20,738
San Jose-Sunnyvale-Santa Clara, CA MSA	42	77,472	154	76,339	196	153,811	6.79	1	5,367
San Luis Obispo-Paso Robles, CA MSA	5	4,208	36	1,495	41	5,703	0.25	0	0
Santa Ana-Anaheim-Irvine, CA MD	47	65,240	171	104,848	218	170,089	7.51	6	44,600
Santa Barbara-Santa Maria-Goleta, CA MSA	8	17,283	71	7,228	79	24,511	1.08	0	0
Santa Cruz-Watsonville, CA MSA	6	877	18	1,651	24	2,528	0.11	0	0
Santa Rosa-Petaluma, CA MSA	14	5,655	50	5,727	64	11,382	0.50	1	737
Stockton, CA MSA	4	2,541	39	2,238	43	4,779	0.21	0	0
Vallejo-Fairfield, CA MSA	9	2,129	37	3,440	46	5,569	0.25	1	814
Visalia-Porterville, CA MSA	7	12,679	41	1,489	48	14,167	0.63	0	0
Yuba City, CA MSA	5	274	15	703	20	977	0.04	0	0
California Non-MSA	22	23,741	48	11,458	70	35,198	1.55	0	0
Statewide investments with potential benefit to one or more AAs	0	0	43	1,569	43	1,569	0.07	0	0
Statewide investments with no potential to benefit one or more AAs	0	0	12	69	12	69	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.



Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: CALIFORNIA								EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Los Angeles-Long Beach-Glendale, CA MD	22.37	253	26.44	7.91	21.74	25.69	44.66	4	11	1	0	-1	-5	8.00	29.44	30.88	31.58
Riverside-San Bernardino-Ontario, CA MSA	3.74	93	9.72	7.53	27.96	37.63	26.88	2	3	0	0	0	-1	3.53	28.54	41.16	26.73
Sacramento-Arden-Arcade-Roseville, CA MSA	2.62	55	5.75	5.45	23.64	32.73	38.18	1	8	0	0	-3	-4	6.61	25.18	38.80	29.41
San Francisco-San Mateo-Redwood City, CA MD	38.33	77	8.05	11.69	20.78	37.66	29.87	0	1	0	0	0	-1	7.21	21.80	42.21	28.77
<b>Limited Review:</b>																	
Bakersfield-Delano, CA MSA	0.70	15	1.57	6.67	40.00	33.33	20.00	0	0	0	0	0	0	4.40	32.14	31.74	30.06
Chico, CA MSA	0.24	6	0.63	0.00	33.33	50.00	16.67	0	0	0	0	0	0	2.16	23.07	52.76	22.01
El Centro, CA MSA	0.14	2	0.21	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	25.50	47.45	27.05
Fresno, CA MSA	0.95	21	2.19	9.52	28.57	42.86	19.05	0	0	0	0	0	0	4.73	32.88	35.66	26.63
Hanford-Corcoran, CA MSA	0.09	2	0.21	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	35.42	35.84	23.81
Madera-Chowchilla, CA MSA	0.10	3	0.31	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	21.87	54.77	23.36
Merced, CA MSA	0.14	4	0.42	0.00	50.00	50.00	0.00	0	1	0	-1	0	0	0.00	26.44	50.04	23.52
Modesto, CA MSA	0.41	8	0.84	12.50	50.00	25.00	12.50	0	1	0	0	-1	0	2.66	21.22	52.77	23.35
Napa, CA MSA	0.21	5	0.52	0.00	60.00	40.00	0.00	0	0	0	0	0	0	0.00	16.66	63.01	20.33

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: CALIFORNIA								EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Limited Review:</b>																	
Oakland-Fremont-Hayward, CA MD	6.08	72	7.52	11.11	19.44	41.67	27.78	0	5	0	-1	-2	-2	8.54	20.25	41.14	30.04
Oxnard-Thousand Oaks-Ventura, CA MSA	1.41	23	2.40	4.35	26.09	43.48	26.09	0	0	0	0	0	0	3.86	23.98	44.41	27.75
Redding, CA MSA	0.17	3	0.31	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	18.51	66.24	15.25
Salinas, CA MSA	0.56	9	0.94	0.00	33.33	55.56	11.11	0	1	0	-1	0	0	0.00	26.32	48.43	25.25
San Diego-Carlsbad-San Marcos, CA MSA	4.31	73	7.63	5.48	28.77	32.88	32.88	0	5	0	-1	-3	-1	7.78	24.46	37.46	30.01
San Jose-Sunnyvale-Santa Clara, CA MSA	5.97	52	5.43	1.92	25.00	50.00	23.08	1	6	0	-1	-3	-1	3.90	24.42	46.97	24.71
San Luis Obispo-Paso Robles, CA MSA	0.31	7	0.73	0.00	28.57	57.14	14.29	0	0	0	0	0	0	0.00	16.72	69.48	13.79
Santa Ana-Anaheim-Irvine, CA MD	7.27	89	9.30	4.49	23.60	34.83	37.08	2	9	0	-2	-1	-4	4.95	30.96	31.84	32.26
Santa Barbara-Santa Maria-Goleta, CA MSA	0.59	8	0.84	12.50	37.50	25.00	25.00	0	0	0	0	0	0	6.08	31.57	33.18	29.18
Santa Cruz-Watsonville, CA MSA	0.38	7	0.73	0.00	28.57	42.86	28.57	0	0	0	0	0	0	0.00	31.25	39.43	29.32
Santa Rosa-Petaluma, CA MSA	0.60	10	1.04	0.00	30.00	60.00	10.00	0	0	0	0	0	0	0.00	14.38	69.79	15.83
Stockton, CA MSA	0.52	12	1.25	8.33	33.33	33.33	25.00	0	0	0	0	0	0	5.88	25.65	38.34	30.13
Vallejo-Fairfield, CA MSA	0.43	9	0.94	0.00	44.44	33.33	22.22	0	0	0	0	0	0	1.55	22.77	47.80	27.02
Visalia-Porterville, CA MSA	0.35	7	0.73	0.00	71.43	14.29	14.29	0	0	0	0	0	0	0.00	32.31	38.64	28.80
Yuba City, CA MSA	0.14	2	0.21	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	25.62	51.20	23.18
California Non-MSA	0.88	30	3.13	0.00	30.00	56.67	13.33	0	0	0	0	0	0	0.00	15.55	64.90	19.55

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: COLORADO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Denver-Aurora-Broomfield, CO MSA	100.00	61,611	13,415,594	2,239	113,412	15	116	1	9,400	63,866	13,538,522	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: COLORADO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Denver-Aurora-Broomfield, CO MSA	23,347	100.00	1.89	2.78	21.89	18.26	42.97	44.96	33.26	34.00	19.02	19.05	18.70	20.10	17.91	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: COLORADO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	413	100.00	1.89	1.21	21.89	14.53	42.97	36.32	33.26	47.94	7.89	9.09	6.80	6.91	9.05

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: COLORADO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Denver-Aurora-Broomfield, CO MSA	37,213	100.00	1.89	1.74	21.89	12.60	42.97	41.26	33.26	44.40	16.17	18.39	19.61	17.76	14.25									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: COLORADO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Denver-Aurora-Broomfield, CO MSA	0	0.00	8.54	0.00	40.67	0.00	42.00	0.00	8.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: COLORADO		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Denver-Aurora-Broomfield, CO MSA	2,239	100.00	3.23	3.66	20.61	18.98	37.60	35.06	38.55	42.30	1.47	1.91	1.33	1.60	1.39						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: COLORADO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Denver-Aurora-Broomfield, CO MSA	15	100.00	1.55	0.00	18.64	13.33	41.31	46.67	38.50	40.00	2.30	0.00	4.17	1.76	2.70									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: COLORADO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Denver-Aurora-Broomfield, CO MSA	23,629	100.00	18.01	16.24	18.65	30.05	23.68	25.89	39.66	27.82	21.32	21.85	22.86	22.73	18.84	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement															Geography: Colorado					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families* **	% BANK Loans****	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Denver-Aurora-Broomfield, CO MSA	417	100.00	18.01	9.56	18.65	22.55	23.68	27.45	39.66	40.44	8.31	7.34	9.21	8.08	8.19									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: COLORADO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Denver-Aurora-Broomfield, CO MSA	37,565	100.00	18.01	8.98	18.65	20.42	23.68	27.28	39.66	43.32	16.77	22.20	20.14	17.58	14.74	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 21.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses									
GEOGRAPHY: COLORADO									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Denver-Aurora-Broomfield, CO MSA	2,239	100.00	68.67	63.33	90.31	1.74	7.95	1.44	1.88

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 20.05% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: COLORADO			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Denver-Aurora-Broomfield, CO MSA	15	100.00	96.45	60.00	100.00	0.00	0.00	2.10	1.13

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 33.33% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: COLORADO									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Denver-Aurora-Broomfield, CO MSA	22	19,690	46	3,186	68	22,875	74.50	0	0
Statewide investments with potential benefit to one or more AAs	0	0	13	88	13	88	0.29	0	0
Statewide investments with no potential to benefit one or more AAs	19	7,577	16	167	35	7,744	25.22	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: COLORADO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Denver-Aurora-Broomfield, CO MSA	100.00	1	100.00	0.00	0.00	0.00	100.0	0	0	0	0	0	0	4.56	27.71	40.28	27.32

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: CONNECTICUT				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Bridgeport-Stamford-Norwalk, CT MSA	26.10	10,594	3,759,803	3,360	212,217	11	299	1	3,289	13,966	3,975,608	16.86
Hartford-West Hartford-East Hartford, CT MSA	37.34	15,897	3,303,420	4,058	279,838	21	374	3	10,255	19,979	3,593,887	71.24
<b>Limited Review:</b>												
New Haven-Milford, CT MSA	23.09	10,089	2,169,390	2,248	139,167	10	84	5	5,507	12,352	2,314,148	8.07
Norwich-New London, CT MSA	5.96	2,465	523,943	716	33,404	7	372	0	0	3,188	557,719	1.78
Connecticut Non-MSA	7.51	3,200	648,081	807	47,268	10	57	0	0	4,017	695,406	2.05

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: CONNECTICUT				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Bridgeport-Stamford-Norwalk, CT MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	16.86
Hartford-West Hartford-East Hartford, CT MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	71.24
<b>Limited Review:</b>														
New Haven-Milford, CT MSA	100.00	2	61	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	8.07
Norwich-New London, CT MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.78
Connecticut Non-MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.05

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: CONNECTICUT				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Bridgeport-Stamford-Norwalk, CT MSA	2,947	22.39	3.34	3.97	16.53	23.85	39.53	41.40	40.60	30.78	11.45	13.13	13.81	12.60	9.07	
Hartford-West Hartford-East Hartford, CT MSA	5,310	40.35	2.33	4.35	9.56	11.94	53.21	54.20	34.90	29.51	14.64	25.67	18.02	14.78	12.66	
<b>Limited Review:</b>																
New Haven-Milford, CT MSA	3,216	24.44	3.04	2.58	12.33	14.43	52.39	55.53	32.24	27.46	13.49	14.22	14.46	14.53	11.28	
Norwich-New London, CT MSA	717	5.45	1.09	1.12	7.53	10.32	67.69	64.99	23.70	23.57	9.68	7.89	10.04	10.23	8.41	
Connecticut Non-MSA	970	7.37	0.25	0.31	14.54	17.22	63.39	66.49	21.81	15.98	13.27	27.27	16.42	13.22	10.67	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: CONNECTICUT				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Bridgeport-Stamford-Norwalk, CT MSA	159	24.77	3.34	0.63	16.53	8.81	39.53	42.77	40.60	47.80	6.63	10.00	6.33	6.98	6.30	
Hartford-West Hartford-East Hartford, CT MSA	237	36.92	2.33	1.27	9.56	4.22	53.21	54.85	34.90	39.66	3.80	5.41	3.87	3.67	3.92	
<b>Limited Review:</b>																
New Haven-Milford, CT MSA	166	25.86	3.04	1.81	12.33	6.63	52.39	54.82	32.24	36.75	5.39	11.11	3.96	6.23	4.44	
Norwich-New London, CT MSA	34	5.30	1.09	0.00	7.53	17.65	67.69	50.00	23.70	32.35	1.77	0.00	2.33	1.24	3.47	
Connecticut Non-MSA	46	7.17	0.25	0.00	14.54	6.52	63.39	65.22	21.81	28.26	2.95	0.00	2.06	2.35	6.31	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: CONNECTICUT					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Bridgeport-Stamford-Norwalk, CT MSA	7,487	26.32	3.34	2.07	16.53	14.37	39.53	42.21	40.60	41.35	10.64	22.69	17.82	12.19	8.26									
Hartford-West Hartford-East Hartford, CT MSA	10,350	36.39	2.33	1.46	9.56	7.43	53.21	52.39	34.90	38.72	12.00	22.88	19.40	12.64	10.32									
<b>Limited Review:</b>																								
New Haven-Milford, CT MSA	6,707	23.58	3.04	1.67	12.33	9.50	52.39	51.32	32.24	37.51	13.61	21.60	20.37	14.83	11.24									
Norwich-New London, CT MSA	1,714	6.03	1.09	1.40	7.53	6.13	67.69	63.19	23.70	29.29	10.72	8.89	15.91	10.92	9.75									
Connecticut Non-MSA	2,184	7.68	0.25	0.23	14.54	12.00	63.39	63.55	21.81	24.22	11.51	14.29	15.09	12.04	9.27									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: CONNECTICUT					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Bridgeport-Stamford-Norwalk, CT MSA	1	100.00	20.80	0.00	42.87	100.00	29.03	0.00	7.31	0.00	2.38	0.00	5.56	0.00	0.00	
Hartford-West Hartford-East Hartford, CT MSA	0	0.00	26.86	0.00	21.47	0.00	39.96	0.00	11.71	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
New Haven-Milford, CT MSA	0	0.00	20.52	0.00	29.27	0.00	42.05	0.00	8.16	0.00	0.00	0.00	0.00	0.00	0.00	
Norwich-New London, CT MSA	0	0.00	11.42	0.00	27.28	0.00	51.49	0.00	9.81	0.00	0.00	0.00	0.00	0.00	0.00	
Connecticut Non-MSA	0	0.00	3.67	0.00	28.99	0.00	56.51	0.00	10.83	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: CONNECTICUT				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*												
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																							
Bridgeport-Stamford-Norwalk, CT MSA	3,360	30.03	7.56	8.10	19.04	13.90	33.66	34.79	39.74	43.21	5.88	8.60	4.73	6.17	5.67								
Hartford-West Hartford-East Hartford, CT MSA	4,058	36.27	8.68	7.93	11.71	10.23	48.27	46.23	31.34	35.61	8.65	12.13	9.25	8.01	8.79								
<b>Limited Review:</b>																							
New Haven-Milford, CT MSA	2,248	20.09	7.47	5.38	17.54	12.99	43.19	43.15	31.80	38.48	6.14	6.09	5.26	6.38	6.23								
Norwich-New London, CT MSA	716	6.40	1.58	0.98	13.20	9.50	59.67	52.23	25.56	37.29	8.16	16.67	7.69	7.36	9.75								
Connecticut Non-MSA	807	7.21	1.09	0.50	14.87	11.65	60.18	60.47	23.86	27.39	6.01	2.63	5.94	5.61	7.05								

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: CONNECTICUT					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Bridgeport-Stamford-Norwalk, CT MSA	11	18.64	5.30	0.00	20.26	27.27	35.42	9.09	39.02	63.64	7.50	0.00	0.00	0.00	16.67									
Hartford-West Hartford-East Hartford, CT MSA	21	35.59	1.76	0.00	6.54	9.52	50.57	38.10	41.13	52.38	15.38	0.00	33.33	14.29	14.29									
<b>Limited Review:</b>																								
New Haven-Milford, CT MSA	10	16.95	2.83	0.00	11.09	10.00	42.07	10.00	44.02	80.00	10.53	0.00	0.00	9.09	12.50									
Norwich-New London, CT MSA	7	11.86	0.39	0.00	3.15	0.00	70.70	85.71	25.76	14.29	0.00	0.00	0.00	0.00	0.00									
Connecticut Non-MSA	10	16.95	0.14	0.00	5.87	10.00	64.80	80.00	29.20	10.00	9.09	0.00	0.00	13.33	0.00									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: CONNECTICUT					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Bridgeport-Stamford-Norwalk, CT MSA	2,947	22.39	21.61	13.40	17.25	26.74	19.58	24.16	41.56	35.70	12.48	13.04	14.16	14.66	10.43		
Hartford-West Hartford-East Hartford, CT MSA	5,310	40.35	20.19	15.08	17.69	35.47	23.41	26.90	38.71	22.54	15.86	17.75	17.40	16.06	13.18		
<b>Limited Review:</b>																	
New Haven-Milford, CT MSA	3,216	24.44	20.85	10.25	17.34	34.69	22.55	27.23	39.26	27.83	14.85	15.46	15.09	15.94	13.46		
Norwich-New London, CT MSA	717	5.45	18.05	12.50	18.82	34.97	25.11	23.88	38.02	28.65	10.85	8.96	12.95	8.50	11.43		
Connecticut Non-MSA	970	7.37	17.52	15.75	19.10	39.69	25.96	26.11	37.43	18.45	14.40	17.60	15.62	15.65	10.05		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: CONNECTICUT					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Bridgeport-Stamford-Norwalk, CT MSA	159	24.77	21.61	10.13	17.25	21.52	19.58	26.58	41.56	41.77	7.05	7.04	9.60	7.23	6.19	
Hartford-West Hartford-East Hartford, CT MSA	237	36.92	20.19	7.86	17.69	24.45	23.41	32.75	38.71	34.93	3.72	3.32	3.91	4.35	3.24	
<b>Limited Review:</b>																
New Haven-Milford, CT MSA	166	25.86	20.85	7.27	17.34	25.45	22.55	24.85	39.26	42.42	5.53	5.88	7.82	4.58	4.90	
Norwich-New London, CT MSA	34	5.30	18.05	8.82	18.82	35.29	25.11	23.53	38.02	32.35	1.87	1.37	2.13	1.93	1.81	
Connecticut Non-MSA	46	7.17	17.52	11.11	19.10	42.22	25.96	26.67	37.43	20.00	2.90	2.94	4.40	2.53	2.16	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Connecticut					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Bridgeport-Stamford-Norwalk, CT MSA	7,487	26.32	21.61	9.53	17.25	21.73	19.58	23.78	41.56	44.97	11.28	22.30	15.44	13.30	8.64	
Hartford-West Hartford-East Hartford, CT MSA	10,350	36.39	20.19	9.16	17.69	24.54	23.41	28.65	38.71	37.65	12.32	17.47	15.63	11.70	10.74	
<b>Limited Review:</b>																
New Haven-Milford, CT MSA	6,707	23.58	20.85	6.56	17.34	23.77	22.55	29.10	39.26	40.57	14.02	18.62	17.17	15.09	11.94	
Norwich-New London, CT MSA	1,714	6.03	18.05	9.02	18.82	24.51	25.11	30.39	38.02	36.08	11.28	14.74	13.52	12.85	8.95	
Connecticut Non-MSA	2,184	7.68	17.52	10.88	19.10	25.89	25.96	32.20	37.43	31.03	11.55	18.32	13.04	12.56	9.10	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 11.1% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: CONNECTICUT			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Bridgeport-Stamford-Norwalk, CT MSA	3,360	30.03	68.81	49.52	86.40	7.56	6.04	5.77	12.30
Hartford-West Hartford-East Hartford, CT MSA	4,058	36.27	67.89	48.42	84.99	8.11	6.90	8.42	14.47
<b>Limited Review:</b>									
New Haven-Milford, CT MSA	2,248	20.09	68.18	50.27	86.34	7.52	6.14	6.01	10.52
Norwich-New London, CT MSA	716	6.40	68.17	58.10	91.20	4.47	4.33	7.90	11.40
Connecticut Non-MSA	807	7.21	71.98	48.70	88.48	6.69	4.83	5.71	10.48

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 29.84% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: CONNECTICUT			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Bridgeport-Stamford-Norwalk, CT MSA	11	18.64	97.25	81.82	90.91	9.09	0.00	7.50	5.00
Hartford-West Hartford-East Hartford, CT MSA	21	35.59	96.85	85.71	95.24	4.76	0.00	14.29	28.57
<b>Limited Review:</b>									
New Haven-Milford, CT MSA	10	16.95	96.79	50.00	100.00	0.00	0.00	9.76	3.85
Norwich-New London, CT MSA	7	11.86	98.42	42.86	85.71	0.00	14.29	0.00	0.00
Connecticut Non-MSA	10	16.95	98.50	90.00	100.00	0.00	0.00	8.16	11.11

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 15.52% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: CONNECTICUT									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Bridgeport-Stamford-Norwalk, CT MSA	16	28,718	153	20,484	169	49,202	21.92	0	0
Hartford-West Hartford-East Hartford, CT MSA	109	62,909	248	81,600	357	144,508	64.38	0	0
<b>Limited Review:</b>									
New Haven-Milford, CT MSA	9	13,539	84	6,070	93	19,608	8.74	0	0
Norwich-New London, CT MSA	5	952	24	871	29	1,823	0.81	0	0
Connecticut Non-MSA	5	5,443	36	1,052	41	6,495	2.89	0	0
Statewide investments with potential benefit to one or more AAs	5	2,568	22	260	27	2,828	1.26	0	0
Statewide investments with no potential to benefit one or more AAs	0	0	0	0	0	0	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: CONNECTICUT				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Bridgeport-Stamford-Norwalk, CT MSA	16.86	54	32.93	11.11	16.67	38.89	33.33	0	2	0	0	-1	-1	10.24	22.80	33.16	33.80
Hartford-West Hartford-East Hartford, CT MSA	71.24	60	36.59	16.67	10.00	48.33	25.00	1	4	1	0	-2	0	9.56	13.97	48.25	28.14
<b>Limited Review:</b>																	
New Haven-Milford, CT MSA	8.07	29	17.68	10.34	31.03	37.93	20.69	0	7	1	-1	-4	-1	9.45	19.46	45.77	25.31
Norwich-New London, CT MSA	1.78	11	6.71	0.00	27.27	45.45	27.27	0	2	0	0	-1	-1	3.44	15.12	60.85	20.59
Connecticut Non-MSA	2.05	10	6.10	0.00	50.00	50.00	0.00	0	3	0	0	-2	-1	1.34	19.00	60.13	19.53

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: DELAWARE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Delaware Non-MSA	100.00	3,666	829,205	331	9,608	9	129	0	0	4,006	838,942	0.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: DELAWARE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Delaware Non-MSA	1,666	100.00	0.00	0.00	0.00	0.00	90.18	90.10	9.82	9.90	17.73	0.00	0.00	19.07	11.21

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: DELAWARE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Delaware Non-MSA	32	100.00	0.00	0.00	0.00	0.00	90.18	87.50	9.82	12.50	5.48	0.00	0.00	5.41	6.06

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: DELAWARE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Delaware Non-MSA	1,968	100.00	0.00	0.00	0.00	0.00	90.18	80.69	9.82	19.31	12.35	0.00	0.00	13.12	9.80									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: DELAWARE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Delaware Non-MSA	0	0.00	0.00	0.00	0.00	0.00	45.38	0.00	54.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: DELAWARE		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Delaware Non-MSA	331	100.00	0.00	0.00	0.00	0.00	84.97	82.48	15.03	17.52	5.31	0.00	0.00	5.41	4.86						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: DELAWARE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Delaware Non-MSA	9	100.00	0.00	0.00	0.00	0.00	96.11	88.89	3.89	11.11	6.52	0.00	0.00	6.67	0.00									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: DELAWARE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Delaware Non-MSA	1,666	100.00	18.14	7.02	19.53	20.52	23.99	18.89	38.34	53.57	19.14	22.61	25.84	20.85	17.16	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: DELAWARE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families* **	% BANK Loans****	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Delaware Non-MSA	32	100.00	18.14	6.90	19.53	24.14	23.99	24.14	38.34	44.83	5.02	3.03	6.00	1.54	6.87	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 9.4% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: DELAWARE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Delaware Non-MSA	1,968	100.00	18.14	5.13	19.53	14.82	23.99	22.67	38.34	57.38	13.09	16.27	15.74	15.26	11.90

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.8% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: DELAWARE			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Delaware Non-MSA	331	100.00	68.68	54.98	95.47	0.60	3.93	5.13	5.87

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 28.22% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: DELAWARE			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Delaware Non-MSA	9	100.00	97.67	77.78	100.00	0.00	0.00	8.51	7.41

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 12.50% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: DELAWARE									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Delaware Non-MSA	3	1,662	4	65	7	1,727	77.45	0	0
Statewide investments with potential benefit to one or more AAs	0	0	10	349	10	349	15.63	0	0
Statewide investments with no potential to benefit one or more AAs	1	84	4	70	5	154	6.91	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: DELAWARE																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Delaware Non-MSA	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	0.00	92.26	7.74

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: FLORIDA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	10.39	15,268	2,973,260	7,993	416,622	17	147	13	38,564	23,291	3,428,593	12.01
Jacksonville, FL MSA	8.28	15,382	2,688,724	3,162	136,055	12	102	1	1,450	18,557	2,826,331	28.08
Miami-Miami Beach-Kendall, FL MD	9.13	12,906	2,621,749	7,518	329,893	26	609	11	27,583	20,461	2,979,834	12.14
Orlando-Kissimmee-Sanford, FL MSA	12.80	22,549	3,737,520	6,095	238,886	35	2,041	6	28,694	28,685	4,007,141	8.89
Tampa-St. Petersburg-Clearwater, FL MSA	16.61	27,445	4,337,649	9,708	436,560	61	1,121	12	93,012	37,226	4,868,342	12.62
<b>Limited Review:</b>												
Cape Coral-Fort Myers, FL MSA	4.11	7,403	1,086,138	1,789	61,480	25	613	0	0	9,217	1,148,231	2.14
Crestview-Ft Walton Beach-Destin, FL MSA	1.62	3,258	597,202	363	9,303	5	35	0	0	3,626	606,540	0.29
Deltona-Daytona Beach-Ormond Beach, FL MSA	2.65	4,624	642,670	1,296	40,403	20	162	0	0	5,940	683,235	1.58
Gainesville, FL MSA	1.41	2,408	384,129	731	36,625	15	110	0	0	3,154	420,864	0.73
Lakeland-Winter Haven, FL MSA	2.58	4,812	650,032	960	44,305	7	125	0	0	5,779	694,462	1.12
Naples-Marco Island, FL MSA	2.01	3,367	759,601	1,130	39,852	13	399	2	6,640	4,512	806,492	1.40
North Port-Bradenton-Sarasota, FL MSA	4.89	7,831	1,353,124	3,095	100,844	25	202	5	14,674	10,956	1,468,844	3.64
Ocala, FL MSA	1.33	2,209	274,292	738	22,899	27	266	0	0	2,974	297,457	0.81

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: FLORIDA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Limited Review:</b>												
Palm Bay-Melbourne-Titusville, FL MSA	3.15	5,633	813,460	1,426	48,517	12	885	1	5,864	7,072	868,726	1.54
Palm Coast, FL MSA	0.57	1,050	155,931	218	5,547	3	82	0	0	1,271	161,560	0.39
Pensacola-Ferry Pass-Brent, FL MSA	2.76	5,317	852,145	854	27,761	11	797	1	12,563	6,183	893,266	0.54
Port St. Lucie, FL MSA	2.22	4,004	619,479	963	35,734	13	167	1	17,688	4,981	673,068	1.16
Punta Gorda, FL MSA	1.02	1,783	233,586	491	11,784	4	35	1	7,000	2,279	252,405	0.66
Sebastian-Vero Beach, FL MSA	0.67	1,062	200,033	428	19,999	7	48	0	0	1,497	220,080	0.57
Tallahassee, FL MSA	1.21	2,173	351,514	541	17,836	5	23	0	0	2,719	369,373	0.59
West Palm Beach-Boca Raton-Boynton Beach, FL MD	7.16	10,677	2,236,642	5,346	286,664	34	1,002	0	0	16,057	2,524,308	7.20
Florida Non-MSA	3.44	5,978	1,009,981	1,653	55,256	78	1,571	2	2,788	7,711	1,069,596	1.90

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: FLORIDA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	12.50	1	26,244	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	12.01
Jacksonville, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	28.08
Miami-Miami Beach-Kendall, FL MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	12.14
Orlando-Kissimmee-Sanford, FL MSA	87.50	7	40,306	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	8.89
Tampa-St. Petersburg-Clearwater, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	12.62
<b>Limited Review:</b>														
Cape Coral-Fort Myers, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.14
Crestview-Ft Walton Beach-Destin, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.29
Deltona-Daytona Beach-Ormond Beach, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.58
Gainesville, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.73
Lakeland-Winter Haven, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.12
Naples-Marco Island, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.40
North Port-Bradenton-Sarasota, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3.64
Ocala, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.81

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: FLORIDA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Limited Review:</b>														
Palm Bay-Melbourne-Titusville, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.54
Palm Coast, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.39
Pensacola-Ferry Pass-Brent, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.54
Port St. Lucie, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.16
Punta Gorda, FL MSA														0.66
Sebastian-Vero Beach, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.57
Tallahassee, FL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.59
West Palm Beach-Boca Raton-Boynton Beach, FL MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	7.20
Florida Non-MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.90

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															GEOGRAPHY: FLORIDA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*												
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp								
<b>Full Review:</b>																							
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	9,562	9.64	1.16	1.53	23.67	19.02	45.93	45.24	29.24	34.21	16.73	14.07	17.81	17.49	15.48								
Jacksonville, FL MSA	8,340	8.41	1.98	0.22	16.44	12.05	54.98	58.39	26.60	29.34	16.65	6.15	15.93	17.20	16.13								
Miami-Miami Beach-Kendall, FL MD	7,814	7.88	1.69	4.06	19.82	18.61	36.99	35.90	41.51	41.44	15.75	15.80	16.66	16.44	14.90								
Orlando-Kissimmee-Sanford, FL MSA	15,062	15.19	0.62	0.10	17.95	12.43	49.89	54.77	31.54	32.70	19.36	15.00	19.17	20.47	17.75								
Tampa-St. Petersburg-Clearwater, FL MSA	16,739	16.88	0.77	0.32	21.94	17.59	48.28	46.87	29.01	35.22	19.41	16.38	20.71	21.18	17.03								
<b>Limited Review:</b>																							
Cape Coral-Fort Myers, FL MSA	4,977	5.02	0.87	0.14	13.24	8.50	63.06	72.67	22.84	18.69	17.08	30.00	21.63	18.17	13.01								
Crestview-Ft Walton Beach-Destin, FL MSA	1,843	1.86	0.00	0.00	5.54	6.19	74.19	71.84	20.28	21.98	20.55	0.00	21.15	20.32	21.08								
Deltona-Daytona Beach-Ormond Beach, FL MSA	2,585	2.61	0.47	0.15	9.62	6.38	74.00	69.09	15.91	24.37	18.95	75.00	23.55	17.87	20.96								
Gainesville, FL MSA	1,214	1.22	5.72	4.45	22.60	18.78	43.73	43.82	27.95	32.95	17.50	21.65	19.20	19.13	14.40								
Lakeland-Winter Haven, FL MSA	2,997	3.02	0.14	0.00	15.41	9.61	60.75	66.37	23.70	24.02	16.87	0.00	19.79	17.76	13.68								
Naples-Marco Island, FL MSA	1,885	1.90	2.30	1.11	13.08	16.39	47.98	58.83	36.65	23.66	14.23	24.24	17.06	16.02	9.73								
North Port-Bradenton-Sarasota, FL MSA	4,476	4.51	0.30	0.04	20.46	10.55	54.68	61.35	24.56	28.06	18.51	0.00	15.81	20.35	16.28								
Ocala, FL MSA	1,015	1.02	0.36	0.00	2.80	0.89	79.14	82.17	17.70	16.95	12.36	0.00	9.09	11.88	15.38								

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															
GEOGRAPHY: FLORIDA															
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Limited Review:</b>															
Palm Bay-Melbourne-Titusville, FL MSA	3,464	3.49	0.62	0.35	17.75	10.33	49.76	61.89	31.87	27.42	18.86	50.00	19.21	19.12	18.07
Palm Coast, FL MSA	550	0.55	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	18.82	0.00	0.00	18.82	0.00
Pensacola-Ferry Pass-Brent, FL MSA	2,882	2.91	1.32	0.56	16.18	6.77	56.87	63.67	25.63	29.01	18.04	20.83	15.31	18.81	17.10
Port St. Lucie, FL MSA	2,539	2.56	1.15	0.12	11.40	4.41	62.21	79.24	25.24	16.23	15.37	100.00	16.30	16.55	10.76
Punta Gorda, FL MSA	1,040	1.05	0.00	0.00	5.11	3.08	82.99	89.52	11.90	7.40	19.07	0.00	26.19	19.53	14.22
Sebastian-Vero Beach, FL MSA	515	0.52	0.00	0.00	13.47	13.01	61.60	63.69	24.93	23.30	12.56	0.00	16.78	11.64	13.58
Tallahassee, FL MSA	822	0.83	4.33	2.31	20.70	16.18	45.98	53.89	28.99	27.62	8.17	5.98	9.39	9.47	5.93
West Palm Beach-Boca Raton-Boynton Beach, FL MD	5,969	6.02	1.53	1.21	24.63	19.55	36.35	39.37	37.50	39.87	16.01	17.76	17.57	16.86	14.63
Florida Non-MSA	2,873	2.90	0.00	0.00	6.02	2.68	76.96	62.03	17.02	35.29	17.51	0.00	18.55	17.90	16.86

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: FLORIDA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	175	10.19	1.16	0.57	23.67	17.71	45.93	45.14	29.24	36.57	14.53	50.00	15.49	16.30	12.25	
Jacksonville, FL MSA	165	9.60	1.98	2.42	16.44	13.33	54.98	48.48	26.60	35.76	5.44	40.00	4.65	5.81	4.53	
Miami-Miami Beach-Kendall, FL MD	160	9.31	1.69	2.50	19.82	13.13	36.99	41.88	41.51	42.50	10.89	8.33	8.33	14.91	8.85	
Orlando-Kissimmee-Sanford, FL MSA	139	8.09	0.62	0.72	17.95	14.39	49.89	43.88	31.54	41.01	7.78	33.33	7.69	6.74	9.01	
Tampa-St. Petersburg-Clearwater, FL MSA	284	16.53	0.77	0.35	21.94	21.83	48.28	42.61	29.01	35.21	8.13	0.00	8.40	7.76	8.54	
<b>Limited Review:</b>																
Cape Coral-Fort Myers, FL MSA	54	3.14	0.87	0.00	13.24	11.11	63.06	51.85	22.84	37.04	10.14	0.00	0.00	8.99	14.89	
Crestview-Ft Walton Beach-Destin, FL MSA	16	0.93	0.00	0.00	5.54	12.50	74.19	56.25	20.28	31.25	6.54	0.00	0.00	2.63	20.83	
Deltona-Daytona Beach-Ormond Beach, FL MSA	69	4.02	0.47	0.00	9.62	15.94	74.00	57.97	15.91	26.09	9.06	0.00	22.73	7.11	10.87	
Gainesville, FL MSA	33	1.92	5.72	3.03	22.60	15.15	43.73	42.42	27.95	39.39	7.58	0.00	9.68	5.77	9.52	
Lakeland-Winter Haven, FL MSA	49	2.85	0.14	0.00	15.41	10.20	60.75	57.14	23.70	32.65	4.86	0.00	5.88	3.91	6.40	
Naples-Marco Island, FL MSA	18	1.05	2.30	0.00	13.08	0.00	47.98	66.67	36.65	33.33	8.33	0.00	0.00	8.89	8.82	
North Port-Bradenton-Sarasota, FL MSA	86	5.01	0.30	0.00	20.46	11.63	54.68	52.33	24.56	36.05	10.57	0.00	8.51	13.53	6.15	
Ocala, FL MSA	42	2.44	0.36	0.00	2.80	0.00	79.14	88.10	17.70	11.90	8.48	0.00	0.00	10.37	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: FLORIDA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Limited Review:</b>																
Palm Bay-Melbourne- Titusville, FL MSA	64	3.73	0.62	0.00	17.75	10.94	49.76	57.81	31.87	31.25	7.44	0.00	12.50	7.29	5.75	
Palm Coast, FL MSA	12	0.70	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	5.88	0.00	0.00	5.88	0.00	
Pensacola-Ferry Pass-Brent, FL MSA	41	2.39	1.32	0.00	16.18	2.44	56.87	58.54	25.63	39.02	3.06	0.00	0.00	2.76	5.43	
Port St. Lucie, FL MSA	36	2.10	1.15	5.56	11.40	0.00	62.21	55.56	25.24	38.89	4.92	0.00	0.00	6.09	4.08	
Punta Gorda, FL MSA	18	1.05	0.00	0.00	5.11	5.56	82.99	88.89	11.90	5.56	14.75	0.00	0.00	16.36	0.00	
Sebastian-Vero Beach, FL MSA	14	0.81	0.00	0.00	13.47	7.14	61.60	78.57	24.93	14.29	18.92	0.00	33.33	20.00	11.11	
Tallahassee, FL MSA	41	2.39	4.33	7.32	20.70	14.63	45.98	29.27	28.99	48.78	3.88	0.00	4.00	1.43	6.90	
West Palm Beach-Boca Raton-Boynton Beach, FL MD	111	6.46	1.53	4.50	24.63	19.82	36.35	30.63	37.50	45.05	8.52	16.67	10.00	7.87	7.73	
Florida Non-MSA	91	5.30	0.00	0.00	6.02	4.40	76.96	76.92	17.02	18.68	7.73	0.00	11.76	8.25	3.70	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: FLORIDA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	5,531	8.36	1.16	1.19	23.67	12.04	45.93	37.71	29.24	49.05	15.31	23.96	23.51	18.12	12.59									
Jacksonville, FL MSA	6,877	10.39	1.98	0.33	16.44	11.09	54.98	52.48	26.60	36.09	14.25	25.64	17.84	15.26	12.32									
Miami-Miami Beach-Kendall, FL MD	4,840	7.32	1.69	1.96	19.82	14.92	36.99	31.78	41.51	51.34	15.39	39.18	23.08	19.29	12.37									
Orlando-Kissimmee-Sanford, FL MSA	7,348	11.11	0.62	0.18	17.95	11.68	49.89	48.60	31.54	39.55	15.36	25.00	23.11	17.82	12.11									
Tampa-St. Petersburg-Clearwater, FL MSA	10,420	15.75	0.77	0.37	21.94	14.72	48.28	42.87	29.01	42.03	15.05	25.45	19.98	17.03	12.60									
<b>Limited Review:</b>																								
Cape Coral-Fort Myers, FL MSA	2,372	3.59	0.87	0.08	13.24	6.66	63.06	55.52	22.84	37.73	14.74	0.00	18.81	16.79	12.29									
Crestview-Ft Walton Beach-Destin, FL MSA	1,399	2.11	0.00	0.00	5.54	5.00	74.19	72.41	20.28	22.59	16.92	0.00	13.41	18.10	14.36									
Deltona-Daytona Beach-Ormond Beach, FL MSA	1,970	2.98	0.47	0.05	9.62	6.04	74.00	65.08	15.91	28.83	18.39	25.00	19.00	18.31	18.44									
Gainesville, FL MSA	1,161	1.75	5.72	4.13	22.60	14.38	43.73	45.91	27.95	35.57	14.49	36.71	18.81	15.96	10.76									
Lakeland-Winter Haven, FL MSA	1,766	2.67	0.14	0.00	15.41	9.34	60.75	57.59	23.70	33.07	17.61	0.00	21.80	18.69	15.22									
Naples-Marco Island, FL MSA	1,464	2.21	2.30	0.41	13.08	8.61	47.98	45.08	36.65	45.90	12.95	33.33	15.32	13.63	11.98									
North Port-Bradenton-Sarasota, FL MSA	3,269	4.94	0.30	0.09	20.46	9.15	54.68	52.62	24.56	38.15	15.49	11.11	20.76	16.83	13.33									
Ocala, FL MSA	1,152	1.74	0.36	0.26	2.80	1.56	79.14	78.82	17.70	19.36	15.06	100.00	14.29	15.89	11.72									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: FLORIDA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp				
<b>Limited Review:</b>																					
Palm Bay-Melbourne-Titusville, FL MSA	2,105	3.18	0.62	0.05	17.75	7.22	49.76	51.16	31.87	41.57	14.48	0.00	15.00	16.42	12.55						
Palm Coast, FL MSA	488	0.74	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	15.33	0.00	0.00	15.33	0.00						
Pensacola-Ferry Pass-Brent, FL MSA	2,394	3.62	1.32	0.17	16.18	7.10	56.87	60.28	25.63	32.46	15.06	16.67	16.14	15.12	14.73						
Port St. Lucie, FL MSA	1,429	2.16	1.15	0.14	11.40	4.83	62.21	62.35	25.24	32.68	15.73	0.00	18.52	17.11	13.26						
Punta Gorda, FL MSA	725	1.10	0.00	0.00	5.11	1.93	82.99	83.45	11.90	14.62	14.27	0.00	28.57	15.70	9.02						
Sebastian-Vero Beach, FL MSA	533	0.81	0.00	0.00	13.47	5.63	61.60	50.28	24.93	44.09	12.69	0.00	15.15	12.57	12.44						
Tallahassee, FL MSA	1,310	1.98	4.33	2.44	20.70	9.08	45.98	48.24	28.99	40.23	11.24	19.10	12.31	12.98	9.38						
West Palm Beach-Boca Raton-Boynton Beach, FL MD	4,596	6.95	1.53	0.98	24.63	11.99	36.35	34.49	37.50	52.55	13.25	21.82	19.86	15.30	11.28						
Florida Non-MSA	3,014	4.56	0.00	0.00	6.02	2.29	76.96	67.35	17.02	30.36	17.49	0.00	24.82	19.86	13.08						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: FLORIDA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	0	0.00	2.27	0.00	32.48	0.00	48.64	0.00	16.61	0.00	0.00	0.00	0.00	0.00	0.00	
Jacksonville, FL MSA	0	0.00	5.03	0.00	21.26	0.00	52.80	0.00	20.92	0.00	0.00	0.00	0.00	0.00	0.00	
Miami-Miami Beach-Kendall, FL MD	4	66.67	6.85	0.00	35.49	100.00	30.24	0.00	27.42	0.00	3.01	0.00	6.35	0.00	0.00	
Orlando-Kissimmee-Sanford, FL MSA	0	0.00	2.41	0.00	30.42	0.00	49.93	0.00	17.23	0.00	0.00	0.00	0.00	0.00	0.00	
Tampa-St. Petersburg-Clearwater, FL MSA	2	33.33	4.33	0.00	18.88	0.00	49.17	100.00	27.61	0.00	1.54	0.00	0.00	3.57	0.00	
<b>Limited Review:</b>																
Cape Coral-Fort Myers, FL MSA	0	0.00	1.45	0.00	15.27	0.00	44.37	0.00	38.90	0.00	0.00	0.00	0.00	0.00	0.00	
Crestview-Ft Walton Beach-Destin, FL MSA	0	0.00	0.00	0.00	4.51	0.00	82.95	0.00	12.54	0.00	0.00	0.00	0.00	0.00	0.00	
Deltona-Daytona Beach-Ormond Beach, FL MSA	0	0.00	1.77	0.00	26.94	0.00	60.83	0.00	10.46	0.00	0.00	0.00	0.00	0.00	0.00	
Gainesville, FL MSA	0	0.00	18.26	0.00	54.14	0.00	13.72	0.00	13.87	0.00	0.00	0.00	0.00	0.00	0.00	
Lakeland-Winter Haven, FL MSA	0	0.00	2.87	0.00	23.09	0.00	42.68	0.00	31.35	0.00	0.00	0.00	0.00	0.00	0.00	
Naples-Marco Island, FL MSA	0	0.00	2.08	0.00	7.03	0.00	35.11	0.00	55.78	0.00	0.00	0.00	0.00	0.00	0.00	
North Port-Bradenton-Sarasota, FL MSA	0	0.00	0.53	0.00	20.94	0.00	43.00	0.00	35.54	0.00	0.00	0.00	0.00	0.00	0.00	
Ocala, FL MSA	0	0.00	3.42	0.00	19.52	0.00	45.14	0.00	31.92	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: FLORIDA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Limited Review:</b>																								
Palm Bay-Melbourne- Titusville, FL MSA	0	0.00	2.10	0.00	26.13	0.00	53.00	0.00	18.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Palm Coast, FL MSA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Pensacola-Ferry Pass-Brent, FL MSA	0	0.00	3.92	0.00	17.60	0.00	60.48	0.00	18.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Port St. Lucie, FL MSA	0	0.00	2.19	0.00	14.37	0.00	43.56	0.00	39.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Punta Gorda, FL MSA	0	0.00	0.00	0.00	15.97	0.00	66.08	0.00	17.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Sebastian-Vero Beach, FL MSA	0	0.00	0.00	0.00	18.93	0.00	45.98	0.00	35.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Tallahassee, FL MSA	0	0.00	44.71	0.00	17.48	0.00	27.81	0.00	10.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
West Palm Beach-Boca Raton-Boynton Beach, FL MD	0	0.00	3.13	0.00	32.78	0.00	31.51	0.00	32.58	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Florida Non-MSA	0	0.00	0.00	0.00	4.92	0.00	41.51	0.00	53.57	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: FLORIDA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*												
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp								
<b>Full Review:</b>																							
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	7,993	14.15	3.37	3.40	20.29	16.78	41.33	41.50	35.01	38.32	9.74	8.55	9.20	9.84	10.01								
Jacksonville, FL MSA	3,162	5.60	3.64	2.44	18.32	17.43	50.65	44.12	27.40	36.02	7.39	7.18	6.20	6.94	8.78								
Miami-Miami Beach-Kendall, FL MD	7,518	13.31	3.98	4.38	19.56	15.68	32.37	29.40	44.10	50.55	5.86	6.86	5.66	5.71	5.94								
Orlando-Kissimmee-Sanford, FL MSA	6,095	10.79	1.07	1.25	18.40	14.26	46.78	43.46	33.75	41.03	8.21	6.34	7.66	8.09	8.63								
Tampa-St. Petersburg-Clearwater, FL MSA	9,708	17.18	1.41	1.14	21.26	19.27	42.74	40.69	34.58	38.90	9.38	4.95	8.81	9.17	10.16								
<b>Limited Review:</b>																							
Cape Coral-Fort Myers, FL MSA	1,789	3.17	0.63	0.56	11.10	8.94	61.63	60.87	26.64	29.63	7.97	11.76	7.43	8.29	7.48								
Crestview-Ft Walton Beach-Destin, FL MSA	363	0.64	0.00	0.00	7.73	12.12	66.82	61.71	25.45	26.17	5.63	0.00	9.01	5.15	5.52								
Deltona-Daytona Beach-Ormond Beach, FL MSA	1,296	2.29	0.71	0.62	14.11	10.49	65.77	61.50	19.40	27.39	8.56	6.98	5.97	8.18	11.52								
Gainesville, FL MSA	731	1.29	7.48	4.24	27.25	22.30	36.55	38.71	28.72	34.75	10.12	7.44	8.68	10.25	11.49								
Lakeland-Winter Haven, FL MSA	960	1.70	0.26	0.00	17.10	18.85	58.73	53.75	23.90	27.40	7.52	0.00	8.51	7.09	7.86								
Naples-Marco Island, FL MSA	1,130	2.00	1.46	0.88	10.63	8.94	44.78	45.58	43.14	44.60	6.70	3.03	7.27	6.95	6.47								
North Port-Bradenton-Sarasota, FL MSA	3,095	5.48	0.33	0.32	17.43	14.28	51.34	50.21	30.90	35.19	10.85	31.25	11.26	10.11	11.65								
Ocala, FL MSA	738	1.31	0.54	0.54	3.74	4.34	73.97	64.36	21.75	30.76	8.02	0.00	9.23	7.39	9.67								

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: FLORIDA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Limited Review:</b>																					
Palm Bay-Melbourne- Titusville, FL MSA	1,426	2.52	0.82	0.70	19.86	21.53	46.97	41.02	32.35	36.75	7.97	7.35	7.88	7.69	8.36						
Palm Coast, FL MSA	218	0.39	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	8.82	0.00	0.00	8.82	0.00						
Pensacola-Ferry Pass- Brent, FL MSA	854	1.51	2.22	2.22	19.48	17.33	52.04	51.64	26.27	28.81	7.07	4.49	6.12	8.08	6.58						
Port St. Lucie, FL MSA	963	1.70	1.99	0.62	16.05	16.72	59.41	52.86	22.54	29.80	7.17	5.41	6.37	6.65	8.81						
Punta Gorda, FL MSA	491	0.87	0.00	0.00	3.93	5.70	85.99	82.08	10.08	12.22	8.17	0.00	9.09	7.98	9.22						
Sebastian-Vero Beach, FL MSA	428	0.76	0.00	0.00	11.49	10.28	60.55	54.91	27.96	34.81	7.25	0.00	7.34	7.62	6.68						
Tallahassee, FL MSA	541	0.96	8.46	3.14	16.58	14.60	46.35	43.99	28.61	38.26	4.95	3.59	4.33	5.06	5.32						
West Palm Beach-Boca Raton-Boynton Beach, FL MD	5,346	9.46	2.78	2.08	19.29	15.02	34.19	34.70	43.74	48.20	7.65	5.97	7.12	8.16	7.59						
Florida Non-MSA	1,653	2.93	0.00	0.00	6.29	5.87	68.60	62.31	25.11	31.82	7.54	0.00	11.00	7.65	6.95						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS																
GEOGRAPHY: FLORIDA																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	17	3.74	2.77	0.00	21.76	0.00	42.51	29.41	32.96	70.59	9.52	0.00	0.00	5.71	18.75	
Jacksonville, FL MSA	12	2.64	1.51	0.00	15.57	8.33	60.48	66.67	22.44	25.00	11.54	0.00	14.29	9.09	18.18	
Miami-Miami Beach-Kendall, FL MD	26	5.71	2.39	0.00	18.13	0.00	35.10	23.08	44.39	76.92	10.08	0.00	0.00	11.11	12.16	
Orlando-Kissimmee-Sanford, FL MSA	35	7.69	0.85	0.00	17.54	20.00	55.52	62.86	26.08	17.14	10.48	0.00	23.08	11.94	0.00	
Tampa-St. Petersburg-Clearwater, FL MSA	61	13.41	0.59	0.00	23.12	13.11	48.74	47.54	27.55	39.34	16.78	0.00	10.53	16.39	23.81	
<b>Limited Review:</b>																
Cape Coral-Fort Myers, FL MSA	25	5.49	0.55	0.00	9.18	0.00	72.97	88.00	17.29	12.00	21.62	0.00	0.00	25.00	20.00	
Crestview-Ft Walton Beach-Destin, FL MSA	5	1.10	0.00	0.00	8.70	0.00	74.91	40.00	16.38	60.00	9.09	0.00	0.00	11.11	0.00	
Deltona-Daytona Beach-Ormond Beach, FL MSA	20	4.40	0.46	0.00	9.27	5.00	72.49	65.00	17.78	30.00	20.51	0.00	0.00	16.00	36.36	
Gainesville, FL MSA	15	3.30	2.80	0.00	26.71	6.67	54.29	93.33	16.20	0.00	4.48	0.00	0.00	8.82	0.00	
Lakeland-Winter Haven, FL MSA	7	1.54	0.00	0.00	14.69	0.00	63.19	71.43	22.12	28.57	4.65	0.00	0.00	3.03	11.11	
Naples-Marco Island, FL MSA	13	2.86	3.98	15.38	19.27	30.77	52.42	23.08	24.32	30.77	14.29	25.00	0.00	14.29	12.50	
North Port-Bradenton-Sarasota, FL MSA	25	5.49	0.31	0.00	16.79	4.00	56.01	60.00	26.89	36.00	18.46	0.00	9.09	23.33	16.67	
Ocala, FL MSA	27	5.93	0.16	0.00	1.41	0.00	83.86	92.59	14.57	7.41	17.31	0.00	0.00	18.75	0.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: FLORIDA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Limited Review:</b>																								
Palm Bay-Melbourne- Titusville, FL MSA	12	2.64	1.07	0.00	17.84	33.33	53.53	33.33	27.56	33.33	26.67	0.00	66.67	11.11	21.43									
Palm Coast, FL MSA	3	0.66	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	20.00	0.00	0.00	20.00	0.00									
Pensacola-Ferry Pass-Brent, FL MSA	11	2.42	1.33	0.00	15.10	0.00	59.89	90.91	23.69	9.09	15.38	0.00	0.00	23.53	0.00									
Port St. Lucie, FL MSA	13	2.86	1.70	0.00	17.98	7.69	60.45	46.15	19.87	46.15	10.53	0.00	0.00	11.54	10.00									
Punta Gorda, FL MSA	4	0.88	0.00	0.00	3.26	0.00	91.91	100.00	4.83	0.00	14.29	0.00	0.00	14.29	0.00									
Sebastian-Vero Beach, FL MSA	7	1.54	0.00	0.00	14.14	14.29	65.64	85.71	20.22	0.00	17.65	0.00	0.00	27.27	0.00									
Tallahassee, FL MSA	5	1.10	4.33	0.00	18.51	20.00	51.19	80.00	25.98	0.00	2.94	0.00	0.00	5.26	0.00									
West Palm Beach-Boca Raton-Boynton Beach, FL MD	34	7.47	2.82	2.94	23.02	14.71	34.77	29.41	39.40	52.94	12.90	25.00	20.00	12.90	10.42									
Florida Non-MSA	78	17.14	0.00	0.00	4.99	8.97	81.91	82.05	13.10	8.97	15.48	0.00	7.69	16.79	9.09									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: FLORIDA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans*** *	% Families***	% BANK Loans*** *	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	9,562	9.64	20.85	5.35	18.17	23.96	20.48	28.70	40.50	41.99	18.85	17.01	18.95	21.69	17.41		
Jacksonville, FL MSA	8,340	8.40	19.42	10.12	18.51	32.80	23.14	28.17	38.94	28.91	18.82	14.99	21.05	20.82	16.68		
Miami-Miami Beach-Kendall, FL MD	7,886	7.95	23.00	1.95	16.98	15.53	18.53	29.10	41.50	53.41	18.09	12.66	16.86	20.24	17.79		
Orlando-Kissimmee-Sanford, FL MSA	15,062	15.18	18.74	7.04	18.84	24.34	22.70	27.85	39.72	40.77	21.57	18.93	22.68	23.80	19.98		
Tampa-St. Petersburg-Clearwater, FL MSA	16,739	16.87	18.87	6.55	19.12	25.13	22.01	28.06	40.01	40.27	21.26	20.34	23.31	24.08	18.44		
<b>Limited Review:</b>																	
Cape Coral-Fort Myers, FL MSA	4,977	5.02	17.16	13.02	19.96	23.35	23.32	23.62	39.56	40.00	19.14	23.32	21.56	22.92	14.90		
Crestview-Ft Walton Beach-Destin, FL MSA	1,843	1.86	17.10	7.73	20.02	25.27	24.36	32.63	38.52	34.37	24.67	23.96	26.42	26.66	22.59		
Deltona-Daytona Beach-Ormond Beach, FL MSA	2,585	2.60	17.44	10.30	19.60	28.01	23.44	27.90	39.51	33.79	20.70	19.89	22.62	23.18	17.85		
Gainesville, FL MSA	1,214	1.22	23.59	7.79	16.37	22.37	19.54	28.00	40.51	41.84	20.09	27.87	23.76	25.29	13.69		
Lakeland-Winter Haven, FL MSA	2,997	3.02	18.23	7.43	19.44	28.25	22.60	29.03	39.73	35.28	18.58	18.69	17.93	19.70	18.21		
Naples-Marco Island, FL MSA	1,885	1.90	19.06	19.86	19.32	22.55	20.65	17.33	40.97	40.26	15.43	24.35	19.20	15.98	11.10		
North Port-Bradenton-Sarasota, FL MSA	4,476	4.51	17.71	7.97	19.64	23.45	23.60	26.59	39.06	41.99	20.60	20.53	24.42	25.58	16.61		
Ocala, FL MSA	1,015	1.02	17.12	8.10	19.85	28.50	23.46	30.70	39.56	32.70	13.73	14.63	15.01	14.17	12.07		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: FLORIDA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
<b>Limited Review:</b>																
Palm Bay-Melbourne- Titusville, FL MSA	3,464	3.49	18.27	10.98	19.30	26.97	22.67	26.71	39.76	35.34	21.48	22.96	23.80	24.43	17.43	
Palm Coast, FL MSA	550	0.55	17.10	8.38	20.20	24.59	23.28	26.05	39.41	40.98	20.59	18.18	21.07	20.68	20.78	
Pensacola-Ferry Pass-Brent, FL MSA	2,882	2.90	20.39	8.23	17.84	21.46	22.05	33.25	39.73	37.06	21.97	17.44	19.66	26.64	20.71	
Port St. Lucie, FL MSA	2,539	2.56	18.46	8.11	19.34	26.13	22.19	28.05	40.01	37.71	17.71	16.45	19.31	20.00	15.45	
Punta Gorda, FL MSA	1,040	1.05	15.59	8.52	20.59	24.39	25.42	26.43	38.40	40.66	20.87	22.70	26.11	24.15	16.81	
Sebastian-Vero Beach, FL MSA	515	0.52	17.61	6.26	19.63	21.53	22.39	20.74	40.37	51.47	14.08	8.25	17.72	12.89	14.61	
Tallahassee, FL MSA	822	0.83	22.19	10.53	16.53	25.58	21.68	25.95	39.60	37.94	10.10	9.88	9.19	9.19	11.54	
West Palm Beach-Boca Raton-Boynton Beach, FL MD	5,969	6.02	19.86	6.60	18.56	23.19	20.60	25.41	40.98	44.81	17.66	17.08	19.32	20.05	15.70	
Florida Non-MSA	2,873	2.90	19.12	3.93	18.98	15.72	21.97	22.00	39.93	58.35	19.45	15.31	19.32	22.90	18.60	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: FLORIDA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	175	10.19	20.85	6.59	18.17	20.36	20.48	29.94	40.50	43.11	14.22	10.29	14.63	19.05	12.64	
Jacksonville, FL MSA	165	9.60	19.42	13.33	18.51	25.33	23.14	29.33	38.94	32.00	5.11	3.47	7.47	6.16	3.46	
Miami-Miami Beach-Kendall, FL MD	160	9.31	23.00	3.25	16.98	8.44	18.53	24.68	41.50	63.64	11.91	5.88	10.91	15.19	11.91	
Orlando-Kissimmee-Sanford, FL MSA	139	8.09	18.74	7.58	18.84	21.97	22.70	34.09	39.72	36.36	7.66	5.31	7.97	8.00	8.33	
Tampa-St. Petersburg-Clearwater, FL MSA	284	16.53	18.87	11.48	19.12	22.96	22.01	25.19	40.01	40.37	7.85	7.07	8.87	7.01	8.15	
<b>Limited Review:</b>																
Cape Coral-Fort Myers, FL MSA	54	3.14	17.16	7.84	19.96	13.73	23.32	39.22	39.56	39.22	10.22	7.69	6.25	20.00	9.26	
Crestview-Ft Walton Beach-Destin, FL MSA	16	0.93	17.10	0.00	20.02	28.57	24.36	21.43	38.52	50.00	6.80	0.00	9.52	3.57	11.11	
Deltona-Daytona Beach-Ormond Beach, FL MSA	69	4.02	17.44	15.15	19.60	33.33	23.44	24.24	39.51	27.27	8.17	4.35	13.25	4.55	8.06	
Gainesville, FL MSA	33	1.92	23.59	3.13	16.37	21.88	19.54	37.50	40.51	37.50	8.06	0.00	21.43	8.00	3.70	
Lakeland-Winter Haven, FL MSA	49	2.85	18.23	10.87	19.44	32.61	22.60	13.04	39.73	43.48	4.53	1.52	5.66	3.03	6.08	
Naples-Marco Island, FL MSA	18	1.05	19.06	5.56	19.32	22.22	20.65	33.33	40.97	38.89	8.86	12.50	5.00	18.75	5.71	
North Port-Bradenton-Sarasota, FL MSA	86	5.01	17.71	7.14	19.64	28.57	23.60	26.19	39.06	38.10	10.78	5.00	16.07	11.32	9.64	
Ocala, FL MSA	42	2.44	17.12	7.50	19.85	30.00	23.46	27.50	39.56	35.00	7.98	0.00	5.00	6.67	14.55	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.9% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: FLORIDA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Limited Review:</b>																
Palm Bay-Melbourne- Titusville, FL MSA	64	3.73	18.27	13.33	19.30	18.33	22.67	16.67	39.76	51.67	6.16	11.43	2.08	7.84	5.19	
Palm Coast, FL MSA	12	0.70	17.10	16.67	20.20	66.67	23.28	0.00	39.41	16.67	6.00	0.00	23.08	0.00	0.00	
Pensacola-Ferry Pass- Brent, FL MSA	41	2.39	20.39	7.32	17.84	24.39	22.05	26.83	39.73	41.46	3.20	0.00	4.48	3.03	3.68	
Port St. Lucie, FL MSA	36	2.10	18.46	5.71	19.34	14.29	22.19	25.71	40.01	54.29	5.08	3.33	2.86	7.50	5.56	
Punta Gorda, FL MSA	18	1.05	15.59	12.50	20.59	37.50	25.42	18.75	38.40	31.25	12.07	20.00	23.53	6.67	4.76	
Sebastian-Vero Beach, FL MSA	14	0.81	17.61	7.14	19.63	7.14	22.39	42.86	40.37	42.86	19.44	16.67	25.00	14.29	20.00	
Tallahassee, FL MSA	41	2.39	22.19	10.00	16.53	25.00	21.68	30.00	39.60	35.00	3.97	5.00	4.11	4.62	3.23	
West Palm Beach-Boca Raton-Boynton Beach, FL MD	111	6.46	19.86	9.52	18.56	15.24	20.60	32.38	40.98	42.86	8.12	7.55	9.41	10.47	6.76	
Florida Non-MSA	91	5.30	19.12	5.75	18.98	20.69	21.97	37.93	39.93	35.63	7.20	5.56	4.35	14.29	4.64	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.9% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance															GEOGRAPHY: FLORIDA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	5,531	8.36	20.85	5.61	18.17	14.15	20.48	22.79	40.50	57.46	16.72	23.99	22.29	20.09	13.99									
Jacksonville, FL MSA	6,877	10.39	19.42	10.05	18.51	21.62	23.14	24.48	38.94	43.85	14.56	19.14	18.07	15.65	12.40									
Miami-Miami Beach-Kendall, FL MD	4,856	7.34	23.00	3.42	16.98	9.70	18.53	20.67	41.50	66.20	17.36	21.97	24.30	23.55	15.16									
Orlando-Kissimmee-Sanford, FL MSA	7,348	11.10	18.74	7.01	18.84	17.85	22.70	24.30	39.72	50.84	15.85	23.06	20.26	18.00	13.02									
Tampa-St. Petersburg-Clearwater, FL MSA	10,420	15.74	18.87	6.25	19.12	16.94	22.01	23.67	40.01	53.14	15.97	22.30	19.37	18.30	13.56									
<b>Limited Review:</b>																								
Cape Coral-Fort Myers, FL MSA	2,372	3.58	17.16	6.14	19.96	14.44	23.32	21.55	39.56	57.87	15.43	20.62	19.97	17.03	13.47									
Crestview-Ft Walton Beach-Destin, FL MSA	1,399	2.11	17.10	9.51	20.02	18.61	24.36	26.16	38.52	45.71	18.29	23.13	19.07	21.71	16.15									
Deltona-Daytona Beach-Ormond Beach, FL MSA	1,970	2.98	17.44	10.86	19.60	22.87	23.44	26.13	39.51	40.13	19.02	22.27	22.36	18.96	17.27									
Gainesville, FL MSA	1,161	1.75	23.59	4.71	16.37	13.73	19.54	20.34	40.51	61.22	15.30	17.78	15.88	15.96	14.69									
Lakeland-Winter Haven, FL MSA	1,766	2.67	18.23	6.70	19.44	20.84	22.60	26.14	39.73	46.32	17.40	24.68	18.93	20.37	15.00									
Naples-Marco Island, FL MSA	1,464	2.21	19.06	6.66	19.32	16.26	20.65	21.03	40.97	56.05	13.12	22.60	18.97	14.64	10.93									
North Port-Bradenton-Sarasota, FL MSA	3,269	4.94	17.71	7.02	19.64	17.84	23.60	22.37	39.06	52.77	16.12	26.35	20.31	16.97	13.58									
Ocala, FL MSA	1,152	1.74	17.12	8.81	19.85	22.43	23.46	27.88	39.56	40.88	15.94	25.76	19.95	16.69	12.83									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 16.8% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Florida					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Limited Review:</b>																
Palm Bay-Melbourne- Titusville, FL MSA	2,105	3.18	18.27	7.79	19.30	19.76	22.67	23.42	39.76	49.03	15.61	20.99	18.08	15.59	13.91	
Palm Coast, FL MSA	488	0.74	17.10	9.53	20.20	20.93	23.28	29.30	39.41	40.23	16.88	24.39	16.77	15.70	16.35	
Pensacola-Ferry Pass- Brent, FL MSA	2,394	3.62	20.39	8.30	17.84	17.37	22.05	26.84	39.73	47.49	16.34	19.54	19.38	17.88	14.40	
Port St. Lucie, FL MSA	1,429	2.16	18.46	6.45	19.34	15.11	22.19	22.24	40.01	56.20	16.58	20.12	18.96	16.69	15.51	
Punta Gorda, FL MSA	725	1.10	15.59	9.61	20.59	22.02	25.42	28.53	38.40	39.84	15.25	24.47	18.92	18.41	11.72	
Sebastian-Vero Beach, FL MSA	533	0.81	17.61	4.36	19.63	13.90	22.39	20.75	40.37	61.00	14.33	15.58	15.57	14.92	13.74	
Tallahassee, FL MSA	1,310	1.98	22.19	7.79	16.53	20.19	21.68	27.81	39.60	44.20	12.02	17.86	16.69	12.64	9.86	
West Palm Beach-Boca Raton-Boynton Beach, FL MD	4,597	6.95	19.86	6.17	18.56	15.41	20.60	21.29	40.98	57.13	14.13	19.66	19.09	15.91	12.04	
Florida Non-MSA	3,014	4.55	19.12	4.31	18.98	14.38	21.97	22.56	39.93	58.74	18.65	24.66	23.32	21.31	16.51	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 16.8% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses									
GEOGRAPHY: FLORIDA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	7,993	14.15	70.49	61.75	89.29	5.23	5.48	9.65	20.44
Jacksonville, FL MSA	3,162	5.60	69.71	59.23	91.49	3.67	4.84	7.24	11.92
Miami-Miami Beach-Kendall, FL MD	7,518	13.31	69.18	61.04	91.46	3.86	4.68	5.82	12.76
Orlando-Kissimmee-Sanford, FL MSA	6,095	10.79	70.85	61.23	92.55	3.30	4.15	8.05	15.79
Tampa-St. Petersburg-Clearwater, FL MSA	9,708	17.18	68.28	60.26	90.55	4.46	4.99	9.25	16.12
<b>Limited Review:</b>									
Cape Coral-Fort Myers, FL MSA	1,789	3.17	71.76	63.28	93.24	3.52	3.24	7.80	14.55
Crestview-Ft Walton Beach-Destin, FL MSA	363	0.64	72.02	63.91	95.04	2.20	2.75	5.49	8.23
Deltona-Daytona Beach-Ormond Beach, FL MSA	1,296	2.29	71.11	65.97	95.06	1.47	3.47	8.39	15.76
Gainesville, FL MSA	731	1.29	68.20	60.33	88.92	5.34	5.75	9.82	15.32
Lakeland-Winter Haven, FL MSA	960	1.70	72.96	57.29	90.31	5.10	4.58	7.20	12.21
Naples-Marco Island, FL MSA	1,130	2.00	70.10	63.01	93.19	3.63	3.19	6.59	12.92
North Port-Bradenton-Sarasota, FL MSA	3,095	5.48	72.14	65.14	94.28	2.81	2.91	10.68	19.43
Ocala, FL MSA	738	1.31	73.16	63.01	94.85	1.76	3.39	7.81	12.80

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 21.54% of small loans to businesses originated and purchased by the bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: FLORIDA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
Palm Bay-Melbourne-Titusville, FL MSA	1,426	2.52	64.34	64.45	93.83	2.73	3.44	7.78	14.36
Palm Coast, FL MSA	218	0.39	73.00	65.60	94.50	2.29	3.21	8.48	17.31
Pensacola-Ferry Pass-Brent, FL MSA	854	1.51	72.67	58.43	93.44	3.28	3.28	6.95	9.08
Port St. Lucie, FL MSA	963	1.70	72.16	69.16	94.08	2.08	3.84	7.05	14.41
Punta Gorda, FL MSA	491	0.87	73.05	67.01	95.52	1.63	2.85	7.97	12.17
Sebastian-Vero Beach, FL MSA	428	0.76	53.40	60.28	91.12	3.97	4.91	7.07	11.93
Tallahassee, FL MSA	541	0.96	70.11	62.85	93.72	3.88	2.40	4.82	7.94
West Palm Beach-Boca Raton-Boynton Beach, FL MD	5,346	9.46	70.34	63.00	88.96	5.27	5.76	7.57	18.15
Florida Non-MSA	1,653	2.93	64.60	63.46	94.07	2.66	3.27	7.21	12.10

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 21.54% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: FLORIDA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	17	3.74	97.37	70.59	100.00	0.00	0.00	9.52	8.33
Jacksonville, FL MSA	12	2.64	97.38	66.67	100.00	0.00	0.00	10.91	9.52
Miami-Miami Beach-Kendall, FL MD	26	5.71	96.88	57.69	96.15	0.00	3.85	9.56	6.12
Orlando-Kissimmee-Sanford, FL MSA	35	7.69	96.74	71.43	88.57	0.00	11.43	9.91	9.30
Tampa-St. Petersburg-Clearwater, FL MSA	61	13.41	97.27	70.49	96.72	3.28	0.00	16.22	13.21
<b>Limited Review:</b>									
Cape Coral-Fort Myers, FL MSA	25	5.49	97.59	64.00	92.00	4.00	4.00	20.00	8.33
Crestview-Ft Walton Beach-Destin, FL MSA	5	1.10	97.61	80.00	100.00	0.00	0.00	9.09	0.00
Deltona-Daytona Beach-Ormond Beach, FL MSA	20	4.40	98.44	85.00	100.00	0.00	0.00	19.51	21.43
Gainesville, FL MSA	15	3.30	96.15	80.00	100.00	0.00	0.00	3.95	3.77
Lakeland-Winter Haven, FL MSA	7	1.54	96.37	71.43	100.00	0.00	0.00	4.55	2.63
Naples-Marco Island, FL MSA	13	2.86	94.81	76.92	92.31	0.00	7.69	14.29	14.29
North Port-Bradenton-Sarasota, FL MSA	25	5.49	96.57	64.00	100.00	0.00	0.00	18.18	17.50
Ocala, FL MSA	27	5.93	98.07	66.67	100.00	0.00	0.00	16.36	14.71

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 19.86% of small loans to farms originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: FLORIDA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
Palm Bay-Melbourne-Titusville, FL MSA	12	2.64	98.14	25.00	75.00	25.00	0.00	25.00	12.50
Palm Coast, FL MSA	3	0.66	97.62	33.33	100.00	0.00	0.00	20.00	33.33
Pensacola-Ferry Pass-Brent, FL MSA	11	2.42	98.48	63.64	72.73	27.27	0.00	14.81	15.00
Port St. Lucie, FL MSA	13	2.86	95.30	92.31	100.00	0.00	0.00	10.26	12.50
Punta Gorda, FL MSA	4	0.88	98.31	75.00	100.00	0.00	0.00	14.29	0.00
Sebastian-Vero Beach, FL MSA	7	1.54	94.25	85.71	100.00	0.00	0.00	16.67	27.27
Tallahassee, FL MSA	5	1.10	97.91	80.00	100.00	0.00	0.00	2.86	3.70
West Palm Beach-Boca Raton-Boynton Beach, FL MD	34	7.47	96.20	73.53	97.06	0.00	2.94	11.88	8.20
Florida Non-MSA	78	17.14	95.70	71.79	93.59	6.41	0.00	14.55	16.48

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 19.86% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: FLORIDA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	59	47,234	194	71,133	253	118,367	13.92	2	20,138
Jacksonville, FL MSA	110	33,467	295	110,824	405	144,291	16.97	0	0
Miami-Miami Beach-Kendall, FL MD	42	106,817	190	51,456	232	158,273	18.61	0	0
Orlando-Kissimmee-Sanford, FL MSA	15	17,013	116	56,093	131	73,106	8.60	5	10,024
Tampa-St. Petersburg-Clearwater, FL MSA	53	60,376	120	88,509	173	148,885	17.51	6	44,151
<b>Limited Review:</b>									
Cape Coral-Fort Myers, FL MSA	7	2,581	53	5,606	60	8,187	0.96	0	0
Crestview-Ft Walton Beach-Destin, FL MSA	2	225	13	522	15	748	0.09	0	0
Deltona-Daytona Beach-Ormond Beach, FL MSA	23	2,389	39	3,029	62	5,418	0.64	0	0
Gainesville, FL MSA	6	954	25	1,242	31	2,196	0.26	0	0
Lakeland-Winter Haven, FL MSA	5	13,334	37	1,682	42	15,016	1.77	0	0
Naples-Marco Island, FL MSA	14	2,576	67	5,072	81	7,648	0.90	0	0
North Port-Bradenton-Sarasota, FL MSA	43	11,243	86	20,474	129	31,718	3.73	1	152
Ocala, FL MSA	3	345	20	1,397	23	1,742	0.20	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: FLORIDA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Limited Review:</b>									
Palm Bay-Melbourne-Titusville, FL MSA	10	5,293	38	17,234	48	22,527	2.65	1	1,883
Palm Coast, FL MSA	1	3,375	17	711	18	4,085	0.48	0	0
Pensacola-Ferry Pass-Brent, FL MSA	7	12,042	23	842	30	12,884	1.51	0	0
Port St. Lucie, FL MSA	0	0	30	8,497	30	8,497	1.00	0	0
Punta Gorda, FL MSA	1	30	22	1,006	23	1,036	0.12	0	0
Sebastian-Vero Beach, FL MSA	3	458	31	821	34	1,279	0.15	0	0
Tallahassee, FL MSA	2	1,627	29	879	31	2,506	0.29	0	0
West Palm Beach-Boca Raton-Boynton Beach, FL MD	49	9,146	170	36,625	219	45,772	5.38	0	0
Florida Non-MSA	13	14,999	90	2,876	103	17,875	2.10	0	0
Statewide investments with potential benefit to one or more AAs	0	0	27	1,036	27	1,036	0.12	0	0
Statewide investments with no potential to benefit one or more AAs	6	17,298	16	77	22	17,375	2.04	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: FLORIDA																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL MD	12.01	73	11.32	1.37	15.07	47.95	35.62	3	4	0	0	-1	0	3.57	26.43	43.13	26.88
Jacksonville, FL MSA	28.08	37	5.74	8.11	13.51	45.95	32.43	0	3	0	-1	0	-2	3.22	20.31	53.75	22.72
Miami-Miami Beach-Kendall, FL MD	12.14	72	11.16	4.17	22.22	25.00	48.61	3	1	0	1	1	0	4.89	28.61	35.68	30.79
Orlando-Kissimmee-Sanford, FL MSA	8.89	68	10.54	2.94	23.53	44.12	29.41	0	4	0	0	-2	-2	1.63	22.82	48.22	27.33
Tampa-St. Petersburg-Clearwater, FL MSA	12.62	101	15.66	1.98	24.75	43.56	29.70	3	7	1	-1	-3	-1	2.35	24.27	46.05	27.32
<b>Limited Review:</b>																	
Cape Coral-Fort Myers, FL MSA	2.14	30	4.65	0.00	16.67	53.33	30.00	0	1	0	0	-1	0	1.95	17.89	61.13	19.03
Crestview-Ft Walton Beach-Destin, FL MSA	0.29	6	0.93	0.00	0.00	83.33	16.67	0	0	0	0	0	0	0.00	10.26	73.30	16.44
Deltona-Daytona Beach-Ormond Beach, FL MSA	1.58	19	2.95	0.00	15.79	68.42	15.79	0	1	0	-1	0	0	0.99	15.06	69.38	14.57
Gainesville, FL MSA	0.73	7	1.09	14.29	42.86	14.29	28.57	0	0	0	0	0	0	15.01	30.51	33.39	21.09
Lakeland-Winter Haven, FL MSA	1.12	13	2.02	0.00	38.46	38.46	23.08	0	2	0	-1	-1	0	0.51	19.53	58.13	21.83
Naples-Marco Island, FL MSA	1.40	17	2.64	5.88	11.76	35.29	47.06	1	1	0	0	0	0	7.48	18.77	45.24	28.51
North Port-Bradenton-Sarasota, FL MSA	3.64	36	5.58	0.00	19.44	55.56	25.00	2	4	0	0	-1	-1	0.67	25.18	52.01	22.14
Ocala, FL MSA	0.81	10	1.55	0.00	0.00	80.00	20.00	0	0	0	0	0	0	0.80	4.61	76.20	18.39

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: FLORIDA																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Limited Review:</b>																	
Palm Bay-Melbourne- Titusville, FL MSA	1.54	17	2.64	0.00	35.29	41.18	23.53	0	2	0	0	-1	-1	1.34	19.21	51.27	28.17
Palm Coast, FL MSA	0.39	4	0.62	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Pensacola-Ferry Pass-Brent, FL MSA	0.54	8	1.24	0.00	37.50	50.00	12.50	0	1	0	0	0	-1	2.03	22.09	53.96	21.92
Port St. Lucie, FL MSA	1.16	15	2.33	0.00	6.67	80.00	13.33	0	0	0	0	0	0	3.58	17.57	57.55	21.31
Punta Gorda, FL MSA	0.66	7	1.09	0.00	14.29	71.43	14.29	1	1	0	0	0	0	0.00	6.13	84.24	9.63
Sebastian-Vero Beach, FL MSA	0.57	7	1.09	0.00	0.00	57.14	42.86	0	0	0	0	0	0	0.00	16.49	61.66	21.84
Tallahassee, FL MSA	0.59	8	1.24	12.50	12.50	50.00	25.00	0	0	0	0	0	0	13.41	22.50	40.56	22.72
West Palm Beach-Boca Raton-Boynton Beach, FL MD	7.20	59	9.15	5.08	20.34	30.51	44.07	2	2	0	1	0	-1	4.21	29.32	33.88	32.37
Florida Non-MSA	1.90	31	4.81	0.00	9.68	67.74	22.58	0	3	0	0	-3	0	0.00	7.97	76.52	15.50

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: GEORGIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Albany, GA MSA	0.90	906	124,890	209	7,735	9	565	0	0	1,124	133,190	0.63
Atlanta-Sandy Springs-Marietta, GA MSA	78.19	84,201	14,716,278	13,532	631,838	40	341	9	22,799	97,782	15,371,256	88.96
<b>Limited Review:</b>												
Athens-Clarke County, GA MSA	1.70	1,840	299,428	274	7,965	10	97	0	0	2,124	307,490	1.32
Brunswick, GA MSA	0.95	1,008	200,191	181	8,766	3	23	0	0	1,192	208,980	0.46
Columbus, GA MSA	2.20	2,595	421,256	154	6,001	3	35	0	0	2,752	427,292	0.08
Dalton, GA MSA	0.86	912	107,650	160	10,251	0	0	0	0	1,072	117,901	0.67
Gainesville, GA MSA	1.87	1,911	304,548	419	28,550	4	24	0	0	2,334	333,122	0.54
Hinesville-Ft Stewart, GA MSA	0.59	700	99,349	31	836	1	5	0	0	732	100,190	0.08
Macon, GA MSA	1.64	1,748	242,031	298	10,752	1	5	0	0	2,047	252,788	1.31
Savannah, GA MSA	4.82	5,267	930,897	755	43,133	6	37	3	23,827	6,031	997,894	2.82
Valdosta, GA MSA	1.10	1,173	174,455	199	13,108	4	19	0	0	1,376	187,582	0.63
Warner Robins, GA MSA	1.88	2,200	324,541	152	7,485	5	31	0	0	2,357	332,057	0.56
Georgia Non-MSA	3.30	3,587	514,147	521	19,685	24	555	0	0	4,132	534,387	1.93

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: GEORGIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Albany, GA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.63
Atlanta-Sandy Springs-Marietta, GA MSA	100.00	4	19,910	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	88.96
<b>Limited Review:</b>														
Athens-Clarke County, GA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.32
Brunswick, GA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.46
Columbus, GA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.08
Dalton, GA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.67
Gainesville, GA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.54
Hinesville-Ft Stewart, GA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.08
Macon, GA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.31
Savannah, GA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.82
Valdosta, GA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.63
Warner Robins, GA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.56
Georgia Non-MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.93

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															GEOGRAPHY: GEORGIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Albany, GA MSA	333	0.65	3.26	0.30	24.70	6.61	41.34	38.14	30.70	54.95	10.75	0.00	5.10	11.67	11.72									
Atlanta-Sandy Springs-Marietta, GA MSA	40,754	79.22	2.35	2.76	17.94	15.01	43.69	51.02	36.02	31.21	21.13	25.06	22.72	22.97	17.96									
<b>Limited Review:</b>																								
Athens-Clarke County, GA MSA	674	1.31	2.67	3.12	12.20	10.68	44.09	33.68	41.05	52.52	15.98	14.81	14.68	15.42	16.72									
Brunswick, GA MSA	348	0.68	1.92	0.29	17.22	9.77	43.59	32.18	37.27	57.76	13.42	25.00	13.91	16.82	11.72									
Columbus, GA MSA	1,042	2.03	2.69	0.48	13.86	4.61	37.91	31.00	45.54	63.92	16.57	7.69	13.26	15.89	17.42									
Dalton, GA MSA	480	0.93	0.00	0.00	8.92	9.58	79.45	76.88	11.63	13.54	17.20	0.00	13.95	17.60	18.35									
Gainesville, GA MSA	887	1.72	0.00	0.00	5.18	6.76	78.96	71.25	15.86	21.98	18.32	0.00	32.91	17.56	18.16									
Hinesville-Ft Stewart, GA MSA	381	0.74	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	13.82	0.00	0.00	13.82	0.00									
Macon, GA MSA	799	1.55	6.34	3.13	12.24	6.76	42.59	33.79	38.84	56.32	15.96	27.91	16.67	13.84	16.75									
Savannah, GA MSA	2,645	5.14	3.92	2.46	20.46	7.41	44.90	57.13	30.73	33.01	19.17	17.11	18.18	19.55	18.94									
Valdosta, GA MSA	507	0.99	6.13	3.75	16.28	2.17	52.31	59.17	25.28	34.91	12.59	16.28	4.17	13.51	12.25									
Warner Robins, GA MSA	1,273	2.47	2.27	0.16	10.53	3.22	61.23	52.71	25.98	43.91	18.24	0.00	10.17	18.91	18.34									
Georgia Non-MSA	1,318	2.56	1.05	0.30	10.11	3.95	62.85	50.15	25.99	45.60	14.78	16.67	10.99	13.02	17.87									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: GEORGIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Albany, GA MSA	11	1.26	3.26	9.09	24.70	18.18	41.34	36.36	30.70	36.36	1.01	9.09	0.00	1.23	0.00	
Atlanta-Sandy Springs-Marietta, GA MSA	589	67.47	2.35	1.70	17.94	10.19	43.69	36.84	36.02	51.27	7.76	14.71	4.29	7.04	9.54	
<b>Limited Review:</b>																
Athens-Clarke County, GA MSA	22	2.52	2.67	4.55	12.20	13.64	44.09	22.73	41.05	59.09	4.82	0.00	5.56	2.70	7.14	
Brunswick, GA MSA	11	1.26	1.92	0.00	17.22	0.00	43.59	54.55	37.27	45.45	2.98	0.00	0.00	2.04	7.50	
Columbus, GA MSA	26	2.98	2.69	0.00	13.86	15.38	37.91	34.62	45.54	50.00	4.87	0.00	3.57	4.76	5.36	
Dalton, GA MSA	9	1.03	0.00	0.00	8.92	0.00	79.45	55.56	11.63	44.44	1.77	0.00	0.00	2.17	0.00	
Gainesville, GA MSA	13	1.49	0.00	0.00	5.18	15.38	78.96	46.15	15.86	38.46	4.55	0.00	8.33	2.56	10.00	
Hinesville-Ft Stewart, GA MSA	4	0.46	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Macon, GA MSA	25	2.86	6.34	0.00	12.24	0.00	42.59	40.00	38.84	60.00	7.14	0.00	0.00	5.33	11.48	
Savannah, GA MSA	66	7.56	3.92	3.03	20.46	12.12	44.90	54.55	30.73	30.30	13.13	12.50	10.26	14.29	13.33	
Valdosta, GA MSA	17	1.95	6.13	0.00	16.28	11.76	52.31	64.71	25.28	23.53	2.33	0.00	0.00	2.84	3.17	
Warner Robins, GA MSA	20	2.29	2.27	0.00	10.53	10.00	61.23	65.00	25.98	25.00	4.52	0.00	7.69	4.26	4.26	
Georgia Non-MSA	60	6.87	1.05	0.00	10.11	3.33	62.85	55.00	25.99	41.67	3.93	0.00	3.92	2.82	6.62	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: GEORGIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Albany, GA MSA	562	1.01	3.26	0.53	24.70	11.74	41.34	30.60	30.70	57.12	10.85	13.04	6.97	9.97	12.63									
Atlanta-Sandy Springs-Marietta, GA MSA	42,857	76.90	2.35	1.34	17.94	11.47	43.69	43.86	36.02	43.33	16.62	18.22	19.48	18.89	14.43									
<b>Limited Review:</b>																								
Athens-Clarke County, GA MSA	1,144	2.05	2.67	3.23	12.20	9.53	44.09	32.08	41.05	55.16	12.91	12.86	15.14	12.48	12.79									
Brunswick, GA MSA	649	1.16	1.92	0.46	17.22	7.86	43.59	27.89	37.27	63.79	11.69	0.00	12.15	11.19	11.99									
Columbus, GA MSA	1,524	2.73	2.69	0.66	13.86	3.67	37.91	24.28	45.54	71.39	15.39	5.88	11.48	15.45	15.77									
Dalton, GA MSA	423	0.76	0.00	0.00	8.92	5.67	79.45	82.27	11.63	12.06	12.21	0.00	10.08	12.45	11.96									
Gainesville, GA MSA	1,011	1.81	0.00	0.00	5.18	2.27	78.96	70.92	15.86	26.81	13.81	0.00	13.79	13.21	15.69									
Hinesville-Ft Stewart, GA MSA	315	0.57	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	9.94	0.00	0.00	9.94	0.00									
Macon, GA MSA	924	1.66	6.34	0.87	12.24	5.19	42.59	35.82	38.84	58.12	12.41	0.00	15.58	11.78	12.90									
Savannah, GA MSA	2,556	4.59	3.92	1.88	20.46	9.86	44.90	48.79	30.73	39.48	14.44	14.81	15.58	15.60	12.94									
Valdosta, GA MSA	649	1.16	6.13	2.16	16.28	5.55	52.31	49.92	25.28	42.37	9.27	9.59	6.33	8.62	10.81									
Warner Robins, GA MSA	907	1.63	2.27	0.22	10.53	5.07	61.23	54.47	25.98	40.24	12.62	4.76	15.03	14.14	10.73									
Georgia Non-MSA	2,209	3.96	1.05	0.09	10.11	3.49	62.85	57.67	25.99	38.75	13.07	2.44	5.93	12.79	14.84									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: GEORGIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Albany, GA MSA	0	0.00	12.77	0.00	30.28	0.00	34.89	0.00	22.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Atlanta-Sandy Springs-Marietta, GA MSA	1	100.00	11.41	0.00	31.17	0.00	31.09	0.00	26.33	100.00	0.69	0.00	0.00	0.00	0.00	3.03								
<b>Limited Review:</b>																								
Athens-Clarke County, GA MSA	0	0.00	29.91	0.00	30.20	0.00	3.94	0.00	35.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Brunswick, GA MSA	0	0.00	6.16	0.00	15.66	0.00	32.55	0.00	45.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Columbus, GA MSA	0	0.00	24.31	0.00	23.72	0.00	22.51	0.00	29.46	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Dalton, GA MSA	0	0.00	0.00	0.00	51.73	0.00	21.53	0.00	26.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Gainesville, GA MSA	0	0.00	0.00	0.00	34.69	0.00	63.49	0.00	1.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Hinesville-Ft Stewart, GA MSA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Macon, GA MSA	0	0.00	13.32	0.00	17.21	0.00	27.34	0.00	42.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Savannah, GA MSA	0	0.00	8.63	0.00	28.75	0.00	34.30	0.00	28.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Valdosta, GA MSA	0	0.00	10.65	0.00	32.98	0.00	33.62	0.00	22.76	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Warner Robins, GA MSA	0	0.00	4.41	0.00	15.54	0.00	79.73	0.00	0.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Georgia Non-MSA	0	0.00	2.19	0.00	10.71	0.00	63.18	0.00	23.92	0.00	0.00	0.00	0.00	0.00	0.00	0.00								

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: GEORGIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans						
<b>Full Review:</b>																
Albany, GA MSA	209	1.24	6.72	7.18	30.65	21.05	32.79	29.67	29.84	42.11	5.20	3.88	4.55	5.34	5.78	
Atlanta-Sandy Springs-Marietta, GA MSA	13,532	80.14	3.59	3.02	17.16	13.35	40.35	35.34	38.91	48.29	6.80	7.25	6.37	6.61	7.04	
<b>Limited Review:</b>																
Athens-Clarke County, GA MSA	274	1.62	11.17	12.41	13.49	8.03	28.60	23.72	46.74	55.84	4.95	4.49	5.28	4.11	5.44	
Brunswick, GA MSA	181	1.07	6.73	4.42	20.48	21.55	30.75	24.86	42.04	49.17	5.13	1.15	5.14	5.82	5.37	
Columbus, GA MSA	154	0.91	6.34	5.19	13.59	7.79	28.99	31.17	51.07	55.84	2.89	0.60	1.47	3.56	3.35	
Dalton, GA MSA	160	0.95	0.00	0.00	25.73	34.38	62.65	53.75	11.63	11.88	5.02	0.00	7.36	4.16	3.96	
Gainesville, GA MSA	419	2.48	0.00	0.00	17.11	22.43	67.86	67.30	15.03	10.26	7.20	0.00	10.54	7.07	3.82	
Hinesville-Ft Stewart, GA MSA	31	0.18	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	6.53	0.00	0.00	6.53	0.00	
Macon, GA MSA	298	1.76	13.36	15.10	12.54	9.40	32.75	29.19	41.36	46.31	4.88	4.19	4.23	5.57	4.93	
Savannah, GA MSA	755	4.47	5.27	3.71	18.08	14.44	46.83	44.77	29.82	37.09	7.44	6.02	7.52	7.08	8.08	
Valdosta, GA MSA	199	1.18	8.18	7.04	22.54	20.10	41.42	41.71	27.85	31.16	5.16	3.33	5.00	5.49	5.35	
Warner Robins, GA MSA	152	0.90	3.37	2.63	14.03	6.58	58.92	61.84	23.68	28.95	6.59	3.70	3.19	6.61	9.04	
Georgia Non-MSA	521	3.09	1.49	1.34	10.77	9.79	61.42	62.00	26.32	26.87	3.59	4.44	2.96	3.48	4.09	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS																
GEOGRAPHY: GEORGIA																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Albany, GA MSA	9	8.18	1.11	0.00	22.25	33.33	52.02	55.56	24.62	11.11	0.67	0.00	0.00	0.83	0.00	
Atlanta-Sandy Springs-Marietta, GA MSA	40	36.36	1.69	0.00	17.57	17.50	49.07	50.00	31.67	32.50	6.36	0.00	2.38	5.88	11.32	
<b>Limited Review:</b>																
Athens-Clarke County, GA MSA	10	9.09	2.47	0.00	5.43	0.00	50.25	80.00	41.85	20.00	4.55	0.00	0.00	4.92	0.00	
Brunswick, GA MSA	3	2.73	2.24	0.00	14.93	0.00	43.28	66.67	39.55	33.33	22.22	0.00	0.00	33.33	0.00	
Columbus, GA MSA	3	2.73	1.47	0.00	12.66	33.33	32.29	66.67	53.58	0.00	4.17	0.00	11.11	0.00	0.00	
Dalton, GA MSA	0	0.00	0.00	0.00	9.88	0.00	80.25	0.00	9.88	0.00	0.00	0.00	0.00	0.00	0.00	
Gainesville, GA MSA	4	3.64	0.00	0.00	6.72	0.00	80.76	100.00	12.52	0.00	11.11	0.00	0.00	11.11	0.00	
Hinesville-Ft Stewart, GA MSA	1	0.91	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Macon, GA MSA	1	0.91	4.87	0.00	5.71	0.00	42.52	0.00	46.89	100.00	4.00	0.00	0.00	0.00	8.33	
Savannah, GA MSA	6	5.45	2.49	0.00	17.72	0.00	49.05	33.33	30.75	66.67	14.29	0.00	0.00	14.29	25.00	
Valdosta, GA MSA	4	3.64	3.39	25.00	21.53	0.00	51.19	75.00	23.90	0.00	1.10	0.00	0.00	1.96	0.00	
Warner Robins, GA MSA	5	4.55	0.93	0.00	12.77	0.00	59.81	20.00	26.48	80.00	7.14	0.00	0.00	0.00	33.33	
Georgia Non-MSA	24	21.82	0.29	0.00	5.21	20.83	71.03	66.67	23.47	12.50	1.11	0.00	5.00	0.97	0.93	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: GEORGIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Albany, GA MSA	333	0.65	24.68	3.36	15.77	21.71	18.73	35.78	40.82	39.14	11.97	9.59	11.81	13.86	11.06	
Atlanta-Sandy Springs-Marietta, GA MSA	40,754	79.22	20.00	19.19	18.13	32.71	22.32	23.51	39.56	24.59	23.01	25.11	26.87	24.69	16.66	
<b>Limited Review:</b>																
Athens-Clarke County, GA MSA	674	1.31	21.70	8.62	17.37	27.93	20.56	25.41	40.37	38.04	17.75	15.98	21.04	19.10	15.74	
Brunswick, GA MSA	348	0.68	22.52	6.09	17.09	27.25	19.20	24.06	41.19	42.61	14.74	5.80	21.05	16.53	12.93	
Columbus, GA MSA	1,043	2.03	20.34	7.71	17.14	24.20	20.66	22.76	41.86	45.32	18.64	16.67	21.04	18.39	17.97	
Dalton, GA MSA	480	0.93	18.65	21.10	18.94	36.50	24.07	24.05	38.34	18.35	18.64	20.30	19.17	18.18	16.14	
Gainesville, GA MSA	887	1.72	18.60	25.06	18.77	32.23	24.32	20.27	38.31	22.44	19.81	26.44	24.02	19.83	12.60	
Hinesville-Ft Stewart, GA MSA	381	0.74	18.74	0.26	18.39	12.11	23.75	43.42	39.12	44.21	16.50	3.45	11.58	18.93	16.47	
Macon, GA MSA	799	1.55	23.52	11.87	15.68	29.92	20.25	29.17	40.55	29.04	18.23	20.21	17.46	19.09	17.53	
Savannah, GA MSA	2,645	5.14	22.13	5.16	16.78	24.78	20.45	33.36	40.65	36.70	21.86	15.45	21.71	24.52	21.23	
Valdosta, GA MSA	507	0.99	22.69	7.52	17.86	24.16	20.17	33.66	39.29	34.65	15.36	13.95	16.54	17.86	13.42	
Warner Robins, GA MSA	1,273	2.47	19.67	15.74	17.94	36.43	24.69	27.93	37.70	19.91	21.89	26.12	23.30	22.64	18.12	
Georgia Non-MSA	1,318	2.56	20.97	3.88	16.13	17.96	20.07	33.03	42.83	45.13	16.34	13.52	18.07	17.61	15.08	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: GEORGIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Albany, GA MSA	11	1.26	24.68	9.09	15.77	9.09	18.73	45.45	40.82	36.36	1.05	2.94	0.00	2.63	0.00	
Atlanta-Sandy Springs-Marietta, GA MSA	589	67.47	20.00	11.07	18.13	21.97	22.32	22.50	39.56	44.46	7.82	6.55	10.41	7.49	7.15	
<b>Limited Review:</b>																
Athens-Clarke County, GA MSA	22	2.52	21.70	9.09	17.37	18.18	20.56	22.73	40.37	50.00	4.97	0.00	3.13	7.14	5.95	
Brunswick, GA MSA	11	1.26	22.52	9.09	17.09	27.27	19.20	36.36	41.19	27.27	3.14	0.00	5.71	2.86	5.00	
Columbus, GA MSA	26	2.98	20.34	7.69	17.14	23.08	20.66	7.69	41.86	61.54	4.93	0.00	7.55	2.35	6.67	
Dalton, GA MSA	9	1.03	18.65	0.00	18.94	0.00	24.07	44.44	38.34	55.56	1.82	0.00	0.00	4.00	3.70	
Gainesville, GA MSA	13	1.49	18.60	7.69	18.77	30.77	24.32	15.38	38.31	46.15	5.00	0.00	7.14	6.67	5.00	
Hinesville-Ft Stewart, GA MSA	4	0.46	18.74	0.00	18.39	25.00	23.75	25.00	39.12	50.00	0.00	0.00	0.00	0.00	0.00	
Macon, GA MSA	25	2.86	23.52	8.00	15.68	16.00	20.25	24.00	40.55	52.00	7.24	6.25	5.88	10.34	6.85	
Savannah, GA MSA	66	7.56	22.13	12.50	16.78	34.38	20.45	17.19	40.65	35.94	14.97	21.74	17.14	11.11	14.55	
Valdosta, GA MSA	17	1.95	22.69	11.76	17.86	0.00	20.17	52.94	39.29	35.29	2.49	0.00	2.17	5.26	2.30	
Warner Robins, GA MSA	20	2.29	19.67	0.00	17.94	25.00	24.69	40.00	37.70	35.00	4.73	0.00	8.33	8.82	3.13	
Georgia Non-MSA	60	6.87	20.97	7.14	16.13	14.29	20.07	23.21	42.83	55.36	3.80	1.41	3.92	5.13	3.81	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance															Geography: Georgia					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Albany, GA MSA	562	1.01	24.68	4.26	15.77	12.37	18.73	24.73	40.82	58.64	11.05	2.90	10.37	11.56	12.06									
Atlanta-Sandy Springs-Marietta, GA MSA	42,857	76.90	20.00	8.58	18.13	19.11	22.32	24.69	39.56	47.62	16.29	21.87	20.97	17.94	13.43									
<b>Limited Review:</b>																								
Athens-Clarke County, GA MSA	1,144	2.05	21.70	6.01	17.37	16.43	20.56	24.05	40.37	53.51	13.86	10.38	15.94	14.08	13.57									
Brunswick, GA MSA	649	1.16	22.52	5.50	17.09	17.98	19.20	21.65	41.19	54.86	11.81	11.32	10.91	15.33	10.68									
Columbus, GA MSA	1,526	2.74	20.34	4.56	17.14	15.43	20.66	24.47	41.86	55.55	18.48	19.72	20.76	21.27	16.78									
Dalton, GA MSA	423	0.76	18.65	5.01	18.94	20.89	24.07	28.13	38.34	45.96	12.86	10.08	12.55	17.41	11.15									
Gainesville, GA MSA	1,011	1.81	18.60	9.00	18.77	19.67	24.32	28.08	38.31	43.25	14.25	19.05	16.96	16.34	11.73									
Hinesville-Ft Stewart, GA MSA	315	0.57	18.74	3.08	18.39	11.45	23.75	25.55	39.12	59.91	13.58	7.41	14.55	16.67	12.78									
Macon, GA MSA	924	1.66	23.52	6.08	15.68	19.77	20.25	26.24	40.55	47.91	13.67	11.19	14.67	16.28	12.56									
Savannah, GA MSA	2,556	4.59	22.13	5.53	16.78	16.67	20.45	26.04	40.65	51.76	17.00	23.04	21.46	19.11	14.67									
Valdosta, GA MSA	649	1.16	22.69	4.80	17.86	13.17	20.17	25.80	39.29	56.23	11.66	9.09	10.66	12.84	11.76									
Warner Robins, GA MSA	907	1.63	19.67	9.34	17.94	24.25	24.69	28.40	37.70	38.00	15.80	19.33	18.47	15.64	14.42									
Georgia Non-MSA	2,209	3.96	20.97	3.16	16.13	11.98	20.07	22.91	42.83	61.95	14.28	9.84	15.30	16.44	13.71									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 21.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: GEORGIA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Albany, GA MSA	209	1.24	68.12	56.94	93.30	3.83	2.87	5.08	7.06
Atlanta-Sandy Springs-Marietta, GA MSA	13,532	80.14	66.86	59.67	90.45	4.33	5.22	6.65	12.09
<b>Limited Review:</b>									
Athens-Clarke County, GA MSA	274	1.62	67.04	69.71	93.80	2.92	3.28	4.77	7.80
Brunswick, GA MSA	181	1.07	67.90	57.46	90.61	3.87	5.52	4.87	6.06
Columbus, GA MSA	154	0.91	66.29	62.99	92.21	2.60	5.19	2.69	3.85
Dalton, GA MSA	160	0.95	65.70	50.00	88.75	1.88	9.38	4.83	4.87
Gainesville, GA MSA	419	2.48	70.68	49.16	84.49	6.68	8.83	6.99	7.39
Hinesville-Ft Stewart, GA MSA	31	0.18	67.36	58.06	96.77	0.00	3.23	6.22	9.23
Macon, GA MSA	298	1.76	66.60	56.71	93.96	1.01	5.03	4.73	8.18
Savannah, GA MSA	755	4.47	66.06	53.77	88.48	4.50	7.02	7.15	12.11
Valdosta, GA MSA	199	1.18	67.70	57.29	88.44	2.51	9.05	5.03	6.24
Warner Robins, GA MSA	152	0.90	67.21	61.84	90.79	3.29	5.92	6.48	9.28
Georgia Non-MSA	521	3.09	68.83	53.93	93.28	2.30	4.41	3.45	3.43

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 25.09% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: GEORGIA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Albany, GA MSA	9	8.18	96.24	77.78	88.89	0.00	11.11	0.67	1.32
Atlanta-Sandy Springs-Marietta, GA MSA	40	36.36	96.76	75.00	100.00	0.00	0.00	6.31	6.21
<b>Limited Review:</b>									
Athens-Clarke County, GA MSA	10	9.09	97.53	90.00	100.00	0.00	0.00	4.41	3.64
Brunswick, GA MSA	3	2.73	97.39	66.67	100.00	0.00	0.00	22.22	25.00
Columbus, GA MSA	3	2.73	95.78	66.67	100.00	0.00	0.00	4.17	4.76
Dalton, GA MSA	0	0.00	97.94	0.00	0.00	0.00	0.00	0.00	0.00
Gainesville, GA MSA	4	3.64	96.91	75.00	100.00	0.00	0.00	11.11	0.00
Hinesville-Ft Stewart, GA MSA	1	0.91	97.65	100.00	100.00	0.00	0.00	0.00	0.00
Macon, GA MSA	1	0.91	97.48	0.00	100.00	0.00	0.00	3.85	0.00
Savannah, GA MSA	6	5.45	97.07	50.00	100.00	0.00	0.00	14.29	20.00
Valdosta, GA MSA	4	3.64	96.44	75.00	100.00	0.00	0.00	1.09	1.54
Warner Robins, GA MSA	5	4.55	98.13	40.00	100.00	0.00	0.00	6.67	0.00
Georgia Non-MSA	24	21.82	97.08	66.67	91.67	8.33	0.00	1.10	0.99

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 22.94% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		GEOGRAPHY: GEORGIA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Albany, GA MSA	2	51	11	284	13	335	0.17	0	0
Atlanta-Sandy Springs-Marietta, GA MSA	84	56,686	221	107,361	305	164,047	85.40	1	13,224
<b>Limited Review:</b>									
Athens-Clarke County, GA MSA	5	1,971	21	1,017	26	2,988	1.56	0	0
Brunswick, GA MSA	2	4,113	17	204	19	4,317	2.25	0	0
Columbus, GA MSA	2	365	9	48	11	413	0.21	0	0
Dalton, GA MSA	1	46	11	343	12	390	0.20	0	0
Gainesville, GA MSA	2	348	12	244	14	591	0.31	0	0
Hinesville-Ft Stewart, GA MSA	0	0	9	66	9	66	0.03	0	0
Macon, GA MSA	6	2,209	24	563	30	2,773	1.44	0	0
Savannah, GA MSA	4	154	27	7,096	31	7,250	3.77	0	0
Valdosta, GA MSA	0	0	10	313	10	313	0.16	0	0
Warner Robins, GA MSA	1	1,095	15	464	16	1,558	0.81	0	0
Georgia Non-MSA	12	3,421	33	892	45	4,313	2.25	0	0
Statewide investments with potential benefit to one or more AAs	0	0	17	360	17	360	0.19	0	0
Statewide investments with no potential to benefit one or more AAs	8	2,198	27	175	35	2,372	1.24	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: GEORGIA																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Albany, GA MSA	0.63	4	2.02	0.00	75.00	0.00	25.00	0	0	0	0	0	0	6.85	33.09	34.85	25.21
Atlanta-Sandy Springs-Marietta, GA MSA	88.96	143	72.22	6.99	18.88	30.07	44.06	2	19	1	-3	-8	-5	5.72	23.65	40.60	29.99
<b>Limited Review:</b>																	
Athens-Clarke County, GA MSA	1.32	4	2.02	25.00	25.00	0.00	50.00	0	1	1	0	0	0	10.77	18.81	33.03	37.40
Brunswick, GA MSA	0.46	3	1.52	33.33	33.33	0.00	33.33	0	0	0	0	0	0	4.45	19.84	43.61	32.10
Columbus, GA MSA	0.08	1	0.51	0.00	0.00	100.00	0.00	0	0	0	0	0	0	8.00	20.60	37.21	33.34
Dalton, GA MSA	0.67	1	0.51	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	16.97	72.06	10.97
Gainesville, GA MSA	0.54	3	1.52	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	13.78	74.17	12.05
Hinesville-Ft Stewart, GA MSA	0.08	1	0.51	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Macon, GA MSA	1.31	9	4.55	22.22	22.22	22.22	33.33	0	0	0	0	0	0	12.80	15.86	38.45	32.89
Savannah, GA MSA	2.82	12	6.06	0.00	41.67	33.33	25.00	0	1	0	0	-1	0	7.65	25.65	41.22	25.48
Valdosta, GA MSA	0.63	3	1.52	0.00	66.67	0.00	33.33	0	0	0	0	0	0	9.13	18.75	52.25	19.87
Warner Robins, GA MSA	0.56	2	1.01	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	3.17	17.62	57.58	21.63
Georgia Non-MSA	1.93	12	6.06	0.00	16.67	75.00	8.33	0	0	0	0	0	0	1.53	11.46	62.63	24.39

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: IDAHO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Boise City-Nampa, ID MSA	56.07	8,882	1,417,196	771	39,299	25	753	0	0	9,678	1,457,248	61.37
<b>Limited Review:</b>												
Coeur d'Alene, ID MSA	12.97	1,839	327,892	391	9,655	8	75	0	0	2,238	337,622	18.40
Idaho Falls, ID MSA	11.49	1,839	278,206	138	4,164	5	63	1	89	1,983	282,522	1.79
Pocatello, ID MSA	4.55	707	97,604	78	4,528	0	0	0	0	785	102,132	1.85
Idaho Non-MSA	14.92	2,194	429,392	359	11,162	22	216	1	5,516	2,576	446,286	16.59

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE																
GEOGRAPHY: IDAHO																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Boise City-Nampa, ID MSA	3,895	64.93	0.81	0.26	16.94	13.58	48.94	49.29	33.31	36.87	12.66	10.26	12.70	12.90	12.37	
<b>Limited Review:</b>																
Coeur d'Alene, ID MSA	605	10.09	0.00	0.00	5.20	4.63	77.44	85.12	17.36	10.25	8.45	0.00	11.11	8.99	4.49	
Idaho Falls, ID MSA	740	12.34	0.00	0.00	10.92	9.32	67.32	73.65	21.76	17.03	14.35	0.00	15.69	15.05	11.48	
Pocatello, ID MSA	220	3.67	0.00	0.00	18.36	25.45	52.28	52.73	29.37	21.82	6.39	0.00	6.82	7.98	4.27	
Idaho Non-MSA	539	8.98	0.00	0.00	6.88	11.69	75.42	69.94	17.70	18.37	9.11	0.00	11.74	9.37	6.90	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT															GEOGRAPHY: IDAHO		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Boise City-Nampa, ID MSA	66	37.29	0.81	0.00	16.94	10.61	48.94	45.45	33.31	43.94	4.99	0.00	8.33	6.22	2.84						
<b>Limited Review:</b>																					
Coeur d'Alene, ID MSA	40	22.60	0.00	0.00	5.20	7.50	77.44	75.00	17.36	17.50	5.92	0.00	0.00	6.98	2.86						
Idaho Falls, ID MSA	16	9.04	0.00	0.00	10.92	12.50	67.32	62.50	21.76	25.00	4.38	0.00	0.00	4.35	5.88						
Pocatello, ID MSA	2	1.13	0.00	0.00	18.36	0.00	52.28	0.00	29.37	100.00	1.11	0.00	0.00	0.00	2.27						
Idaho Non-MSA	53	29.94	0.00	0.00	6.88	5.66	75.42	77.36	17.70	16.98	8.06	0.00	10.00	7.25	10.71						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: IDAHO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Boise City-Nampa, ID MSA	4,921	53.00	0.81	0.18	16.94	12.48	48.94	46.05	33.31	41.29	14.69	23.08	19.41	15.81	12.77									
<b>Limited Review:</b>																								
Coeur d'Alene, ID MSA	1,194	12.86	0.00	0.00	5.20	2.85	77.44	80.90	17.36	16.25	10.33	0.00	12.61	10.88	7.92									
Idaho Falls, ID MSA	1,083	11.66	0.00	0.00	10.92	5.91	67.32	74.15	21.76	19.94	11.25	0.00	13.33	12.04	8.74									
Pocatello, ID MSA	485	5.22	0.00	0.00	18.36	12.78	52.28	51.55	29.37	35.67	7.40	0.00	6.01	8.63	6.55									
Idaho Non-MSA	1,602	17.25	0.00	0.00	6.88	7.05	75.42	66.79	17.70	26.15	14.26	0.00	17.58	13.66	15.18									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: IDAHO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Boise City-Nampa, ID MSA	0	0.00	1.79	0.00	38.62	0.00	32.77	0.00	26.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
<b>Limited Review:</b>																								
Coeur d'Alene, ID MSA	0	0.00	0.00	0.00	24.85	0.00	61.21	0.00	13.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Idaho Falls, ID MSA	0	0.00	0.00	0.00	36.24	0.00	53.48	0.00	10.29	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Pocatello, ID MSA	0	0.00	0.00	0.00	48.34	0.00	43.72	0.00	7.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Idaho Non-MSA	0	0.00	0.00	0.00	10.37	0.00	52.63	0.00	37.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: IDAHO		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*														
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp										
<b>Full Review:</b>																									
Boise City-Nampa, ID MSA	771	44.39	0.71	0.65	20.82	23.22	42.52	38.00	35.96	38.13	2.67	1.33	2.88	2.70	2.56										
<b>Limited Review:</b>																									
Coeur d'Alene, ID MSA	391	22.51	0.00	0.00	12.55	10.49	74.13	71.87	13.32	17.65	5.46	0.00	4.82	5.27	6.89										
Idaho Falls, ID MSA	138	7.94	0.00	0.00	15.82	12.32	61.96	57.97	22.22	29.71	2.46	0.00	2.06	2.10	3.57										
Pocatello, ID MSA	78	4.49	0.00	0.00	28.09	25.64	46.33	42.31	25.59	32.05	2.23	0.00	2.33	2.24	2.08										
Idaho Non-MSA	359	20.67	0.00	0.00	8.89	6.41	67.67	58.77	23.44	34.82	3.40	0.00	2.42	3.13	4.44										

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: IDAHO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Boise City-Nampa, ID MSA	25	41.67	0.28	0.00	19.50	28.00	58.09	56.00	22.13	16.00	2.77	0.00	2.78	2.82	2.50									
<b>Limited Review:</b>																								
Coeur d'Alene, ID MSA	8	13.33	0.00	0.00	5.45	0.00	80.00	87.50	14.55	12.50	7.89	0.00	0.00	9.68	0.00									
Idaho Falls, ID MSA	5	8.33	0.00	0.00	5.05	0.00	79.95	100.00	15.01	0.00	0.29	0.00	0.00	0.30	0.00									
Pocatello, ID MSA	0	0.00	0.00	0.00	7.66	0.00	73.78	0.00	18.56	0.00	0.00	0.00	0.00	0.00	0.00									
Idaho Non-MSA	22	36.67	0.00	0.00	8.91	4.55	74.35	95.45	16.74	0.00	1.32	0.00	0.00	1.56	0.00									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: IDAHO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Boise City-Nampa, ID MSA	3,895	64.93	17.91	17.60	19.17	26.93	23.63	24.99	39.29	30.48	14.17	12.49	14.34	15.58	13.93		
<b>Limited Review:</b>																	
Coeur d'Alene, ID MSA	605	10.09	17.20	8.68	19.03	26.71	25.04	32.05	38.73	32.55	9.42	10.65	9.66	10.77	7.89		
Idaho Falls, ID MSA	740	12.34	18.07	13.41	18.91	34.28	23.84	29.54	39.18	22.76	16.49	15.98	19.17	18.44	12.64		
Pocatello, ID MSA	220	3.67	19.76	14.55	18.53	29.55	22.10	25.91	39.62	30.00	7.85	6.21	10.76	6.14	7.30		
Idaho Non-MSA	539	8.98	18.11	7.92	18.75	25.28	23.26	25.09	39.88	41.70	10.18	10.64	11.13	10.26	9.43		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: IDAHO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Boise City-Nampa, ID MSA	66	37.29	17.91	7.81	19.17	28.13	23.63	28.13	39.29	35.94	5.04	4.76	6.02	2.70	6.21	
<b>Limited Review:</b>																
Coeur d'Alene, ID MSA	40	22.60	17.20	10.26	19.03	23.08	25.04	30.77	38.73	35.90	6.21	16.67	5.71	5.88	4.76	
Idaho Falls, ID MSA	16	9.04	18.07	6.25	18.91	18.75	23.84	37.50	39.18	37.50	4.67	9.09	8.70	6.06	2.41	
Pocatello, ID MSA	2	1.13	19.76	0.00	18.53	0.00	22.10	100.00	39.62	0.00	1.19	0.00	0.00	4.17	0.00	
Idaho Non-MSA	53	29.94	18.11	5.66	18.75	15.09	23.26	37.74	39.88	41.51	8.38	0.00	9.09	12.20	7.50	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Idaho					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Boise City-Nampa, ID MSA	4,921	53.00	17.91	11.80	19.17	19.76	23.63	26.95	39.29	41.49	14.13	16.59	14.97	15.73	12.63	
<b>Limited Review:</b>																
Coeur d'Alene, ID MSA	1,194	12.86	17.20	8.98	19.03	21.43	25.04	28.67	38.73	40.93	10.82	15.52	12.90	11.21	9.21	
Idaho Falls, ID MSA	1,083	11.66	18.07	9.46	18.91	23.20	23.84	30.74	39.18	36.60	12.08	15.73	16.85	13.53	8.96	
Pocatello, ID MSA	485	5.22	19.76	7.20	18.53	20.82	22.10	31.88	39.62	40.10	6.90	6.61	8.19	6.59	6.64	
Idaho Non-MSA	1,602	17.25	18.11	7.37	18.75	15.03	23.26	24.91	39.88	52.69	14.91	22.67	16.74	15.60	13.42	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 20.8% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: IDAHO			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Boise City-Nampa, ID MSA	771	44.39	72.58	56.55	90.79	3.37	5.84	2.57	3.15
<b>Limited Review:</b>									
Coeur d'Alene, ID MSA	391	22.51	73.57	61.13	95.14	2.81	2.05	5.10	5.94
Idaho Falls, ID MSA	138	7.94	71.62	55.80	96.38	1.45	2.17	2.29	2.52
Pocatello, ID MSA	78	4.49	69.75	64.10	91.03	2.56	6.41	2.06	3.37
Idaho Non-MSA	359	20.67	72.10	57.10	95.26	1.67	3.06	2.88	3.12

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 23.03% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: IDAHO			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Boise City-Nampa, ID MSA	25	41.67	96.53	56.00	92.00	8.00	0.00	2.65	1.24
<b>Limited Review:</b>									
Coeur d'Alene, ID MSA	8	13.33	97.98	62.50	100.00	0.00	0.00	6.98	7.14
Idaho Falls, ID MSA	5	8.33	95.22	80.00	100.00	0.00	0.00	0.28	0.00
Pocatello, ID MSA	0	0.00	95.82	0.00	0.00	0.00	0.00	0.00	0.00
Idaho Non-MSA	22	36.67	95.35	68.18	100.00	0.00	0.00	1.27	1.03

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 20.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: IDAHO									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Boise City-Nampa, ID MSA	11	1,800	60	2,295	71	4,095	29.75	0	0
<b>Limited Review:</b>									
Coeur d'Alene, ID MSA	6	444	16	1,167	22	1,611	11.70	0	0
Idaho Falls, ID MSA	1	204	7	105	8	309	2.25	0	0
Pocatello, ID MSA	0	0	6	95	6	95	0.69	0	0
Idaho Non-MSA	4	6,269	31	1,111	35	7,380	53.60	0	0
Statewide investments with potential benefit to one or more AAs	0	0	16	95	16	95	0.69	0	0
Statewide investments with no potential to benefit one or more AAs	3	150	16	33	19	182	1.32	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: IDAHO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population						
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review:</b>																		
Boise City-Nampa, ID MSA	61.37	6	28.57	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0	1.56	20.97	47.20	30.27
<b>Limited Review:</b>																		
Coeur d'Alene, ID MSA	18.40	5	23.81	0.00	20.00	80.00	0.00	0	0	0	0	0	0	0.00	7.82	76.03	16.15	
Idaho Falls, ID MSA	1.79	1	4.76	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	13.54	66.55	19.91	
Pocatello, ID MSA	1.85	1	4.76	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	21.77	51.13	27.10	
Idaho Non-MSA	16.59	8	38.10	0.00	12.50	62.50	25.00	0	0	0	0	0	0	0.00	8.48	74.09	17.42	

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: ILLINOIS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Chicago-Joliet-Naperville, IL MD	86.96	98,979	21,434,176	11,363	888,878	31	644	35	150,650	110,408	22,474,348	95.80
<b>Limited Review:</b>												
Lake County-Kenosha County, IL MD	9.18	10,544	2,457,508	1,105	66,255	3	30	1	165	11,653	2,523,958	2.80
Rockford, IL MSA	2.93	3,452	430,768	266	8,485	3	34	0	0	3,721	439,287	0.13
Illinois Non-MSA	0.95	775	78,724	367	12,732	61	3,712	0	0	1,203	95,168	1.26

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: ILLINOIS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Chicago-Joliet-Naperville, IL MD	100.00	4	51,581	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	95.80
<b>Limited Review:</b>														
Lake County-Kenosha County, IL MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.80
Rockford, IL MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.13
Illinois Non-MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.26

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: ILLINOIS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Chicago-Joliet-Naperville, IL MD	27,586	86.28	2.59	3.12	15.03	13.97	45.23	45.07	37.15	37.84	13.31	16.43	15.02	14.51	11.42	
<b>Limited Review:</b>																
Lake County-Kenosha County, IL MD	2,862	8.95	1.19	0.56	16.35	17.02	36.62	47.20	45.84	35.22	15.07	17.50	19.67	16.75	11.93	
Rockford, IL MSA	1,254	3.92	1.40	0.88	14.80	11.48	59.49	66.11	24.30	21.53	12.78	9.52	16.58	14.11	9.15	
Illinois Non-MSA	272	0.85	0.00	0.00	15.55	17.65	77.63	70.59	6.81	11.76	4.38	0.00	7.84	3.55	7.14	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: ILLINOIS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	1,106	86.27	2.59	2.53	15.03	12.21	45.23	35.99	37.15	49.28	8.77	5.56	7.09	7.55	10.75
<b>Limited Review:</b>															
Lake County-Kenosha County, IL MD	132	10.30	1.19	0.76	16.35	9.09	36.62	26.52	45.84	63.64	9.16	0.00	10.71	5.96	11.63
Rockford, IL MSA	21	1.64	1.40	0.00	14.80	14.29	59.49	57.14	24.30	28.57	1.58	0.00	1.08	1.67	1.69
Illinois Non-MSA	23	1.79	0.00	0.00	15.55	17.39	77.63	78.26	6.81	4.35	2.24	0.00	5.26	2.15	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: ILLINOIS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	70,193	87.30	2.59	1.95	15.03	10.21	45.23	38.78	37.15	49.05	11.57	13.94	15.61	12.97	10.19
<b>Limited Review:</b>															
Lake County-Kenosha County, IL MD	7,550	9.39	1.19	0.49	16.35	8.98	36.62	36.48	45.84	54.05	10.92	16.67	15.67	11.87	10.01
Rockford, IL MSA	2,177	2.71	1.40	0.23	14.80	8.13	59.49	62.15	24.30	29.49	7.97	9.68	10.93	8.85	6.45
Illinois Non-MSA	480	0.60	0.00	0.00	15.55	11.25	77.63	78.75	6.81	10.00	4.50	0.00	8.19	4.73	1.59

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: ILLINOIS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Chicago-Joliet-Naperville, IL MD	15	100.00	12.02	33.33	24.02	66.67	35.72	0.00	28.23	0.00	1.12	3.13	2.02	0.00	0.00									
<b>Limited Review:</b>																								
Lake County-Kenosha County, IL MD	0	0.00	6.09	0.00	34.70	0.00	36.12	0.00	23.10	0.00	0.00	0.00	0.00	0.00	0.00									
Rockford, IL MSA	0	0.00	10.01	0.00	25.92	0.00	53.34	0.00	10.74	0.00	0.00	0.00	0.00	0.00	0.00									
Illinois Non-MSA	0	0.00	0.00	0.00	30.56	0.00	58.90	0.00	10.53	0.00	0.00	0.00	0.00	0.00	0.00									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: ILLINOIS		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Chicago-Joliet-Naperville, IL MD	11,363	86.73	3.47	2.29	13.54	10.55	38.42	39.10	44.57	48.06	3.61	4.38	3.42	3.73	3.54						
<b>Limited Review:</b>																					
Lake County-Kenosha County, IL MD	1,105	8.43	0.86	0.45	12.94	8.51	32.41	28.60	53.80	62.44	3.15	1.64	3.02	3.00	3.25						
Rockford, IL MSA	266	2.03	3.25	1.50	13.87	11.28	55.53	48.87	27.35	38.35	3.67	2.44	2.84	3.12	5.26						
Illinois Non-MSA	367	2.80	0.00	0.00	19.16	21.53	74.28	72.48	6.56	5.99	5.37	0.00	6.28	5.26	4.08						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: ILLINOIS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Chicago-Joliet-Naperville, IL MD	31	31.63	1.32	0.00	8.70	9.68	51.50	51.61	38.49	38.71	1.14	0.00	4.76	0.54	3.08									
<b>Limited Review:</b>																								
Lake County-Kenosha County, IL MD	3	3.06	1.05	0.00	19.04	0.00	39.66	33.33	40.25	66.67	2.50	0.00	0.00	0.00	9.09									
Rockford, IL MSA	3	3.06	0.19	0.00	7.07	0.00	60.27	100.00	32.47	0.00	0.99	0.00	0.00	1.59	0.00									
Illinois Non-MSA	61	62.24	0.00	0.00	4.59	1.64	92.39	98.36	3.01	0.00	4.07	0.00	0.00	4.23	0.00									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: ILLINOIS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Chicago-Joliet-Naperville, IL MD	27,625	86.29	20.85	12.78	17.60	30.35	22.09	28.05	39.45	28.81	14.85	17.20	17.62	16.29	11.25	
<b>Limited Review:</b>																
Lake County-Kenosha County, IL MD	2,862	8.94	17.00	21.66	17.25	28.67	22.01	20.92	43.75	28.74	16.97	20.80	20.41	17.46	12.78	
Rockford, IL MSA	1,254	3.92	18.51	22.06	18.84	34.31	24.28	27.86	38.36	15.77	15.01	20.16	16.37	14.88	9.52	
Illinois Non-MSA	272	0.85	19.65	17.04	19.95	30.00	24.41	27.41	35.99	25.56	4.57	5.62	4.86	4.38	3.99	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: ILLINOIS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Chicago-Joliet-Naperville, IL MD	1,107	86.28	20.85	8.09	17.60	19.39	22.09	27.30	39.45	45.22	9.43	7.13	8.09	10.10	10.29	
<b>Limited Review:</b>																
Lake County-Kenosha County, IL MD	132	10.29	17.00	3.85	17.25	14.62	22.01	37.69	43.75	43.85	10.00	2.22	7.41	15.27	9.71	
Rockford, IL MSA	21	1.64	18.51	10.00	18.84	25.00	24.28	30.00	38.36	35.00	2.89	2.00	2.06	5.00	2.52	
Illinois Non-MSA	23	1.79	19.65	21.74	19.95	13.04	24.41	13.04	35.99	52.17	2.40	10.26	1.45	2.00	1.20	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Illinois					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Chicago-Joliet-Naperville, IL MD	70,232	87.31	20.85	7.61	17.60	18.17	22.09	26.91	39.45	47.30	12.26	18.22	15.33	13.75	10.56	
<b>Limited Review:</b>																
Lake County-Kenosha County, IL MD	7,550	9.39	17.00	7.12	17.25	15.96	22.01	26.88	43.75	50.05	11.64	16.06	14.13	13.01	10.23	
Rockford, IL MSA	2,177	2.71	18.51	10.90	18.84	25.87	24.28	30.88	38.36	32.35	6.98	10.47	8.84	6.81	5.62	
Illinois Non-MSA	480	0.60	19.65	7.86	19.95	20.64	24.41	28.26	35.99	43.24	4.46	7.05	5.26	5.61	3.38	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.9% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: ILLINOIS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Chicago-Joliet-Naperville, IL MD	11,363	86.73	65.12	54.28	83.19	7.04	9.77	3.56	6.76
<b>Limited Review:</b>									
Lake County-Kenosha County, IL MD	1,105	8.43	66.77	57.10	87.60	4.80	7.60	3.09	5.53
Rockford, IL MSA	266	2.03	68.26	62.41	94.36	1.13	4.51	3.60	4.66
Illinois Non-MSA	367	2.80	68.04	58.31	91.55	5.18	3.27	5.16	6.29

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 23.15% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: ILLINOIS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Chicago-Joliet-Naperville, IL MD	31	31.63	95.32	74.19	96.77	0.00	3.23	1.12	1.00
<b>Limited Review:</b>									
Lake County-Kenosha County, IL MD	3	3.06	93.93	33.33	100.00	0.00	0.00	2.44	0.00
Rockford, IL MSA	3	3.06	97.61	100.00	100.00	0.00	0.00	0.99	1.39
Illinois Non-MSA	61	62.24	98.93	47.54	85.25	9.84	4.92	4.05	3.70

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 36.08% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: ILLINOIS									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Chicago-Joliet-Naperville, IL MD	117	114,499	522	208,212	639	322,711	92.08	8	68,441
<b>Limited Review:</b>									
Lake County-Kenosha County, IL MD	6	500	50	1,889	56	2,389	0.68	0	0
Rockford, IL MSA	4	120	14	191	18	311	0.09	0	0
Illinois Non-MSA	5	1,736	14	597	19	2,333	0.67	0	0
Statewide investments with potential benefit to one or more AAs	0	0	22	244	22	244	0.07	0	0
Statewide investments with no potential to benefit one or more AAs	28	22,146	22	326	50	22,472	6.41	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: ILLINOIS																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Chicago-Joliet-Naperville, IL MD	95.80	164	86.77	5.49	18.29	31.10	45.12	3	17	0	1	-5	-10	8.00	23.35	39.50	29.15
<b>Limited Review:</b>																	
Lake County-Kenosha County, IL MD	2.80	13	6.88	0.00	7.69	30.77	61.54	1	3	0	1	-1	-2	2.76	24.34	33.68	39.23
Rockford, IL MSA	0.13	1	0.53	0.00	0.00	0.00	100.00	0	0	0	0	0	0	3.72	19.51	55.62	21.15
Illinois Non-MSA	1.26	11	5.82	0.00	36.36	54.55	9.09	0	0	0	0	0	0	0.00	17.90	75.95	6.15

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: INDIANA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Elkhart-Goshen, IN MSA	100.00	929	114,644	163	10,928	1	13	0	0	1,093	125,585	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															
GEOGRAPHY: INDIANA															
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Elkhart-Goshen, IN MSA	289	100.00	0.06	0.00	2.92	1.73	90.58	87.89	6.44	10.38	4.52	0.00	7.14	4.45	4.91

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: INDIANA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Elkhart-Goshen, IN MSA	9	100.00	0.06	0.00	2.92	22.22	90.58	77.78	6.44	0.00	1.27	0.00	20.00	0.69	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: INDIANA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Elkhart-Goshen, IN MSA	631	100.00	0.06	0.00	2.92	1.90	90.58	89.86	6.44	8.24	6.38	0.00	25.00	6.10	7.27									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: INDIANA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Elkhart-Goshen, IN MSA	0	0.00	2.97	0.00	7.24	0.00	85.35	0.00	4.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00								

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: INDIANA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Elkhart-Goshen, IN MSA	163	100.00	3.36	0.61	3.96	7.36	87.64	87.12	5.04	4.91	3.25	1.14	5.88	3.24	3.85						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: INDIANA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Elkhart-Goshen, IN MSA	1	100.00	0.37	0.00	0.87	0.00	97.01	100.00	1.74	0.00	0.00	0.00	0.00	0.00	0.00									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase															Geography: Indiana					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Elkhart-Goshen, IN MSA	289	100.00	16.23	14.34	19.39	34.62	27.07	31.12	37.31	19.93	5.50	5.64	5.77	4.91	5.59									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: INDIANA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families* **	% BANK Loans****	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Elkhart-Goshen, IN MSA	9	100.00	16.23	37.50	19.39	37.50	27.07	25.00	37.31	0.00	1.39	5.56	3.33	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 11.1% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Indiana				Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****					
<b>Full Review:</b>															
Elkhart-Goshen, IN MSA	631	100.00	16.23	7.60	19.39	20.53	27.07	30.60	37.31	41.27	5.91	8.96	7.38	6.51	4.05

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 22.8% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: INDIANA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Elkhart-Goshen, IN MSA	163	100.00	67.38	49.69	85.28	6.13	8.59	3.02	4.36

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 27.78% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: INDIANA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Elkhart-Goshen, IN MSA	1	100.00	98.88	100.00	100.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: INDIANA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Elkhart-Goshen, IN MSA	3	146	8	256	11	401	1.25	0	0
Statewide investments with potential benefit to one or more AAs	0	0	6	15	6	15	0.05	0	0
Statewide investments with no potential to benefit one or more AAs	43	31,461	15	115	58	31,576	98.70	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		
GEOGRAPHY: INDIANA																		
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																		
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review:</b>																		
Elkhart-Goshen, IN MSA	100.00	1	100.00	0.00	100.0	0.00	0.00	0	1	0	0	-1	0	0.45	6.06	88.14	5.36	

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: IOWA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Des Moines-West Des Moines, IA MSA	83.76	7,073	1,096,715	675	15,183	16	357	1	6,141	7,765	1,118,396	94.70
<b>Limited Review:</b>												
Sioux City, IA MSA	4.83	364	40,046	80	649	4	37	0	0	448	40,732	0.44
Iowa Non-MSA	11.41	776	79,705	201	4,997	81	5,599	0	0	1,058	90,301	4.86

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: IOWA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Des Moines-West Des Moines, IA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	94.70
<b>Limited Review:</b>														
Sioux City, IA MSA	50.00	1	4,648	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.44
Iowa Non-MSA	50.00	1	4,759	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4.86

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															
GEOGRAPHY: IOWA															
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Des Moines-West Des Moines, IA MSA	2,725	86.43	1.68	0.81	19.27	11.85	54.63	50.86	24.42	36.48	11.38	10.58	13.81	11.49	10.62
<b>Limited Review:</b>															
Sioux City, IA MSA	146	4.63	0.00	0.00	12.81	7.53	54.83	49.32	32.35	43.15	5.75	0.00	4.55	5.25	6.56
Iowa Non-MSA	282	8.94	0.00	0.00	0.48	0.35	96.33	96.45	3.19	3.19	11.97	0.00	0.00	12.38	7.27

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT															GEOGRAPHY: IOWA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Des Moines-West Des Moines, IA MSA	92	77.31	1.68	0.00	19.27	8.70	54.63	53.26	24.42	38.04	2.74	0.00	1.84	3.11	2.56						
<b>Limited Review:</b>																					
Sioux City, IA MSA	6	5.04	0.00	0.00	12.81	16.67	54.83	33.33	32.35	50.00	0.88	0.00	0.00	1.09	0.83						
Iowa Non-MSA	21	17.65	0.00	0.00	0.48	0.00	96.33	95.24	3.19	4.76	2.11	0.00	0.00	2.29	0.00						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: IOWA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Des Moines-West Des Moines, IA MSA	4,256	86.14	1.68	0.73	19.27	9.75	54.63	50.28	24.42	39.24	8.96	10.14	13.90	9.19	7.98						
<b>Limited Review:</b>																					
Sioux City, IA MSA	212	4.29	0.00	0.00	12.81	8.02	54.83	51.42	32.35	40.57	4.73	0.00	9.09	5.41	3.78						
Iowa Non-MSA	473	9.57	0.00	0.00	0.48	0.21	96.33	97.04	3.19	2.75	10.13	0.00	0.00	10.33	7.23						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: IOWA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Des Moines-West Des Moines, IA MSA	0	0.00	13.23	0.00	16.06	0.00	47.62	0.00	23.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
<b>Limited Review:</b>																								
Sioux City, IA MSA	0	0.00	0.07	0.00	28.29	0.00	47.97	0.00	23.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Iowa Non-MSA	0	0.00	0.00	0.00	7.18	0.00	89.32	0.00	3.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: IOWA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Des Moines-West Des Moines, IA MSA	675	70.61	8.44	6.22	11.19	11.85	49.00	42.81	31.37	39.11	3.04	3.22	4.38	2.69	3.12						
<b>Limited Review:</b>																					
Sioux City, IA MSA	80	8.37	2.16	6.25	23.87	25.00	41.97	36.25	32.00	32.50	3.25	9.76	3.23	3.20	2.56						
Iowa Non-MSA	201	21.03	0.00	0.00	4.51	7.96	93.57	87.56	1.92	4.48	4.51	0.00	4.90	4.42	6.90						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: IOWA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Des Moines-West Des Moines, IA MSA	16	15.84	0.88	0.00	12.53	0.00	65.20	81.25	21.39	18.75	2.68	0.00	0.00	3.11	2.00									
<b>Limited Review:</b>																								
Sioux City, IA MSA	4	3.96	0.13	0.00	3.94	0.00	75.72	100.00	20.21	0.00	1.49	0.00	0.00	2.00	0.00									
Iowa Non-MSA	81	80.20	0.00	0.00	0.65	0.00	98.39	100.00	0.96	0.00	6.87	0.00	0.00	6.91	0.00									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase																
GEOGRAPHY: IOWA																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Des Moines-West Des Moines, IA MSA	2,725	86.43	17.62	22.66	19.08	33.74	25.40	25.64	37.90	17.95	12.93	15.92	14.35	14.16	8.50	
<b>Limited Review:</b>																
Sioux City, IA MSA	146	4.63	17.63	19.86	19.20	31.51	24.42	29.45	38.75	19.18	6.86	7.01	6.94	7.83	5.74	
Iowa Non-MSA	282	8.94	17.30	29.54	19.03	35.23	26.15	19.22	37.52	16.01	14.61	28.23	14.97	13.77	7.69	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: IOWA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Des Moines-West Des Moines, IA MSA	92	77.31	17.62	15.38	19.08	19.78	25.40	30.77	37.90	34.07	2.82	3.41	1.67	2.67	3.34	
<b>Limited Review:</b>																
Sioux City, IA MSA	6	5.04	17.63	16.67	19.20	33.33	24.42	33.33	38.75	16.67	0.96	0.00	1.61	2.25	0.00	
Iowa Non-MSA	21	17.65	17.30	4.76	19.03	19.05	26.15	28.57	37.52	47.62	2.21	0.00	2.94	2.27	2.22	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Iowa				Evaluation Period: April 1, 2009 to December 31, 2011									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Des Moines-West Des Moines, IA MSA	4,256	86.14	17.62	11.19	19.08	25.27	25.40	29.28	37.90	34.25	9.37	12.75	11.83	10.41	7.25
<b>Limited Review:</b>															
Sioux City, IA MSA	212	4.29	17.63	10.15	19.20	23.35	24.42	32.49	38.75	34.01	5.26	6.15	7.27	6.29	3.71
Iowa Non-MSA	473	9.57	17.30	12.11	19.03	24.23	26.15	30.64	37.52	33.02	10.08	16.38	14.58	12.09	6.24

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.3% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: IOWA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Des Moines-West Des Moines, IA MSA	675	70.61	66.83	58.52	94.96	3.70	1.33	2.92	2.99
<b>Limited Review:</b>									
Sioux City, IA MSA	80	8.37	66.93	58.75	100.00	0.00	0.00	3.04	3.29
Iowa Non-MSA	201	21.03	69.55	53.73	95.52	1.99	2.49	4.29	5.14

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 26.61% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: IOWA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Des Moines-West Des Moines, IA MSA	16	15.84	97.96	87.50	93.75	6.25	0.00	2.61	2.70
<b>Limited Review:</b>									
Sioux City, IA MSA	4	3.96	98.29	100.00	100.00	0.00	0.00	1.45	2.27
Iowa Non-MSA	81	80.20	98.96	14.81	75.31	23.46	1.23	6.85	8.75

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 68.32% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: IOWA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Des Moines-West Des Moines, IA MSA	23	2,752	70	9,697	93	12,449	69.27	0	0
<b>Limited Review:</b>									
Sioux City, IA MSA	5	1,336	9	62	14	1,398	7.78	0	0
Iowa Non-MSA	1	69	13	379	14	448	2.49	0	0
Statewide investments with potential benefit to one or more AAs	0	0	6	103	6	103	0.57	0	0
Statewide investments with no potential to benefit one or more AAs	24	3,157	11	417	35	3,573	19.88	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: IOWA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Des Moines-West Des Moines, IA MSA	94.70	6	46.15	16.67	16.67	50.00	16.67	0	1	0	-1	0	0	4.23	20.52	52.31	22.94
<b>Limited Review:</b>																	
Sioux City, IA MSA	0.44	1	7.69	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.05	19.36	52.57	28.01
Iowa Non-MSA	4.86	6	46.15	0.00	16.67	83.33	0.00	0	1	0	0	-1	0	0.00	1.23	95.93	2.85

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: KANSAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Wichita, KS MSA	48.65	7,329	945,304	962	54,193	29	1,141	0	0	8,320	1,000,638	54.94
<b>Limited Review:</b>												
Lawrence, KS MSA	11.60	1,856	298,113	122	2,621	6	199	0	0	1,984	300,933	1.67
Manhattan, KS MSA	3.74	544	79,708	89	1,532	6	38	0	0	639	81,278	0.31
Topeka, KS MSA	19.57	3,107	360,637	236	4,790	4	23	0	0	3,347	365,450	26.19
Kansas Non-MSA	16.43	2,141	231,505	533	17,751	136	11,480	0	0	2,810	260,736	16.89

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: KANSAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Wichita, KS MSA	3,208	46.82	1.09	0.25	18.00	14.00	54.42	49.41	26.49	36.35	12.94	12.50	14.32	12.84	12.57	
<b>Limited Review:</b>																
Lawrence, KS MSA	743	10.84	0.11	0.13	19.97	18.57	49.84	47.11	30.08	34.19	19.20	20.00	15.77	20.51	19.58	
Manhattan, KS MSA	276	4.03	0.00	0.00	15.01	46.74	59.82	38.77	25.17	14.49	5.23	0.00	11.09	4.11	2.98	
Topeka, KS MSA	1,673	24.42	0.47	0.12	17.32	12.73	55.66	50.69	26.54	36.46	20.86	0.00	23.06	18.47	23.75	
Kansas Non-MSA	952	13.89	0.00	0.00	11.28	9.87	64.90	59.87	23.82	30.25	10.76	0.00	11.75	10.43	11.14	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT			GEOGRAPHY: KANSAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Wichita, KS MSA	106	52.22	1.09	1.89	18.00	8.49	54.42	50.00	26.49	39.62	2.78	8.70	1.69	2.40	3.52	
<b>Limited Review:</b>																
Lawrence, KS MSA	17	8.37	0.11	0.00	19.97	11.76	49.84	47.06	30.08	41.18	5.98	0.00	7.14	4.17	7.27	
Manhattan, KS MSA	4	1.97	0.00	0.00	15.01	0.00	59.82	100.00	25.17	0.00	0.40	0.00	0.00	0.65	0.00	
Topeka, KS MSA	39	19.21	0.47	2.56	17.32	7.69	55.66	66.67	26.54	23.08	3.31	100.00	1.61	4.24	1.61	
Kansas Non-MSA	37	18.23	0.00	0.00	11.28	2.70	64.90	78.38	23.82	18.92	2.51	0.00	0.00	3.56	0.74	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: KANSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Wichita, KS MSA	4,015	50.68	1.09	0.20	18.00	7.47	54.42	51.11	26.49	41.22	11.68	9.09	11.46	12.15	11.21									
<b>Limited Review:</b>																								
Lawrence, KS MSA	1,096	13.83	0.11	0.00	19.97	11.50	49.84	46.17	30.08	42.34	15.43	0.00	13.83	15.41	15.85									
Manhattan, KS MSA	264	3.33	0.00	0.00	15.01	17.80	59.82	54.55	25.17	27.65	3.76	0.00	5.76	3.73	3.01									
Topeka, KS MSA	1,395	17.61	0.47	0.07	17.32	9.03	55.66	51.83	26.54	39.07	12.38	0.00	14.17	12.30	12.19									
Kansas Non-MSA	1,152	14.54	0.00	0.00	11.28	4.51	64.90	60.85	23.82	34.64	9.68	0.00	8.47	9.75	9.75									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: KANSAS		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Wichita, KS MSA	0	0.00	3.99	0.00	31.16	0.00	45.20	0.00	19.65	0.00	0.00	0.00	0.00	0.00	0.00						
<b>Limited Review:</b>																					
Lawrence, KS MSA	0	0.00	10.24	0.00	34.66	0.00	37.90	0.00	17.20	0.00	0.00	0.00	0.00	0.00	0.00						
Manhattan, KS MSA	0	0.00	0.00	0.00	33.58	0.00	46.91	0.00	19.50	0.00	0.00	0.00	0.00	0.00	0.00						
Topeka, KS MSA	0	0.00	5.27	0.00	21.88	0.00	53.93	0.00	18.92	0.00	0.00	0.00	0.00	0.00	0.00						
Kansas Non-MSA	0	0.00	0.00	0.00	11.70	0.00	57.24	0.00	31.06	0.00	0.00	0.00	0.00	0.00	0.00						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: KANSAS		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Wichita, KS MSA	962	49.54	1.56	2.49	20.31	20.48	48.98	44.59	29.14	32.43	5.54	7.64	4.41	6.27	5.23						
<b>Limited Review:</b>																					
Lawrence, KS MSA	122	6.28	2.14	0.00	24.42	22.95	43.29	40.98	30.15	36.07	2.46	0.00	3.06	1.71	2.97						
Manhattan, KS MSA	89	4.58	0.00	0.00	25.65	15.73	54.08	61.80	20.27	22.47	2.07	0.00	1.75	2.50	1.27						
Topeka, KS MSA	236	12.15	8.08	6.36	13.82	17.37	53.61	47.88	24.48	28.39	4.07	2.30	6.36	4.55	2.73						
Kansas Non-MSA	533	27.45	0.00	0.00	13.27	12.57	64.31	65.48	22.42	21.95	5.16	0.00	5.61	5.24	4.70						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: KANSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Wichita, KS MSA	29	16.02	0.51	0.00	6.54	0.00	69.39	75.86	23.56	24.14	3.27	0.00	0.00	3.04	5.26									
<b>Limited Review:</b>																								
Lawrence, KS MSA	6	3.31	0.28	0.00	13.93	33.33	52.65	16.67	33.15	50.00	0.00	0.00	0.00	0.00	0.00									
Manhattan, KS MSA	6	3.31	0.00	0.00	5.46	0.00	65.99	100.00	28.55	0.00	1.60	0.00	0.00	2.56	0.00									
Topeka, KS MSA	4	2.21	1.11	0.00	4.29	0.00	77.91	75.00	16.69	25.00	1.49	0.00	0.00	0.00	11.11									
Kansas Non-MSA	136	75.14	0.00	0.00	4.28	2.94	72.99	60.29	22.74	36.76	7.99	0.00	4.76	6.03	17.50									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: KANSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Wichita, KS MSA	3,208	46.82	17.88	19.90	19.22	31.15	24.52	25.31	38.38	23.64	15.25	17.70	16.63	16.11	11.74	
<b>Limited Review:</b>																
Lawrence, KS MSA	743	10.84	18.17	13.36	18.89	29.42	24.70	26.99	38.24	30.23	22.78	23.38	25.37	24.43	19.49	
Manhattan, KS MSA	276	4.03	18.62	2.90	19.24	23.55	22.28	42.39	39.86	31.16	7.12	7.46	9.49	7.96	5.52	
Topeka, KS MSA	1,673	24.42	13.42	19.96	15.51	33.13	22.82	24.47	48.25	22.43	25.77	32.01	29.35	26.14	19.75	
Kansas Non-MSA	952	13.89	17.94	12.63	19.13	29.26	24.88	31.68	38.05	26.42	12.77	15.09	13.06	13.53	11.09	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: KANSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Wichita, KS MSA	106	52.22	17.88	15.09	19.22	9.43	24.52	33.96	38.38	41.51	2.94	2.61	1.36	4.49	2.82	
<b>Limited Review:</b>																
Lawrence, KS MSA	17	8.37	18.17	11.76	18.89	5.88	24.70	35.29	38.24	47.06	6.09	0.00	4.00	10.34	6.00	
Manhattan, KS MSA	4	1.97	18.62	0.00	19.24	0.00	22.28	25.00	39.86	75.00	0.44	0.00	0.00	0.00	0.79	
Topeka, KS MSA	39	19.21	13.42	13.89	15.51	16.67	22.82	36.11	48.25	33.33	3.07	4.00	3.90	4.40	1.73	
Kansas Non-MSA	37	18.23	17.94	13.51	19.13	29.73	24.88	21.62	38.05	35.14	2.62	3.85	5.26	3.70	0.83	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: KANSAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Wichita, KS MSA	4,015	50.68	17.88	9.96	19.22	20.79	24.52	28.17	38.38	41.08	12.97	17.89	14.55	13.40	11.48		
<b>Limited Review:</b>																	
Lawrence, KS MSA	1,096	13.83	18.17	6.86	18.89	22.78	24.70	26.27	38.24	44.09	16.98	21.55	19.00	16.43	16.18		
Manhattan, KS MSA	264	3.33	18.62	7.21	19.24	24.52	22.28	27.88	39.86	40.38	4.33	5.71	8.64	4.88	3.20		
Topeka, KS MSA	1,395	17.61	13.42	6.97	15.51	23.78	22.82	31.18	48.25	38.07	12.99	11.81	16.51	14.97	10.75		
Kansas Non-MSA	1,152	14.54	17.94	6.69	19.13	20.47	24.88	28.84	38.05	44.00	10.51	15.58	12.68	11.49	8.96		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: KANSAS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Wichita, KS MSA	962	49.54	67.28	52.70	88.98	5.20	5.82	5.44	7.95
<b>Limited Review:</b>									
Lawrence, KS MSA	122	6.28	68.75	60.66	95.08	3.28	1.64	2.42	3.22
Manhattan, KS MSA	89	4.58	69.12	64.04	96.63	2.25	1.12	2.01	2.53
Topeka, KS MSA	236	12.15	67.11	56.36	97.88	1.27	0.85	3.98	5.64
Kansas Non-MSA	533	27.45	68.58	56.10	93.43	3.38	3.19	4.94	7.31

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 24.87% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: KANSAS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Wichita, KS MSA	29	16.02	98.16	48.28	86.21	13.79	0.00	3.23	2.53
<b>Limited Review:</b>									
Lawrence, KS MSA	6	3.31	98.33	50.00	83.33	16.67	0.00	0.00	0.00
Manhattan, KS MSA	6	3.31	96.88	33.33	100.00	0.00	0.00	1.56	1.32
Topeka, KS MSA	4	2.21	99.38	75.00	100.00	0.00	0.00	1.41	2.27
Kansas Non-MSA	136	75.14	97.78	22.79	71.32	23.53	5.15	7.94	8.80

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 61.11% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: KANSAS									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Wichita, KS MSA	15	4,752	107	21,950	122	26,702	58.31	0	0
<b>Limited Review:</b>									
Lawrence, KS MSA	0	0	14	149	14	149	0.33	0	0
Manhattan, KS MSA	4	5,573	12	59	16	5,631	12.30	0	0
Topeka, KS MSA	7	4,935	43	1,287	50	6,222	13.59	0	0
Kansas Non-MSA	8	2,411	102	2,972	110	5,383	11.76	0	0
Statewide investments with potential benefit to one or more AAs	0	0	7	28	7	28	0.06	0	0
Statewide investments with no potential to benefit one or more AAs	2	1,645	11	31	13	1,676	3.66	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: KANSAS																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Wichita, KS MSA	54.93	16	37.21	0.00	31.25	37.50	31.25	0	2	0	-1	-1	0	2.10	23.53	50.65	23.72
<b>Limited Review:</b>																	
Lawrence, KS MSA	1.67	1	2.33	0.00	100.00	0.00	0.00	0	0	0	0	0	0	5.95	25.54	46.20	22.31
Manhattan, KS MSA	0.31	1	2.33	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	30.86	50.78	18.37
Topeka, KS MSA	26.20	6	13.95	33.33	16.67	50.00	0.00	0	0	0	0	0	0	1.30	21.47	53.59	23.64
Kansas Non-MSA	16.88	19	44.19	0.00	21.05	57.89	21.05	0	2	0	-1	0	-1	0.00	13.64	64.47	21.89

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: MAINE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Portland-South Portland-Biddeford, ME MSA	69.63	8,865	1,858,673	1,433	63,731	10	57	0	0	10,308	1,922,461	76.87
<b>Limited Review:</b>												
Bangor, ME MSA	9.42	1,159	161,240	232	9,771	3	16	0	0	1,394	171,027	8.71
Lewiston-Auburn, ME MSA	8.31	1,031	150,536	198	6,814	1	5	0	0	1,230	157,355	5.00
Maine Non-MSA	12.65	1,432	220,961	426	12,748	14	130	1	4,333	1,873	238,172	9.42

\* Loan Data as of December 11, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE																
GEOGRAPHY: MAINE																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011																
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Portland-South Portland-Biddeford, ME MSA	2,550	66.06	0.32	0.55	8.72	8.86	75.71	76.63	15.26	13.96	13.25	14.52	15.28	13.21	12.23	
<b>Limited Review:</b>																
Bangor, ME MSA	418	10.83	0.00	0.00	12.67	11.00	65.64	58.61	21.69	30.38	10.43	0.00	9.40	9.92	12.01	
Lewiston-Auburn, ME MSA	441	11.42	1.34	1.13	7.96	9.07	75.02	73.47	15.69	16.33	15.68	11.11	17.17	16.28	13.16	
Maine Non-MSA	451	11.68	0.00	0.00	2.20	2.88	78.16	80.27	19.64	16.85	11.79	0.00	10.53	12.78	7.98	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT															GEOGRAPHY: MAINE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Portland-South Portland-Biddeford, ME MSA	147	65.33	0.32	0.00	8.72	6.12	75.71	74.83	15.26	19.05	3.00	0.00	1.01	2.64	5.15									
<b>Limited Review:</b>																								
Bangor, ME MSA	33	14.67	0.00	0.00	12.67	6.06	65.64	51.52	21.69	42.42	3.27	0.00	0.00	2.26	6.73									
Lewiston-Auburn, ME MSA	10	4.44	1.34	0.00	7.96	0.00	75.02	80.00	15.69	20.00	1.90	0.00	0.00	1.91	2.44									
Maine Non-MSA	35	15.56	0.00	0.00	2.20	0.00	78.16	80.00	19.64	20.00	2.19	0.00	0.00	2.35	1.56									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: MAINE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Portland-South Portland-Biddeford, ME MSA	6,168	73.41	0.32	0.49	8.72	5.92	75.71	74.53	15.26	19.07	13.16	28.81	13.52	13.40	11.96									
<b>Limited Review:</b>																								
Bangor, ME MSA	708	8.43	0.00	0.00	12.67	8.90	65.64	61.86	21.69	29.24	11.29	0.00	12.72	11.18	11.10									
Lewiston-Auburn, ME MSA	580	6.90	1.34	0.86	7.96	6.03	75.02	71.90	15.69	21.21	11.28	23.08	19.12	10.88	11.01									
Maine Non-MSA	946	11.26	0.00	0.00	2.20	0.74	78.16	77.91	19.64	21.35	10.99	0.00	5.66	11.31	10.34									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: MAINE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Portland-South Portland-Biddeford, ME MSA	0	0.00	6.36	0.00	24.62	0.00	64.22	0.00	4.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
<b>Limited Review:</b>																								
Bangor, ME MSA	0	0.00	0.00	0.00	40.03	0.00	39.91	0.00	20.07	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Lewiston-Auburn, ME MSA	0	0.00	28.02	0.00	28.64	0.00	39.07	0.00	4.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Maine Non-MSA	0	0.00	0.00	0.00	17.23	0.00	68.02	0.00	14.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00								

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: MAINE		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Portland-South Portland-Biddeford, ME MSA	1,433	62.60	1.52	0.98	14.14	13.47	71.71	67.69	12.63	17.86	5.66	2.24	5.40	5.56	6.68						
<b>Limited Review:</b>																					
Bangor, ME MSA	232	10.14	0.00	0.00	18.67	16.38	56.97	54.74	24.36	28.88	3.52	0.00	4.52	2.98	4.06						
Lewiston-Auburn, ME MSA	198	8.65	8.71	7.58	9.72	7.07	70.05	70.20	11.53	15.15	6.21	2.46	6.17	6.32	9.02						
Maine Non-MSA	426	18.61	0.00	0.00	5.74	6.34	74.17	67.37	20.09	26.29	4.40	0.00	6.67	3.98	5.07						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: MAINE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Portland-South Portland-Biddeford, ME MSA	10	35.71	0.71	0.00	9.64	10.00	72.26	80.00	17.40	10.00	2.67	0.00	0.00	1.59	12.50									
<b>Limited Review:</b>																								
Bangor, ME MSA	3	10.71	0.00	0.00	15.31	0.00	63.70	100.00	20.99	0.00	3.70	0.00	0.00	4.17	0.00									
Lewiston-Auburn, ME MSA	1	3.57	2.12	0.00	4.24	0.00	73.31	100.00	20.34	0.00	16.67	0.00	0.00	20.00	0.00									
Maine Non-MSA	14	50.00	0.00	0.00	0.94	0.00	79.55	78.57	19.52	21.43	1.32	0.00	0.00	1.94	0.00									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: MAINE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011										
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Portland-South Portland-Biddeford, ME MSA	2,550	66.06	17.58	9.08	19.29	28.27	25.12	28.19	38.01	34.47	15.31	15.34	17.52	15.41	13.82		
<b>Limited Review:</b>																	
Bangor, ME MSA	418	10.83	20.39	7.56	17.26	28.54	23.04	29.51	39.31	34.39	11.65	8.41	11.73	13.47	11.05		
Lewiston-Auburn, ME MSA	441	11.42	18.49	9.17	18.69	30.50	24.29	33.26	38.53	27.06	17.42	12.94	15.38	18.29	19.87		
Maine Non-MSA	451	11.68	16.78	9.68	17.14	28.57	22.80	28.57	43.29	33.18	12.97	15.91	14.00	14.32	10.98		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: MAINE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Portland-South Portland-Biddeford, ME MSA	147	65.33	17.58	6.25	19.29	20.14	25.12	27.08	38.01	46.53	3.03	0.69	4.18	1.89	3.74	
<b>Limited Review:</b>																
Bangor, ME MSA	33	14.67	20.39	9.09	17.26	33.33	23.04	24.24	39.31	33.33	3.36	0.00	7.81	2.22	2.96	
Lewiston-Auburn, ME MSA	10	4.44	18.49	10.00	18.69	0.00	24.29	30.00	38.53	60.00	1.93	5.56	0.00	1.67	2.13	
Maine Non-MSA	35	15.56	16.78	2.86	17.14	22.86	22.80	37.14	43.29	37.14	2.33	0.00	2.74	4.26	1.34	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: MAINE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011										
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Portland-South Portland-Biddeford, ME MSA	6,168	73.41	17.58	6.83	19.29	19.44	25.12	25.53	38.01	48.20	14.64	14.71	15.70	13.68	14.78		
<b>Limited Review:</b>																	
Bangor, ME MSA	708	8.43	20.39	5.24	17.26	16.04	23.04	31.59	39.31	47.14	11.79	8.85	9.74	14.07	11.46		
Lewiston-Auburn, ME MSA	580	6.90	18.49	3.72	18.69	21.90	24.29	30.79	38.53	43.60	12.22	8.33	14.23	13.95	10.86		
Maine Non-MSA	946	11.26	16.78	5.02	17.14	17.34	22.80	28.11	43.29	49.52	11.76	10.28	12.43	12.85	11.22		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 10.3% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: MAINE			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Portland-South Portland-Biddeford, ME MSA	1,433	62.60	68.88	51.50	90.23	5.02	4.75	5.49	7.57
<b>Limited Review:</b>									
Bangor, ME MSA	232	10.14	62.27	51.29	89.66	6.03	4.31	3.42	3.96
Lewiston-Auburn, ME MSA	198	8.65	69.41	34.85	93.43	4.04	2.53	5.95	4.21
Maine Non-MSA	426	18.61	68.32	53.76	94.37	2.58	3.05	4.28	4.15

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 32.19% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: MAINE									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Portland-South Portland-Biddeford, ME MSA	10	35.71	96.71	70.00	100.00	0.00	0.00	2.60	0.00
<b>Limited Review:</b>									
Bangor, ME MSA	3	10.71	96.05	100.00	100.00	0.00	0.00	3.23	3.70
Lewiston-Auburn, ME MSA	1	3.57	96.61	100.00	100.00	0.00	0.00	16.67	16.67
Maine Non-MSA	14	50.00	97.73	71.43	100.00	0.00	0.00	1.32	0.94

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 17.86% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: MAINE									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Portland-South Portland-Biddeford, ME MSA	35	22,306	75	9,289	110	31,595	72.63	6	2,559
<b>Limited Review:</b>									
Bangor, ME MSA	10	1,040	16	570	26	1,610	3.70	0	0
Lewiston-Auburn, ME MSA	5	1,464	11	176	16	1,640	3.77	0	0
Maine Non-MSA	8	5,786	16	350	24	6,136	14.11	0	0
Statewide investments with potential benefit to one or more AAs	1	338	11	357	12	695	1.60	0	0
Statewide investments with no potential to benefit one or more AAs	5	1,567	18	259	23	1,826	4.20	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: MAINE																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 11, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Portland-South Portland-Biddeford, ME MSA	76.87	20	57.14	0.00	25.00	65.00	10.00	0	3	0	0	-2	-1	1.33	11.65	73.75	13.26
<b>Limited Review:</b>																	
Bangor, ME MSA	8.71	7	20.00	0.00	14.29	42.86	42.86	0	0	0	0	0	0	0.00	19.01	59.64	21.35
Lewiston-Auburn, ME MSA	5.00	2	5.71	50.00	0.00	50.00	0.00	0	1	0	-1	0	0	6.13	14.25	66.93	12.69
Maine Non-MSA	9.42	6	17.14	0.00	16.67	83.33	0.00	0	3	0	0	-3	0	0.00	4.04	77.77	18.19

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: MARYLAND				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Baltimore-Towson, MD MSA	90.17	41,826	10,093,244	7,854	393,494	56	1,443	26	138,123	49,762	10,626,304	96.83
<b>Limited Review:</b>												
Salisbury, MD MSA	1.92	872	144,896	177	8,120	8	469	0	0	1,057	153,485	0.68
Maryland Non-MSA	7.91	3,797	898,126	553	22,562	15	102	1	1,462	4,366	922,252	2.49

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: MARYLAND				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Baltimore-Towson, MD MSA	100.00	6	10,941	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	96.83
<b>Limited Review:</b>														
Salisbury, MD MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.68
Maryland Non-MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.49

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: MARYLAND				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Baltimore-Towson, MD MSA	14,683	90.87	4.55	3.13	16.09	16.74	42.83	48.71	36.52	31.42	14.46	16.41	16.92	15.07	12.78	
<b>Limited Review:</b>																
Salisbury, MD MSA	292	1.81	0.23	0.00	12.76	10.96	69.54	72.60	17.47	16.44	8.98	0.00	7.64	9.11	9.44	
Maryland Non-MSA	1,184	7.33	0.79	0.25	11.72	8.36	58.64	64.61	28.86	26.77	8.86	13.33	11.24	9.00	7.88	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: MARYLAND				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Baltimore-Towson, MD MSA	673	88.20	4.55	2.82	16.09	11.74	42.83	46.06	36.52	39.38	7.19	8.04	5.15	7.53	7.35
<b>Limited Review:</b>															
Salisbury, MD MSA	12	1.57	0.23	0.00	12.76	16.67	69.54	58.33	17.47	25.00	3.57	0.00	5.88	3.26	3.23
Maryland Non-MSA	78	10.22	0.79	1.28	11.72	8.97	58.64	57.69	28.86	32.05	6.08	0.00	10.53	6.51	4.93

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: MARYLAND					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Baltimore-Towson, MD MSA	26,469	89.51	4.55	2.15	16.09	12.58	42.83	45.01	36.52	40.25	12.64	17.01	18.65	13.96	10.51									
<b>Limited Review:</b>																								
Salisbury, MD MSA	568	1.92	0.23	0.35	12.76	11.62	69.54	64.61	17.47	23.42	11.25	0.00	14.84	11.67	8.89									
Maryland Non-MSA	2,535	8.57	0.79	0.28	11.72	6.15	58.64	58.07	28.86	35.50	11.68	25.00	15.54	11.13	11.91									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: MARYLAND					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Baltimore-Towson, MD MSA	1	100.00	9.27	0.00	27.09	0.00	44.67	0.00	18.97	100.00	0.00	0.00	0.00	0.00	0.00	0.00								
<b>Limited Review:</b>																								
Salisbury, MD MSA	0	0.00	2.73	0.00	29.21	0.00	60.23	0.00	7.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Maryland Non-MSA	0	0.00	1.58	0.00	8.61	0.00	86.54	0.00	3.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00								

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: MARYLAND		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Baltimore-Towson, MD MSA	7,854	91.50	4.74	2.86	15.19	11.10	41.74	41.62	38.33	44.41	8.82	8.56	8.77	8.92	8.76						
<b>Limited Review:</b>																					
Salisbury, MD MSA	177	2.06	1.06	2.26	14.93	10.17	63.27	66.67	20.75	20.90	4.35	15.00	2.86	4.71	3.70						
Maryland Non-MSA	553	6.44	0.85	0.36	14.31	11.39	62.14	59.49	22.71	28.75	6.80	7.69	7.05	6.54	7.33						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS																
GEOGRAPHY: MARYLAND																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Baltimore-Towson, MD MSA	56	70.89	0.77	0.00	6.70	0.00	44.87	44.64	47.66	55.36	14.71	0.00	0.00	15.63	14.93	
<b>Limited Review:</b>																
Salisbury, MD MSA	8	10.13	0.50	0.00	6.86	12.50	71.40	62.50	21.24	25.00	5.08	0.00	0.00	2.17	22.22	
Maryland Non-MSA	15	18.99	0.00	0.00	13.60	33.33	68.38	46.67	18.02	20.00	12.70	0.00	21.43	6.82	40.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: MARYLAND					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Baltimore-Towson, MD MSA	14,683	90.87	20.46	13.06	17.74	30.97	22.48	27.56	39.33	28.42	16.05	16.71	17.15	17.05	14.39	
<b>Limited Review:</b>																
Salisbury, MD MSA	292	1.81	21.13	7.22	17.82	26.80	22.01	31.27	39.03	34.71	10.02	0.98	9.91	9.88	12.89	
Maryland Non-MSA	1,184	7.33	18.03	4.77	17.41	22.30	23.61	28.51	40.95	44.43	9.83	11.60	11.80	10.09	8.96	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: MARYLAND					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Baltimore-Towson, MD MSA	673	88.20	20.46	12.31	17.74	28.15	22.48	26.46	39.33	33.08	7.42	5.85	10.40	8.31	5.89	
<b>Limited Review:</b>																
Salisbury, MD MSA	12	1.57	21.13	18.18	17.82	27.27	22.01	27.27	39.03	27.27	3.05	0.00	0.00	5.56	3.85	
Maryland Non-MSA	78	10.22	18.03	5.41	17.41	17.57	23.61	28.38	40.95	48.65	6.09	5.41	1.82	7.79	6.77	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.7% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: MARYLAND					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Baltimore-Towson, MD MSA	26,469	89.51	20.46	10.63	17.74	22.39	22.48	27.16	39.33	39.81	13.09	18.67	16.18	14.25	10.87	
<b>Limited Review:</b>																
Salisbury, MD MSA	568	1.92	21.13	8.70	17.82	26.54	22.01	30.21	39.03	34.55	11.04	10.20	11.64	12.74	9.81	
Maryland Non-MSA	2,535	8.57	18.03	5.73	17.41	16.45	23.61	24.91	40.95	52.91	12.34	14.08	15.89	13.71	11.08	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 19.9% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: MARYLAND			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Baltimore-Towson, MD MSA	7,854	91.50	66.15	56.19	90.01	4.57	5.42	8.66	14.97
<b>Limited Review:</b>									
Salisbury, MD MSA	177	2.06	67.31	55.37	92.66	2.82	4.52	4.26	3.83
Maryland Non-MSA	553	6.44	68.13	53.71	92.22	2.17	5.61	6.56	8.05

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 27.14% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: MARYLAND			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Baltimore-Towson, MD MSA	56	70.89	96.29	57.14	96.43	0.00	3.57	15.00	12.09
<b>Limited Review:</b>									
Salisbury, MD MSA	8	10.13	97.16	50.00	75.00	25.00	0.00	5.00	4.55
Maryland Non-MSA	15	18.99	98.34	73.33	100.00	0.00	0.00	12.12	12.77

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 29.49% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: MARYLAND									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Baltimore-Towson, MD MSA	64	60,529	247	122,176	311	182,705	89.18	7	115,722
<b>Limited Review:</b>									
Salisbury, MD MSA	3	796	21	207	24	1,003	0.49	0	0
Maryland Non-MSA	7	6,010	24	780	31	6,790	3.31	0	0
Statewide investments with potential benefit to one or more AAs	0	0	16	5,672	16	5,672	2.77	0	0
Statewide investments with no potential to benefit one or more AAs	8	8,687	8	20	16	8,708	4.25	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: MARYLAND				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Baltimore-Towson, MD MSA	96.83	97	89.81	3.09	21.65	43.30	31.96	2	6	0	0	-3	-1	8.92	20.01	40.13	30.53
<b>Limited Review:</b>																	
Salisbury, MD MSA	0.68	2	1.85	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.36	20.52	63.25	14.78
Maryland Non-MSA	2.49	9	8.33	0.00	33.33	44.44	22.22	0	0	0	0	0	0	1.74	15.02	56.10	27.14

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: MASSACHUSETTS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Springfield, MA MSA	30.87	6,331	1,106,567	1,474	43,769	7	48	1	20,000	7,813	1,170,384	40.34
Worcester, MA MSA	47.68	10,041	2,188,923	2,011	104,041	16	114	2	16,457	12,070	2,309,535	42.06
<b>Limited Review:</b>												
Barnstable Town, MA MSA	18.29	3,798	1,054,082	821	29,150	11	91	0	0	4,630	1,083,323	14.87
Massachusetts Non-MSA	3.16	559	337,892	236	10,211	5	24	0	0	800	348,127	2.73

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: MASSACHUSETTS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield, MA MSA	2,413	35.96	2.29	3.69	11.06	16.33	56.42	57.56	30.22	22.42	13.84	22.95	17.31	14.37	10.27
Worcester, MA MSA	3,213	47.88	1.46	2.68	12.32	15.50	57.33	56.27	28.90	25.55	13.17	21.47	14.84	13.50	11.30
<b>Limited Review:</b>															
Barnstable Town, MA MSA	965	14.38	0.44	0.52	5.19	9.53	78.19	74.40	16.18	15.54	9.99	11.11	10.81	9.83	10.30
Massachusetts Non-MSA	120	1.79	0.00	0.00	1.90	4.17	85.42	60.83	12.69	35.00	9.09	0.00	9.52	8.22	12.64

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: MASSACHUSETTS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Springfield, MA MSA	127	41.10	2.29	0.79	11.06	8.66	56.42	49.61	30.22	40.94	2.92	7.14	3.15	2.88	2.83
Worcester, MA MSA	127	41.10	1.46	0.79	12.32	9.45	57.33	56.69	28.90	33.07	3.24	0.00	2.45	3.00	4.22
<b>Limited Review:</b>															
Barnstable Town, MA MSA	46	14.89	0.44	0.00	5.19	6.52	78.19	65.22	16.18	28.26	3.33	0.00	8.33	3.01	3.88
Massachusetts Non-MSA	9	2.91	0.00	0.00	1.90	0.00	85.42	66.67	12.69	33.33	4.26	0.00	0.00	5.06	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: MASSACHUSETTS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Springfield, MA MSA	3,791	27.67	2.29	1.50	11.06	9.55	56.42	53.71	30.22	35.24	11.98	27.17	19.08	11.98	10.52									
Worcester, MA MSA	6,695	48.86	1.46	1.05	12.32	7.33	57.33	52.55	28.90	39.07	11.83	16.45	14.15	12.67	10.59									
<b>Limited Review:</b>																								
Barnstable Town, MA MSA	2,787	20.34	0.44	0.25	5.19	7.89	78.19	74.78	16.18	17.08	9.97	12.90	10.54	10.14	9.04									
Massachusetts Non-MSA	430	3.14	0.00	0.00	1.90	4.88	85.42	70.00	12.69	25.12	9.26	0.00	12.50	8.25	12.96									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: MASSACHUSETTS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Springfield, MA MSA	0	0.00	26.23	0.00	22.69	0.00	38.81	0.00	12.28	0.00	0.00	0.00	0.00	0.00	0.00	
Worcester, MA MSA	0	0.00	16.82	0.00	30.32	0.00	39.75	0.00	13.12	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Barnstable Town, MA MSA	0	0.00	9.03	0.00	19.74	0.00	63.10	0.00	8.13	0.00	0.00	0.00	0.00	0.00	0.00	
Massachusetts Non-MSA	0	0.00	0.00	0.00	0.00	0.00	68.45	0.00	31.55	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: MASSACHUSETTS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Springfield, MA MSA	1,474	32.45	9.71	8.62	15.52	11.60	47.39	44.71	27.38	35.07	5.50	5.87	5.25	5.47	5.55									
Worcester, MA MSA	2,011	44.28	5.36	4.72	17.02	12.18	48.76	45.50	28.86	37.59	7.52	6.06	6.48	6.92	9.23									
<b>Limited Review:</b>																								
Barnstable Town, MA MSA	821	18.08	6.64	7.31	7.97	5.36	69.57	69.06	15.82	18.27	6.48	5.21	4.03	6.38	8.98									
Massachusetts Non-MSA	236	5.20	0.00	0.00	1.52	1.27	76.20	73.31	22.28	25.42	10.04	0.00	14.29	9.76	10.83									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: MASSACHUSETTS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Springfield, MA MSA	7	17.95	0.99	0.00	6.53	0.00	55.17	85.71	37.31	14.29	3.45	0.00	0.00	7.14	0.00	
Worcester, MA MSA	16	41.03	1.02	6.25	7.23	0.00	55.19	18.75	36.56	75.00	17.65	0.00	0.00	5.88	33.33	
<b>Limited Review:</b>																
Barnstable Town, MA MSA	11	28.21	1.59	0.00	6.24	27.27	75.71	63.64	16.46	9.09	23.53	0.00	0.00	23.08	50.00	
Massachusetts Non-MSA	5	12.82	0.00	0.00	2.38	0.00	85.24	100.00	12.38	0.00	12.50	0.00	0.00	12.50	0.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: MASSACHUSETTS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Springfield, MA MSA	2,413	35.95	21.40	13.76	17.35	38.46	22.20	27.73	39.05	20.04	15.23	19.06	16.13	16.89	11.46	
Worcester, MA MSA	3,215	47.89	20.29	16.65	17.67	36.43	22.54	25.63	39.50	21.28	14.87	16.84	17.28	15.74	10.91	
<b>Limited Review:</b>																
Barnstable Town, MA MSA	965	14.38	17.31	5.05	19.45	19.87	23.97	18.82	39.26	56.26	11.01	11.03	14.23	11.88	10.04	
Massachusetts Non-MSA	120	1.79	17.00	0.88	20.04	6.19	23.86	18.58	39.10	74.34	10.42	0.00	3.45	10.17	11.15	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: MASSACHUSETTS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Springfield, MA MSA	127	41.10	21.40	8.00	17.35	25.60	22.20	27.20	39.05	39.20	2.89	3.10	2.44	2.83	3.11	
Worcester, MA MSA	127	41.10	20.29	9.45	17.67	22.05	22.54	31.50	39.50	37.01	3.35	1.82	3.16	3.76	3.54	
<b>Limited Review:</b>																
Barnstable Town, MA MSA	46	14.89	17.31	11.63	19.45	25.58	23.97	27.91	39.26	34.88	3.13	4.00	5.11	1.75	2.84	
Massachusetts Non-MSA	9	2.91	17.00	11.11	20.04	11.11	23.86	11.11	39.10	66.67	4.44	25.00	7.14	0.00	3.33	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: MASSACHUSETTS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Springfield, MA MSA	3,791	27.66	21.40	7.85	17.35	24.06	22.20	29.68	39.05	38.41	12.27	19.75	14.70	12.56	10.42	
Worcester, MA MSA	6,699	48.87	20.29	7.45	17.67	19.80	22.54	27.79	39.50	44.96	12.46	15.26	14.82	12.45	11.53	
<b>Limited Review:</b>																
Barnstable Town, MA MSA	2,787	20.33	17.31	4.71	19.45	15.57	23.97	21.61	39.26	58.11	11.06	10.94	10.10	11.67	11.07	
Massachusetts Non-MSA	430	3.14	17.00	1.70	20.04	11.92	23.86	16.55	39.10	69.83	9.91	11.11	10.13	10.89	9.68	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 11.4% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: MASSACHUSETTS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Springfield, MA MSA	1,474	32.45	67.85	55.90	94.10	3.93	1.97	5.39	9.15
Worcester, MA MSA	2,011	44.28	68.00	53.31	90.50	3.78	5.72	7.33	12.82
<b>Limited Review:</b>									
Barnstable Town, MA MSA	821	18.08	70.54	55.66	92.57	4.87	2.56	6.12	10.46
Massachusetts Non-MSA	236	5.20	70.12	44.92	91.53	5.08	3.39	8.97	20.29

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 30.34% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: MASSACHUSETTS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Springfield, MA MSA	7	17.95	97.17	100.00	100.00	0.00	0.00	3.39	6.06
Worcester, MA MSA	16	41.03	96.93	68.75	100.00	0.00	0.00	16.22	12.00
<b>Limited Review:</b>									
Barnstable Town, MA MSA	11	28.21	96.59	63.64	100.00	0.00	0.00	22.22	25.00
Massachusetts Non-MSA	5	12.82	94.76	60.00	100.00	0.00	0.00	11.11	14.29

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 25.64% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: MASSACHUSETTS									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Springfield, MA MSA	18	16,647	36	26,214	54	42,861	47.47	0	0
Worcester, MA MSA	11	20,536	92	11,709	103	32,245	35.71	0	0
<b>Limited Review:</b>									
Barnstable Town, MA MSA	6	3,878	28	2,210	34	6,089	6.74	1	1,537
Massachusetts Non-MSA	2	2,835	12	432	14	3,266	3.62	0	0
Statewide investments with potential benefit to one or more AAs	1	2,523	20	429	21	2,952	3.27	0	0
Statewide investments with no potential to benefit one or more AAs	7	2,776	10	99	17	2,875	3.18	1	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: MASSACHUSETTS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Springfield, MA MSA	40.34	31	46.27	6.45	32.26	45.16	16.13	0	5	2	0	-1	-2	8.43	17.83	48.62	25.13
Worcester, MA MSA	42.06	23	34.33	8.70	26.09	43.48	21.74	0	3	1	0	-2	0	6.08	18.12	51.85	23.81
<b>Limited Review:</b>																	
Barnstable Town, MA MSA	14.87	11	16.42	9.09	9.09	72.73	9.09	0	5	0	0	-3	-2	1.55	7.25	76.21	14.98
Massachusetts Non-MSA	2.73	2	2.99	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	1.73	84.21	14.06

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: MICHIGAN				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Detroit-Livonia-Dearborn, MI MD	17.37	12,867	1,607,181	2,237	208,959	5	90	10	53,551	15,119	1,869,781	17.09
Kalamazoo-Portage, MI MSA	4.10	3,044	415,292	513	42,536	14	59	0	0	3,571	457,887	2.19
Warren-Troy-Farmington Hills, MI MD	41.06	29,743	4,542,878	5,971	598,294	31	359	0	0	35,745	5,141,531	66.48
<b>Limited Review:</b>												
Ann Arbor, MI MSA	4.81	3,700	701,509	489	27,586	1	5	0	0	4,190	729,100	1.88
Battle Creek, MI MSA	1.34	909	106,232	245	32,553	10	1,559	2	2,644	1,166	142,988	0.81
Bay City, MI MSA	0.92	670	69,419	127	6,771	7	69	0	0	804	76,259	0.31
Flint, MI MSA	3.97	2,937	330,479	514	60,824	6	57	2	17,108	3,459	408,468	1.52
Grand Rapids-Wyoming, MI MSA	7.66	5,525	721,489	1,127	111,671	20	368	0	0	6,672	833,528	2.03
Holland-Grand Haven, MI MSA	2.83	2,002	284,328	450	39,967	14	883	0	0	2,466	325,178	0.07
Jackson, MI MSA	1.49	1,126	132,235	170	9,894	2	23	0	0	1,298	142,152	0.58
Lansing-East Lansing, MI MSA	4.90	3,621	474,811	630	50,322	11	1,266	0	0	4,262	526,399	2.60
Monroe, MI MSA	1.91	1,519	197,669	138	5,813	4	21	0	0	1,661	203,503	1.72
Muskegon-Norton Shores, MI MSA	1.18	878	98,542	151	10,321	2	6	0	0	1,031	108,869	0.08

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: MICHIGAN				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Limited Review:</b>												
Niles-Benton Harbor, MI MSA	1.45	1,055	161,700	196	23,417	10	374	0	0	1,261	185,491	0.53
Saginaw-Saginaw Township North, MI MSA	1.64	1,158	128,498	269	22,141	2	200	0	0	1,429	150,839	1.26
Michigan Non-MSA	3.36	2,322	299,591	577	23,921	25	930	0	0	2,924	324,442	0.84

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: MICHIGAN				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Detroit-Livonia-Dearborn, MI MD	6,667	19.61	3.81	0.97	22.11	6.70	38.26	36.64	35.82	55.68	19.00	23.44	25.24	21.57	17.10	
Kalamazoo-Portage, MI MSA	1,364	4.01	1.66	0.07	17.36	10.78	54.68	52.93	26.30	36.22	14.43	0.00	14.21	14.71	14.21	
Warren-Troy-Farmington Hills, MI MD	14,218	41.83	0.97	0.27	18.95	12.64	53.58	55.37	26.49	31.73	16.45	16.13	16.16	16.33	16.77	
<b>Limited Review:</b>																
Ann Arbor, MI MSA	1,465	4.31	2.07	2.46	13.42	8.40	55.60	60.75	28.90	28.40	13.62	13.10	15.80	14.12	12.12	
Battle Creek, MI MSA	486	1.43	1.18	0.21	19.41	13.58	52.71	45.06	26.70	41.15	16.04	50.00	19.01	13.60	18.30	
Bay City, MI MSA	313	0.92	0.00	0.00	15.32	21.41	67.48	68.37	17.20	10.22	10.40	0.00	9.86	11.61	6.51	
Flint, MI MSA	1,551	4.56	7.56	1.16	15.95	5.93	42.80	43.20	33.69	49.71	14.61	33.33	25.73	14.70	13.51	
Grand Rapids-Wyoming, MI MSA	2,387	7.02	0.91	0.67	13.82	13.36	62.29	59.28	22.99	26.69	9.12	9.52	11.47	9.43	7.74	
Holland-Grand Haven, MI MSA	748	2.20	0.00	0.00	4.67	4.68	91.47	92.51	3.87	2.81	8.17	0.00	8.62	8.18	7.30	
Jackson, MI MSA	457	1.34	0.59	0.44	11.63	9.63	77.08	72.87	10.69	17.07	13.31	0.00	18.52	12.49	16.00	
Lansing-East Lansing, MI MSA	1,542	4.54	1.72	1.49	13.87	12.65	61.20	58.56	23.22	27.30	10.42	19.44	12.17	10.23	9.71	
Monroe, MI MSA	666	1.96	0.58	0.30	1.35	2.25	94.57	94.14	3.51	3.30	15.81	33.33	21.05	15.99	6.00	
Muskegon-Norton Shores, MI MSA	306	0.90	3.33	2.29	15.03	9.80	54.98	58.50	26.66	29.41	6.27	18.75	10.00	6.02	5.35	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: MICHIGAN				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Limited Review:</b>																
Niles-Benton Harbor, MI MSA	362	1.06	2.31	0.55	6.82	7.73	67.25	70.17	23.62	21.55	6.94	18.18	12.68	7.11	5.51	
Saginaw-Saginaw Township North, MI MSA	537	1.58	8.48	0.56	8.97	3.54	58.66	57.54	23.89	38.36	11.24	8.33	21.62	11.51	10.27	
Michigan Non-MSA	924	2.72	0.00	0.00	1.44	1.41	65.07	54.76	33.49	43.83	8.37	0.00	13.56	7.79	8.92	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: MICHIGAN					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Detroit-Livonia-Dearborn, MI MD	94	21.51	3.81	0.00	22.11	12.77	38.26	36.17	35.82	51.06	5.13	0.00	4.03	5.23	5.83	
Kalamazoo-Portage, MI MSA	26	5.95	1.66	0.00	17.36	0.00	54.68	50.00	26.30	50.00	3.33	0.00	0.00	4.06	3.51	
Warren-Troy-Farmington Hills, MI MD	151	34.55	0.97	0.00	18.95	10.60	53.58	46.36	26.49	43.05	3.35	0.00	1.35	2.79	8.33	
<b>Limited Review:</b>																
Ann Arbor, MI MSA	21	4.81	2.07	0.00	13.42	0.00	55.60	52.38	28.90	47.62	3.31	0.00	0.00	2.17	6.76	
Battle Creek, MI MSA	6	1.37	1.18	33.33	19.41	0.00	52.71	33.33	26.70	33.33	0.57	0.00	0.00	1.08	0.00	
Bay City, MI MSA	4	0.92	0.00	0.00	15.32	25.00	67.48	25.00	17.20	50.00	0.82	0.00	0.00	0.00	6.25	
Flint, MI MSA	15	3.43	7.56	0.00	15.95	0.00	42.80	20.00	33.69	80.00	1.03	0.00	0.00	0.59	2.08	
Grand Rapids-Wyoming, MI MSA	23	5.26	0.91	0.00	13.82	8.70	62.29	65.22	22.99	26.09	1.68	0.00	1.16	1.76	1.75	
Holland-Grand Haven, MI MSA	6	1.37	0.00	0.00	4.67	0.00	91.47	100.00	3.87	0.00	1.29	0.00	0.00	1.43	0.00	
Jackson, MI MSA	15	3.43	0.59	0.00	11.63	0.00	77.08	86.67	10.69	13.33	1.61	0.00	0.00	2.08	0.00	
Lansing-East Lansing, MI MSA	22	5.03	1.72	0.00	13.87	9.09	61.20	40.91	23.22	50.00	1.71	0.00	1.45	1.32	3.13	
Monroe, MI MSA	14	3.20	0.58	0.00	1.35	0.00	94.57	85.71	3.51	14.29	5.94	0.00	0.00	5.26	25.00	
Muskegon-Norton Shores, MI MSA	5	1.14	3.33	0.00	15.03	0.00	54.98	80.00	26.66	20.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT															GEOGRAPHY: MICHIGAN					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Limited Review:</b>																								
Niles-Benton Harbor, MI MSA	12	2.75	2.31	0.00	6.82	8.33	67.25	75.00	23.62	16.67	0.88	0.00	0.00	0.69	1.42									
Saginaw-Saginaw Township North, MI MSA	6	1.37	8.48	0.00	8.97	0.00	58.66	66.67	23.89	33.33	2.01	0.00	0.00	2.96	0.00									
Michigan Non-MSA	17	3.89	0.00	0.00	1.44	0.00	65.07	58.82	33.49	41.18	1.17	0.00	0.00	1.36	0.78									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: MICHIGAN					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Detroit-Livonia-Dearborn, MI MD	6,106	15.81	3.81	0.69	22.11	6.75	38.26	30.25	35.82	62.32	16.29	31.11	42.69	25.31	13.33									
Kalamazoo-Portage, MI MSA	1,654	4.28	1.66	0.06	17.36	9.61	54.68	53.57	26.30	36.76	8.42	0.00	11.38	8.41	7.84									
Warren-Troy-Farmington Hills, MI MD	15,360	39.76	0.97	0.29	18.95	10.03	53.58	50.49	26.49	39.19	12.65	13.95	17.09	13.49	11.20									
<b>Limited Review:</b>																								
Ann Arbor, MI MSA	2,214	5.73	2.07	1.90	13.42	7.18	55.60	48.28	28.90	42.64	10.29	16.81	15.42	9.98	9.95									
Battle Creek, MI MSA	417	1.08	1.18	0.24	19.41	8.63	52.71	50.60	26.70	40.53	8.29	50.00	8.26	8.20	8.31									
Bay City, MI MSA	353	0.91	0.00	0.00	15.32	10.48	67.48	65.16	17.20	24.36	8.17	0.00	14.08	7.49	8.12									
Flint, MI MSA	1,371	3.55	7.56	0.51	15.95	6.42	42.80	41.21	33.69	51.86	10.89	14.29	20.33	11.99	9.90									
Grand Rapids-Wyoming, MI MSA	3,115	8.06	0.91	0.58	13.82	8.28	62.29	58.04	22.99	33.10	6.26	21.05	7.69	7.04	5.09									
Holland-Grand Haven, MI MSA	1,248	3.23	0.00	0.00	4.67	4.17	91.47	91.59	3.87	4.25	5.65	0.00	9.09	5.55	5.78									
Jackson, MI MSA	654	1.69	0.59	0.00	11.63	5.96	77.08	82.42	10.69	11.62	9.54	0.00	8.43	9.80	8.52									
Lansing-East Lansing, MI MSA	2,057	5.32	1.72	0.97	13.87	9.87	61.20	60.72	23.22	28.44	8.74	10.61	16.28	9.18	6.94									
Monroe, MI MSA	839	2.17	0.58	0.12	1.35	1.19	94.57	95.23	3.51	3.46	13.48	16.67	21.05	13.67	9.29									
Muskegon-Norton Shores, MI MSA	567	1.47	3.33	0.53	15.03	4.76	54.98	57.50	26.66	37.21	7.05	7.69	9.85	7.68	5.88									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: MICHIGAN					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Limited Review:</b>																								
Niles-Benton Harbor, MI MSA	681	1.76	2.31	0.00	6.82	3.23	67.25	70.63	23.62	26.14	6.52	0.00	6.78	7.31	5.03									
Saginaw-Saginaw Township North, MI MSA	615	1.59	8.48	0.81	8.97	3.09	58.66	52.85	23.89	43.25	7.33	6.45	12.07	7.49	6.97									
Michigan Non-MSA	1,381	3.57	0.00	0.00	1.44	0.65	65.07	54.45	33.49	44.90	6.48	0.00	2.70	6.23	6.81									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: MICHIGAN					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Detroit-Livonia-Dearborn, MI MD	0	0.00	13.15	0.00	27.75	0.00	35.30	0.00	23.80	0.00	0.00	0.00	0.00	0.00	0.00									
Kalamazoo-Portage, MI MSA	0	0.00	9.30	0.00	23.27	0.00	56.64	0.00	10.79	0.00	0.00	0.00	0.00	0.00	0.00									
Warren-Troy-Farmington Hills, MI MD	0	0.00	5.75	0.00	27.16	0.00	55.32	0.00	11.77	0.00	0.00	0.00	0.00	0.00	0.00									
<b>Limited Review:</b>																								
Ann Arbor, MI MSA	0	0.00	22.08	0.00	30.13	0.00	39.91	0.00	7.88	0.00	0.00	0.00	0.00	0.00	0.00									
Battle Creek, MI MSA	0	0.00	2.84	0.00	30.70	0.00	45.79	0.00	20.66	0.00	0.00	0.00	0.00	0.00	0.00									
Bay City, MI MSA	0	0.00	0.00	0.00	35.36	0.00	55.53	0.00	9.11	0.00	0.00	0.00	0.00	0.00	0.00									
Flint, MI MSA	0	0.00	11.66	0.00	12.88	0.00	56.68	0.00	18.78	0.00	0.00	0.00	0.00	0.00	0.00									
Grand Rapids-Wyoming, MI MSA	0	0.00	0.79	0.00	19.41	0.00	68.73	0.00	11.07	0.00	0.00	0.00	0.00	0.00	0.00									
Holland-Grand Haven, MI MSA	0	0.00	0.00	0.00	4.25	0.00	94.68	0.00	1.07	0.00	0.00	0.00	0.00	0.00	0.00									
Jackson, MI MSA	0	0.00	12.03	0.00	17.18	0.00	58.69	0.00	12.09	0.00	0.00	0.00	0.00	0.00	0.00									
Lansing-East Lansing, MI MSA	0	0.00	14.64	0.00	19.48	0.00	46.19	0.00	19.69	0.00	0.00	0.00	0.00	0.00	0.00									
Monroe, MI MSA	0	0.00	0.17	0.00	6.67	0.00	93.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00									
Muskegon-Norton Shores, MI MSA	0	0.00	11.91	0.00	42.97	0.00	27.84	0.00	17.28	0.00	0.00	0.00	0.00	0.00	0.00									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: MICHIGAN					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Limited Review:</b>																								
Niles-Benton Harbor, MI MSA	0	0.00	14.41	0.00	15.61	0.00	52.34	0.00	17.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Saginaw-Saginaw Township North, MI MSA	0	0.00	12.33	0.00	8.96	0.00	42.71	0.00	36.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Michigan Non-MSA	0	0.00	0.00	0.00	3.67	0.00	76.00	0.00	20.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: MICHIGAN				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*												
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp								
<b>Full Review:</b>																							
Detroit-Livonia-Dearborn, MI MD	2,237	16.21	5.34	4.87	21.67	14.84	35.29	36.88	37.70	43.41	5.67	7.13	5.35	6.05	5.37								
Kalamazoo-Portage, MI MSA	513	3.72	2.03	0.78	20.49	21.05	52.59	48.54	24.89	29.63	5.69	0.00	5.14	5.75	6.48								
Warren-Troy-Farmington Hills, MI MD	5,971	43.26	2.09	2.63	17.24	17.10	50.99	48.27	29.68	32.00	5.34	5.58	6.04	5.35	4.98								
<b>Limited Review:</b>																							
Ann Arbor, MI MSA	489	3.54	9.43	6.13	11.99	8.38	52.34	52.76	26.24	32.72	3.81	2.84	3.38	4.04	3.85								
Battle Creek, MI MSA	245	1.77	2.25	4.90	18.43	15.10	52.12	53.88	27.20	26.12	9.69	14.29	7.21	10.93	9.03								
Bay City, MI MSA	127	0.92	0.00	0.00	20.60	18.90	63.65	58.27	15.75	22.83	3.82	0.00	3.05	3.28	6.90								
Flint, MI MSA	514	3.72	8.82	7.59	11.95	10.12	45.05	48.44	34.17	33.85	5.02	4.80	4.53	5.97	4.03								
Grand Rapids-Wyoming, MI MSA	1,127	8.16	1.76	2.75	14.81	11.71	56.00	51.91	27.43	33.63	4.09	4.96	3.20	4.31	4.06								
Holland-Grand Haven, MI MSA	450	3.26	0.00	0.00	7.17	6.89	89.93	90.67	2.90	2.44	4.96	0.00	3.95	5.08	2.67								
Jackson, MI MSA	170	1.23	5.98	2.94	12.05	12.35	72.89	77.65	9.08	7.06	4.86	1.39	5.19	5.39	2.42								
Lansing-East Lansing, MI MSA	630	4.56	3.77	4.60	15.95	18.10	54.16	47.78	26.12	29.52	5.94	8.70	6.23	6.00	5.31								
Monroe, MI MSA	138	1.00	0.64	0.00	2.24	2.17	94.35	94.20	2.77	3.62	3.29	0.00	3.23	3.38	0.00								
Muskegon-Norton Shores, MI MSA	151	1.09	4.14	1.99	16.91	12.58	45.58	45.70	33.37	39.74	3.44	0.00	3.03	3.41	4.12								

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: MICHIGAN		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Limited Review:</b>																					
Niles-Benton Harbor, MI MSA	196	1.42	5.21	2.04	8.86	6.63	63.07	61.22	22.85	30.10	4.66	3.51	6.11	4.63	4.44						
Saginaw-Saginaw Township North, MI MSA	269	1.95	6.67	6.32	9.69	12.64	55.99	56.13	27.65	24.91	6.10	8.79	7.98	5.95	5.19						
Michigan Non-MSA	577	4.18	0.00	0.00	1.84	4.68	66.01	55.46	32.16	39.86	5.72	0.00	10.47	5.25	6.17						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS																
GEOGRAPHY: MICHIGAN																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Detroit-Livonia-Dearborn, MI MD	5	3.05	3.36	0.00	16.79	0.00	41.45	0.00	38.40	100.00	5.26	0.00	0.00	0.00	12.50	
Kalamazoo-Portage, MI MSA	14	8.54	0.52	0.00	18.78	21.43	56.50	71.43	24.20	7.14	16.67	0.00	14.29	20.00	12.50	
Warren-Troy-Farmington Hills, MI MD	31	18.90	1.57	3.23	17.96	19.35	60.19	38.71	20.28	38.71	5.36	0.00	9.68	1.56	11.76	
<b>Limited Review:</b>																
Ann Arbor, MI MSA	1	0.61	2.18	0.00	6.24	0.00	60.85	0.00	30.72	100.00	5.26	0.00	0.00	0.00	16.67	
Battle Creek, MI MSA	10	6.10	0.32	0.00	5.27	0.00	80.35	90.00	14.06	10.00	0.00	0.00	0.00	0.00	0.00	
Bay City, MI MSA	7	4.27	0.00	0.00	4.55	0.00	74.53	71.43	20.91	28.57	22.22	0.00	0.00	20.00	33.33	
Flint, MI MSA	6	3.66	3.96	0.00	7.64	0.00	40.88	16.67	47.51	83.33	4.76	0.00	0.00	0.00	14.29	
Grand Rapids-Wyoming, MI MSA	20	12.20	0.25	0.00	6.21	5.00	72.48	90.00	21.07	5.00	5.19	0.00	0.00	6.40	0.00	
Holland-Grand Haven, MI MSA	14	8.54	0.00	0.00	1.67	0.00	97.38	100.00	0.94	0.00	5.43	0.00	0.00	5.43	0.00	
Jackson, MI MSA	2	1.22	0.95	0.00	3.47	0.00	90.85	100.00	4.73	0.00	0.00	0.00	0.00	0.00	0.00	
Lansing-East Lansing, MI MSA	11	6.71	0.94	0.00	5.67	0.00	77.28	72.73	16.11	27.27	8.16	0.00	0.00	7.50	14.29	
Monroe, MI MSA	4	2.44	0.14	0.00	0.42	0.00	97.21	100.00	2.23	0.00	5.56	0.00	0.00	5.56	0.00	
Muskegon-Norton Shores, MI MSA	2	1.22	1.48	0.00	8.13	0.00	68.72	100.00	21.67	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: MICHIGAN					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Limited Review:</b>																								
Niles-Benton Harbor, MI MSA	10	6.10	1.44	0.00	1.83	0.00	78.98	70.00	17.75	30.00	6.38	0.00	0.00	2.78	20.00									
Saginaw-Saginaw Township North, MI MSA	2	1.22	1.25	0.00	2.26	0.00	74.94	100.00	21.55	0.00	0.00	0.00	0.00	0.00	0.00									
Michigan Non-MSA	25	15.24	0.00	0.00	0.21	0.00	70.01	64.00	29.79	36.00	2.22	0.00	0.00	1.54	5.00									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase															Geography: Michigan					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Detroit-Livonia-Dearborn, MI MD	6,667	19.61	23.09	8.17	16.60	28.16	19.31	28.64	41.01	35.03	20.81	20.26	23.00	22.15	18.10									
Kalamazoo-Portage, MI MSA	1,364	4.01	19.20	18.41	18.77	26.66	23.27	25.18	38.75	29.75	15.30	17.41	16.31	15.92	13.19									
Warren-Troy-Farmington Hills, MI MD	14,231	41.85	18.39	21.35	18.77	31.28	23.93	24.01	38.92	23.35	17.90	18.24	18.62	19.06	15.46									
<b>Limited Review:</b>																								
Ann Arbor, MI MSA	1,465	4.31	19.62	17.75	18.04	29.81	22.71	25.09	39.63	27.35	16.29	17.48	15.35	18.08	15.03									
Battle Creek, MI MSA	486	1.43	19.31	12.42	18.76	27.54	22.55	25.26	39.38	34.78	16.80	16.06	16.52	16.25	17.92									
Bay City, MI MSA	313	0.92	18.81	28.94	19.72	32.80	21.93	19.61	39.53	18.65	11.30	13.45	11.03	7.36	13.79									
Flint, MI MSA	1,551	4.56	22.10	18.58	17.07	32.20	20.46	26.60	40.37	22.62	16.03	16.58	17.31	15.23	14.89									
Grand Rapids-Wyoming, MI MSA	2,387	7.02	18.17	19.80	18.95	34.79	24.57	24.18	38.30	21.23	9.77	10.91	11.06	9.66	7.32									
Holland-Grand Haven, MI MSA	748	2.20	14.28	20.38	19.85	36.03	29.77	23.35	36.09	20.24	8.67	9.67	10.10	8.71	5.99									
Jackson, MI MSA	457	1.34	17.84	20.26	19.18	32.38	24.66	25.55	38.32	21.81	14.50	16.48	14.19	11.93	15.82									
Lansing-East Lansing, MI MSA	1,542	4.53	18.99	22.37	18.70	33.94	23.64	24.71	38.67	18.99	10.97	11.61	11.42	12.09	8.61									
Monroe, MI MSA	666	1.96	17.78	16.09	19.03	32.63	25.15	28.87	38.05	22.41	16.91	17.65	16.33	21.60	11.94									
Muskegon-Norton Shores, MI MSA	306	0.90	19.62	24.75	18.74	31.68	22.87	24.75	38.77	18.81	6.63	9.38	5.86	6.96	4.98									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: MICHIGAN					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Limited Review:</b>																
Niles-Benton Harbor, MI MSA	362	1.06	20.21	18.26	17.87	26.69	21.98	23.03	39.93	32.02	7.76	12.03	10.30	9.81	4.60	
Saginaw-Saginaw Township North, MI MSA	537	1.58	21.61	18.98	17.36	30.83	20.27	25.75	40.76	24.44	12.30	14.24	14.09	11.78	9.40	
Michigan Non-MSA	924	2.72	13.47	10.39	16.02	30.41	22.46	24.35	48.04	34.85	9.07	9.07	11.17	8.88	7.71	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: MICHIGAN					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Detroit-Livonia- Dearborn, MI MD	94	21.51	23.09	8.79	16.60	17.58	19.31	25.27	41.01	48.35	4.87	3.88	3.90	3.54	7.73	
Kalamazoo-Portage, MI MSA	26	5.95	19.20	7.69	18.77	26.92	23.27	7.69	38.75	57.69	3.43	2.00	4.94	1.27	4.29	
Warren-Troy-Farmington Hills, MI MD	151	34.55	18.39	10.88	18.77	19.05	23.93	31.97	38.92	38.10	4.56	1.88	3.79	5.88	6.86	
<b>Limited Review:</b>																
Ann Arbor, MI MSA	21	4.81	19.62	15.00	18.04	20.00	22.71	20.00	39.63	45.00	3.02	2.63	0.00	5.08	3.45	
Battle Creek, MI MSA	6	1.37	19.31	33.33	18.76	16.67	22.55	16.67	39.38	33.33	0.58	0.00	0.00	0.00	1.41	
Bay City, MI MSA	4	0.92	18.81	50.00	19.72	50.00	21.93	0.00	39.53	0.00	0.82	1.89	1.67	0.00	0.00	
Flint, MI MSA	15	3.43	22.10	0.00	17.07	35.71	20.46	42.86	40.37	21.43	0.78	0.00	1.77	1.06	0.00	
Grand Rapids-Wyoming, MI MSA	23	5.26	18.17	17.39	18.95	30.43	24.57	30.43	38.30	21.74	1.76	2.50	2.22	1.79	0.94	
Holland-Grand Haven, MI MSA	6	1.37	14.28	16.67	19.85	16.67	29.77	50.00	36.09	16.67	1.37	4.55	2.04	1.47	0.00	
Jackson, MI MSA	15	3.43	17.84	20.00	19.18	13.33	24.66	20.00	38.32	46.67	1.67	2.50	0.00	1.49	2.53	
Lansing-East Lansing, MI MSA	22	5.03	18.99	0.00	18.70	23.81	23.64	33.33	38.67	42.86	1.55	0.00	1.84	1.37	2.33	
Monroe, MI MSA	14	3.20	17.78	15.38	19.03	30.77	25.15	15.38	38.05	38.46	6.06	11.11	3.45	8.70	3.45	
Muskegon-Norton Shores, MI MSA	5	1.14	19.62	0.00	18.74	40.00	22.87	40.00	38.77	20.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: MICHIGAN					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families* **	% BANK Loans****	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Limited Review:</b>																
Niles-Benton Harbor, MI MSA	12	2.75	20.21	8.33	17.87	25.00	21.98	33.33	39.93	33.33	0.93	0.00	1.16	1.71	0.55	
Saginaw-Saginaw Township North, MI MSA	6	1.37	21.61	20.00	17.36	0.00	20.27	40.00	40.76	40.00	1.59	2.70	0.00	0.00	3.57	
Michigan Non-MSA	17	3.89	13.47	12.50	16.02	18.75	22.46	25.00	48.04	43.75	1.24	2.33	0.00	0.90	2.11	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Michigan					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Detroit-Livonia- Dearborn, MI MD	6,106	15.81	23.09	4.45	16.60	14.49	19.31	20.19	41.01	60.87	15.55	21.46	22.65	17.48	13.46	
Kalamazoo-Portage, MI MSA	1,654	4.28	19.20	7.73	18.77	19.15	23.27	27.46	38.75	45.66	8.20	8.52	8.56	9.37	7.49	
Warren-Troy- Farmington Hills, MI MD	15,361	39.76	18.39	10.28	18.77	21.10	23.93	25.46	38.92	43.15	12.76	16.14	15.13	12.59	11.11	
<b>Limited Review:</b>																
Ann Arbor, MI MSA	2,214	5.73	19.62	7.98	18.04	20.49	22.71	25.01	39.63	46.51	11.24	11.50	11.79	10.91	11.20	
Battle Creek, MI MSA	417	1.08	19.31	3.17	18.76	16.83	22.55	23.17	39.38	56.83	7.69	5.61	8.97	8.06	7.31	
Bay City, MI MSA	353	0.91	18.81	11.03	19.72	21.35	21.93	24.91	39.53	42.70	8.45	9.76	8.56	9.20	7.75	
Flint, MI MSA	1,371	3.55	22.10	8.54	17.07	24.72	20.46	25.74	40.37	41.00	9.31	11.41	11.23	9.37	8.23	
Grand Rapids- Wyoming, MI MSA	3,115	8.06	18.17	8.72	18.95	21.81	24.57	29.47	38.30	40.00	5.68	7.00	6.26	6.13	4.95	
Holland-Grand Haven, MI MSA	1,248	3.23	14.28	10.10	19.85	27.52	29.77	27.33	36.09	35.05	5.63	7.15	7.09	5.02	4.80	
Jackson, MI MSA	654	1.69	17.84	8.94	19.18	21.86	24.66	30.80	38.32	38.40	9.65	11.41	9.07	10.37	9.21	
Lansing-East Lansing, MI MSA	2,057	5.32	18.99	11.27	18.70	23.38	23.64	27.26	38.67	38.10	8.19	12.52	10.10	8.11	6.86	
Monroe, MI MSA	839	2.17	17.78	7.19	19.03	21.71	25.15	31.96	38.05	39.14	13.09	10.37	14.34	13.14	12.84	
Muskegon-Norton Shores, MI MSA	567	1.47	19.62	10.17	18.74	24.46	22.87	28.79	38.77	36.58	6.55	8.13	7.88	6.97	5.45	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 22.7% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: MICHIGAN					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Limited Review:</b>																
Niles-Benton Harbor, MI MSA	681	1.76	20.21	7.78	17.87	20.43	21.98	20.07	39.93	51.72	6.22	6.21	8.52	7.24	5.41	
Saginaw-Saginaw Township North, MI MSA	615	1.59	21.61	6.78	17.36	18.43	20.27	27.97	40.76	46.82	6.93	6.60	5.73	6.99	7.38	
Michigan Non-MSA	1,381	3.57	13.47	5.34	16.02	16.85	22.46	22.46	48.04	55.34	6.26	7.12	5.92	6.46	6.20	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 22.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: MICHIGAN			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Detroit-Livonia-Dearborn, MI MD	2,237	16.21	67.41	49.13	78.50	9.79	11.71	5.62	9.70
Kalamazoo-Portage, MI MSA	513	3.72	67.18	54.39	83.63	7.21	9.16	5.53	8.67
Warren-Troy-Farmington Hills, MI MD	5,971	43.26	69.66	49.61	77.54	9.46	13.00	5.28	9.09
<b>Limited Review:</b>									
Ann Arbor, MI MSA	489	3.54	68.40	61.15	90.18	2.04	7.77	3.76	7.83
Battle Creek, MI MSA	245	1.77	66.14	32.24	68.57	15.51	15.92	9.68	10.71
Bay City, MI MSA	127	0.92	70.04	48.82	86.61	8.66	4.72	3.76	3.19
Flint, MI MSA	514	3.72	72.95	47.28	74.51	10.70	14.79	4.88	6.75
Grand Rapids-Wyoming, MI MSA	1,127	8.16	68.29	43.12	80.12	7.10	12.78	4.04	4.52
Holland-Grand Haven, MI MSA	450	3.26	71.09	48.89	84.00	4.67	11.33	4.92	5.46
Jackson, MI MSA	170	1.23	67.51	45.88	86.47	7.06	6.47	4.77	5.81
Lansing-East Lansing, MI MSA	630	4.56	68.04	52.70	82.86	7.78	9.37	5.89	8.51
Monroe, MI MSA	138	1.00	69.20	70.29	92.75	3.62	3.62	3.23	4.68
Muskegon-Norton Shores, MI MSA	151	1.09	70.97	50.33	88.08	1.99	9.93	3.41	3.70

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 24.23% of small loans to businesses originated and purchased by the bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: MICHIGAN			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
Niles-Benton Harbor, MI MSA	196	1.42	69.61	54.08	74.49	9.18	16.33	4.50	6.40
Saginaw-Saginaw Township North, MI MSA	269	1.95	70.45	41.64	82.53	8.92	8.55	6.03	6.78
Michigan Non-MSA	577	4.18	71.37	53.55	92.20	2.95	4.85	5.56	5.29

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 24.23% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: MICHIGAN									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Detroit-Livonia-Dearborn, MI MD	5	3.05	97.30	80.00	100.00	0.00	0.00	5.26	6.67
Kalamazoo-Portage, MI MSA	14	8.54	94.92	42.86	100.00	0.00	0.00	16.00	8.33
Warren-Troy-Farmington Hills, MI MD	31	18.90	97.23	74.19	96.77	3.23	0.00	5.31	5.45
<b>Limited Review:</b>									
Ann Arbor, MI MSA	1	0.61	97.42	100.00	100.00	0.00	0.00	5.26	7.69
Battle Creek, MI MSA	10	6.10	98.24	60.00	50.00	20.00	30.00	0.00	0.00
Bay City, MI MSA	7	4.27	99.17	100.00	100.00	0.00	0.00	21.05	25.00
Flint, MI MSA	6	3.66	98.16	83.33	100.00	0.00	0.00	4.55	7.69
Grand Rapids-Wyoming, MI MSA	20	12.20	96.90	50.00	95.00	5.00	0.00	5.13	2.06
Holland-Grand Haven, MI MSA	14	8.54	94.77	35.71	85.71	0.00	14.29	5.32	1.89
Jackson, MI MSA	2	1.22	99.68	50.00	100.00	0.00	0.00	0.00	0.00
Lansing-East Lansing, MI MSA	11	6.71	97.90	63.64	72.73	0.00	27.27	8.16	11.11
Monroe, MI MSA	4	2.44	97.07	75.00	100.00	0.00	0.00	5.56	4.26
Muskegon-Norton Shores, MI MSA	2	1.22	97.29	100.00	100.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 22.84% of small loans to farms originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: MICHIGAN			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
Niles-Benton Harbor, MI MSA	10	6.10	96.87	90.00	90.00	0.00	10.00	6.25	10.71
Saginaw-Saginaw Township North, MI MSA	2	1.22	98.12	0.00	100.00	0.00	0.00	0.00	0.00
Michigan Non-MSA	25	15.24	97.77	60.00	92.00	4.00	4.00	2.22	1.29

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 22.84% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: MICHIGAN									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Detroit-Livonia-Dearborn, MI MD	75	17,211	101	32,364	176	49,575	25.86	2	5,463
Kalamazoo-Portage, MI MSA	13	513	13	625	26	1,138	0.59	0	0
Warren-Troy-Farmington Hills, MI MD	102	28,877	153	69,884	255	98,761	51.52	0	0
<b>Limited Review:</b>									
Ann Arbor, MI MSA	9	507	18	561	27	1,068	0.56	0	0
Battle Creek, MI MSA	5	647	11	392	16	1,039	0.54	0	0
Bay City, MI MSA	2	3,935	4	108	6	4,043	2.11	0	0
Flint, MI MSA	9	855	11	8,534	20	9,390	4.90	1	1,232
Grand Rapids-Wyoming, MI MSA	27	2,492	20	639	47	3,130	1.63	1	0
Holland-Grand Haven, MI MSA	5	304	6	115	11	419	0.22	0	0
Jackson, MI MSA	6	461	10	183	16	644	0.34	0	0
Lansing-East Lansing, MI MSA	18	1,222	14	835	32	2,056	1.07	0	0
Monroe, MI MSA	2	3,727	13	573	15	4,300	2.24	0	0
Muskegon-Norton Shores, MI MSA	7	347	2	30	9	377	0.20	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: MICHIGAN									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Limited Review:</b>									
Niles-Benton Harbor, MI MSA	3	1,258	5	157	8	1,415	0.74	0	0
Saginaw-Saginaw Township North, MI MSA	4	1,587	9	375	13	1,962	1.02	0	0
Michigan Non-MSA	15	965	10	248	25	1,212	0.63	0	0
Statewide investments with potential benefit to one or more AAs	0	0	13	316	13	316	0.17	0	0
Statewide investments with no potential to benefit one or more AAs	46	10,785	8	49	54	10,834	5.65	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: MICHIGAN								EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Detroit-Livonia-Dearborn, MI MD	17.09	55	25.82	3.64	21.82	34.55	40.00	1	10	0	0	-4	-5	7.80	30.49	33.77	27.85
Kalamazoo-Portage, MI MSA	2.19	9	4.23	0.00	11.11	88.89	0.00	0	2	0	0	-1	-1	5.92	21.21	51.05	21.82
Warren-Troy-Farmington Hills, MI MD	66.48	80	37.56	1.25	17.50	51.25	30.00	1	12	1	-2	-9	-1	2.05	20.52	52.36	25.06
<b>Limited Review:</b>																	
Ann Arbor, MI MSA	1.88	7	3.29	14.29	28.57	42.86	14.29	0	2	0	0	-1	-1	11.48	18.11	48.69	21.72
Battle Creek, MI MSA	0.81	4	1.88	0.00	0.00	25.00	75.00	0	0	0	0	0	0	1.99	23.53	51.25	23.21
Bay City, MI MSA	0.31	2	0.94	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	19.55	65.06	15.39
Flint, MI MSA	1.52	8	3.76	12.50	25.00	62.50	0.00	0	3	0	-1	-1	-1	12.32	17.84	40.48	29.36
Grand Rapids-Wyoming, MI MSA	2.03	10	4.69	0.00	20.00	60.00	20.00	0	3	0	-1	-1	-1	2.01	18.22	59.42	20.35
Holland-Grand Haven, MI MSA	0.07	1	0.47	0.00	0.00	100.0	0.00	0	1	0	0	-1	0	0.00	5.86	90.83	3.31
Jackson, MI MSA	0.58	3	1.41	33.33	0.00	66.67	0.00	0	1	0	0	-1	0	2.43	14.06	72.73	8.89
Lansing-East Lansing, MI MSA	2.60	12	5.63	8.33	33.33	25.00	33.33	0	0	0	0	0	0	5.69	16.98	55.47	21.05
Monroe, MI MSA	1.72	6	2.82	0.00	16.67	83.33	0.00	0	1	0	0	-1	0	1.03	2.15	93.50	3.33
Muskegon-Norton Shores, MI MSA	0.08	1	0.47	0.00	0.00	0.00	100.0	0	0	0	0	0	0	5.82	21.98	48.81	23.40

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: MICHIGAN																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Limited Review:</b>																	
Niles-Benton Harbor, MI MSA	0.53	3	1.41	0.00	33.33	33.33	33.33	0	1	0	-1	0	0	5.96	9.99	63.16	20.88
Saginaw-Saginaw Township North, MI MSA	1.26	6	2.82	16.67	16.67	33.33	33.33	0	2	0	-1	-1	0	12.52	11.50	53.37	22.61
Michigan Non-MSA	0.84	6	2.82	0.00	0.00	100.0	0.00	0	2	0	0	-1	-1	0.00	1.71	67.07	31.22

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: MINNESOTA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Minneapolis-St Paul-Bloomington MN, MSA	100.00	24,687	4,932,401	2,207	69,442	13	98	2	2,500	26,909	5,004,441	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: MINNESOTA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Minneapolis-St Paul-Bloomington MN, MSA	100.00	1	3,681	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															GEOGRAPHY: MINNESOTA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Minneapolis-St Paul-Bloomington MN, MSA	9,083	100.00	1.55	2.36	13.44	15.01	56.15	58.24	28.86	24.40	6.62	6.11	6.92	7.06	5.65						

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: MINNESOTA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Minneapolis-St Paul-Bloomington MN, MSA	227	100.00	1.55	0.00	13.44	11.01	56.15	53.74	28.86	35.24	1.97	0.00	2.98	1.96	1.71

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: MINNESOTA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Minneapolis-St Paul-Bloomington MN, MSA	15,377	100.00	1.55	1.01	13.44	9.52	56.15	56.37	28.86	33.09	5.93	7.80	7.75	6.49	4.84									

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: MINNESOTA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp															
<b>Full Review:</b>																														
Minneapolis-St Paul-Bloomington MN, MSA	0	0.00	10.03	0.00	29.60	0.00	46.68	0.00	13.69	0.00	0.00	0.00	0.00	0.00	0.00															

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: MINNESOTA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Minneapolis-St Paul-Bloomington MN, MSA	2,207	100.00	3.34	2.54	13.80	11.42	53.67	56.55	29.18	29.50	1.34	1.09	1.47	1.45	1.16									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: MINNESOTA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Minneapolis-St Paul-Bloomington MN, MSA	13	100.00	0.63	0.00	7.46	0.00	66.88	84.62	25.03	15.38	1.01	0.00	0.00	1.37	0.00									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: MINNESOTA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Minneapolis-St Paul-Bloomington MN, MSA	9,083	100.00	17.05	23.85	18.87	33.62	26.31	21.61	37.77	20.92	7.77	8.40	8.83	7.47	6.24	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: MINNESOTA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families* **	% BANK Loans****	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Minneapolis-St Paul-Bloomington MN, MSA	227	100.00	17.05	12.00	18.87	30.67	26.31	25.33	37.77	32.00	2.06	1.82	2.49	2.17	1.74	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: MINNESOTA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****					
<b>Full Review:</b>															
Minneapolis-St Paul-Bloomington MN, MSA	15,377	100.00	17.05	11.43	18.87	25.37	26.31	28.41	37.77	34.79	6.12	8.85	7.52	6.40	4.77

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.2% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: MINNESOTA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Minneapolis-St Paul-Bloomington MN, MSA	2,207	100.00	68.55	59.36	95.06	1.04	3.90	1.32	1.49

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 23.21% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: MINNESOTA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Minneapolis-St Paul-Bloomington MN, MSA	13	100.00	97.17	69.23	100.00	0.00	0.00	0.98	1.00

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 23.08% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: MINNESOTA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Minneapolis-St Paul-Bloomington MN, MSA	38	8,268	39	1,458	77	9,726	47.55	0	0
Statewide investments with potential benefit to one or more AAs	1	677	14	62	15	739	3.61	0	0
Statewide investments with no potential to benefit one or more AAs	17	9,778	6	211	23	9,990	48.84	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: MINNESOTA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Minneapolis-St Paul-Bloomington MN, MSA	100.00	1	100.00	0.00	0.00	100.00	0.00	1	1	0	0	0	0	4.72	17.25	52.26	25.70

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: MISSOURI				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Missouri Non-MSA	25.95	3,895	482,334	616	26,909	153	9,252	1	5,332	4,665	523,827	39.32
Springfield, MO MSA	45.99	7,608	1,020,110	624	26,962	34	1,413	0	0	8,266	1,048,485	26.23
<b>Limited Review:</b>												
Cape Girardeau, MO MSA	7.63	1,156	155,114	184	12,364	31	2,229	0	0	1,371	169,707	13.50
Columbia, MO MSA	11.73	1,884	272,763	217	6,723	7	39	0	0	2,108	279,525	13.98
Joplin, MO MSA	8.71	1,406	153,815	152	3,626	7	113	0	0	1,565	157,554	6.96

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: MISSOURI				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Missouri Non-MSA	1,359	24.64	0.00	0.00	7.91	3.16	82.48	81.09	9.61	15.75	10.64	0.00	7.96	11.31	8.04	
Springfield, MO MSA	2,555	46.32	0.04	0.00	16.16	11.15	56.80	54.13	27.01	34.72	12.86	0.00	12.27	12.20	14.35	
<b>Limited Review:</b>																
Cape Girardeau, MO MSA	334	6.06	0.00	0.00	10.92	7.78	74.50	73.65	14.58	18.56	10.62	0.00	11.76	9.38	15.42	
Columbia, MO MSA	704	12.76	1.68	1.14	12.53	13.78	59.86	64.63	25.94	20.45	8.97	7.50	9.38	9.37	7.86	
Joplin, MO MSA	564	10.22	0.00	0.00	8.10	10.28	84.22	82.27	7.68	7.45	9.41	0.00	11.70	9.35	7.73	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: MISSOURI				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Missouri Non-MSA	68	38.42	0.00	0.00	7.91	4.41	82.48	83.82	9.61	11.76	4.36	0.00	2.56	4.72	3.33	
Springfield, MO MSA	49	27.68	0.04	0.00	16.16	14.29	56.80	44.90	27.01	40.82	3.96	0.00	2.63	2.55	7.97	
<b>Limited Review:</b>																
Cape Girardeau, MO MSA	25	14.12	0.00	0.00	10.92	4.00	74.50	76.00	14.58	20.00	5.41	0.00	6.67	3.42	18.75	
Columbia, MO MSA	17	9.60	1.68	0.00	12.53	17.65	59.86	64.71	25.94	17.65	2.46	0.00	3.70	2.68	1.61	
Joplin, MO MSA	18	10.17	0.00	0.00	8.10	5.56	84.22	83.33	7.68	11.11	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: MISSOURI					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Missouri Non-MSA	2,468	24.06	0.00	0.00	7.91	4.25	82.48	86.67	9.61	9.08	13.23	0.00	17.26	13.82	8.51									
Springfield, MO MSA	5,004	48.79	0.04	0.00	16.16	6.71	56.80	51.88	27.01	41.41	16.58	0.00	14.74	16.00	17.64									
<b>Limited Review:</b>																								
Cape Girardeau, MO MSA	797	7.77	0.00	0.00	10.92	2.51	74.50	82.94	14.58	14.55	16.00	0.00	7.50	16.65	15.06									
Columbia, MO MSA	1,163	11.34	1.68	0.86	12.53	9.89	59.86	62.60	25.94	26.66	10.24	9.30	13.74	9.79	10.20									
Joplin, MO MSA	824	8.03	0.00	0.00	8.10	5.46	84.22	85.44	7.68	9.10	9.38	0.00	10.95	9.33	9.09									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY																
GEOGRAPHY: MISSOURI																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Missouri Non-MSA	0	0.00	0.00	0.00	12.93	0.00	80.63	0.00	6.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Springfield, MO MSA	0	0.00	7.78	0.00	20.58	0.00	53.39	0.00	18.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>																
Cape Girardeau, MO MSA	0	0.00	0.00	0.00	20.24	0.00	67.92	0.00	11.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Columbia, MO MSA	0	0.00	26.53	0.00	30.29	0.00	16.53	0.00	26.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Joplin, MO MSA	0	0.00	0.00	0.00	33.32	0.00	59.26	0.00	7.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: MISSOURI					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans						
<b>Full Review:</b>																
Missouri Non-MSA	616	34.36	0.00	0.00	8.58	7.79	83.59	85.39	7.84	6.82	5.13	0.00	5.56	5.28	3.48	
Springfield, MO MSA	624	34.80	2.06	1.60	14.80	13.94	54.43	49.04	28.71	35.42	4.43	2.36	3.65	4.15	5.44	
<b>Limited Review:</b>																
Cape Girardeau, MO MSA	184	10.26	0.00	0.00	9.57	7.07	79.31	83.70	11.12	9.24	7.16	0.00	6.76	7.93	3.42	
Columbia, MO MSA	217	12.10	13.91	17.05	15.57	12.90	48.20	41.94	22.32	28.11	4.08	3.08	5.12	3.53	5.19	
Joplin, MO MSA	152	8.48	0.00	0.00	12.44	13.16	79.55	79.61	8.00	7.24	3.93	0.00	3.83	3.98	3.73	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: MISSOURI				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Missouri Non-MSA	153	65.95	0.00	0.00	7.95	2.61	76.79	81.05	15.26	16.34	4.49	0.00	0.00	5.19	2.73	
Springfield, MO MSA	34	14.66	0.10	0.00	13.09	17.65	66.73	50.00	20.08	32.35	2.87	0.00	5.63	2.11	5.41	
<b>Limited Review:</b>																
Cape Girardeau, MO MSA	31	13.36	0.00	0.00	2.42	6.45	92.74	93.55	4.84	0.00	15.71	0.00	100.00	14.71	0.00	
Columbia, MO MSA	7	3.02	1.23	0.00	16.50	0.00	71.79	100.00	10.48	0.00	3.15	0.00	0.00	4.21	0.00	
Joplin, MO MSA	7	3.02	0.00	0.00	3.22	0.00	93.41	100.00	3.37	0.00	3.81	0.00	0.00	3.88	0.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: MISSOURI					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Missouri Non-MSA	1,359	24.64	18.91	9.62	19.12	21.02	23.69	28.87	38.28	40.49	12.23	14.01	12.64	13.95	10.59	
Springfield, MO MSA	2,555	46.32	17.54	15.29	19.69	28.66	24.11	25.59	38.66	30.46	15.53	14.70	15.36	16.12	15.58	
<b>Limited Review:</b>																
Cape Girardeau, MO MSA	334	6.06	13.49	10.48	14.46	24.55	21.81	26.05	50.24	38.92	11.52	13.46	11.97	10.45	11.48	
Columbia, MO MSA	704	12.76	19.80	17.52	18.22	31.77	23.18	27.07	38.80	23.65	10.55	12.78	11.20	10.90	8.79	
Joplin, MO MSA	564	10.22	17.53	11.74	19.46	29.00	24.59	26.16	38.41	33.10	11.12	13.82	10.31	12.79	9.55	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement															Geography: Missouri					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Missouri Non-MSA	68	38.42	18.91	9.09	19.12	19.70	23.69	31.82	38.28	39.39	4.49	0.00	5.05	6.31	4.23									
Springfield, MO MSA	49	27.68	17.54	12.50	19.69	31.25	24.11	22.92	38.66	33.33	4.02	1.56	5.04	2.84	5.20									
<b>Limited Review:</b>																								
Cape Girardeau, MO MSA	25	14.12	13.49	4.17	14.46	20.83	21.81	16.67	50.24	58.33	5.88	0.00	8.70	5.56	6.67									
Columbia, MO MSA	17	9.60	19.80	5.88	18.22	17.65	23.18	35.29	38.80	41.18	2.61	0.00	2.27	3.28	3.19									
Joplin, MO MSA	18	10.17	17.53	6.25	19.46	25.00	24.59	31.25	38.41	37.50	0.00	0.00	0.00	0.00	0.00									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.4% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance															Geography: Missouri					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Missouri Non-MSA	2,468	24.06	18.91	5.57	19.12	18.22	23.69	27.15	38.28	49.06	15.34	16.28	18.46	16.69	13.86									
Springfield, MO MSA	5,004	48.79	17.54	9.03	19.69	19.69	24.11	26.79	38.66	44.49	19.15	21.62	20.43	19.50	18.22									
<b>Limited Review:</b>																								
Cape Girardeau, MO MSA	797	7.77	13.49	3.70	14.46	18.25	21.81	27.12	50.24	50.93	17.29	16.67	19.25	18.12	16.43									
Columbia, MO MSA	1,163	11.34	19.80	9.30	18.22	22.93	23.18	27.07	38.80	40.70	10.20	16.44	12.08	10.54	8.78									
Joplin, MO MSA	824	8.03	17.53	6.68	19.46	19.74	24.59	25.28	38.41	48.30	10.22	16.41	13.02	11.41	8.28									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 11.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: MISSOURI			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Missouri Non-MSA	616	34.36	69.28	56.66	92.05	3.73	4.22	4.84	5.30
Springfield, MO MSA	624	34.80	68.44	56.57	91.67	3.69	4.65	4.27	4.65
<b>Limited Review:</b>									
Cape Girardeau, MO MSA	184	10.26	65.19	34.78	84.24	7.07	8.70	6.86	6.76
Columbia, MO MSA	217	12.10	66.30	60.37	94.47	2.76	2.76	4.03	5.72
Joplin, MO MSA	152	8.48	68.31	57.24	96.71	1.32	1.97	3.87	4.58

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 29.05% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: MISSOURI			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Missouri Non-MSA	153	65.95	98.87	27.45	85.62	9.80	4.58	4.36	4.67
Springfield, MO MSA	34	14.66	98.85	73.53	88.24	0.00	11.76	2.82	2.82
<b>Limited Review:</b>									
Cape Girardeau, MO MSA	31	13.36	99.60	25.81	87.10	3.23	9.68	15.07	17.86
Columbia, MO MSA	7	3.02	98.89	85.71	100.00	0.00	0.00	3.15	3.06
Joplin, MO MSA	7	3.02	99.27	57.14	100.00	0.00	0.00	3.77	2.06

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 58.08% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: MISSOURI									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Missouri Non-MSA	14	684	45	2,846	59	3,530	16.70	0	0
Springfield, MO MSA	10	5,471	54	1,842	64	7,312	34.60	0	0
<b>Limited Review:</b>									
Cape Girardeau, MO MSA	0	0	19	687	19	687	3.25	0	0
Columbia, MO MSA	5	3,512	20	1,066	25	4,578	21.66	0	0
Joplin, MO MSA	4	394	14	302	18	696	3.29	0	0
Statewide investments with potential benefit to one or more AAs	0	0	7	77	7	77	0.36	0	0
Statewide investments with no potential to benefit one or more AAs	6	3,852	16	401	22	4,253	20.13	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: MISSOURI																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Missouri Non-MSA	39.32	21	58.33	0.00	4.76	90.48	4.76	0	3	0	0	-3	0	0.00	8.91	81.24	9.85
Springfield, MO MSA	26.23	7	19.44	14.29	14.29	28.57	42.86	0	0	0	0	0	0	1.64	19.56	55.52	23.28
<b>Limited Review:</b>																	
Cape Girardeau, MO MSA	13.50	2	5.56	0.00	50.00	50.00	0.00	0	1	0	0	0	-1	0.00	13.54	73.72	12.75
Columbia, MO MSA	13.98	3	8.33	33.33	33.33	0.00	33.33	0	1	0	0	-1	0	6.96	18.82	51.91	22.31
Joplin, MO MSA	6.96	3	8.33	0.00	33.33	66.67	0.00	0	1	0	0	-1	0	0.00	11.30	81.76	6.94

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: NEVADA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Las Vegas-Paradise, NV MSA	73.45	36,005	6,037,573	3,913	186,470	9	83	3	4,261	39,930	6,228,387	83.83
<b>Limited Review:</b>												
Carson City, NV MSA	1.67	704	126,279	200	7,148	2	15	0	0	906	133,442	1.15
Reno-Sparks, NV MSA	17.24	8,193	1,575,776	1,172	42,131	7	92	0	0	9,372	1,617,999	9.56
Nevada Non-MSA	7.64	3,545	619,689	590	19,908	22	754	0	0	4,157	640,351	5.46

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															
GEOGRAPHY: NEVADA															
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	25,133	78.43	0.39	0.21	16.32	3.46	44.57	46.84	38.72	49.48	22.68	21.05	21.71	23.60	21.90
<b>Limited Review:</b>															
Carson City, NV MSA	317	0.99	0.00	0.00	6.70	9.78	68.56	76.03	24.74	14.20	21.57	0.00	19.05	22.37	20.00
Reno-Sparks, NV MSA	4,965	15.49	0.98	0.26	16.35	10.37	44.30	48.00	38.38	41.37	22.97	26.92	24.71	25.04	20.47
Nevada Non-MSA	1,630	5.09	0.00	0.00	12.95	11.35	68.40	67.98	18.65	20.67	17.25	0.00	16.43	17.03	18.36

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NEVADA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	98	46.01	0.39	0.00	16.32	5.10	44.57	35.71	38.72	59.18	11.27	0.00	4.76	9.74	13.33
<b>Limited Review:</b>															
Carson City, NV MSA	9	4.23	0.00	0.00	6.70	0.00	68.56	66.67	24.74	33.33	17.65	0.00	0.00	15.38	25.00
Reno-Sparks, NV MSA	51	23.94	0.98	0.00	16.35	9.80	44.30	33.33	38.38	56.86	17.04	0.00	7.69	12.20	20.99
Nevada Non-MSA	55	25.82	0.00	0.00	12.95	1.82	68.40	65.45	18.65	32.73	9.50	0.00	7.69	10.71	7.41

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: NEVADA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Las Vegas-Paradise, NV MSA	10,774	66.56	0.39	0.14	16.32	5.27	44.57	39.43	38.72	55.16	22.75	18.75	32.14	24.09	21.43									
<b>Limited Review:</b>																								
Carson City, NV MSA	378	2.34	0.00	0.00	6.70	7.94	68.56	63.23	24.74	28.84	19.67	0.00	23.08	20.00	18.53									
Reno-Sparks, NV MSA	3,176	19.62	0.98	0.19	16.35	5.82	44.30	36.62	38.38	57.37	18.19	27.27	22.31	20.01	16.93									
Nevada Non-MSA	1,860	11.49	0.00	0.00	12.95	7.85	68.40	60.59	18.65	31.56	18.51	0.00	17.32	18.88	18.15									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: NEVADA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Las Vegas-Paradise, NV MSA	0	0.00	5.44	0.00	45.33	0.00	37.71	0.00	11.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
<b>Limited Review:</b>																								
Carson City, NV MSA	0	0.00	0.00	0.00	23.09	0.00	63.04	0.00	13.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Reno-Sparks, NV MSA	1	100.00	11.64	0.00	53.56	0.00	24.75	100.00	10.04	0.00	9.09	0.00	0.00	33.33	0.00									
Nevada Non-MSA	0	0.00	0.00	0.00	9.42	0.00	67.37	0.00	23.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: NEVADA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans						
<b>Full Review:</b>																
Las Vegas-Paradise, NV MSA	3,913	66.60	2.13	2.61	17.34	13.19	37.56	35.32	42.97	48.89	4.83	6.09	5.70	4.77	4.62	
<b>Limited Review:</b>																
Carson City, NV MSA	200	3.40	0.00	0.00	13.04	13.50	70.05	66.00	16.90	20.50	4.06	0.00	7.64	3.37	4.74	
Reno-Sparks, NV MSA	1,172	19.95	2.45	2.22	33.49	30.12	30.21	24.23	33.84	43.43	4.21	5.03	4.71	3.42	4.35	
Nevada Non-MSA	590	10.04	0.00	0.00	11.34	7.12	67.86	66.95	20.80	25.93	4.88	0.00	3.39	4.93	5.38	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: NEVADA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Las Vegas-Paradise, NV MSA	9	22.50	0.79	0.00	13.99	11.11	41.64	22.22	43.59	66.67	7.84	0.00	50.00	0.00	9.09	
<b>Limited Review:</b>																
Carson City, NV MSA	2	5.00	0.00	0.00	5.66	50.00	73.58	0.00	20.75	50.00	0.00	0.00	0.00	0.00	0.00	
Reno-Sparks, NV MSA	7	17.50	1.38	0.00	22.31	0.00	38.15	14.29	38.15	85.71	7.14	0.00	0.00	0.00	28.57	
Nevada Non-MSA	22	55.00	0.00	0.00	11.96	9.09	70.65	81.82	17.39	9.09	4.26	0.00	0.00	5.50	0.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NEVADA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Las Vegas-Paradise, NV MSA	25,133	78.43	18.69	13.91	18.74	26.95	23.47	27.75	39.10	31.39	25.73	26.27	27.38	28.05	22.27		
<b>Limited Review:</b>																	
Carson City, NV MSA	317	0.99	18.53	16.46	18.74	33.86	22.28	27.85	40.45	21.84	24.07	20.29	22.70	28.46	23.29		
Reno-Sparks, NV MSA	4,965	15.49	19.08	17.84	18.90	30.87	23.06	24.35	38.95	26.94	24.30	25.28	27.61	24.92	20.09		
Nevada Non-MSA	1,630	5.09	18.25	9.43	18.86	27.99	25.32	33.17	37.57	29.41	18.56	18.36	20.04	19.41	16.42		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NEVADA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Las Vegas-Paradise, NV MSA	98	46.01	18.69	11.83	18.74	27.96	23.47	23.66	39.10	36.56	10.86	17.07	10.39	5.38	12.95	
<b>Limited Review:</b>																
Carson City, NV MSA	9	4.23	18.53	11.11	18.74	11.11	22.28	22.22	40.45	55.56	17.65	0.00	0.00	0.00	42.86	
Reno-Sparks, NV MSA	51	23.94	19.08	4.26	18.90	21.28	23.06	34.04	38.95	40.43	15.45	0.00	17.24	13.33	18.87	
Nevada Non-MSA	55	25.82	18.25	16.67	18.86	16.67	25.32	42.59	37.57	24.07	9.14	11.76	13.33	11.29	6.17	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.7% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: NEVADA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Las Vegas-Paradise, NV MSA	10,774	66.56	18.69	10.13	18.74	19.09	23.47	24.64	39.10	46.14	20.76	26.59	23.59	20.48	18.96	
<b>Limited Review:</b>																
Carson City, NV MSA	378	2.34	18.53	10.36	18.74	21.04	22.28	24.60	40.45	44.01	18.76	23.73	16.41	15.53	20.54	
Reno-Sparks, NV MSA	3,176	19.62	19.08	9.56	18.90	19.47	23.06	23.25	38.95	47.72	18.42	23.89	21.08	17.31	17.30	
Nevada Non-MSA	1,860	11.49	18.25	7.70	18.86	19.24	25.32	27.68	37.57	45.37	18.24	25.00	21.18	17.71	16.71	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 34.6% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: NEVADA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Las Vegas-Paradise, NV MSA	3,913	66.60	67.00	58.11	90.44	4.17	5.39	4.73	6.70
<b>Limited Review:</b>									
Carson City, NV MSA	200	3.40	67.07	65.50	94.00	3.00	3.00	3.87	5.47
Reno-Sparks, NV MSA	1,172	19.95	68.20	53.67	93.86	3.16	2.99	3.92	4.77
Nevada Non-MSA	590	10.04	69.23	59.83	94.07	2.37	3.56	4.11	6.13

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 26.60% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: NEVADA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Las Vegas-Paradise, NV MSA	9	22.50	93.32	66.67	100.00	0.00	0.00	7.14	4.88
<b>Limited Review:</b>									
Carson City, NV MSA	2	5.00	96.23	100.00	100.00	0.00	0.00	0.00	0.00
Reno-Sparks, NV MSA	7	17.50	93.69	100.00	100.00	0.00	0.00	5.71	9.52
Nevada Non-MSA	22	55.00	94.37	59.09	95.45	0.00	4.55	3.59	2.55

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 18.42% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: NEVADA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Las Vegas-Paradise, NV MSA	74	38,791	184	48,020	258	86,812	90.56	1	1,041
<b>Limited Review:</b>									
Carson City, NV MSA	2	175	14	229	16	404	0.42	0	0
Reno-Sparks, NV MSA	8	4,805	29	2,099	37	6,904	7.20	0	0
Nevada Non-MSA	6	312	21	1,193	27	1,506	1.57	0	0
Statewide investments with potential benefit to one or more AAs	0	0	14	220	14	220	0.23	0	0
Statewide investments with no potential to benefit one or more AAs	0	0	6	19	6	19	0.02	1	52

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: NEVADA																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Las Vegas-Paradise, NV MSA	83.83	54	64.29	1.85	14.81	37.04	46.30	0	5	0	0	-2	-3	2.05	27.84	41.73	28.38
<b>Limited Review:</b>																	
Carson City, NV MSA	1.15	1	1.19	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	11.55	66.93	21.52
Reno-Sparks, NV MSA	9.56	16	19.05	0.00	37.50	25.00	37.50	0	1	0	0	-1	0	3.61	29.33	40.08	26.98
Nevada Non-MSA	5.46	13	15.48	0.00	0.00	84.62	15.38	0	0	0	0	0	0	0.00	13.74	69.01	17.24

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: NEW HAMPSHIRE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Manchester-Nashua, NH MSA	65.51	5,755	1,233,192	978	61,990	5	22	0	0	6,738	1,295,204	75.31
<b>Limited Review:</b>												
New Hampshire Non-MSA	34.49	2,918	536,758	621	22,562	9	95	0	0	3,548	559,415	24.69

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NEW HAMPSHIRE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Manchester-Nashua, NH MSA	1,895	65.96	0.73	1.00	8.76	10.45	56.63	53.67	33.88	34.88	15.69	23.91	16.43	15.16	16.07	
<b>Limited Review:</b>																
New Hampshire Non-MSA	978	34.04	0.00	0.00	2.58	2.15	78.16	77.30	19.26	20.55	14.42	0.00	16.00	14.72	13.27	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NEW HAMPSHIRE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Manchester-Nashua, NH MSA	58	48.74	0.73	0.00	8.76	0.00	56.63	46.55	33.88	53.45	4.29	0.00	0.00	3.85	6.37
<b>Limited Review:</b>															
New Hampshire Non-MSA	61	51.26	0.00	0.00	2.58	1.64	78.16	78.69	19.26	19.67	4.01	0.00	9.09	3.68	4.60

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: NEW HAMPSHIRE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Manchester-Nashua, NH MSA	3,802	66.92	0.73	0.53	8.76	6.76	56.63	52.45	33.88	40.27	12.80	22.50	15.06	13.45	11.72									
<b>Limited Review:</b>																								
New Hampshire Non-MSA	1,879	33.08	0.00	0.00	2.58	2.13	78.16	75.41	19.26	22.46	11.68	0.00	14.29	12.65	9.31									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: NEW HAMPSHIRE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Manchester-Nashua, NH MSA	0	0.00	5.97	0.00	38.60	0.00	47.98	0.00	7.45	0.00	0.00	0.00	0.00	0.00	0.00									
<b>Limited Review:</b>																								
New Hampshire Non-MSA	0	0.00	0.00	0.00	12.37	0.00	75.12	0.00	12.51	0.00	0.00	0.00	0.00	0.00	0.00									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: NEW HAMPSHIRE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Manchester-Nashua, NH MSA	978	61.16	1.92	3.27	17.70	15.44	51.63	44.48	28.75	36.81	5.55	7.08	5.88	5.01	6.15									
<b>Limited Review:</b>																								
New Hampshire Non-MSA	621	38.84	0.00	0.00	4.43	4.19	75.26	65.86	20.31	29.95	5.19	0.00	5.41	4.72	6.79									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: NEW HAMPSHIRE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Manchester-Nashua, NH MSA	5	35.71	0.55	0.00	6.84	0.00	61.08	80.00	31.53	20.00	6.45	0.00	0.00	4.55	11.11	
<b>Limited Review:</b>																
New Hampshire Non-MSA	9	64.29	0.00	0.00	1.71	11.11	81.64	77.78	16.65	11.11	5.88	0.00	0.00	8.00	0.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NEW HAMPSHIRE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Manchester-Nashua, NH MSA	1,895	65.96	16.82	10.37	18.82	34.15	26.62	29.73	37.74	25.74	18.50	16.95	18.67	19.59	17.79	
<b>Limited Review:</b>																
New Hampshire Non-MSA	978	34.04	15.01	6.99	18.50	28.67	25.72	32.79	40.77	31.55	16.31	16.50	18.54	16.88	14.34	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NEW HAMPSHIRE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Manchester-Nashua, NH MSA	58	48.74	16.82	3.45	18.82	24.14	26.62	37.93	37.74	34.48	4.53	2.04	5.50	7.50	2.69	
<b>Limited Review:</b>																
New Hampshire Non-MSA	61	51.26	15.01	8.33	18.50	11.67	25.72	25.00	40.77	55.00	4.10	2.44	1.32	5.05	5.03	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: NEW HAMPSHIRE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Manchester-Nashua, NH MSA	3,802	66.92	16.82	8.25	18.82	22.99	26.62	29.67	37.74	39.09	13.71	15.83	16.71	15.27	11.28	
<b>Limited Review:</b>																
New Hampshire Non-MSA	1,879	33.08	15.01	5.79	18.50	17.89	25.72	29.57	40.77	46.75	12.85	17.50	15.55	14.28	11.18	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: NEW HAMPSHIRE			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Manchester-Nashua, NH MSA	978	61.16	68.55	49.69	89.16	3.89	6.95	5.43	8.18
<b>Limited Review:</b>									
New Hampshire Non-MSA	621	38.84	69.39	52.98	93.72	2.58	3.70	4.95	7.66

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 31.08% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: NEW HAMPSHIRE			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Manchester-Nashua, NH MSA	5	35.71	96.91	60.00	100.00	0.00	0.00	6.25	10.00
<b>Limited Review:</b>									
New Hampshire Non-MSA	9	64.29	97.34	66.67	100.00	0.00	0.00	5.71	11.11

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 28.57% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: NEW HAMPSHIRE									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Manchester-Nashua, NH MSA	24	3,515	111	16,909	135	20,424	47.94	0	0
<b>Limited Review:</b>									
New Hampshire Non-MSA	28	10,113	49	4,972	77	15,085	34.50	3	100
Statewide investments with potential benefit to one or more AAs	4	1,685	18	240	22	1,925	4.40	0	0
Statewide investments with no potential to benefit one or more AAs	7	5,381	10	913	17	6,294	14.39	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: NEW HAMPSHIRE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Manchester-Nashua, NH MSA	75.31	13	72.22	0.00	30.77	53.85	15.38	0	2	0	0	-2	0	2.68	17.41	52.62	27.29
<b>Limited Review:</b>																	
New Hampshire Non-MSA	24.69	5	27.78	0.00	0.00	60.00	40.00	0	1	0	0	0	-1	0.00	3.31	77.63	19.06

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: NEW JERSEY				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Trenton-Ewing, NJ MSA	34.41	4,665	1,100,264	1,009	55,561	6	76	0	0	5,680	1,155,901	65.77
<b>Limited Review:</b>												
Atlantic City-Hammonton, NJ MSA	35.70	5,163	1,026,868	726	38,535	5	57	0	0	5,894	1,065,460	21.44
Ocean City, NJ MSA	17.53	2,479	642,503	410	13,047	5	48	0	0	2,894	655,598	6.65
Vineland-Millville-Bridgeton, NJ MSA	12.36	1,783	290,566	247	5,095	10	98	0	0	2,040	295,759	6.14

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NEW JERSEY				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Trenton-Ewing, NJ MSA	1,186	27.29	6.07	8.77	12.82	13.66	38.98	41.48	42.12	36.09	11.71	22.13	16.62	11.01	9.79	
<b>Limited Review:</b>																
Atlantic City-Hammonton, NJ MSA	1,719	39.55	0.98	0.99	9.67	9.83	66.10	62.19	23.26	26.99	19.97	38.10	21.55	19.52	20.16	
Ocean City, NJ MSA	864	19.88	0.00	0.00	21.44	26.50	50.49	45.25	28.06	28.24	12.59	0.00	19.88	11.29	10.65	
Vineland-Millville-Bridgeton, NJ MSA	577	13.28	1.56	1.39	10.01	10.57	59.09	49.91	29.35	38.13	14.65	37.50	16.22	13.22	16.09	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NEW JERSEY				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Trenton-Ewing, NJ MSA	66	32.51	6.07	0.00	12.82	9.09	38.98	31.82	42.12	59.09	5.32	0.00	6.12	3.49	7.14
<b>Limited Review:</b>															
Atlantic City-Hammonton, NJ MSA	69	33.99	0.98	0.00	9.67	1.45	66.10	72.46	23.26	26.09	4.45	0.00	0.00	4.63	4.62
Ocean City, NJ MSA	37	18.23	0.00	0.00	21.44	32.43	50.49	48.65	28.06	18.92	4.08	0.00	8.20	3.77	2.44
Vineland-Millville-Bridgeton, NJ MSA	31	15.27	1.56	0.00	10.01	22.58	59.09	48.39	29.35	29.03	3.60	0.00	8.33	3.25	3.13

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: NEW JERSEY				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Trenton-Ewing, NJ MSA	3,413	35.78	6.07	2.84	12.82	10.25	38.98	36.42	42.12	50.48	13.90	29.17	27.33	16.32	11.29
<b>Limited Review:</b>															
Atlantic City-Hammonton, NJ MSA	3,374	35.37	0.98	0.65	9.67	6.94	66.10	63.46	23.26	28.96	19.02	18.42	28.18	18.75	18.25
Ocean City, NJ MSA	1,578	16.54	0.00	0.00	21.44	19.20	50.49	48.67	28.06	32.13	11.33	0.00	16.44	12.49	8.73
Vineland-Millville-Bridgeton, NJ MSA	1,175	12.32	1.56	0.60	10.01	9.96	59.09	54.98	29.35	34.47	19.56	27.27	26.87	20.00	17.60

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: NEW JERSEY		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Trenton-Ewing, NJ MSA	0	0.00	19.55	0.00	8.94	0.00	40.17	0.00	31.35	0.00	0.00	0.00	0.00	0.00	0.00						
<b>Limited Review:</b>																					
Atlantic City-Hammonton, NJ MSA	0	0.00	14.40	0.00	27.71	0.00	51.78	0.00	6.10	0.00	0.00	0.00	0.00	0.00	0.00						
Ocean City, NJ MSA	0	0.00	0.00	0.00	22.14	0.00	53.11	0.00	24.75	0.00	0.00	0.00	0.00	0.00	0.00						
Vineland-Millville-Bridgeton, NJ MSA	0	0.00	6.08	0.00	25.05	0.00	46.63	0.00	22.24	0.00	0.00	0.00	0.00	0.00	0.00						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: NEW JERSEY					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Trenton-Ewing, NJ MSA	1,009	42.18	10.69	3.37	10.70	5.45	32.32	30.03	46.30	61.15	6.43	4.74	4.27	5.89	7.14									
<b>Limited Review:</b>																								
Atlantic City-Hammonton, NJ MSA	726	30.35	5.21	4.68	12.52	8.68	59.81	62.12	22.46	24.52	8.28	12.36	8.22	8.00	8.54									
Ocean City, NJ MSA	410	17.14	0.00	0.00	19.68	14.88	54.95	62.93	25.37	22.20	7.59	0.00	5.41	8.51	7.05									
Vineland-Millville-Bridgeton, NJ MSA	247	10.33	7.67	10.12	16.15	10.12	48.47	43.72	27.71	36.03	6.99	9.64	5.63	6.91	7.03									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: NEW JERSEY					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Trenton-Ewing, NJ MSA	6	23.08	3.01	0.00	9.03	0.00	33.61	33.33	54.35	66.67	25.00	0.00	0.00	33.33	20.00									
<b>Limited Review:</b>																								
Atlantic City-Hammonton, NJ MSA	5	19.23	0.33	0.00	3.75	0.00	77.16	80.00	18.76	20.00	21.43	0.00	0.00	18.18	100.00									
Ocean City, NJ MSA	5	19.23	0.00	0.00	18.04	0.00	56.01	80.00	25.95	20.00	0.00	0.00	0.00	0.00	0.00									
Vineland-Millville-Bridgeton, NJ MSA	10	38.46	0.29	0.00	4.06	0.00	50.43	20.00	45.22	80.00	14.29	0.00	0.00	33.33	6.67									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NEW JERSEY					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Trenton-Ewing, NJ MSA	1,186	27.28	20.71	18.26	17.30	32.48	21.40	24.32	40.58	24.93	13.04	14.73	16.47	12.72	9.68	
<b>Limited Review:</b>																
Atlantic City-Hammonton, NJ MSA	1,720	39.57	19.29	9.54	18.27	28.85	23.34	31.54	39.11	30.08	22.44	27.06	26.85	28.66	15.77	
Ocean City, NJ MSA	864	19.88	18.91	4.23	18.76	15.61	21.69	21.48	40.65	58.69	13.63	25.93	25.12	22.02	10.68	
Vineland-Millville-Bridgeton, NJ MSA	577	13.27	21.78	6.81	17.56	27.75	20.35	36.82	40.31	28.62	17.36	9.09	15.67	19.21	18.11	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NEW JERSEY					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Trenton-Ewing, NJ MSA	66	32.51	20.71	15.38	17.30	24.62	21.40	23.08	40.58	36.92	5.44	6.67	3.81	6.73	5.23	
<b>Limited Review:</b>																
Atlantic City-Hammonton, NJ MSA	69	33.99	19.29	4.62	18.27	32.31	23.34	33.85	39.11	29.23	4.15	0.00	6.41	5.50	3.09	
Ocean City, NJ MSA	37	18.23	18.91	10.81	18.76	16.22	21.69	40.54	40.65	32.43	4.20	4.17	8.00	5.41	2.70	
Vineland-Millville-Bridgeton, NJ MSA	31	15.27	21.78	10.00	17.56	40.00	20.35	36.67	40.31	13.33	3.35	12.50	2.33	5.80	1.42	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: NEW JERSEY					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Trenton-Ewing, NJ MSA	3,413	35.78	20.71	10.50	17.30	21.23	21.40	26.91	40.58	41.36	14.54	23.13	19.76	16.73	11.20	
<b>Limited Review:</b>																
Atlantic City-Hammonton, NJ MSA	3,374	35.37	19.29	8.17	18.27	23.06	23.34	29.74	39.11	39.02	20.19	32.46	28.19	22.02	15.75	
Ocean City, NJ MSA	1,578	16.54	18.91	5.11	18.76	15.25	21.69	21.17	40.65	58.48	12.03	21.93	18.61	16.11	10.06	
Vineland-Millville-Bridgeton, NJ MSA	1,175	12.32	21.78	5.90	17.56	22.94	20.35	33.07	40.31	38.08	20.66	22.81	24.18	23.37	17.74	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.2% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: NEW JERSEY			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Trenton-Ewing, NJ MSA	1,009	42.18	65.33	54.91	88.31	5.45	6.24	6.34	11.70
<b>Limited Review:</b>									
Atlantic City-Hammonton, NJ MSA	726	30.35	66.95	52.75	88.43	6.61	4.96	8.03	11.92
Ocean City, NJ MSA	410	17.14	67.33	52.93	93.17	3.66	3.17	7.37	10.45
Vineland-Millville-Bridgeton, NJ MSA	247	10.33	65.50	46.56	97.17	1.62	1.21	6.91	9.50

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 28.95% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: NEW JERSEY									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Trenton-Ewing, NJ MSA	6	23.08	95.65	100.00	100.00	0.00	0.00	22.22	22.22
<b>Limited Review:</b>									
Atlantic City-Hammonton, NJ MSA	5	19.23	95.76	40.00	100.00	0.00	0.00	20.00	11.11
Ocean City, NJ MSA	5	19.23	96.20	40.00	100.00	0.00	0.00	0.00	0.00
Vineland-Millville-Bridgeton, NJ MSA	10	38.46	95.36	70.00	100.00	0.00	0.00	13.04	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 19.23% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		GEOGRAPHY: NEW JERSEY		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Trenton-Ewing, NJ MSA	6	2,434	61	8,569	67	11,003	34.65	0	0
<b>Limited Review:</b>									
Atlantic City-Hammonton, NJ MSA	7	1,423	33	3,782	40	5,204	16.39	0	0
Ocean City, NJ MSA	2	170	7	521	9	691	2.18	0	0
Vineland-Millville-Bridgeton, NJ MSA	6	4,989	16	552	22	5,541	17.45	0	0
Statewide investments with potential benefit to one or more AAs	3	2,558	35	1,590	38	4,148	13.06	0	0
Statewide investments with no potential to benefit one or more AAs	3	5,123	10	48	13	5,171	16.28	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: NEW JERSEY				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Trenton-Ewing, NJ MSA	65.77	16	39.02	12.50	6.25	37.50	43.75	0	4	0	0	-1	-3	11.94	14.87	35.29	37.37
<b>Limited Review:</b>																	
Atlantic City-Hammonton, NJ MSA	21.44	13	31.71	0.00	23.08	61.54	15.38	0	1	0	0	0	-1	4.31	16.09	61.29	17.52
Ocean City, NJ MSA	6.65	7	17.07	0.00	14.29	57.14	28.57	0	2	0	0	-1	-1	0.00	23.79	51.50	24.71
Vineland-Millville-Bridgeton, NJ MSA	6.14	5	12.20	0.00	40.00	40.00	20.00	0	3	0	-1	-1	-1	5.07	17.50	54.11	23.32

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: NEW MEXICO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Albuquerque, NM MSA	64.76	13,700	2,329,198	1,582	99,988	17	745	1	2,836	15,300	2,432,767	73.40
<b>Limited Review:</b>												
Farmington, NM MSA	4.97	994	170,821	178	6,208	1	3	2	6,732	1,175	183,764	3.03
Las Cruces, NM MSA	8.05	1,713	275,202	177	7,369	11	132	1	390	1,902	283,093	2.78
Santa Fe, NM MSA	10.09	2,044	490,839	340	15,753	0	0	1	8,300	2,385	514,892	6.29
New Mexico Non-MSA	12.13	2,370	340,861	448	10,265	45	2,014	3	13,195	2,866	366,335	14.50

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NEW MEXICO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Albuquerque, NM MSA	5,328	66.10	1.39	2.42	23.24	17.15	41.85	38.19	33.52	42.23	16.05	20.96	16.96	15.42	15.96	
<b>Limited Review:</b>																
Farmington, NM MSA	317	3.93	4.35	0.00	20.80	5.05	52.16	54.57	22.69	40.38	12.34	0.00	9.84	11.30	14.18	
Las Cruces, NM MSA	820	10.17	0.00	0.00	27.58	5.98	37.80	48.05	34.62	45.98	13.18	0.00	12.26	12.97	13.53	
Santa Fe, NM MSA	534	6.63	0.84	0.75	24.88	20.79	36.23	33.71	38.05	44.76	11.76	12.50	17.38	12.75	9.40	
New Mexico Non-MSA	1,061	13.16	1.11	0.00	21.31	11.69	56.69	49.67	20.89	38.64	12.48	0.00	13.65	13.15	11.41	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT			GEOGRAPHY: NEW MEXICO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Albuquerque, NM MSA	207	53.49	1.39	0.97	23.24	15.46	41.85	38.16	33.52	45.41	6.32	12.50	5.81	6.52	6.09	
<b>Limited Review:</b>																
Farmington, NM MSA	29	7.49	4.35	0.00	20.80	3.45	52.16	55.17	22.69	41.38	6.03	0.00	0.00	7.46	5.41	
Las Cruces, NM MSA	30	7.75	0.00	0.00	27.58	20.00	37.80	23.33	34.62	56.67	7.98	0.00	5.41	6.82	9.76	
Santa Fe, NM MSA	53	13.70	0.84	0.00	24.88	15.09	36.23	20.75	38.05	64.15	6.45	0.00	14.81	2.27	6.10	
New Mexico Non-MSA	68	17.57	1.11	0.00	21.31	19.12	56.69	52.94	20.89	27.94	8.24	0.00	15.15	8.79	1.92	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE			GEOGRAPHY: NEW MEXICO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Albuquerque, NM MSA	8,165	65.99	1.39	1.27	23.24	14.68	41.85	39.44	33.52	44.61	13.46	17.70	17.12	14.52	11.68	
<b>Limited Review:</b>																
Farmington, NM MSA	648	5.24	4.35	0.31	20.80	3.40	52.16	56.64	22.69	39.66	17.78	0.00	12.24	19.69	15.82	
Las Cruces, NM MSA	862	6.97	0.00	0.00	27.58	7.19	37.80	38.52	34.62	54.29	9.29	0.00	7.82	9.83	9.18	
Santa Fe, NM MSA	1,457	11.78	0.84	0.89	24.88	15.99	36.23	34.25	38.05	48.87	11.80	9.43	15.86	12.21	10.64	
New Mexico Non-MSA	1,241	10.03	1.11	0.00	21.31	9.02	56.69	59.23	20.89	31.75	13.31	0.00	18.38	15.92	9.57	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: NEW MEXICO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans					
<b>Full Review:</b>															
Albuquerque, NM MSA	0	0.00	3.74	0.00	27.16	0.00	46.31	0.00	22.79	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Farmington, NM MSA	0	0.00	0.00	0.00	18.38	0.00	46.56	0.00	35.06	0.00	0.00	0.00	0.00	0.00	0.00
Las Cruces, NM MSA	1	100.00	2.29	0.00	25.45	0.00	33.41	0.00	38.84	100.00	7.69	0.00	0.00	0.00	14.29
Santa Fe, NM MSA	0	0.00	2.34	0.00	35.29	0.00	30.73	0.00	31.65	0.00	0.00	0.00	0.00	0.00	0.00
New Mexico Non-MSA	0	0.00	0.28	0.00	18.49	0.00	52.84	0.00	28.39	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: NEW MEXICO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans						
<b>Full Review:</b>																
Albuquerque, NM MSA	1,582	58.06	1.63	1.26	21.60	22.69	43.69	39.76	33.08	36.28	4.68	5.00	5.66	4.37	4.45	
<b>Limited Review:</b>																
Farmington, NM MSA	178	6.53	2.49	0.56	12.39	12.92	59.98	58.99	25.15	27.53	5.70	0.00	6.36	5.11	6.99	
Las Cruces, NM MSA	177	6.50	0.88	0.00	17.25	24.29	39.49	37.29	42.39	38.42	3.44	0.00	5.04	2.98	3.23	
Santa Fe, NM MSA	340	12.48	1.78	0.88	17.57	19.12	28.60	27.35	52.06	52.65	4.10	2.94	4.50	4.31	3.90	
New Mexico Non-MSA	448	16.44	0.06	0.00	18.43	14.06	54.98	59.60	26.53	26.34	5.75	0.00	3.66	6.44	5.71	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: NEW MEXICO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Albuquerque, NM MSA	17	22.97	1.58	5.88	22.15	11.76	45.95	23.53	30.32	58.82	6.10	0.00	0.00	7.14	15.00
<b>Limited Review:</b>															
Farmington, NM MSA	1	1.35	1.18	0.00	11.24	0.00	58.58	0.00	28.99	100.00	5.00	0.00	0.00	0.00	33.33
Las Cruces, NM MSA	11	14.86	0.41	0.00	34.08	54.55	32.65	27.27	32.86	18.18	11.76	0.00	18.18	15.38	0.00
Santa Fe, NM MSA	0	0.00	1.49	0.00	15.17	0.00	36.32	0.00	47.01	0.00	0.00	0.00	0.00	0.00	0.00
New Mexico Non-MSA	45	60.81	0.00	0.00	11.23	2.22	69.41	71.11	19.36	26.67	15.53	0.00	0.00	13.25	29.41

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NEW MEXICO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans*** *	% Families***	% BANK Loans*** *	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Albuquerque, NM MSA	5,328	66.10	21.03	9.08	17.68	26.67	21.02	30.69	40.27	33.57	19.12	17.67	19.26	22.16	17.31		
<b>Limited Review:</b>																	
Farmington, NM MSA	317	3.93	22.47	2.22	16.42	20.00	20.54	34.29	40.57	43.49	13.57	0.00	15.52	13.27	13.67		
Las Cruces, NM MSA	820	10.17	23.12	2.95	16.27	13.39	18.83	26.78	41.78	56.88	17.75	14.81	15.99	20.27	17.27		
Santa Fe, NM MSA	534	6.63	22.01	4.76	17.85	21.52	18.89	30.10	41.25	43.62	14.85	10.75	18.22	18.05	12.72		
New Mexico Non-MSA	1,061	13.16	22.57	4.27	16.36	14.25	19.32	28.77	41.74	52.71	15.38	19.48	13.11	18.91	14.19		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NEW MEXICO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Albuquerque, NM MSA	207	53.49	21.03	6.50	17.68	22.00	21.02	31.50	40.27	40.00	6.25	4.49	7.56	8.73	4.59	
<b>Limited Review:</b>																
Farmington, NM MSA	29	7.49	22.47	0.00	16.42	20.69	20.54	27.59	40.57	51.72	6.14	0.00	8.33	4.55	6.85	
Las Cruces, NM MSA	30	7.75	23.12	3.33	16.27	3.33	18.83	10.00	41.78	83.33	8.50	12.50	0.00	0.00	15.38	
Santa Fe, NM MSA	53	13.70	22.01	5.77	17.85	32.69	18.89	21.15	41.25	40.38	6.67	0.00	8.33	13.51	4.29	
New Mexico Non-MSA	68	17.57	22.57	1.56	16.36	15.63	19.32	25.00	41.74	57.81	8.84	0.00	11.36	8.93	9.60	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: NEW MEXICO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Albuquerque, NM MSA	8,165	65.99	21.03	7.95	17.68	20.12	21.02	27.35	40.27	44.58	14.48	18.95	17.41	15.47	12.53	
<b>Limited Review:</b>																
Farmington, NM MSA	648	5.24	22.47	3.17	16.42	11.75	20.54	30.97	40.57	54.10	18.62	17.86	25.47	20.45	17.20	
Las Cruces, NM MSA	862	6.97	23.12	3.50	16.27	7.94	18.83	18.71	41.78	69.85	10.45	20.29	10.08	10.37	10.17	
Santa Fe, NM MSA	1,457	11.78	22.01	8.72	17.85	20.36	18.89	22.97	41.25	47.95	13.41	21.65	16.79	13.40	11.65	
New Mexico Non-MSA	1,241	10.03	22.57	3.84	16.36	13.91	19.32	23.51	41.74	58.74	14.50	17.24	19.29	18.00	12.91	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.3% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: NEW MEXICO			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Albuquerque, NM MSA	1,582	58.06	69.25	52.59	85.40	7.33	7.27	4.37	5.52
<b>Limited Review:</b>									
Farmington, NM MSA	178	6.53	64.64	52.25	94.94	2.25	2.81	4.91	6.25
Las Cruces, NM MSA	177	6.50	65.31	62.15	93.22	1.13	5.65	3.02	2.84
Santa Fe, NM MSA	340	12.48	66.63	55.29	91.76	4.12	4.12	3.78	4.02
New Mexico Non-MSA	448	16.44	64.58	51.34	96.65	2.23	1.12	4.84	5.98

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 31.13% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: NEW MEXICO			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Albuquerque, NM MSA	17	22.97	96.63	58.82	82.35	17.65	0.00	4.81	2.67
<b>Limited Review:</b>									
Farmington, NM MSA	1	1.35	98.22	0.00	100.00	0.00	0.00	4.00	0.00
Las Cruces, NM MSA	11	14.86	92.24	36.36	100.00	0.00	0.00	9.30	0.00
Santa Fe, NM MSA	0	0.00	97.51	0.00	0.00	0.00	0.00	0.00	0.00
New Mexico Non-MSA	45	60.81	94.61	37.78	95.56	2.22	2.22	10.96	10.87

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 50.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: NEW MEXICO									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Albuquerque, NM MSA	8	3,958	111	14,954	119	18,913	45.46	0	0
<b>Limited Review:</b>									
Farmington, NM MSA	2	228	12	872	14	1,100	2.64	0	0
Las Cruces, NM MSA	5	811	19	562	24	1,373	3.30	0	0
Santa Fe, NM MSA	4	661	19	957	23	1,618	3.89	0	0
New Mexico Non-MSA	8	15,956	34	1,253	42	17,210	41.36	0	0
Statewide investments with potential benefit to one or more AAs	0	0	29	447	29	447	1.07	0	0
Statewide investments with no potential to benefit one or more AAs	1	899	7	50	8	948	2.28	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: NEW MEXICO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Albuquerque, NM MSA	73.40	23	50.00	0.00	21.74	52.17	26.09	0	3	0	0	-1	-2	2.77	28.03	40.78	28.41
<b>Limited Review:</b>																	
Farmington, NM MSA	3.03	3	6.52	0.00	33.33	66.67	0.00	0	0	0	0	0	0	4.41	25.49	49.38	20.71
Las Cruces, NM MSA	2.78	2	4.35	0.00	0.00	50.00	50.00	0	0	0	0	0	0	1.59	32.86	35.36	30.20
Santa Fe, NM MSA	6.29	4	8.70	25.00	0.00	75.00	0.00	0	1	0	0	-1	0	1.40	29.81	35.71	33.08
New Mexico Non-MSA	14.50	14	30.43	0.00	28.57	71.43	0.00	0	2	0	-1	0	-1	1.58	25.36	55.38	17.69

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: NEW YORK				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Albany-Schenectady-Troy, NY MSA	17.67	5,519	971,712	1,688	104,872	22	188	8	29,387	7,237	1,106,159	21.12
Buffalo-Niagara Falls, NY MSA	20.56	6,731	835,822	1,675	118,096	7	71	5	23,025	8,418	977,014	21.13
Rochester, NY MSA	18.47	6,074	768,972	1,453	76,224	36	459	0	0	7,563	845,655	12.03
Syracuse, NY MSA	13.53	4,593	580,110	930	42,244	18	142	0	0	5,541	622,496	13.45
<b>Limited Review:</b>												
Glens Falls, NY MSA	2.48	773	116,427	237	9,319	7	43	0	0	1,017	125,789	1.07
Ithaca, NY MSA	0.77	181	27,699	132	1,957	4	28	0	0	317	29,684	2.48
Kingston, NY MSA	2.91	701	137,966	481	14,736	7	49	2	1,030	1,191	153,781	4.24
Poughkeepsie-Newburgh-Middletown, NY MSA	10.47	3,226	768,426	1,046	40,366	16	110	0	0	4,288	808,902	8.08
Utica-Rome, NY MSA	4.90	1,458	151,481	527	23,958	22	198	1	10,000	2,008	185,637	6.24
New York Non-MSA	8.22	2,349	306,068	981	31,987	37	507	0	0	3,367	338,562	10.14

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NEW YORK				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Albany-Schenectady-Troy, NY MSA	2,585	14.94	2.78	2.40	13.35	14.47	53.66	54.16	30.21	28.97	8.50	11.81	11.35	8.18	7.81	
Buffalo-Niagara Falls, NY MSA	3,715	21.47	4.34	1.16	13.17	9.48	51.87	56.61	30.61	32.76	11.29	13.82	12.89	12.05	9.74	
Rochester, NY MSA	3,830	22.13	3.53	2.45	11.76	13.79	51.96	54.73	32.74	29.03	10.45	17.72	13.46	11.62	7.58	
Syracuse, NY MSA	2,709	15.66	2.33	1.55	11.70	10.15	55.10	57.33	30.87	30.97	13.33	10.57	14.64	14.19	11.81	
<b>Limited Review:</b>																
Glens Falls, NY MSA	362	2.09	0.00	0.00	7.87	9.94	76.58	74.59	15.56	15.47	10.66	0.00	9.09	11.19	9.46	
Ithaca, NY MSA	85	0.49	0.00	0.00	6.41	7.06	82.16	83.53	11.43	9.41	2.93	0.00	4.23	3.41	0.00	
Kingston, NY MSA	320	1.85	0.00	0.00	8.34	13.13	76.90	75.00	14.76	11.88	10.09	0.00	12.34	10.56	6.00	
Poughkeepsie-Newburgh-Middletown, NY MSA	1,661	9.60	2.07	3.49	8.38	18.18	66.59	57.44	22.96	20.89	11.86	11.35	25.56	10.06	10.91	
Utica-Rome, NY MSA	935	5.40	2.64	2.46	9.37	11.55	65.33	62.67	22.66	23.32	15.00	36.36	20.76	14.85	12.42	
New York Non-MSA	1,101	6.36	0.00	0.00	4.80	6.63	72.01	72.39	23.19	20.98	10.02	0.00	13.54	9.97	9.40	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NEW YORK				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Albany-Schenectady-Troy, NY MSA	123	21.43	2.78	2.44	13.35	7.32	53.66	53.66	30.21	36.59	3.14	3.45	1.60	3.06	3.89	
Buffalo-Niagara Falls, NY MSA	126	21.95	4.34	1.59	13.17	4.76	51.87	53.97	30.61	39.68	2.81	0.00	0.50	2.63	4.80	
Rochester, NY MSA	62	10.80	3.53	0.00	11.76	14.52	51.96	53.23	32.74	32.26	0.77	0.00	1.36	0.49	1.24	
Syracuse, NY MSA	77	13.41	2.33	0.00	11.70	2.60	55.10	44.16	30.87	53.25	2.06	0.00	0.00	1.72	3.59	
<b>Limited Review:</b>																
Glens Falls, NY MSA	15	2.61	0.00	0.00	7.87	0.00	76.58	80.00	15.56	20.00	1.19	0.00	0.00	1.55	0.00	
Ithaca, NY MSA	4	0.70	0.00	0.00	6.41	0.00	82.16	100.00	11.43	0.00	0.94	0.00	0.00	1.08	0.00	
Kingston, NY MSA	15	2.61	0.00	0.00	8.34	13.33	76.90	80.00	14.76	6.67	1.95	0.00	4.55	2.11	0.00	
Poughkeepsie-Newburgh-Middletown, NY MSA	63	10.98	2.07	0.00	8.38	9.52	66.59	69.84	22.96	20.63	3.69	0.00	1.96	3.89	4.03	
Utica-Rome, NY MSA	20	3.48	2.64	5.00	9.37	20.00	65.33	60.00	22.66	15.00	0.36	4.35	0.00	0.18	0.57	
New York Non-MSA	69	12.02	0.00	0.00	4.80	8.70	72.01	57.97	23.19	33.33	2.28	0.00	3.33	2.03	2.93	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: NEW YORK					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Albany-Schenectady-Troy, NY MSA	2,811	20.48	2.78	1.85	13.35	9.82	53.66	53.08	30.21	35.25	6.52	13.30	8.55	6.50	5.97									
Buffalo-Niagara Falls, NY MSA	2,890	21.05	4.34	0.83	13.17	5.36	51.87	50.87	30.61	42.94	10.14	21.28	14.36	10.66	9.20									
Rochester, NY MSA	2,182	15.89	3.53	1.51	11.76	7.52	51.96	50.60	32.74	40.38	6.33	12.31	7.65	6.90	5.47									
Syracuse, NY MSA	1,807	13.16	2.33	0.94	11.70	6.14	55.10	53.62	30.87	39.29	8.99	11.48	8.44	9.07	8.92									
<b>Limited Review:</b>																								
Glens Falls, NY MSA	396	2.88	0.00	0.00	7.87	7.32	76.58	71.97	15.56	20.71	9.58	0.00	12.50	9.21	10.20									
Ithaca, NY MSA	92	0.67	0.00	0.00	6.41	3.26	82.16	88.04	11.43	8.70	3.87	0.00	1.72	4.49	1.43									
Kingston, NY MSA	366	2.67	0.00	0.00	8.34	7.92	76.90	72.95	14.76	19.13	6.63	0.00	9.00	6.96	4.88									
Poughkeepsie-Newburgh-Middletown, NY MSA	1,502	10.94	2.07	1.66	8.38	8.72	66.59	63.05	22.96	26.56	7.36	9.41	10.49	7.32	6.78									
Utica-Rome, NY MSA	503	3.66	2.64	1.39	9.37	5.57	65.33	64.21	22.66	28.83	5.95	15.79	5.45	5.90	5.94									
New York Non-MSA	1,179	8.59	0.00	0.00	4.80	3.90	72.01	69.55	23.19	26.55	9.62	0.00	14.63	9.62	9.15									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: NEW YORK					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Albany-Schenectady-Troy, NY MSA	0	0.00	18.98	0.00	14.82	0.00	46.89	0.00	19.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Buffalo-Niagara Falls, NY MSA	0	0.00	18.07	0.00	14.71	0.00	43.80	0.00	23.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Rochester, NY MSA	0	0.00	15.95	0.00	19.52	0.00	42.90	0.00	21.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Syracuse, NY MSA	0	0.00	26.31	0.00	23.07	0.00	34.40	0.00	16.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
<b>Limited Review:</b>																								
Glens Falls, NY MSA	0	0.00	0.00	0.00	29.96	0.00	38.04	0.00	32.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Ithaca, NY MSA	0	0.00	0.00	0.00	39.70	0.00	42.66	0.00	17.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Kingston, NY MSA	0	0.00	0.00	0.00	30.39	0.00	63.99	0.00	5.62	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Poughkeepsie-Newburgh-Middletown, NY MSA	0	0.00	15.63	0.00	20.85	0.00	59.37	0.00	4.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Utica-Rome, NY MSA	0	0.00	22.57	0.00	25.82	0.00	38.62	0.00	12.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
New York Non-MSA	0	0.00	0.00	0.00	16.43	0.00	74.73	0.00	8.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00								

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: NEW YORK		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Albany-Schenectady-Troy, NY MSA	1,688	18.45	9.96	5.57	12.72	11.61	49.23	49.88	28.10	32.94	5.16	3.54	5.91	5.00	5.57						
Buffalo-Niagara Falls, NY MSA	1,675	18.31	8.26	6.45	12.42	9.61	46.20	44.96	33.12	38.99	4.13	4.15	3.41	4.12	4.37						
Rochester, NY MSA	1,453	15.88	7.74	5.78	13.45	12.80	47.23	42.74	31.58	38.68	3.31	4.09	3.66	2.93	3.57						
Syracuse, NY MSA	930	10.16	11.18	12.58	11.88	7.53	49.67	48.49	27.28	31.40	4.08	5.37	2.49	3.90	4.48						
<b>Limited Review:</b>																					
Glens Falls, NY MSA	237	2.59	0.00	0.00	11.84	11.39	68.01	61.60	20.15	27.00	4.97	0.00	4.69	4.81	5.63						
Ithaca, NY MSA	132	1.44	0.00	0.00	22.51	29.55	65.06	64.39	12.42	6.06	3.74	0.00	4.99	3.66	0.00						
Kingston, NY MSA	481	5.26	0.00	0.00	10.70	6.86	74.98	75.26	14.32	17.88	6.63	0.00	5.43	6.65	7.06						
Poughkeepsie-Newburgh-Middletown, NY MSA	1,046	11.43	7.60	6.50	10.86	8.51	61.92	61.19	19.62	23.80	4.05	3.29	3.69	4.15	4.14						
Utica-Rome, NY MSA	527	5.76	8.23	6.07	12.00	11.01	59.83	61.67	19.94	21.25	5.65	2.51	4.66	6.62	5.06						
New York Non-MSA	981	10.72	0.00	0.00	7.69	8.66	71.22	65.44	21.09	25.89	5.08	0.00	5.39	4.89	5.54						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: NEW YORK					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Albany-Schenectady-Troy, NY MSA	22	12.50	1.34	0.00	13.68	22.73	59.16	59.09	25.82	18.18	8.77	0.00	11.11	11.76	0.00									
Buffalo-Niagara Falls, NY MSA	7	3.98	1.96	0.00	4.82	14.29	59.80	42.86	33.42	42.86	4.00	0.00	0.00	4.44	4.17									
Rochester, NY MSA	36	20.45	1.27	0.00	6.82	13.89	66.67	69.44	25.24	16.67	5.19	0.00	33.33	3.38	7.50									
Syracuse, NY MSA	18	10.23	1.48	0.00	12.09	16.67	53.76	5.56	32.66	77.78	3.03	0.00	0.00	1.19	18.75									
<b>Limited Review:</b>																								
Glens Falls, NY MSA	7	3.98	0.00	0.00	2.47	0.00	89.40	100.00	8.13	0.00	8.11	0.00	0.00	8.33	0.00									
Ithaca, NY MSA	4	2.27	0.00	0.00	7.37	0.00	85.25	50.00	7.37	50.00	14.29	0.00	0.00	8.33	50.00									
Kingston, NY MSA	7	3.98	0.00	0.00	5.45	0.00	73.39	42.86	21.16	57.14	14.29	0.00	0.00	0.00	50.00									
Poughkeepsie-Newburgh-Middletown, NY MSA	16	9.09	0.82	0.00	7.34	0.00	65.42	43.75	26.43	56.25	7.58	0.00	0.00	6.06	11.11									
Utica-Rome, NY MSA	22	12.50	1.06	0.00	3.48	0.00	80.99	77.27	14.47	22.73	6.98	0.00	0.00	5.00	50.00									
New York Non-MSA	37	21.02	0.00	0.00	1.46	0.00	69.54	56.76	29.01	43.24	3.05	0.00	0.00	2.25	5.32									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NEW YORK					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Albany-Schenectady-Troy, NY MSA	2,585	14.94	19.23	12.27	18.71	33.58	23.17	28.55	38.88	25.59	8.95	11.59	9.74	8.68	7.75	
Buffalo-Niagara Falls, NY MSA	3,715	21.47	20.37	14.06	18.07	34.12	22.08	27.10	39.48	24.73	12.87	14.24	14.58	13.06	10.59	
Rochester, NY MSA	3,830	22.13	19.78	16.31	18.27	33.81	22.85	26.37	39.10	23.51	12.35	16.04	14.30	12.63	8.91	
Syracuse, NY MSA	2,709	15.66	20.27	12.41	18.30	31.24	21.84	28.34	39.58	28.01	14.54	15.56	15.68	15.26	12.71	
<b>Limited Review:</b>																
Glens Falls, NY MSA	362	2.09	17.50	8.06	19.41	37.50	24.45	24.72	38.65	29.72	11.38	14.55	12.38	11.82	10.00	
Ithaca, NY MSA	85	0.49	19.53	5.88	17.96	32.94	23.38	32.94	39.13	28.24	3.05	0.00	5.24	3.70	1.91	
Kingston, NY MSA	320	1.85	19.23	5.64	18.20	26.65	23.74	35.74	38.83	31.97	10.62	10.23	11.95	13.66	7.78	
Poughkeepsie-Newburgh-Middletown, NY MSA	1,661	9.60	19.14	6.42	18.04	24.88	24.40	39.16	38.41	29.54	12.56	13.31	11.00	14.36	11.82	
Utica-Rome, NY MSA	935	5.40	19.89	12.50	18.20	40.00	23.06	26.41	38.84	21.09	15.94	17.12	21.19	14.89	11.35	
New York Non-MSA	1,101	6.36	16.97	8.51	17.93	25.89	22.44	31.84	42.66	33.76	10.74	13.68	12.94	10.62	9.08	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NEW YORK					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Albany-Schenectady-Troy, NY MSA	123	21.43	19.23	8.13	18.71	29.27	23.17	28.46	38.88	34.15	3.24	2.89	3.75	2.89	3.28	
Buffalo-Niagara Falls, NY MSA	126	21.95	20.37	14.63	18.07	24.39	22.08	34.96	39.48	26.02	2.90	1.55	1.35	5.56	3.15	
Rochester, NY MSA	62	10.80	19.78	9.84	18.27	22.95	22.85	36.07	39.10	31.15	0.78	0.26	0.62	1.37	0.65	
Syracuse, NY MSA	77	13.41	20.27	12.33	18.30	21.92	21.84	30.14	39.58	35.62	1.92	0.58	1.45	2.47	2.24	
<b>Limited Review:</b>																
Glens Falls, NY MSA	15	2.61	17.50	7.14	19.41	0.00	24.45	64.29	38.65	28.57	0.90	0.00	0.00	1.22	1.27	
Ithaca, NY MSA	4	0.70	19.53	25.00	17.96	25.00	23.38	25.00	39.13	25.00	0.97	2.50	1.41	0.00	0.83	
Kingston, NY MSA	15	2.61	19.23	20.00	18.20	13.33	23.74	26.67	38.83	40.00	2.01	7.69	0.00	1.16	2.54	
Poughkeepsie-Newburgh-Middletown, NY MSA	63	10.98	19.14	8.06	18.04	22.58	24.40	40.32	38.41	29.03	3.62	1.69	3.25	5.37	3.17	
Utica-Rome, NY MSA	20	3.48	19.89	10.53	18.20	31.58	23.06	31.58	38.84	26.32	0.36	0.00	0.51	0.47	0.31	
New York Non-MSA	69	12.02	16.97	6.25	17.93	26.56	22.44	23.44	42.66	43.75	2.24	0.00	2.00	2.86	2.46	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance															Geography: New York					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Albany-Schenectady-Troy, NY MSA	2,811	20.48	19.23	7.17	18.71	23.41	23.17	32.59	38.88	36.83	6.49	6.77	7.46	6.89	5.77									
Buffalo-Niagara Falls, NY MSA	2,890	21.05	20.37	8.12	18.07	23.49	22.08	30.02	39.48	38.37	10.78	14.25	12.23	11.85	9.21									
Rochester, NY MSA	2,182	15.89	19.78	8.08	18.27	24.67	22.85	26.98	39.10	40.27	6.32	7.77	7.62	6.62	5.44									
Syracuse, NY MSA	1,807	13.16	20.27	7.68	18.30	20.69	21.84	29.00	39.58	42.64	8.74	10.41	10.84	9.68	7.28									
<b>Limited Review:</b>																								
Glens Falls, NY MSA	396	2.88	17.50	6.15	19.41	23.46	24.45	30.45	38.65	39.94	9.77	9.68	11.16	11.20	8.65									
Ithaca, NY MSA	92	0.67	19.53	11.90	17.96	35.71	23.38	26.19	39.13	26.19	3.81	11.36	7.22	4.91	1.27									
Kingston, NY MSA	366	2.67	19.23	7.69	18.20	23.08	23.74	33.23	38.83	36.00	6.29	4.00	11.19	7.79	4.11									
Poughkeepsie-Newburgh-Middletown, NY MSA	1,502	10.94	19.14	6.56	18.04	23.08	24.40	36.36	38.41	34.00	7.31	7.86	8.90	8.85	5.72									
Utica-Rome, NY MSA	503	3.66	19.89	6.38	18.20	23.01	23.06	32.35	38.84	38.27	5.68	8.67	9.42	6.43	3.89									
New York Non-MSA	1,179	8.59	16.97	5.47	17.93	16.68	22.44	30.39	42.66	47.46	9.60	14.29	9.67	12.31	8.15									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 10.6% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: NEW YORK			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Albany-Schenectady-Troy, NY MSA	1,688	18.45	66.79	49.88	86.91	6.16	6.93	5.04	10.06
Buffalo-Niagara Falls, NY MSA	1,675	18.31	64.68	48.96	85.43	6.63	7.94	3.96	6.70
Rochester, NY MSA	1,453	15.88	67.58	52.44	90.16	4.40	5.44	3.26	5.75
Syracuse, NY MSA	930	10.16	68.20	51.08	90.97	4.30	4.73	3.97	7.62
<b>Limited Review:</b>									
Glens Falls, NY MSA	237	2.59	69.95	56.12	94.51	1.27	4.22	4.78	6.50
Ithaca, NY MSA	132	1.44	68.03	68.94	98.48	1.52	0.00	3.73	7.42
Kingston, NY MSA	481	5.26	70.04	60.08	94.59	2.91	2.49	6.20	13.81
Poughkeepsie-Newburgh-Middletown, NY MSA	1,046	11.43	68.85	54.59	91.40	5.16	3.44	3.87	8.14
Utica-Rome, NY MSA	527	5.76	69.50	46.68	91.27	4.17	4.55	5.52	8.12
New York Non-MSA	981	10.72	68.32	55.05	95.11	2.14	2.75	4.83	9.32

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 28.93% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: NEW YORK			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Albany-Schenectady-Troy, NY MSA	22	12.50	97.79	59.09	100.00	0.00	0.00	8.47	2.56
Buffalo-Niagara Falls, NY MSA	7	3.98	95.83	71.43	100.00	0.00	0.00	4.00	4.35
Rochester, NY MSA	36	20.45	96.38	55.56	100.00	0.00	0.00	5.15	4.43
Syracuse, NY MSA	18	10.23	96.50	72.22	100.00	0.00	0.00	2.99	3.00
<b>Limited Review:</b>									
Glens Falls, NY MSA	7	3.98	98.06	71.43	100.00	0.00	0.00	8.11	8.70
Ithaca, NY MSA	4	2.27	96.46	75.00	100.00	0.00	0.00	14.29	11.11
Kingston, NY MSA	7	3.98	97.19	14.29	100.00	0.00	0.00	13.64	9.09
Poughkeepsie-Newburgh-Middletown, NY MSA	16	9.09	96.52	75.00	100.00	0.00	0.00	7.25	16.13
Utica-Rome, NY MSA	22	12.50	98.31	77.27	100.00	0.00	0.00	6.82	6.49
New York Non-MSA	37	21.02	97.17	64.86	97.30	2.70	0.00	3.00	1.80

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 23.12% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: NEW YORK									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Albany-Schenectady-Troy, NY MSA	15	7,227	76	15,102	91	22,330	19.23	2	2,050
Buffalo-Niagara Falls, NY MSA	24	25,347	83	6,430	107	31,778	27.37	0	0
Rochester, NY MSA	25	17,251	68	4,135	93	21,386	18.42	0	0
Syracuse, NY MSA	7	4,662	46	3,659	53	8,321	7.17	0	0
<b>Limited Review:</b>									
Glens Falls, NY MSA	1	50	13	473	14	523	0.45	0	0
Ithaca, NY MSA	4	2,577	10	221	14	2,799	2.41	0	0
Kingston, NY MSA	2	1,206	17	1,386	19	2,592	2.23	0	0
Poughkeepsie-Newburgh-Middletown, NY MSA	12	4,216	25	3,356	37	7,572	6.52	0	0
Utica-Rome, NY MSA	4	1,155	38	2,244	42	3,399	2.93	0	0
New York Non-MSA	9	4,119	59	3,550	68	7,670	6.61	0	0
Statewide investments with potential benefit to one or more AAs	3	2,610	18	214	21	2,824	2.43	0	0
Statewide investments with no potential to benefit one or more AAs	8	327	15	4,573	23	4,899	4.22	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: NEW YORK								EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Albany-Schenectady-Troy, NY MSA	21.12	28	17.83	17.86	10.71	42.86	28.57	0	2	0	-1	-1	0	7.34	16.25	50.39	25.85
Buffalo-Niagara Falls, NY MSA	21.13	33	21.02	15.15	12.12	45.45	27.27	0	2	1	-1	0	0	8.78	16.45	47.62	26.35
Rochester, NY MSA	12.03	20	12.74	10.00	15.00	45.00	30.00	0	3	0	-1	-1	-1	8.63	14.32	48.68	27.76
Syracuse, NY MSA	13.45	16	10.19	18.75	6.25	37.50	37.50	0	0	0	0	0	0	8.20	15.32	49.06	27.42
<b>Limited Review:</b>																	
Glens Falls, NY MSA	1.07	2	1.27	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	10.39	74.77	14.84
Ithaca, NY MSA	2.48	2	1.27	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	13.96	67.88	18.15
Kingston, NY MSA	4.24	7	4.46	0.00	14.29	85.71	0.00	0	3	0	-1	-2	0	0.00	11.46	75.10	13.44
Poughkeepsie-Newburgh-Middletown, NY MSA	8.08	13	8.28	15.38	7.69	69.23	7.69	0	1	0	0	-1	0	7.18	11.97	62.07	18.75
Utica-Rome, NY MSA	6.24	13	8.28	15.38	15.38	61.54	7.69	0	1	0	0	-1	0	5.95	13.31	60.65	20.07
New York Non-MSA	10.14	23	14.65	0.00	8.70	69.57	21.74	0	3	0	-1	-1	-1	0.00	7.14	71.17	21.01

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: NORTH CAROLINA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Greensboro-High Point, NC MSA	10.34	6,831	1,025,182	1,068	44,477	14	94	4	4,821	7,917	1,074,574	12.34
North Carolina Non-MSA	19.89	12,931	2,270,859	2,214	77,352	78	4,633	4	13,650	15,227	2,366,494	24.94
Raleigh-Cary, NC MSA	24.60	16,557	3,199,742	2,265	98,122	12	290	1	888	18,835	3,299,042	24.27
<b>Limited Review:</b>												
Asheville, NC MSA	5.71	3,462	632,304	901	29,627	6	46	0	0	4,369	661,977	5.61
Burlington, NC MSA	1.67	1,127	157,430	149	9,285	1	10	0	0	1,277	166,725	1.67
Durham-Chapel Hill, NC MSA	8.05	5,300	1,019,222	851	34,975	13	186	2	2,404	6,166	1,056,787	9.44
Fayetteville, NC MSA	5.60	3,949	577,783	331	19,421	5	41	0	0	4,285	597,245	4.39
Goldsboro, NC MSA	0.78	522	71,925	73	931	5	39	0	0	600	72,895	0.78
Greenville, NC MSA	2.12	1,396	206,001	214	6,481	11	2,115	0	0	1,621	214,597	2.29
Hickory-Lenoir-Morganton, NC MSA	3.42	2,263	320,972	352	15,566	6	50	0	0	2,621	336,588	1.47
Jacksonville, NC MSA	3.90	2,791	455,753	187	8,046	5	18	0	0	2,983	463,817	1.94
Wilmington, NC MSA	7.82	5,162	1,008,711	813	25,354	11	323	0	0	5,986	1,034,388	6.38
Winston-Salem, NC MSA	6.09	4,228	622,822	432	15,654	4	28	0	0	4,664	638,504	4.47

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: NORTH CAROLINA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Greensboro-High Point, NC MSA	100.00	1	3,947	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	12.34
North Carolina Non-MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	24.94
Raleigh-Cary, NC MSA														24.27
<b>Limited Review:</b>														
Asheville, NC MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	5.61
Burlington, NC MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.67
Durham-Chapel Hill, NC MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	9.44
Fayetteville, NC MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4.39
Goldsboro, NC MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.78
Greenville, NC MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.29
Hickory-Lenoir-Morganton, NC MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.47
Jacksonville, NC MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.94
Wilmington, NC MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	6.38
Winston-Salem, NC MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4.47

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NORTH CAROLINA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Greensboro-High Point, NC MSA	2,790	10.72	1.58	1.47	13.70	10.22	56.38	49.75	28.34	38.57	15.44	23.38	16.91	16.00	14.16	
North Carolina Non-MSA	4,448	17.09	0.25	0.20	5.81	3.37	71.34	54.25	22.60	42.18	11.59	35.29	13.23	10.76	12.67	
Raleigh-Cary, NC MSA	6,501	24.98	0.78	0.92	18.90	8.58	54.17	61.62	26.14	28.87	12.68	14.61	11.74	12.30	13.75	
<b>Limited Review:</b>																
Asheville, NC MSA	946	3.63	0.55	0.63	6.31	6.66	81.77	79.18	11.36	13.53	6.85	2.27	7.22	6.88	6.78	
Burlington, NC MSA	443	1.70	0.00	0.00	12.07	11.74	76.04	76.52	11.89	11.74	12.48	0.00	15.11	13.11	7.63	
Durham-Chapel Hill, NC MSA	1,983	7.62	2.82	1.97	10.54	4.49	52.16	63.14	34.48	30.41	11.18	14.39	7.98	13.79	8.27	
Fayetteville, NC MSA	2,028	7.79	1.15	0.54	7.45	3.55	70.71	76.82	20.69	19.08	14.52	15.63	11.98	14.76	14.13	
Goldsboro, NC MSA	219	0.84	1.16	0.91	18.30	15.53	62.30	51.14	18.23	32.42	10.86	66.67	14.88	9.48	11.37	
Greenville, NC MSA	607	2.33	1.48	0.49	9.91	3.29	54.67	44.65	33.94	51.57	12.02	13.33	7.30	12.91	11.81	
Hickory-Lenoir-Morganton, NC MSA	792	3.04	0.00	0.00	8.05	7.32	85.34	83.96	6.61	8.71	11.33	0.00	14.74	11.53	8.10	
Jacksonville, NC MSA	1,580	6.07	0.69	0.70	3.33	2.78	77.08	81.01	18.90	15.51	17.41	43.48	23.86	17.69	14.73	
Wilmington, NC MSA	1,851	7.11	1.66	0.81	18.83	15.88	60.15	65.86	19.37	17.45	13.55	13.51	14.68	12.92	15.01	
Winston-Salem, NC MSA	1,838	7.06	0.91	0.38	13.46	10.12	56.06	60.83	29.57	28.67	15.63	17.24	19.32	17.11	12.31	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NORTH CAROLINA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Greensboro-High Point, NC MSA	70	9.25	1.58	2.86	13.70	7.14	56.38	40.00	28.34	50.00	5.09	16.67	1.85	1.64	12.50
North Carolina Non-MSA	191	25.23	0.25	0.00	5.81	3.14	71.34	58.64	22.60	38.22	3.59	0.00	1.37	3.60	4.02
Raleigh-Cary, NC MSA	123	16.25	0.78	0.81	18.90	8.13	54.17	53.66	26.14	37.40	5.40	7.14	2.54	4.82	7.72
<b>Limited Review:</b>															
Asheville, NC MSA	58	7.66	0.55	1.72	6.31	1.72	81.77	75.86	11.36	20.69	6.55	0.00	0.00	6.97	7.89
Burlington, NC MSA	17	2.25	0.00	0.00	12.07	0.00	76.04	70.59	11.89	29.41	14.29	0.00	0.00	10.53	33.33
Durham-Chapel Hill, NC MSA	48	6.34	2.82	0.00	10.54	2.08	52.16	47.92	34.48	50.00	5.92	0.00	0.00	5.19	8.73
Fayetteville, NC MSA	64	8.45	1.15	1.56	7.45	4.69	70.71	75.00	20.69	18.75	4.93	0.00	15.38	4.72	4.17
Goldsboro, NC MSA	4	0.53	1.16	0.00	18.30	25.00	62.30	50.00	18.23	25.00	2.08	0.00	6.67	1.92	0.00
Greenville, NC MSA	11	1.45	1.48	0.00	9.91	9.09	54.67	45.45	33.94	45.45	3.91	0.00	0.00	2.41	8.82
Hickory-Lenoir-Morganton, NC MSA	42	5.55	0.00	0.00	8.05	7.14	85.34	83.33	6.61	9.52	6.27	0.00	13.33	6.36	0.00
Jacksonville, NC MSA	34	4.49	0.69	0.00	3.33	2.94	77.08	79.41	18.90	17.65	3.93	0.00	7.14	4.17	2.63
Wilmington, NC MSA	65	8.59	1.66	3.08	18.83	21.54	60.15	52.31	19.37	23.08	6.16	0.00	10.20	5.05	7.14
Winston-Salem, NC MSA	30	3.96	0.91	0.00	13.46	13.33	56.06	50.00	29.57	36.67	2.06	0.00	0.00	1.87	3.15

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: NORTH CAROLINA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Greensboro-High Point, NC MSA	3,971	9.99	1.58	0.63	13.70	7.20	56.38	45.71	28.34	46.46	10.90	1.79	13.43	11.05	10.54									
North Carolina Non-MSA	8,292	20.87	0.25	0.02	5.81	2.57	71.34	53.28	22.60	44.13	10.03	14.29	12.26	9.48	10.65									
Raleigh-Cary, NC MSA	9,933	25.00	0.78	0.46	18.90	7.47	54.17	58.69	26.14	33.37	9.67	10.36	10.91	10.66	8.10									
<b>Limited Review:</b>																								
Asheville, NC MSA	2,458	6.19	0.55	0.85	6.31	5.37	81.77	79.78	11.36	14.00	7.97	7.50	8.39	8.03	7.53									
Burlington, NC MSA	667	1.68	0.00	0.00	12.07	5.70	76.04	77.51	11.89	16.79	10.04	0.00	11.46	10.65	7.36									
Durham-Chapel Hill, NC MSA	3,268	8.22	2.82	1.10	10.54	5.35	52.16	49.76	34.48	43.79	9.42	7.32	11.57	10.11	8.60									
Fayetteville, NC MSA	1,857	4.67	1.15	0.38	7.45	3.12	70.71	70.54	20.69	25.96	10.01	16.67	6.42	10.44	9.30									
Goldsboro, NC MSA	299	0.75	1.16	1.00	18.30	16.05	62.30	57.53	18.23	25.42	7.20	14.29	11.30	7.17	5.69									
Greenville, NC MSA	778	1.96	1.48	0.13	9.91	3.08	54.67	40.23	33.94	56.56	9.62	14.29	8.24	9.98	9.43									
Hickory-Lenoir-Morganton, NC MSA	1,429	3.60	0.00	0.00	8.05	5.81	85.34	83.34	6.61	10.85	8.92	0.00	12.86	8.88	7.97									
Jacksonville, NC MSA	1,177	2.96	0.69	0.00	3.33	2.80	77.08	79.52	18.90	17.67	11.56	0.00	13.64	12.02	9.78									
Wilmington, NC MSA	3,246	8.17	1.66	0.71	18.83	11.98	60.15	66.30	19.37	21.01	11.32	10.61	12.67	11.67	9.74									
Winston-Salem, NC MSA	2,360	5.94	0.91	0.13	13.46	7.33	56.06	52.12	29.57	40.42	9.82	5.26	11.13	10.94	8.52									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: NORTH CAROLINA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Greensboro-High Point, NC MSA	0	0.00	6.20	0.00	18.44	0.00	42.14	0.00	33.21	0.00	0.00	0.00	0.00	0.00	0.00	
North Carolina Non-MSA	0	0.00	2.36	0.00	14.08	0.00	54.51	0.00	29.05	0.00	0.00	0.00	0.00	0.00	0.00	
Raleigh-Cary, NC MSA	0	0.00	6.77	0.00	18.84	0.00	51.09	0.00	23.30	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Asheville, NC MSA	0	0.00	6.05	0.00	17.36	0.00	56.25	0.00	20.34	0.00	0.00	0.00	0.00	0.00	0.00	
Burlington, NC MSA	0	0.00	0.00	0.00	14.11	0.00	70.63	0.00	15.26	0.00	0.00	0.00	0.00	0.00	0.00	
Durham-Chapel Hill, NC MSA	1	100.00	14.14	0.00	24.69	0.00	31.01	0.00	30.15	100.00	4.55	0.00	0.00	0.00	11.11	
Fayetteville, NC MSA	0	0.00	3.10	0.00	21.70	0.00	56.62	0.00	18.58	0.00	0.00	0.00	0.00	0.00	0.00	
Goldsboro, NC MSA	0	0.00	9.97	0.00	35.49	0.00	21.17	0.00	33.36	0.00	0.00	0.00	0.00	0.00	0.00	
Greenville, NC MSA	0	0.00	4.14	0.00	9.49	0.00	47.76	0.00	38.62	0.00	0.00	0.00	0.00	0.00	0.00	
Hickory-Lenoir-Morganton, NC MSA	0	0.00	0.00	0.00	26.29	0.00	63.50	0.00	10.21	0.00	0.00	0.00	0.00	0.00	0.00	
Jacksonville, NC MSA	0	0.00	2.30	0.00	18.16	0.00	76.61	0.00	2.93	0.00	0.00	0.00	0.00	0.00	0.00	
Wilmington, NC MSA	0	0.00	3.33	0.00	30.57	0.00	45.11	0.00	21.00	0.00	0.00	0.00	0.00	0.00	0.00	
Winston-Salem, NC MSA	0	0.00	4.17	0.00	22.45	0.00	52.40	0.00	20.98	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: NORTH CAROLINA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*												
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp								
<b>Full Review:</b>																							
Greensboro-High Point, NC MSA	1,068	10.84	2.60	1.69	15.57	14.23	49.59	46.16	32.24	37.92	4.73	5.11	4.62	4.56	4.99								
North Carolina Non-MSA	2,214	22.48	0.62	0.27	7.12	4.74	63.41	54.74	28.85	40.24	4.39	2.15	3.27	4.09	5.19								
Raleigh-Cary, NC MSA	2,265	22.99	1.36	0.53	13.81	7.64	57.01	54.79	27.82	37.04	5.10	3.17	3.13	5.07	5.98								
<b>Limited Review:</b>																							
Asheville, NC MSA	901	9.15	2.10	3.44	11.93	13.10	74.40	66.59	11.58	16.87	5.77	7.18	4.95	5.63	7.15								
Burlington, NC MSA	149	1.51	0.00	0.00	12.45	10.74	71.68	72.48	15.87	16.78	4.71	0.00	2.53	5.13	4.76								
Durham-Chapel Hill, NC MSA	851	8.64	4.80	2.12	11.35	7.99	48.78	43.01	35.07	46.89	5.20	2.33	3.38	4.93	6.43								
Fayetteville, NC MSA	331	3.36	5.18	6.34	12.17	6.04	61.03	58.01	21.62	29.61	4.20	2.79	4.00	3.98	4.99								
Goldsboro, NC MSA	73	0.74	5.65	1.37	18.37	10.96	52.49	64.38	23.49	23.29	2.36	0.00	1.34	2.65	3.19								
Greenville, NC MSA	214	2.17	1.35	0.00	13.87	12.62	44.59	35.05	40.19	52.34	4.79	0.00	6.03	3.52	5.92								
Hickory-Lenoir-Morganton, NC MSA	352	3.57	0.00	0.00	10.75	11.36	79.33	75.28	9.92	13.35	3.50	0.00	3.89	3.17	4.94								
Jacksonville, NC MSA	187	1.90	4.48	7.49	5.97	4.28	72.87	71.12	16.67	17.11	6.57	2.86	8.77	6.48	7.46								
Wilmington, NC MSA	813	8.25	2.28	1.35	20.22	15.74	56.64	58.30	20.86	24.60	5.39	3.08	2.91	6.05	6.08								
Winston-Salem, NC MSA	432	4.39	1.46	1.39	11.74	8.10	57.44	56.48	29.36	34.03	3.25	1.52	2.96	3.35	3.22								

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: NORTH CAROLINA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Greensboro-High Point, NC MSA	14	8.19	1.36	0.00	7.68	0.00	66.31	92.86	24.65	7.14	5.36	0.00	0.00	6.25	0.00	
North Carolina Non-MSA	78	45.61	0.19	0.00	4.46	5.13	77.44	82.05	17.90	12.82	4.17	0.00	0.00	3.83	16.67	
Raleigh-Cary, NC MSA	12	7.02	0.45	0.00	23.05	25.00	57.67	58.33	18.83	16.67	0.40	0.00	0.00	1.27	0.00	
<b>Limited Review:</b>																
Asheville, NC MSA	6	3.51	0.28	0.00	7.80	16.67	83.50	83.33	8.43	0.00	4.65	0.00	0.00	5.26	0.00	
Burlington, NC MSA	1	0.58	0.00	0.00	7.63	0.00	86.01	100.00	6.36	0.00	0.00	0.00	0.00	0.00	0.00	
Durham-Chapel Hill, NC MSA	13	7.60	1.42	0.00	7.84	7.69	67.74	38.46	23.00	53.85	6.67	0.00	14.29	1.79	30.00	
Fayetteville, NC MSA	5	2.92	1.34	0.00	7.59	0.00	69.05	60.00	22.02	40.00	6.67	0.00	0.00	4.76	12.50	
Goldsboro, NC MSA	5	2.92	1.29	0.00	5.17	0.00	78.23	100.00	15.31	0.00	1.41	0.00	0.00	1.57	0.00	
Greenville, NC MSA	11	6.43	0.58	0.00	6.76	18.18	68.63	36.36	24.03	45.45	4.30	0.00	14.29	1.61	8.70	
Hickory-Lenoir-Morganton, NC MSA	6	3.51	0.00	0.00	4.42	0.00	90.01	100.00	5.57	0.00	2.78	0.00	0.00	2.90	0.00	
Jacksonville, NC MSA	5	2.92	1.72	0.00	4.01	0.00	80.23	100.00	14.04	0.00	13.33	0.00	0.00	14.29	0.00	
Wilmington, NC MSA	11	6.43	0.28	0.00	21.27	45.45	63.06	45.45	15.38	9.09	15.79	0.00	16.67	15.00	16.67	
Winston-Salem, NC MSA	4	2.34	0.13	0.00	13.12	0.00	64.45	100.00	22.30	0.00	2.04	0.00	0.00	2.63	0.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: NORTH CAROLINA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans*** *	% Families***	% BANK Loans*** *	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Greensboro-High Point, NC MSA	2,790	10.72	19.32	10.17	18.43	32.33	23.23	27.50	39.02	30.00	17.40	17.00	19.73	19.38	14.13	
North Carolina Non-MSA	4,448	17.09	18.22	5.66	17.33	20.31	22.38	26.52	42.08	47.50	12.93	15.02	15.05	14.15	11.31	
Raleigh-Cary, NC MSA	6,501	24.98	19.58	17.18	18.24	32.44	23.50	25.58	38.68	24.80	14.38	15.99	15.68	14.98	12.01	
<b>Limited Review:</b>																
Asheville, NC MSA	946	3.63	18.01	5.84	19.26	26.04	23.76	27.21	38.96	40.91	7.60	7.43	8.08	8.40	6.86	
Burlington, NC MSA	443	1.70	18.81	15.98	18.16	33.79	23.65	25.80	39.38	24.43	14.22	21.62	16.33	14.53	10.22	
Durham-Chapel Hill, NC MSA	1,983	7.62	21.15	9.05	17.67	28.54	21.48	26.86	39.70	35.55	12.99	14.93	14.50	16.57	10.04	
Fayetteville, NC MSA	2,028	7.79	19.32	3.12	18.02	17.26	23.43	37.14	39.22	42.48	17.50	16.83	17.54	18.44	16.69	
Goldsboro, NC MSA	219	0.84	18.92	8.26	19.11	24.77	23.15	35.32	38.82	31.65	12.39	17.95	12.06	14.65	10.55	
Greenville, NC MSA	607	2.33	23.33	6.47	16.32	28.19	19.71	25.37	40.63	39.97	13.59	11.01	13.77	14.23	13.42	
Hickory-Lenoir-Morganton, NC MSA	792	3.04	17.58	16.14	19.21	33.55	24.99	24.27	38.22	26.05	12.41	15.19	12.93	12.97	10.32	
Jacksonville, NC MSA	1,580	6.07	17.36	0.95	19.59	13.86	24.25	47.22	38.80	37.97	19.61	18.42	19.13	20.39	18.96	
Wilmington, NC MSA	1,851	7.11	20.49	4.54	18.06	21.09	22.04	25.79	39.41	48.58	15.24	14.48	16.81	18.03	13.46	
Winston-Salem, NC MSA	1,838	7.06	19.32	18.89	18.45	35.15	23.31	23.50	38.92	22.46	17.45	23.93	20.06	18.60	11.66	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: NORTH CAROLINA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Greensboro-High Point, NC MSA	70	9.25	19.32	11.76	18.43	11.76	23.23	29.41	39.02	47.06	5.07	1.56	2.22	3.30	8.88	
North Carolina Non-MSA	191	25.23	18.22	4.23	17.33	18.52	22.38	23.81	42.08	53.44	3.62	3.48	3.85	3.69	3.51	
Raleigh-Cary, NC MSA	123	16.25	19.58	11.67	18.24	31.67	23.50	27.50	38.68	29.17	5.91	2.44	10.78	6.25	4.06	
<b>Limited Review:</b>																
Asheville, NC MSA	58	7.66	18.01	11.11	19.26	16.67	23.76	24.07	38.96	48.15	6.08	19.23	3.08	7.78	4.05	
Burlington, NC MSA	17	2.25	18.81	0.00	18.16	11.76	23.65	47.06	39.38	41.18	14.67	0.00	11.11	23.53	13.89	
Durham-Chapel Hill, NC MSA	48	6.34	21.15	6.25	17.67	27.08	21.48	16.67	39.70	50.00	6.35	4.17	10.00	5.36	5.66	
Fayetteville, NC MSA	64	8.45	19.32	6.45	18.02	19.35	23.43	22.58	39.22	51.61	5.08	12.00	8.33	7.41	2.50	
Goldsboro, NC MSA	4	0.53	18.92	25.00	19.11	25.00	23.15	0.00	38.82	50.00	2.11	0.00	7.69	0.00	1.69	
Greenville, NC MSA	11	1.45	23.33	0.00	16.32	27.27	19.71	36.36	40.63	36.36	4.03	0.00	0.00	6.25	5.17	
Hickory-Lenoir-Morganton, NC MSA	42	5.55	17.58	5.13	19.21	25.64	24.99	25.64	38.22	43.59	5.33	0.00	7.81	5.08	5.56	
Jacksonville, NC MSA	34	4.49	17.36	8.82	19.59	20.59	24.25	29.41	38.80	41.18	4.05	11.11	8.33	3.61	3.11	
Wilmington, NC MSA	65	8.59	20.49	9.68	18.06	27.42	22.04	20.97	39.41	41.94	6.64	13.33	10.00	5.06	3.92	
Winston-Salem, NC MSA	30	3.96	19.32	13.79	18.45	31.03	23.31	20.69	38.92	34.48	2.25	0.00	5.63	1.03	2.04	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.6% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: North Carolina					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Greensboro-High Point, NC MSA	3,971	9.99	19.32	5.34	18.43	18.22	23.23	25.24	39.02	51.20	11.26	13.29	14.27	12.27	9.71	
North Carolina Non-MSA	8,292	20.87	18.22	4.00	17.33	13.22	22.38	22.56	42.08	60.22	10.45	12.91	12.31	12.22	9.37	
Raleigh-Cary, NC MSA	9,933	25.00	19.58	9.72	18.24	21.63	23.50	26.35	38.68	42.29	10.36	14.33	13.46	10.84	8.53	
<b>Limited Review:</b>																
Asheville, NC MSA	2,458	6.19	18.01	7.12	19.26	22.84	23.76	28.03	38.96	42.01	8.40	9.04	9.89	9.34	7.33	
Burlington, NC MSA	667	1.68	18.81	8.60	18.16	21.51	23.65	28.49	39.38	41.40	10.52	18.49	15.18	11.05	8.16	
Durham-Chapel Hill, NC MSA	3,268	8.22	21.15	6.30	17.67	17.69	21.48	23.61	39.70	52.40	10.35	14.29	12.47	12.33	8.86	
Fayetteville, NC MSA	1,857	4.67	19.32	3.96	18.02	14.66	23.43	25.36	39.22	56.02	13.69	18.99	15.81	14.67	12.56	
Goldsboro, NC MSA	299	0.75	18.92	6.09	19.11	16.96	23.15	26.52	38.82	50.43	8.17	13.95	12.41	9.36	6.46	
Greenville, NC MSA	778	1.96	23.33	3.04	16.32	14.06	19.71	22.90	40.63	60.00	10.52	3.13	14.13	12.32	9.54	
Hickory-Lenoir-Morganton, NC MSA	1,429	3.60	17.58	7.84	19.21	22.82	24.99	25.36	38.22	43.98	9.29	13.40	11.32	9.48	7.86	
Jacksonville, NC MSA	1,177	2.96	17.36	3.44	19.59	9.57	24.25	23.98	38.80	63.01	14.40	19.05	14.37	16.44	13.58	
Wilmington, NC MSA	3,246	8.17	20.49	5.96	18.06	16.31	22.04	25.19	39.41	52.54	12.01	16.32	15.22	14.56	10.01	
Winston-Salem, NC MSA	2,360	5.94	19.32	9.38	18.45	21.40	23.31	26.68	38.92	42.54	10.10	11.40	13.12	11.36	8.49	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: NORTH CAROLINA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Greensboro-High Point, NC MSA	1,068	10.84	66.30	55.90	92.42	3.65	3.93	4.59	5.42
North Carolina Non-MSA	2,214	22.48	68.61	57.86	93.54	2.39	4.07	4.18	4.74
Raleigh-Cary, NC MSA	2,265	22.99	68.06	61.81	92.10	2.47	5.43	4.99	7.03
<b>Limited Review:</b>									
Asheville, NC MSA	901	9.15	64.63	58.93	93.90	2.00	4.11	5.50	6.94
Burlington, NC MSA	149	1.51	65.99	57.05	89.93	2.01	8.05	4.51	7.33
Durham-Chapel Hill, NC MSA	851	8.64	66.24	63.57	91.07	3.88	5.05	5.11	6.74
Fayetteville, NC MSA	331	3.36	67.20	60.12	89.73	3.63	6.65	4.06	5.32
Goldsboro, NC MSA	73	0.74	69.59	49.32	100.00	0.00	0.00	2.29	2.13
Greenville, NC MSA	214	2.17	67.21	57.94	94.86	1.40	3.74	4.62	5.38
Hickory-Lenoir-Morganton, NC MSA	352	3.57	67.24	62.50	91.48	2.56	5.97	3.34	4.79
Jacksonville, NC MSA	187	1.90	69.35	58.29	90.91	5.88	3.21	6.30	9.21
Wilmington, NC MSA	813	8.25	69.97	61.13	94.46	2.71	2.83	5.26	6.72
Winston-Salem, NC MSA	432	4.39	66.13	56.94	93.75	3.47	2.78	3.16	3.26

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 26.52% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: NORTH CAROLINA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Greensboro-High Point, NC MSA	14	8.19	98.30	71.43	100.00	0.00	0.00	5.31	3.33
North Carolina Non-MSA	78	45.61	97.60	55.13	85.90	3.85	10.26	4.09	2.38
Raleigh-Cary, NC MSA	12	7.02	95.85	83.33	91.67	8.33	0.00	0.40	0.00
<b>Limited Review:</b>									
Asheville, NC MSA	6	3.51	98.40	83.33	100.00	0.00	0.00	4.00	5.13
Burlington, NC MSA	1	0.58	98.47	100.00	100.00	0.00	0.00	0.00	0.00
Durham-Chapel Hill, NC MSA	13	7.60	96.94	69.23	100.00	0.00	0.00	6.58	7.55
Fayetteville, NC MSA	5	2.92	97.32	60.00	100.00	0.00	0.00	6.67	5.56
Goldsboro, NC MSA	5	2.92	96.31	80.00	100.00	0.00	0.00	1.41	0.82
Greenville, NC MSA	11	6.43	96.69	27.27	54.55	18.18	27.27	4.12	2.56
Hickory-Lenoir-Morganton, NC MSA	6	3.51	98.21	100.00	100.00	0.00	0.00	2.78	3.45
Jacksonville, NC MSA	5	2.92	97.13	80.00	100.00	0.00	0.00	13.33	7.69
Wilmington, NC MSA	11	6.43	96.87	45.45	81.82	18.18	0.00	15.79	13.33
Winston-Salem, NC MSA	4	2.34	98.74	100.00	100.00	0.00	0.00	2.00	2.78

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 33.73% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: NORTH CAROLINA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Greensboro-High Point, NC MSA	28	4,043	52	4,758	80	8,801	7.97	0	0
North Carolina Non-MSA	21	9,713	118	10,602	139	20,315	18.40	0	0
Raleigh-Cary, NC MSA	22	5,791	87	9,705	109	15,495	14.03	0	0
<b>Limited Review:</b>									
Asheville, NC MSA	12	3,719	25	809	37	4,528	4.10	0	0
Burlington, NC MSA	6	366	7	270	13	636	0.58	0	0
Durham-Chapel Hill, NC MSA	15	20,621	64	4,131	79	24,752	22.42	0	0
Fayetteville, NC MSA	8	2,771	16	1,024	24	3,795	3.44	0	0
Goldsboro, NC MSA	2	503	8	159	10	662	0.60	0	0
Greenville, NC MSA	6	1,609	19	328	25	1,937	1.75	0	0
Hickory-Lenoir-Morganton, NC MSA	4	735	11	245	15	979	0.89	0	0
Jacksonville, NC MSA	4	3,589	13	327	17	3,916	3.55	0	0
Wilmington, NC MSA	14	6,956	27	933	41	7,888	7.14	0	0
Winston-Salem, NC MSA	13	3,269	28	1,836	41	5,105	4.62	0	0
Statewide investments with potential to benefit one or more AAs	0	0	24	403	24	403	0.36	0	0
Statewide investments with no potential to benefit one or more AAs	21	11,053	27	157	48	11,211	10.15	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: NORTH CAROLINA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Greensboro-High Point, NC MSA	12.34	19	13.48	5.26	26.32	47.37	21.05	0	1	0	0	0	-1	4.49	17.33	52.94	25.25
North Carolina Non-MSA	24.94	37	26.24	0.00	16.22	45.95	37.84	0	2	0	0	-1	-1	0.86	8.95	69.73	20.46
Raleigh-Cary, NC MSA	24.27	20	14.18	0.00	10.00	55.00	35.00	0	1	0	0	0	-1	4.19	21.12	51.42	23.27
<b>Limited Review:</b>																	
Asheville, NC MSA	5.61	9	6.38	0.00	33.33	55.56	11.11	0	0	0	0	0	0	1.22	7.96	80.16	10.66
Burlington, NC MSA	1.67	3	2.13	0.00	33.33	33.33	33.33	1	1	0	0	-1	1	0.00	14.51	73.97	11.52
Durham-Chapel Hill, NC MSA	9.44	10	7.09	0.00	20.00	50.00	30.00	0	0	0	0	0	0	10.70	15.26	45.24	28.35
Fayetteville, NC MSA	4.39	7	4.96	14.29	14.29	71.43	0.00	0	0	0	0	0	0	2.14	18.37	62.98	16.50
Goldsboro, NC MSA	0.78	2	1.42	0.00	0.00	50.00	50.00	0	1	0	0	-1	0	2.71	21.14	60.29	15.86
Greenville, NC MSA	2.29	5	3.55	0.00	20.00	40.00	40.00	0	0	0	0	0	0	3.40	12.81	52.40	31.39
Hickory-Lenoir-Morganton, NC MSA	1.47	4	2.84	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	10.71	83.00	6.29
Jacksonville, NC MSA	1.94	4	2.84	0.00	0.00	75.00	25.00	0	0	0	0	0	0	0.83	10.46	66.38	22.32
Wilmington, NC MSA	6.38	11	7.80	0.00	36.36	45.45	18.18	1	3	1	0	-1	0	3.28	23.01	55.62	18.08
Winston-Salem, NC MSA	4.47	10	7.09	10.00	10.00	80.00	0.00	0	1	0	0	0	-1	3.19	17.56	53.32	25.93

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: OHIO				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Cincinnati (Hamilton Co)	OH	5,590	844,346	625	13,402	6	36	0	0	6,221	857,784	0.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															
GEOGRAPHY: OHIO															
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cincinnati (Hamilton Co), OH	2,405	100.00	4.38	2.58	14.09	13.43	50.86	58.46	30.67	25.53	10.33	8.33	10.68	11.46	8.58

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT															GEOGRAPHY: OHIO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Cincinnati (Hamilton Co), OH	38	100.00	4.38	5.26	14.09	21.05	50.86	42.11	30.67	31.58	2.33	0.00	5.56	1.56	2.43									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: OHIO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Cincinnati (Hamilton Co), OH	3,147	100.00	4.38	2.76	14.09	11.63	50.86	52.24	30.67	33.37	6.00	8.99	8.61	7.71	4.22									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: OHIO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp														
<b>Full Review:</b>																															
Cincinnati (Hamilton Co), OH	0	0.00	25.46	0.00	24.12	0.00	36.99	0.00	13.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00														

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: OHIO		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Cincinnati (Hamilton Co), OH	625	100.00	8.19	6.56	15.74	12.64	45.57	46.72	30.49	34.08	2.04	1.84	1.84	2.37	1.74						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: OHIO					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Cincinnati (Hamilton Co), OH	6	100.00	2.78	0.00	14.20	16.67	48.22	16.67	34.81	66.67	3.33	0.00	0.00	0.00	8.33									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE															GEOGRAPHY: OHIO		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*										
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Cincinnati (Hamilton Co), OH	2,405	100.00	22.05	25.26	18.04	35.17	21.57	19.87	38.34	19.70	11.90	14.85	15.05	12.28	7.41						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement															Geography: Ohio					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families* **	% BANK Loans****	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Cincinnati (Hamilton Co), OH	38	100.00	22.05	22.86	18.04	22.86	21.57	28.57	38.34	25.71	1.92	2.47	1.41	3.47	0.87									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 7.9% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance															Geography: Ohio					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Cincinnati (Hamilton Co), OH	3,147	100.00	22.05	13.68	18.04	24.57	21.57	24.90	38.34	36.84	5.52	10.86	7.80	6.46	3.89									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 21.5% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: OHIO			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Cincinnati (Hamilton Co), OH	625	100.00	63.20	52.00	97.12	0.64	2.24	2.03	2.56

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 30.58% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: OHIO									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Cincinnati (Hamilton Co), OH	6	100.00	96.03	83.33	100.00	0.00	0.00	3.33	4.76

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 16.67% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: OHIO									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Cincinnati (Hamilton Co), OH	8	235	13	128	21	363	4.99	0	0
Statewide investments with potential to benefit one or more AAs	6	183	9	12	15	195	2.68	0	0
Statewide investments with no potential to benefit one or more AAs	80	6,258	50	464	130	6,721	92.33	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		
GEOGRAPHY: OHIO																		
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																		
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review:</b>																		
Cincinnati (Hamilton Co), OH	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0	11.93	18.16	45.08	24.72

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: OKLAHOMA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Tulsa, OK MSA	33.12	11,781	1,734,167	1,301	43,642	29	209	2	14,276	13,113	1,792,294	57.54
<b>Limited Review:</b>												
Lawton, OK MSA	4.32	1,629	228,057	76	1,129	4	65	0	0	1,709	229,251	0.53
Oklahoma City, OK MSA	56.85	20,925	3,029,718	1,540	45,535	41	829	0	0	22,506	3,076,082	36.97
Oklahoma Non-MSA	5.71	1,984	236,891	256	3,908	20	703	0	0	2,260	241,502	4.96

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: OKLAHOMA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Tulsa, OK MSA	5,835	30.38	0.92	0.31	20.83	8.07	47.41	42.01	30.84	49.61	14.91	18.75	11.42	15.17	15.37	
<b>Limited Review:</b>																
Lawton, OK MSA	993	5.17	1.57	0.30	15.78	9.87	64.80	73.51	17.86	16.31	18.00	0.00	17.35	17.84	19.76	
Oklahoma City, OK MSA	11,389	59.29	1.79	0.47	21.95	11.10	41.09	38.19	35.17	50.23	19.87	19.53	18.82	20.05	20.01	
Oklahoma Non-MSA	992	5.16	0.00	0.00	11.91	8.17	65.78	57.66	22.30	34.17	19.99	0.00	22.39	18.56	21.90	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT			GEOGRAPHY: OKLAHOMA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Tulsa, OK MSA	164	35.04	0.92	0.00	20.83	11.59	47.41	49.39	30.84	39.02	2.93	0.00	1.22	3.59	3.14	
<b>Limited Review:</b>																
Lawton, OK MSA	16	3.42	1.57	0.00	15.78	0.00	64.80	75.00	17.86	25.00	1.53	0.00	0.00	1.14	3.51	
Oklahoma City, OK MSA	228	48.72	1.79	0.44	21.95	13.16	41.09	35.96	35.17	50.44	2.51	0.00	1.75	2.15	3.35	
Oklahoma Non-MSA	60	12.82	0.00	0.00	11.91	5.00	65.78	66.67	22.30	28.33	4.58	0.00	2.04	4.46	5.59	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: OKLAHOMA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Tulsa, OK MSA	5,782	34.74	0.92	0.12	20.83	6.92	47.41	38.60	30.84	54.36	13.13	6.82	12.89	13.90	12.69									
<b>Limited Review:</b>																								
Lawton, OK MSA	620	3.73	1.57	0.16	15.78	8.06	64.80	68.23	17.86	23.55	13.99	0.00	9.77	13.70	16.71									
Oklahoma City, OK MSA	9,308	55.93	1.79	0.20	21.95	8.50	41.09	36.41	35.17	54.89	15.05	6.00	13.15	15.75	14.98									
Oklahoma Non-MSA	932	5.60	0.00	0.00	11.91	5.36	65.78	65.13	22.30	29.51	16.66	0.00	20.34	16.94	15.41									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: OKLAHOMA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Tulsa, OK MSA	0	0.00	3.48	0.00	25.20	0.00	41.27	0.00	30.05	0.00	0.00	0.00	0.00	0.00	0.00									
<b>Limited Review:</b>																								
Lawton, OK MSA	0	0.00	3.66	0.00	23.17	0.00	56.90	0.00	16.27	0.00	0.00	0.00	0.00	0.00	0.00									
Oklahoma City, OK MSA	0	0.00	4.60	0.00	37.30	0.00	35.87	0.00	22.22	0.00	0.00	0.00	0.00	0.00	0.00									
Oklahoma Non-MSA	0	0.00	0.00	0.00	17.57	0.00	57.43	0.00	25.01	0.00	0.00	0.00	0.00	0.00	0.00									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: OKLAHOMA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Tulsa, OK MSA	1,301	41.00	0.88	0.54	20.63	19.37	40.49	38.36	38.01	41.74	4.00	0.00	4.22	4.21	3.79						
<b>Limited Review:</b>																					
Lawton, OK MSA	76	2.40	8.46	3.95	21.17	18.42	54.86	63.16	15.51	14.47	3.49	0.00	3.08	5.13	2.04						
Oklahoma City, OK MSA	1,540	48.53	3.11	2.60	19.70	17.08	37.18	35.58	40.01	44.74	3.66	2.30	3.30	3.89	3.77						
Oklahoma Non-MSA	256	8.07	0.00	0.00	11.61	12.50	68.31	64.45	20.08	23.05	4.40	0.00	5.39	4.08	4.83						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: OKLAHOMA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Tulsa, OK MSA	29	30.85	0.42	0.00	17.83	27.59	53.65	44.83	28.10	27.59	5.74	0.00	4.17	3.97	14.29	
<b>Limited Review:</b>																
Lawton, OK MSA	4	4.26	2.71	0.00	8.60	0.00	71.04	50.00	17.65	50.00	0.57	0.00	0.00	0.65	0.00	
Oklahoma City, OK MSA	41	43.62	0.85	0.00	15.57	7.32	45.84	43.90	37.73	48.78	3.15	0.00	0.98	2.54	7.29	
Oklahoma Non-MSA	20	21.28	0.00	0.00	5.68	5.00	74.98	55.00	19.35	40.00	1.50	0.00	0.00	0.93	4.55	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: OKLAHOMA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Tulsa, OK MSA	5,835	30.38	19.97	10.72	18.37	32.15	21.62	28.73	40.05	28.40	15.96	13.76	18.21	19.07	12.71		
<b>Limited Review:</b>																	
Lawton, OK MSA	993	5.17	20.53	4.26	17.07	15.31	22.19	37.93	40.21	42.49	21.70	18.02	21.31	25.47	19.96		
Oklahoma City, OK MSA	11,389	59.29	20.04	12.44	18.19	30.70	21.66	26.81	40.11	30.05	22.31	21.38	25.01	23.98	19.43		
Oklahoma Non-MSA	992	5.16	19.76	8.81	17.46	23.91	21.13	24.82	41.66	42.45	21.91	18.88	21.14	22.84	22.36		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: OKLAHOMA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Tulsa, OK MSA	164	35.04	19.97	10.69	18.37	27.04	21.62	25.79	40.05	36.48	3.04	2.51	4.37	3.17	2.51	
<b>Limited Review:</b>																
Lawton, OK MSA	16	3.42	20.53	0.00	17.07	18.75	22.19	31.25	40.21	50.00	1.61	0.00	0.00	1.69	2.16	
Oklahoma City, OK MSA	228	48.72	20.04	7.34	18.19	26.15	21.66	30.28	40.11	36.24	2.52	1.25	2.23	3.61	2.30	
Oklahoma Non-MSA	60	12.82	19.76	6.67	17.46	15.00	21.13	33.33	41.66	45.00	4.78	4.55	5.26	4.10	4.98	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.2% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

BORROWER DISTRIBUTION: HOME MORTGAGE REFINANCE		GEOGRAPHY: OKLAHOMA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Tulsa, OK MSA	5,782	34.74	19.97	6.48	18.37	19.25	21.62	26.22	40.05	48.04	13.30	15.57	15.04	13.77	12.29		
<b>Limited Review:</b>																	
Lawton, OK MSA	620	3.73	20.53	4.30	17.07	17.65	22.19	26.24	40.21	51.81	15.76	13.79	23.03	17.42	13.62		
Oklahoma City, OK MSA	9,308	55.93	20.04	7.08	18.19	18.52	21.66	26.60	40.11	47.80	15.76	18.33	17.47	17.57	14.25		
Oklahoma Non-MSA	932	5.60	19.76	4.19	17.46	15.48	21.13	25.96	41.66	54.37	17.97	12.50	17.83	19.57	17.80		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.5% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: OKLAHOMA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Tulsa, OK MSA	1,301	41.00	60.51	55.11	93.62	3.07	3.31	3.88	5.28
<b>Limited Review:</b>									
Lawton, OK MSA	76	2.40	62.06	53.95	97.37	1.32	1.32	3.39	2.20
Oklahoma City, OK MSA	1,540	48.53	64.88	55.58	94.35	2.73	2.92	3.50	5.53
Oklahoma Non-MSA	256	8.07	68.39	52.34	98.05	1.95	0.00	4.28	4.74

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 29.89% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: OKLAHOMA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Tulsa, OK MSA	29	30.85	97.76	72.41	100.00	0.00	0.00	5.50	5.26
<b>Limited Review:</b>									
Lawton, OK MSA	4	4.26	98.94	50.00	100.00	0.00	0.00	0.56	0.00
Oklahoma City, OK MSA	41	43.62	97.90	68.29	95.12	4.88	0.00	3.04	2.44
Oklahoma Non-MSA	20	21.28	98.27	50.00	85.00	15.00	0.00	1.47	1.73

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 31.18% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: OKLAHOMA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Tulsa, OK MSA	11	8,139	70	15,183	81	23,322	45.69	1	7,283
<b>Limited Review:</b>									
Lawton, OK MSA	4	485	2	45	6	530	1.04	0	0
Oklahoma City, OK MSA	20	3,102	81	7,388	101	10,489	20.55	0	0
Oklahoma Non-MSA	1	142	39	436	40	578	1.13	0	0
Statewide investments with potential to benefit one or more AAs	1	100	12	162	13	262	0.51	0	0
Statewide investments with no potential to benefit one or more AAs	15	15,813	17	50	32	15,863	31.08	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: OKLAHOMA																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Tulsa, OK MSA	57.54	16	39.02	0.00	25.00	50.00	25.00	0	1	0	-1	0	0	1.78	24.53	45.74	27.94
<b>Limited Review:</b>																	
Lawton, OK MSA	0.53	1	2.44	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.18	17.78	66.40	13.63
Oklahoma City, OK MSA	36.96	18	43.90	5.56	16.67	38.89	38.89	0	1	0	0	0	-1	3.59	27.59	39.08	29.66
Oklahoma Non-MSA	4.96	6	14.63	0.00	0.00	83.33	16.67	0	1	0	0	-1	0	0.00	13.18	67.38	19.44

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: OREGON				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Oregon Non-MSA	33.72	8,359	1,418,803	1,377	41,911	92	710	11	1,389	9,839	1,462,813	46.48
Salem, OR MSA	16.35	4,154	742,374	575	14,588	40	1,201	1	22	4,770	758,185	13.50
<b>Limited Review:</b>												
Bend, OR MSA	12.72	3,079	602,584	619	20,104	10	74	4	864	3,712	623,626	10.62
Corvallis, OR MSA	4.21	1,048	222,282	169	5,103	10	150	0	0	1,227	227,535	4.97
Eugene-Springfield, OR MSA	20.05	5,246	1,020,780	585	18,068	15	119	3	543	5,849	1,039,510	12.79
Medford, OR MSA	12.96	3,304	634,499	469	11,593	7	263	2	541	3,782	646,896	11.63

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															GEOGRAPHY: OREGON		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Oregon Non-MSA	2,992	30.08	0.00	0.00	7.95	7.19	74.04	73.06	18.01	19.75	17.12	0.00	18.65	16.81	17.83						
Salem, OR MSA	1,444	14.52	0.09	0.00	14.36	13.50	59.70	56.99	25.85	29.50	14.13	0.00	14.62	14.92	12.49						
<b>Limited Review:</b>																					
Bend, OR MSA	1,679	16.88	0.00	0.00	18.64	17.39	48.92	52.71	32.44	29.90	17.70	0.00	17.54	19.33	15.45						
Corvallis, OR MSA	368	3.70	0.00	0.00	26.55	26.90	28.42	19.57	45.02	53.53	18.10	0.00	19.53	14.01	19.19						
Eugene-Springfield, OR MSA	1,932	19.42	0.53	0.31	10.64	8.95	65.10	63.20	23.73	27.54	18.28	5.56	16.67	18.38	18.79						
Medford, OR MSA	1,532	15.40	0.31	0.39	15.60	17.04	56.76	56.59	27.33	25.98	24.47	33.33	21.37	24.52	26.27						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: OREGON				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oregon Non-MSA	186	42.37	0.00	0.00	7.95	4.84	74.04	78.49	18.01	16.67	10.33	0.00	11.11	10.46	9.41
Salem, OR MSA	51	11.62	0.09	0.00	14.36	7.84	59.70	62.75	25.85	29.41	6.47	0.00	6.25	7.35	5.45
<b>Limited Review:</b>															
Bend, OR MSA	27	6.15	0.00	0.00	18.64	14.81	48.92	33.33	32.44	51.85	8.14	0.00	8.33	9.38	6.67
Corvallis, OR MSA	33	7.52	0.00	0.00	26.55	18.18	28.42	33.33	45.02	48.48	13.11	0.00	8.33	16.67	13.51
Eugene-Springfield, OR MSA	91	20.73	0.53	0.00	10.64	8.79	65.10	56.04	23.73	35.16	13.01	0.00	14.29	10.84	17.72
Medford, OR MSA	51	11.62	0.31	0.00	15.60	5.88	56.76	62.75	27.33	31.37	12.28	0.00	0.00	15.15	11.43

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: OREGON		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Oregon Non-MSA	5,180	34.99	0.00	0.00	7.95	6.04	74.04	74.17	18.01	19.79	14.74	0.00	18.03	14.75	13.88						
Salem, OR MSA	2,659	17.96	0.09	0.08	14.36	13.28	59.70	56.71	25.85	29.94	11.16	0.00	13.83	11.05	10.55						
<b>Limited Review:</b>																					
Bend, OR MSA	1,373	9.28	0.00	0.00	18.64	14.71	48.92	43.12	32.44	42.17	12.01	0.00	14.70	13.75	9.86						
Corvallis, OR MSA	647	4.37	0.00	0.00	26.55	24.88	28.42	24.11	45.02	51.00	12.17	0.00	14.43	12.00	11.31						
Eugene-Springfield, OR MSA	3,223	21.77	0.53	0.47	10.64	9.68	65.10	62.80	23.73	27.06	14.11	20.00	17.50	14.25	12.82						
Medford, OR MSA	1,721	11.63	0.31	0.06	15.60	12.26	56.76	52.93	27.33	34.75	16.18	0.00	18.81	16.27	15.28						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: OREGON					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Oregon Non-MSA	1	100.00	0.00	0.00	11.92	0.00	73.14	0.00	14.94	100.00	3.45	0.00	0.00	0.00	0.00	20.00								
Salem, OR MSA	0	0.00	0.46	0.00	40.27	0.00	41.61	0.00	17.66	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
<b>Limited Review:</b>																								
Bend, OR MSA	0	0.00	0.00	0.00	27.32	0.00	57.45	0.00	15.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Corvallis, OR MSA	0	0.00	0.00	0.00	69.50	0.00	11.08	0.00	19.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Eugene-Springfield, OR MSA	0	0.00	14.02	0.00	28.02	0.00	42.14	0.00	15.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Medford, OR MSA	0	0.00	4.18	0.00	38.22	0.00	32.71	0.00	24.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00								

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															
GEOGRAPHY: OREGON															
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oregon Non-MSA	1,377	36.29	0.00	0.00	9.03	8.71	72.91	74.15	18.06	17.14	5.33	0.00	4.92	5.38	5.32
Salem, OR MSA	575	15.16	0.24	0.17	20.52	25.39	56.65	50.26	22.58	24.17	4.75	0.00	5.81	4.25	5.03
<b>Limited Review:</b>															
Bend, OR MSA	619	16.32	0.00	0.00	20.66	22.13	44.06	39.26	35.28	38.61	7.41	0.00	8.59	7.30	6.98
Corvallis, OR MSA	169	4.45	0.00	0.00	41.84	40.24	23.27	34.32	34.89	25.44	5.78	0.00	5.90	6.80	4.88
Eugene-Springfield, OR MSA	585	15.42	4.10	6.50	16.15	17.44	57.63	54.19	22.12	21.88	4.54	3.36	5.91	4.47	4.01
Medford, OR MSA	469	12.36	5.09	5.33	21.11	25.80	49.48	41.36	24.32	27.51	4.82	3.37	4.69	5.08	4.84

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS																
GEOGRAPHY: OREGON																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Oregon Non-MSA	92	52.87	0.00	0.00	7.24	6.52	74.21	73.91	18.55	19.57	4.64	0.00	6.45	3.67	8.74	
Salem, OR MSA	40	22.99	0.09	0.00	8.04	2.50	72.74	75.00	19.13	22.50	5.17	0.00	0.00	5.00	5.88	
<b>Limited Review:</b>																
Bend, OR MSA	10	5.75	0.00	0.00	13.70	20.00	48.86	50.00	37.44	30.00	6.38	0.00	25.00	7.69	0.00	
Corvallis, OR MSA	10	5.75	0.00	0.00	20.90	60.00	53.52	30.00	25.59	10.00	8.33	0.00	50.00	0.00	9.09	
Eugene-Springfield, OR MSA	15	8.62	1.34	0.00	8.25	0.00	70.59	80.00	19.82	20.00	9.84	0.00	0.00	9.09	11.76	
Medford, OR MSA	7	4.02	1.93	14.29	14.34	0.00	59.01	71.43	24.72	14.29	7.04	33.33	0.00	7.50	6.25	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: OREGON					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Oregon Non-MSA	2,992	30.08	19.16	7.11	18.43	24.39	22.68	31.60	39.72	36.90	18.81	21.58	19.55	18.64	18.19	
Salem, OR MSA	1,444	14.52	18.49	6.28	18.97	29.92	23.62	32.50	38.92	31.31	15.17	12.83	16.62	14.81	14.65	
<b>Limited Review:</b>																
Bend, OR MSA	1,679	16.88	17.37	13.52	20.54	28.37	22.66	24.72	39.43	33.39	19.58	24.38	23.54	21.28	15.68	
Corvallis, OR MSA	368	3.70	19.62	5.43	18.42	28.26	22.30	36.41	39.65	29.89	19.25	15.22	21.00	24.81	14.53	
Eugene-Springfield, OR MSA	1,932	19.42	19.02	7.22	18.57	26.56	22.91	30.15	39.49	36.07	20.46	22.61	22.80	19.95	19.04	
Medford, OR MSA	1,532	15.40	19.34	7.80	18.89	24.90	21.45	31.06	40.32	36.24	27.21	22.29	25.56	27.79	28.53	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: OREGON					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Oregon Non-MSA	186	42.37	19.16	6.86	18.43	16.57	22.68	34.86	39.72	41.71	9.74	11.63	7.89	13.60	8.03	
Salem, OR MSA	51	11.62	18.49	4.08	18.97	20.41	23.62	26.53	38.92	48.98	6.59	7.14	8.77	6.45	5.71	
<b>Limited Review:</b>																
Bend, OR MSA	27	6.15	17.37	8.00	20.54	40.00	22.66	16.00	39.43	36.00	8.33	0.00	21.05	4.76	5.56	
Corvallis, OR MSA	33	7.52	19.62	3.03	18.42	30.30	22.30	33.33	39.65	33.33	13.33	0.00	20.00	6.25	14.29	
Eugene-Springfield, OR MSA	91	20.73	19.02	5.75	18.57	19.54	22.91	40.23	39.49	34.48	13.28	8.00	10.64	15.38	14.15	
Medford, OR MSA	51	11.62	19.34	6.67	18.89	26.67	21.45	33.33	40.32	33.33	10.58	0.00	18.18	15.00	8.16	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.7% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Oregon					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Oregon Non-MSA	5,180	34.99	19.16	6.11	18.43	18.07	22.68	27.76	39.72	48.06	15.51	19.61	18.41	16.28	14.19	
Salem, OR MSA	2,659	17.96	18.49	6.37	18.97	20.79	23.62	29.88	38.92	42.96	11.50	17.07	12.74	12.43	10.18	
<b>Limited Review:</b>																
Bend, OR MSA	1,373	9.28	17.37	7.95	20.54	19.01	22.66	24.29	39.43	48.75	12.21	16.86	14.68	13.14	10.91	
Corvallis, OR MSA	647	4.37	19.62	6.22	18.42	21.18	22.30	27.56	39.65	45.04	13.09	8.26	15.36	11.72	13.66	
Eugene-Springfield, OR MSA	3,223	21.77	19.02	6.05	18.57	20.06	22.91	29.39	39.49	44.51	14.61	15.92	16.28	14.91	13.80	
Medford, OR MSA	1,721	11.63	19.34	6.68	18.89	19.78	21.45	26.46	40.32	47.09	17.64	19.87	23.04	18.39	15.71	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 14.6% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: OREGON			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Oregon Non-MSA	1,377	36.29	69.35	58.61	94.63	2.11	3.27	4.84	5.50
Salem, OR MSA	575	15.16	70.24	60.00	96.17	1.39	2.43	4.34	5.36
<b>Limited Review:</b>									
Bend, OR MSA	619	16.32	71.63	63.65	94.02	2.75	3.23	6.87	9.13
Corvallis, OR MSA	169	4.45	68.07	67.46	95.27	1.78	2.96	5.30	7.64
Eugene-Springfield, OR MSA	585	15.42	70.00	56.92	94.70	2.05	3.25	4.22	5.17
Medford, OR MSA	469	12.36	72.66	61.41	96.16	1.28	2.56	4.53	6.08

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 23.40% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: OREGON									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Oregon Non-MSA	92	52.87	96.51	64.13	100.00	0.00	0.00	4.37	4.00
Salem, OR MSA	40	22.99	93.39	50.00	87.50	12.50	0.00	4.79	4.40
<b>Limited Review:</b>									
Bend, OR MSA	10	5.75	97.95	90.00	100.00	0.00	0.00	5.45	5.13
Corvallis, OR MSA	10	5.75	96.48	40.00	100.00	0.00	0.00	7.50	4.00
Eugene-Springfield, OR MSA	15	8.62	97.25	53.33	100.00	0.00	0.00	8.45	7.55
Medford, OR MSA	7	4.02	97.61	42.86	71.43	28.57	0.00	6.58	6.52

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 24.28% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		GEOGRAPHY: OREGON		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Oregon Non-MSA	19	4,094	56	3,976	75	8,070	45.03	0	0
Salem, OR MSA	4	623	11	906	15	1,529	8.53	0	0
<b>Limited Review:</b>									
Bend, OR MSA	4	209	11	915	15	1,123	6.27	0	0
Corvallis, OR MSA	0	0	7	464	7	464	2.59	0	0
Eugene-Springfield, OR MSA	6	677	11	673	17	1,350	7.53	0	0
Medford, OR MSA	1	84	17	1,186	18	1,270	7.09	0	0
Statewide investments with potential to benefit one or more AAs	0	0	17	155	17	155	0.86	0	0
Statewide investments with no potential to benefit one or more AAs	1	139	9	3,823	10	3,962	22.10	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: OREGON																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Oregon Non-MSA	46.48	20	57.14	0.00	20.00	70.00	10.00	1	2	0	0	-1	0	0.00	8.95	74.24	16.81
Salem, OR MSA	13.50	4	11.43	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.98	21.38	56.75	20.89
<b>Limited Review:</b>																	
Bend, OR MSA	10.62	3	8.57	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	21.19	49.23	29.58
Corvallis, OR MSA	4.97	1	2.86	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	43.47	23.14	33.39
Eugene-Springfield, OR MSA	12.79	4	11.43	0.00	50.00	50.00	0.00	0	0	0	0	0	0	2.90	14.69	61.85	20.56
Medford, OR MSA	11.63	3	8.57	33.33	33.33	33.33	0.00	0	0	0	0	0	0	1.16	22.53	52.66	23.65

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: PENNSYLVANIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Scranton-Wilkes Barre, PA MSA	18.01	3,553	454,831	741	16,455	6	53	0	0	4,300	471,339	74.89
<b>Limited Review:</b>												
Pittsburgh (Allegheny Co), PA	38.51	7,981	1,175,199	1,212	19,863	1	3	2	6,216	9,196	1,201,281	0.00
Lancaster, PA MSA	21.60	4,333	723,494	809	11,225	16	131	0	0	5,158	734,850	14.50
Reading, PA MSA	17.51	3,693	597,263	483	6,628	5	86	0	0	4,181	603,977	7.21
Pennsylvania Non-MSA	4.37	871	97,345	171	4,876	2	15	0	0	1,044	102,236	3.39

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: PENNSYLVANIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Scranton-Wilkes Barre, PA MSA	1,488	16.51	0.03	0.00	7.89	9.54	74.88	71.03	17.20	19.42	12.95	0.00	18.34	13.32	10.51
<b>Limited Review:</b>															
Pittsburgh (Allegheny Co), PA	3,706	41.13	1.97	0.27	14.63	7.20	46.23	46.25	37.17	46.28	10.38	2.96	9.26	11.85	9.54
Lancaster, PA MSA	1,784	19.80	1.17	0.62	6.39	8.46	81.91	80.66	10.53	10.26	10.45	4.05	10.48	10.73	9.11
Reading, PA MSA	1,596	17.71	3.01	1.50	10.08	7.64	70.43	70.68	16.49	20.18	13.05	6.41	10.30	13.13	14.63
Pennsylvania Non-MSA	436	4.84	0.00	0.00	13.06	11.47	75.64	72.94	11.30	15.60	15.88	0.00	21.25	15.36	16.00

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: PENNSYLVANIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Scranton-Wilkes Barre, PA MSA	58	24.79	0.03	0.00	7.89	10.34	74.88	74.14	17.20	15.52	1.40	0.00	3.13	1.02	2.48
<b>Limited Review:</b>															
Pittsburgh (Allegheny Co), PA	81	34.62	1.97	0.00	14.63	11.11	46.23	49.38	37.17	39.51	0.93	0.00	0.83	1.24	0.65
Lancaster, PA MSA	41	17.52	1.17	0.00	6.39	7.32	81.91	85.37	10.53	7.32	1.54	0.00	0.00	1.60	2.00
Reading, PA MSA	34	14.53	3.01	0.00	10.08	0.00	70.43	70.59	16.49	29.41	1.62	0.00	0.00	2.06	1.36
Pennsylvania Non-MSA	20	8.55	0.00	0.00	13.06	5.00	75.64	75.00	11.30	20.00	2.79	0.00	0.00	2.69	5.71

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE												GEOGRAPHY: PENNSYLVANIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
<b>Full Review:</b>																				
Scranton-Wilkes Barre, PA MSA	2,007	17.94	0.03	0.00	7.89	4.43	74.88	69.21	17.20	26.36	9.60	0.00	9.06	10.43	7.90					
<b>Limited Review:</b>																				
Pittsburgh (Allegheny Co), PA	4,194	37.49	1.97	0.21	14.63	4.89	46.23	39.91	37.17	54.98	7.86	5.97	7.77	9.40	7.06					
Lancaster, PA MSA	2,508	22.42	1.17	0.24	6.39	4.11	81.91	82.34	10.53	13.32	8.99	4.08	10.41	9.13	8.00					
Reading, PA MSA	2,063	18.44	3.01	0.78	10.08	3.54	70.43	73.24	16.49	22.44	10.21	19.57	17.93	10.12	9.50					
Pennsylvania Non-MSA	415	3.71	0.00	0.00	13.06	3.37	75.64	77.11	11.30	19.52	10.54	0.00	6.35	11.09	9.33					

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: PENNSYLVANIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Scranton-Wilkes Barre, PA MSA	0	0.00	6.46	0.00	23.06	0.00	60.87	0.00	9.60	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Pittsburgh (Allegheny Co), PA	0	0.00	12.90	0.00	19.29	0.00	35.37	0.00	32.44	0.00	0.00	0.00	0.00	0.00	0.00
Lancaster, PA MSA	0	0.00	8.06	0.00	11.61	0.00	67.83	0.00	12.49	0.00	0.00	0.00	0.00	0.00	0.00
Reading, PA MSA	0	0.00	24.92	0.00	11.67	0.00	47.61	0.00	15.81	0.00	0.00	0.00	0.00	0.00	0.00
Pennsylvania Non-MSA	0	0.00	0.00	0.00	30.55	0.00	60.33	0.00	9.12	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: PENNSYLVANIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Scranton-Wilkes Barre, PA MSA	741	21.69	2.97	1.75	8.56	8.10	70.02	69.23	18.45	20.92	4.02	2.51	3.87	4.24	3.59									
<b>Limited Review:</b>																								
Pittsburgh (Allegheny Co), PA	1,212	35.48	3.98	2.39	13.10	11.39	36.18	37.79	46.74	48.43	2.88	1.64	2.70	2.85	3.05									
Lancaster, PA MSA	809	23.68	3.28	1.36	7.19	4.70	77.05	81.95	12.48	11.99	3.94	1.46	2.99	4.08	4.11									
Reading, PA MSA	483	14.14	7.83	2.90	6.99	4.76	64.60	71.22	20.58	21.12	4.19	1.72	4.88	4.38	4.04									
Pennsylvania Non-MSA	171	5.01	0.00	0.00	14.60	11.11	70.89	71.35	14.51	17.54	4.78	0.00	5.66	4.18	6.61									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: PENNSYLVANIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Scranton-Wilkes Barre, PA MSA	6	20.00	0.29	0.00	3.85	16.67	70.19	83.33	25.67	0.00	4.17	0.00	0.00	9.09	0.00	
<b>Limited Review:</b>																
Pittsburgh (Allegheny Co), PA	1	3.33	1.34	0.00	7.80	0.00	47.41	0.00	43.45	100.00	5.26	0.00	0.00	0.00	11.11	
Lancaster, PA MSA	16	53.33	0.56	0.00	2.77	0.00	92.55	100.00	4.11	0.00	0.66	0.00	0.00	0.70	0.00	
Reading, PA MSA	5	16.67	0.83	0.00	0.90	0.00	86.52	100.00	11.75	0.00	0.31	0.00	0.00	0.32	0.00	
Pennsylvania Non-MSA	2	6.67	0.00	0.00	1.69	0.00	76.34	100.00	21.97	0.00	1.64	0.00	0.00	1.82	0.00	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: PENNSYLVANIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Scranton-Wilkes Barre, PA MSA	1,488	16.51	19.02	17.41	18.75	31.10	22.88	29.20	39.34	22.29	13.99	20.99	17.73	14.69	8.93	
<b>Limited Review:</b>																
Pittsburgh (Allegheny Co), PA	3,706	41.13	18.69	10.76	17.33	27.66	21.10	26.17	42.88	35.41	11.23	12.81	12.12	12.16	9.84	
Lancaster, PA MSA	1,784	19.80	15.76	12.26	19.70	36.00	26.55	30.76	37.99	20.98	11.53	9.93	12.56	12.03	10.47	
Reading, PA MSA	1,596	17.71	17.73	12.63	19.00	33.04	24.38	30.09	38.90	24.25	14.10	14.16	13.98	15.05	13.29	
Pennsylvania Non-MSA	436	4.84	17.34	14.71	19.95	34.02	24.41	27.59	38.30	23.68	17.29	18.12	18.27	16.79	16.26	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: PENNSYLVANIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Scranton-Wilkes Barre, PA MSA	58	24.79	19.02	21.43	18.75	16.07	22.88	26.79	39.34	35.71	1.37	0.88	1.23	1.60	1.48	
<b>Limited Review:</b>																
Pittsburgh (Allegheny Co), PA	81	34.62	18.69	7.50	17.33	28.75	21.10	27.50	42.88	36.25	0.93	0.61	1.21	1.20	0.71	
Lancaster, PA MSA	41	17.52	15.76	7.32	19.70	31.71	26.55	36.59	37.99	24.39	1.58	0.00	2.85	2.47	0.51	
Reading, PA MSA	34	14.53	17.73	2.94	19.00	23.53	24.38	52.94	38.90	20.59	1.67	0.00	2.02	3.03	1.32	
Pennsylvania Non-MSA	20	8.55	17.34	5.00	19.95	30.00	24.41	45.00	38.30	20.00	2.83	0.00	4.65	4.11	2.06	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Pennsylvania					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Scranton-Wilkes Barre, PA MSA	2,007	17.94	19.02	9.80	18.75	21.90	22.88	28.41	39.34	39.88	9.31	14.49	12.70	10.26	7.31	
<b>Limited Review:</b>																
Pittsburgh (Allegheny Co), PA	4,194	37.49	18.69	6.35	17.33	19.00	21.10	24.89	42.88	49.76	7.78	10.60	10.05	8.69	6.73	
Lancaster, PA MSA	2,508	22.42	15.76	7.29	19.70	27.73	26.55	31.42	37.99	33.55	8.84	10.36	10.96	8.95	7.43	
Reading, PA MSA	2,063	18.44	17.73	6.70	19.00	24.42	24.38	31.29	38.90	37.59	9.96	10.00	11.59	10.61	8.96	
Pennsylvania Non-MSA	415	3.71	17.34	6.83	19.95	21.58	24.41	28.96	38.30	42.62	10.37	14.08	14.36	10.25	8.90	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.2% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: PENNSYLVANIA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Scranton-Wilkes Barre, PA MSA	741	21.69	64.93	55.47	96.90	1.35	1.75	3.88	4.23
<b>Limited Review:</b>									
Pittsburgh (Allegheny Co), PA	1,212	35.48	62.05	51.49	98.02	0.66	1.32	2.85	3.09
Lancaster, PA MSA	809	23.68	66.75	52.66	98.76	0.37	0.87	3.84	4.27
Reading, PA MSA	483	14.14	66.31	54.45	98.14	0.83	1.04	4.06	5.21
Pennsylvania Non-MSA	171	5.01	66.53	51.46	95.32	1.75	2.92	4.61	5.41

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 27.97% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: PENNSYLVANIA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Scranton-Wilkes Barre, PA MSA	6	20.00	97.50	83.33	100.00	0.00	0.00	3.57	6.25
<b>Limited Review:</b>									
Pittsburgh (Allegheny Co), PA	1	3.33	96.21	0.00	100.00	0.00	0.00	5.26	0.00
Lancaster, PA MSA	16	53.33	97.36	43.75	100.00	0.00	0.00	0.66	0.33
Reading, PA MSA	5	16.67	97.21	80.00	100.00	0.00	0.00	0.31	0.34
Pennsylvania Non-MSA	2	6.67	97.18	100.00	100.00	0.00	0.00	1.61	1.92

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 23.33% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: PENNSYLVANIA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Scranton-Wilkes Barre, PA MSA	4	750	27	1,625	31	2,375	24.80	0	0
<b>Limited Review:</b>									
Pittsburgh (Allegheny Co), PA	4	2,841	10	97	14	2,938	30.67	0	0
Lancaster, PA MSA	1	268	14	1,559	15	1,827	19.07	0	0
Reading, PA MSA	1	329	9	643	10	972	10.15	0	0
Pennsylvania Non-MSA	0	0	2	40	2	40	0.42	0	0
Statewide investments with potential to benefit one or more AAs	0	0	10	71	10	71	0.74	0	0
Statewide investments with no potential to benefit one or more AAs	9	1,115	33	242	42	1,357	14.17	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				GEOGRAPHY: PENNSYLVANIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Scranton-Wilkes Barre, PA MSA	74.89	8	57.14	12.50	12.50	50.00	25.00	0	02	0	0	-1	-1	0.46	10.26	73.22	16.06
<b>Limited Review:</b>																	
Pittsburgh (Allegheny Co), PA	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	4.62	17.77	42.67	34.93
Lancaster, PA MSA	14.50	3	21.43	33.33	0.00	0.00	66.67	0	0	0	0	0	0	3.13	8.69	79.02	9.15
Reading, PA MSA	7.21	2	14.29	0.00	50.00	0.00	50.00	0	0	0	0	0	0	7.37	12.67	64.96	15.00
Pennsylvania Non-MSA	3.39	1	7.14	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	13.79	75.13	11.08

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: SOUTH CAROLINA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Columbia, SC MSA	23.88	11,097	1,794,701	1,212	60,563	15	1,163	2	5,646	12,326	1,862,073	43.58
Greenville-Mauldin-Easley, SC MSA	13.76	5,975	954,802	1,112	44,509	14	86	1	5,731	7,102	1,005,128	17.70
<b>Limited Review:</b>												
Anderson, SC MSA	3.49	1,554	224,760	245	7,684	4	33	0	0	1,803	232,477	1.17
Charleston-North Charleston-Summerville, SC MSA	26.28	11,951	2,526,930	1,597	87,299	9	77	5	16,508	13,562	2,630,814	13.64
Florence, SC MSA	2.98	1,306	181,400	228	21,161	6	78	0	0	1,540	202,639	1.83
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	9.96	4,582	752,358	557	25,522	2	8	0	0	5,141	777,888	2.90
Spartanburg, SC MSA	4.76	1,998	278,668	451	23,240	8	37	0	0	2,457	301,945	9.72
Sumter, SC MSA	1.83	844	111,280	88	4,015	10	1,216	0	0	942	116,511	0.65
South Carolina Non-MSA	13.06	5,599	1,105,319	1,119	37,203	22	408	1	955	6,741	1,143,885	8.82

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: SOUTH CAROLINA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Columbia, SC MSA	5,679	28.62	0.96	0.28	23.50	10.07	42.68	36.17	32.86	53.48	20.20	13.64	16.48	20.20	21.18	
Greenville-Mauldin-Easley, SC MSA	2,421	12.20	1.08	0.91	16.80	8.76	56.73	48.95	25.39	41.39	11.21	11.24	9.51	11.03	11.83	
<b>Limited Review:</b>																
Anderson, SC MSA	563	2.84	0.00	0.00	13.81	7.82	68.46	57.55	17.73	34.64	12.04	0.00	11.81	11.45	13.31	
Charleston-North Charleston-Summerville, SC MSA	5,364	27.03	2.42	0.80	16.78	4.60	49.56	62.79	31.24	31.80	16.52	14.56	12.11	17.91	14.99	
Florence, SC MSA	573	2.89	2.33	0.17	20.03	9.25	55.83	54.97	21.81	35.60	13.83	11.11	13.21	16.50	10.78	
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	2,032	10.24	0.00	0.00	9.72	5.36	72.14	78.74	18.13	15.90	15.93	0.00	20.42	15.63	15.96	
Spartanburg, SC MSA	785	3.96	1.89	0.89	12.54	8.03	69.00	66.75	16.57	24.33	8.66	17.65	12.68	8.38	8.18	
Sumter, SC MSA	392	1.98	0.00	0.00	25.98	10.71	42.80	39.29	31.22	50.00	12.08	0.00	8.18	11.38	13.94	
South Carolina Non-MSA	2,032	10.24	0.15	0.05	6.86	2.21	62.11	32.43	30.87	65.31	11.08	0.00	9.88	10.95	11.20	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: SOUTH CAROLINA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Columbia, SC MSA	106	20.46	0.96	0.00	23.50	13.21	42.68	32.08	32.86	54.72	7.54	0.00	7.69	4.50	10.26
Greenville-Mauldin-Easley, SC MSA	84	16.22	1.08	1.19	16.80	5.95	56.73	51.19	25.39	41.67	8.09	50.00	4.00	8.95	7.51
<b>Limited Review:</b>															
Anderson, SC MSA	18	3.47	0.00	0.00	13.81	11.11	68.46	44.44	17.73	44.44	1.94	0.00	12.50	0.87	3.13
Charleston-North Charleston-Summerville, SC MSA	129	24.90	2.42	0.78	16.78	8.53	49.56	48.06	31.24	42.64	4.58	12.50	0.76	4.40	7.04
Florence, SC MSA	20	3.86	2.33	5.00	20.03	10.00	55.83	45.00	21.81	40.00	3.65	33.33	0.00	2.27	8.51
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	36	6.95	0.00	0.00	9.72	5.56	72.14	69.44	18.13	25.00	4.33	0.00	3.57	4.10	6.45
Spartanburg, SC MSA	38	7.34	1.89	2.63	12.54	7.89	69.00	76.32	16.57	13.16	7.82	0.00	9.09	8.06	6.25
Sumter, SC MSA	12	2.32	0.00	0.00	25.98	8.33	42.80	16.67	31.22	75.00	7.50	0.00	4.55	6.67	10.71
South Carolina Non-MSA	75	14.48	0.15	0.00	6.86	2.67	62.11	49.33	30.87	48.00	5.71	0.00	3.33	3.70	11.11

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: SOUTH CAROLINA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Columbia, SC MSA	5,311	21.64	0.96	0.28	23.50	9.15	42.68	34.25	32.86	56.32	13.02	17.31	12.97	13.58	12.68									
Greenville-Mauldin-Easley, SC MSA	3,470	14.14	1.08	0.58	16.80	6.92	56.73	48.56	25.39	43.95	10.00	6.94	12.14	10.75	8.98									
<b>Limited Review:</b>																								
Anderson, SC MSA	973	3.96	0.00	0.00	13.81	5.65	68.46	65.36	17.73	28.98	12.05	0.00	12.82	12.85	10.49									
Charleston-North Charleston-Summerville, SC MSA	6,458	26.31	2.42	0.84	16.78	5.68	49.56	47.77	31.24	45.71	16.34	13.97	15.52	16.94	15.91									
Florence, SC MSA	713	2.90	2.33	0.42	20.03	11.08	55.83	48.81	21.81	39.69	11.76	0.00	12.40	13.05	10.44									
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	2,514	10.24	0.00	0.00	9.72	4.18	72.14	77.25	18.13	18.58	15.89	0.00	12.54	16.17	15.66									
Spartanburg, SC MSA	1,175	4.79	1.89	0.51	12.54	5.79	69.00	66.55	16.57	27.15	10.40	19.05	9.31	10.49	10.27									
Sumter, SC MSA	440	1.79	0.00	0.00	25.98	10.23	42.80	37.95	31.22	51.82	11.95	0.00	10.32	12.57	11.84									
South Carolina Non-MSA	3,492	14.23	0.15	0.03	6.86	2.43	62.11	32.85	30.87	64.69	10.04	0.00	12.08	9.81	10.10									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: SOUTH CAROLINA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Columbia, SC MSA	0	0.00	9.41	0.00	28.46	0.00	39.61	0.00	22.51	0.00	0.00	0.00	0.00	0.00	0.00	
Greenville-Mauldin-Easley, SC MSA	0	0.00	2.90	0.00	26.00	0.00	44.53	0.00	26.57	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Anderson, SC MSA	0	0.00	0.00	0.00	13.95	0.00	63.05	0.00	23.00	0.00	0.00	0.00	0.00	0.00	0.00	
Charleston-North Charleston-Summerville, SC MSA	0	0.00	8.85	0.00	16.36	0.00	46.36	0.00	28.43	0.00	0.00	0.00	0.00	0.00	0.00	
Florence, SC MSA	0	0.00	6.03	0.00	21.70	0.00	31.33	0.00	40.94	0.00	0.00	0.00	0.00	0.00	0.00	
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	0	0.00	0.00	0.00	6.30	0.00	46.59	0.00	47.11	0.00	0.00	0.00	0.00	0.00	0.00	
Spartanburg, SC MSA	0	0.00	8.26	0.00	33.42	0.00	34.42	0.00	23.89	0.00	0.00	0.00	0.00	0.00	0.00	
Sumter, SC MSA	0	0.00	0.00	0.00	51.20	0.00	13.10	0.00	35.71	0.00	0.00	0.00	0.00	0.00	0.00	
South Carolina Non-MSA	0	0.00	0.85	0.00	6.70	0.00	29.79	0.00	62.65	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: SOUTH CAROLINA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Columbia, SC MSA	1,212	18.34	3.50	3.88	22.29	16.17	35.98	31.44	38.24	48.51	5.74	4.84	5.42	5.55	6.13									
Greenville-Mauldin-Easley, SC MSA	1,112	16.83	2.73	2.34	15.22	10.79	52.34	46.67	29.70	40.20	5.52	4.07	3.78	6.20	5.37									
<b>Limited Review:</b>																								
Anderson, SC MSA	245	3.71	0.00	0.00	12.85	8.57	63.10	58.37	24.05	33.06	6.42	0.00	5.41	5.95	7.71									
Charleston-North Charleston-Summerville, SC MSA	1,597	24.16	4.05	3.19	15.82	10.71	47.07	42.77	33.06	43.33	7.79	4.36	5.44	8.20	8.42									
Florence, SC MSA	228	3.45	3.35	2.63	22.78	21.05	49.13	43.42	24.74	32.89	4.62	4.44	6.12	3.99	4.78									
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	557	8.43	0.00	0.00	13.80	8.62	64.84	56.01	21.36	35.37	4.70	0.00	2.73	4.09	7.31									
Spartanburg, SC MSA	451	6.82	4.76	3.33	13.59	9.76	60.91	57.87	20.74	29.05	6.69	7.37	3.37	7.66	6.48									
Sumter, SC MSA	88	1.33	0.00	0.00	29.08	26.14	37.84	27.27	33.07	46.59	3.31	0.00	1.38	4.53	3.90									
South Carolina Non-MSA	1,119	16.93	0.66	0.80	6.55	2.86	50.05	35.30	42.74	61.04	6.45	4.76	3.64	5.77	7.22									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: SOUTH CAROLINA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Columbia, SC MSA	15	16.67	1.11	0.00	22.84	0.00	47.48	73.33	28.57	26.67	4.85	0.00	0.00	7.02	8.33		
Greenville-Mauldin-Easley, SC MSA	14	15.56	1.42	7.14	11.17	7.14	66.42	71.43	21.00	14.29	22.73	100.00	0.00	28.57	0.00		
<b>Limited Review:</b>																	
Anderson, SC MSA	4	4.44	0.00	0.00	8.71	0.00	73.47	100.00	17.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Charleston-North Charleston-Summerville, SC MSA	9	10.00	2.03	0.00	16.85	33.33	51.56	55.56	29.56	11.11	8.82	0.00	8.33	11.76	0.00		
Florence, SC MSA	6	6.67	0.95	0.00	14.77	16.67	68.94	83.33	15.34	0.00	3.03	0.00	0.00	4.17	0.00		
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	2	2.22	0.00	0.00	12.33	0.00	77.10	100.00	10.57	0.00	0.00	0.00	0.00	0.00	0.00		
Spartanburg, SC MSA	8	8.89	0.61	0.00	8.37	0.00	76.10	75.00	14.92	25.00	45.45	0.00	0.00	57.14	33.33		
Sumter, SC MSA	10	11.11	0.00	0.00	26.84	0.00	54.55	100.00	18.61	0.00	15.00	0.00	0.00	18.75	0.00		
South Carolina Non-MSA	22	24.44	0.11	0.00	5.72	4.55	64.72	59.09	29.44	36.36	5.15	0.00	0.00	5.63	5.26		

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: SOUTH CAROLINA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Columbia, SC MSA	5,680	28.63	20.66	12.56	17.72	28.87	22.17	27.63	39.45	30.93	22.83	21.29	22.40	23.94	23.02	
Greenville-Mauldin-Easley, SC MSA	2,421	12.20	19.99	14.49	18.25	28.27	22.03	25.24	39.72	32.00	12.37	13.57	13.31	12.40	11.24	
<b>Limited Review:</b>																
Anderson, SC MSA	563	2.84	19.55	12.86	17.96	30.89	22.67	26.25	39.82	30.00	12.97	14.23	12.36	14.14	11.99	
Charleston-North Charleston-Summerville, SC MSA	5,364	27.03	21.35	6.80	17.45	26.21	21.13	30.13	40.08	36.87	18.56	14.36	20.24	21.22	16.76	
Florence, SC MSA	573	2.89	23.11	11.07	16.29	28.47	20.19	28.30	40.41	32.16	15.48	15.00	20.19	15.22	12.50	
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	2,032	10.24	18.14	4.27	19.53	19.00	22.91	23.36	39.42	53.37	17.12	10.66	18.69	19.14	16.52	
Spartanburg, SC MSA	785	3.96	20.05	16.04	18.24	31.57	22.52	25.61	39.19	26.78	9.35	9.35	9.07	10.75	8.48	
Sumter, SC MSA	392	1.98	21.04	4.60	17.91	25.32	21.47	32.48	39.59	37.60	16.78	17.02	21.59	17.47	13.90	
South Carolina Non-MSA	2,032	10.24	18.47	4.50	16.49	18.96	20.64	22.96	44.40	53.58	12.14	15.23	14.44	14.85	10.36	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: SOUTH CAROLINA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Columbia, SC MSA	106	20.46	20.66	5.77	17.72	25.00	22.17	23.08	39.45	46.15	7.94	1.67	11.36	8.27	8.10	
Greenville-Mauldin-Easley, SC MSA	84	16.22	19.99	12.16	18.25	10.81	22.03	24.32	39.72	52.70	6.83	6.67	6.32	8.24	6.54	
<b>Limited Review:</b>																
Anderson, SC MSA	18	3.47	19.55	18.75	17.96	0.00	22.67	37.50	39.82	43.75	1.36	0.00	0.00	4.35	0.00	
Charleston-North Charleston-Summerville, SC MSA	129	24.90	21.35	8.00	17.45	21.60	21.13	29.60	40.08	40.80	4.58	1.52	6.25	5.47	4.35	
Florence, SC MSA	20	3.86	23.11	15.00	16.29	15.00	20.19	25.00	40.41	45.00	3.88	3.70	2.27	4.76	4.17	
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	36	6.95	18.14	9.09	19.53	36.36	22.91	12.12	39.42	42.42	4.59	0.00	11.36	0.00	6.10	
Spartanburg, SC MSA	38	7.34	20.05	10.00	18.24	16.67	22.52	30.00	39.19	43.33	6.25	4.55	4.65	11.36	3.92	
Sumter, SC MSA	12	2.32	21.04	8.33	17.91	41.67	21.47	25.00	39.59	25.00	7.50	8.33	21.43	12.50	0.00	
South Carolina Non-MSA	75	14.48	18.47	4.29	16.49	8.57	20.64	21.43	44.40	65.71	5.16	2.56	3.03	3.88	7.59	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 6.6% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance															Geography: South Carolina					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Columbia, SC MSA	5,311	21.64	20.66	7.38	17.72	19.77	22.17	26.43	39.45	46.42	14.18	16.94	15.33	15.43	12.85									
Greenville-Mauldin-Easley, SC MSA	3,470	14.14	19.99	6.85	18.25	18.41	22.03	23.88	39.72	50.87	10.55	10.54	13.20	11.06	9.57									
<b>Limited Review:</b>																								
Anderson, SC MSA	973	3.96	19.55	6.12	17.96	21.29	22.67	27.86	39.82	44.73	12.92	16.67	17.03	12.48	11.54									
Charleston-North Charleston-Summerville, SC MSA	6,458	26.31	21.35	6.20	17.45	15.81	21.13	23.63	40.08	54.36	17.69	22.13	20.15	19.40	16.00									
Florence, SC MSA	713	2.90	23.11	5.63	16.29	16.08	20.19	25.08	40.41	53.22	12.69	11.34	15.38	12.80	12.13									
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	2,514	10.24	18.14	6.93	19.53	17.03	22.91	23.11	39.42	52.93	16.60	15.61	17.86	15.89	16.62									
Spartanburg, SC MSA	1,175	4.79	20.05	8.81	18.24	19.96	22.52	29.55	39.19	41.68	10.91	12.05	12.24	12.08	9.56									
Sumter, SC MSA	440	1.79	21.04	5.21	17.91	13.42	21.47	27.95	39.59	53.42	14.60	18.18	12.26	19.68	12.57									
South Carolina Non-MSA	3,492	14.23	18.47	3.61	16.49	10.59	20.64	20.10	44.40	65.70	10.88	15.26	11.27	12.51	10.21									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.6% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: SOUTH CAROLINA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Columbia, SC MSA	1,212	18.34	67.30	54.79	90.10	4.46	5.45	5.52	6.94
Greenville-Mauldin-Easley, SC MSA	1,112	16.83	65.73	55.94	91.91	3.33	4.77	5.34	7.51
<b>Limited Review:</b>									
Anderson, SC MSA	245	3.71	66.28	56.33	94.69	2.45	2.86	6.10	8.74
Charleston-North Charleston-Summerville, SC MSA	1,597	24.16	67.09	56.11	89.23	4.13	6.64	7.58	12.39
Florence, SC MSA	228	3.45	68.23	46.49	79.39	10.96	9.65	4.27	4.05
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	557	8.43	68.74	55.66	90.66	3.23	6.10	4.57	4.32
Spartanburg, SC MSA	451	6.82	63.79	53.88	89.14	4.88	5.99	6.46	9.49
Sumter, SC MSA	88	1.33	68.28	43.18	81.82	17.05	1.14	3.23	3.52
South Carolina Non-MSA	1,119	16.93	67.79	52.01	92.67	4.02	3.31	6.19	8.23

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 28.01% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: SOUTH CAROLINA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Columbia, SC MSA	15	16.67	97.48	33.33	80.00	6.67	13.33	4.63	3.85
Greenville-Mauldin-Easley, SC MSA	14	15.56	97.67	71.43	100.00	0.00	0.00	22.73	23.53
<b>Limited Review:</b>									
Anderson, SC MSA	4	4.44	98.22	100.00	100.00	0.00	0.00	0.00	0.00
Charleston-North Charleston-Summerville, SC MSA	9	10.00	95.87	88.89	100.00	0.00	0.00	8.11	11.54
Florence, SC MSA	6	6.67	98.67	66.67	100.00	0.00	0.00	2.78	4.35
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	2	2.22	98.37	0.00	100.00	0.00	0.00	0.00	0.00
Spartanburg, SC MSA	8	8.89	97.72	25.00	100.00	0.00	0.00	45.45	33.33
Sumter, SC MSA	10	11.11	97.84	70.00	40.00	60.00	0.00	15.00	6.67
South Carolina Non-MSA	22	24.44	96.80	63.64	95.45	4.55	0.00	4.85	3.66

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 37.50% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: SOUTH CAROLINA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Columbia, SC MSA	12	1,800	85	15,935	97	17,735	20.23	1	6,453
Greenville-Mauldin-Easley, SC MSA	11	8,324	36	10,367	47	18,690	21.32	1	3,348
<b>Limited Review:</b>									
Anderson, SC MSA	5	862	6	336	11	1,198	1.37	0	0
Charleston-North Charleston-Summerville, SC MSA	9	7,003	46	12,332	55	19,335	22.05	1	6,126
Florence, SC MSA	3	786	16	372	19	1,158	1.32	0	0
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	6	1,915	25	1,084	31	2,999	3.42	0	0
Spartanburg, SC MSA	4	6,214	31	2,810	35	9,024	10.29	0	0
Sumter, SC MSA	1	4,847	7	106	8	4,953	5.65	0	0
South Carolina Non-MSA	13	1,477	88	4,235	101	5,712	6.51	0	0
Statewide investments with potential to benefit one or more AAs	0	0	23	386	23	386	0.44	0	0
Statewide investments with no potential to benefit one or more AAs	7	226	16	6,270	23	6,495	7.41	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: SOUTH CAROLINA								EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Columbia, SC MSA	43.58	22	22.22	4.55	22.73	27.27	45.45	0	3	1	0	-1	-1	3.21	27.35	40.27	28.37
Greenville-Mauldin-Easley, SC MSA	17.70	18	18.18	5.56	27.78	38.89	27.78	0	2	0	0	-2	0	1.93	20.48	53.15	24.44
<b>Limited Review:</b>																	
Anderson, SC MSA	1.17	2	2.02	0.00	0.00	100.00	0.00	0	2	0	0	-1	-1	0.00	16.52	66.32	17.04
Charleston-North Charleston-Summerville, SC MSA	13.63	18	18.18	5.56	22.22	33.33	38.89	0	1	0	0	0	-1	5.20	20.09	48.15	26.57
Florence, SC MSA	1.83	5	5.05	20.00	20.00	40.00	20.00	0	1	0	-1	0	0	3.49	22.49	53.82	20.19
Myrtle Beach-N Myrtle Beach-Conway, SC MSA	2.90	7	7.07	0.00	14.29	28.57	57.14	1	1	0	1	-1	0	0.00	12.74	70.33	16.93
Spartanburg, SC MSA	9.72	7	7.07	0.00	57.14	28.57	14.29	0	1	0	0	-1	0	4.57	15.95	64.23	15.25
Sumter, SC MSA	0.65	2	2.02	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	30.25	43.10	26.66
South Carolina Non-MSA	8.82	18	18.18	5.56	0.00	44.44	50.00	0	2	0	0	0	-2	0.43	8.96	63.23	27.38

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: TENNESSEE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	48.68	32,967	5,888,695	2,750	105,545	27	404	1	3,864	35,745	5,998,508	78.32
<b>Limited Review:</b>												
Chattanooga, TN MSA	7.54	4,908	725,711	627	14,081	1	3	0	0	5,536	739,795	2.37
Clarksville, TN/KY MSA	6.65	4,672	684,604	201	3,425	8	80	1	6,045	4,882	694,154	2.57
Johnson City, TN MSA	2.17	1,396	193,873	199	5,448	1	8	0	0	1,596	199,329	1.01
Knoxville, TN MSA	13.90	9,145	1,488,983	1,051	38,794	6	48	1	2,775	10,203	1,530,600	2.87
Memphis, TN MSA	15.50	10,282	1,663,676	1,088	39,734	8	60	2	5,190	11,380	1,708,660	7.73
Tennessee Non-MSA	5.56	3,686	492,918	385	15,606	10	70	0	0	4,081	508,594	5.13

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: TENNESSEE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	13,161	46.41	1.59	1.07	17.54	9.10	57.52	62.77	23.35	27.06	18.44	18.23	14.61	19.29	18.11	
<b>Limited Review:</b>																
Chattanooga, TN MSA	2,261	7.97	1.97	1.59	17.37	8.18	46.91	47.01	33.74	43.21	18.16	22.22	15.51	17.30	19.54	
Clarksville, TN/KY MSA	3,119	11.00	0.00	0.00	4.54	2.79	65.23	73.23	30.23	23.98	23.12	0.00	28.99	24.05	20.17	
Johnson City, TN MSA	469	1.65	0.00	0.00	9.81	9.81	71.89	65.03	18.30	25.16	9.09	0.00	14.46	8.57	8.78	
Knoxville, TN MSA	3,115	10.98	2.85	1.80	14.64	9.53	57.71	52.65	24.80	36.02	12.87	9.30	11.82	12.12	14.69	
Memphis, TN MSA	5,012	17.67	6.03	0.74	21.99	5.41	31.12	20.63	40.86	73.22	15.83	15.13	13.11	14.41	16.61	
Tennessee Non-MSA	1,224	4.32	0.00	0.00	3.81	1.88	70.13	44.53	26.07	53.59	15.22	0.00	13.75	13.00	18.03	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: TENNESSEE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	426	52.53	1.59	0.47	17.54	9.39	57.52	56.57	23.35	33.57	8.21	0.00	3.01	8.38	14.44
<b>Limited Review:</b>															
Chattanooga, TN MSA	69	8.51	1.97	1.45	17.37	8.70	46.91	53.62	33.74	36.23	6.02	0.00	0.62	7.04	11.97
Clarksville, TN/KY MSA	41	5.06	0.00	0.00	4.54	0.00	65.23	70.73	30.23	29.27	7.51	0.00	0.00	9.23	5.19
Johnson City, TN MSA	15	1.85	0.00	0.00	9.81	0.00	71.89	73.33	18.30	26.67	0.28	0.00	0.00	0.39	0.00
Knoxville, TN MSA	128	15.78	2.85	1.56	14.64	11.72	57.71	56.25	24.80	30.47	4.84	4.00	3.04	4.87	6.27
Memphis, TN MSA	56	6.91	6.03	1.79	21.99	17.86	31.12	26.79	40.86	53.57	3.59	0.00	4.71	2.45	4.55
Tennessee Non-MSA	76	9.37	0.00	0.00	3.81	0.00	70.13	69.74	26.07	30.26	4.46	0.00	0.00	3.31	7.19

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: TENNESSEE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	19,380	51.16	1.59	0.87	17.54	8.47	57.52	59.32	23.35	31.34	17.69	19.50	16.45	18.54	16.55									
<b>Limited Review:</b>																								
Chattanooga, TN MSA	2,578	6.80	1.97	0.93	17.37	9.78	46.91	44.69	33.74	44.61	14.09	9.59	11.83	14.98	13.90									
Clarksville, TN/KY MSA	1,512	3.99	0.00	0.00	4.54	1.19	65.23	57.14	30.23	41.67	14.11	0.00	9.52	12.58	16.69									
Johnson City, TN MSA	912	2.41	0.00	0.00	9.81	8.33	71.89	69.08	18.30	22.59	10.90	0.00	11.21	11.73	8.84									
Knoxville, TN MSA	5,902	15.58	2.85	0.81	14.64	7.95	57.71	54.00	24.80	37.24	14.39	11.76	13.14	14.28	14.91									
Memphis, TN MSA	5,214	13.76	6.03	0.73	21.99	5.47	31.12	23.44	40.86	70.37	12.53	16.25	14.90	12.34	12.43									
Tennessee Non-MSA	2,386	6.30	0.00	0.00	3.81	2.05	70.13	51.55	26.07	46.40	16.97	0.00	12.39	14.91	19.93									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: TENNESSEE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	0	0.00	7.79	0.00	24.68	0.00	51.09	0.00	16.43	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Chattanooga, TN MSA	0	0.00	16.81	0.00	10.42	0.00	54.55	0.00	18.22	0.00	0.00	0.00	0.00	0.00	0.00	
Clarksville, TN/KY MSA	0	0.00	0.00	0.00	19.47	0.00	59.35	0.00	21.18	0.00	0.00	0.00	0.00	0.00	0.00	
Johnson City, TN MSA	0	0.00	0.00	0.00	25.69	0.00	58.42	0.00	15.89	0.00	0.00	0.00	0.00	0.00	0.00	
Knoxville, TN MSA	0	0.00	18.27	0.00	25.67	0.00	35.97	0.00	20.08	0.00	0.00	0.00	0.00	0.00	0.00	
Memphis, TN MSA	0	0.00	15.09	0.00	31.10	0.00	28.93	0.00	24.88	0.00	0.00	0.00	0.00	0.00	0.00	
Tennessee Non-MSA	0	0.00	0.00	0.00	8.91	0.00	66.55	0.00	24.54	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: TENNESSEE				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*												
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																							
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	2,750	43.64	2.97	2.44	20.01	17.89	50.57	49.05	26.45	30.62	4.61	2.81	4.30	5.08	4.30								
<b>Limited Review:</b>																							
Chattanooga, TN MSA	627	9.95	4.29	3.99	16.30	14.19	50.21	47.85	29.21	33.97	5.62	2.40	6.59	5.45	6.06								
Clarksville, TN/KY MSA	201	3.19	0.00	0.00	10.90	16.92	59.82	53.23	29.28	29.85	6.33	0.00	8.39	6.37	5.53								
Johnson City, TN MSA	199	3.16	0.00	0.00	12.78	13.57	63.11	52.76	24.11	33.67	4.14	0.00	3.89	3.95	4.60								
Knoxville, TN MSA	1,051	16.68	6.23	7.14	14.48	13.51	48.12	39.96	31.17	39.39	4.87	5.08	5.42	4.48	5.09								
Memphis, TN MSA	1,088	17.27	7.30	6.62	17.28	14.25	26.90	21.05	48.52	58.09	4.09	4.11	4.45	3.71	4.15								
Tennessee Non-MSA	385	6.11	0.00	0.00	5.45	5.45	65.45	63.12	29.10	31.43	6.52	0.00	5.45	6.73	6.39								

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS															GEOGRAPHY: TENNESSEE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	27	44.26	0.96	0.00	18.25	7.41	62.06	85.19	18.72	7.41	2.89	0.00	0.60	4.23	8.33									
<b>Limited Review:</b>																								
Chattanooga, TN MSA	1	1.64	0.87	0.00	19.90	0.00	44.25	100.00	34.98	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Clarksville, TN/KY MSA	8	13.11	0.00	0.00	3.39	0.00	56.18	25.00	40.44	75.00	7.69	0.00	0.00	0.00	0.00	14.29								
Johnson City, TN MSA	1	1.64	0.00	0.00	7.24	0.00	68.88	100.00	23.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Knoxville, TN MSA	6	9.84	2.28	0.00	11.78	0.00	62.60	100.00	23.34	0.00	6.06	0.00	0.00	8.70	0.00									
Memphis, TN MSA	8	13.11	3.25	0.00	12.32	0.00	40.61	75.00	43.81	25.00	3.45	0.00	0.00	4.84	0.00									
Tennessee Non-MSA	10	16.39	0.00	0.00	1.62	0.00	71.13	80.00	27.25	20.00	2.53	0.00	0.00	3.64	0.00									

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: TENNESSEE					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	13,161	46.41	19.23	17.13	18.34	30.00	23.56	24.97	38.86	27.90	20.13	20.68	21.18	22.19	17.53		
<b>Limited Review:</b>																	
Chattanooga, TN MSA	2,261	7.97	19.38	12.57	17.15	29.81	21.28	25.63	42.18	31.99	20.24	25.37	22.72	20.67	16.97		
Clarksville, TN/KY MSA	3,119	11.00	15.10	3.25	18.88	28.92	24.16	39.11	41.85	28.72	27.14	25.47	32.69	29.65	21.77		
Johnson City, TN MSA	469	1.65	19.61	9.38	18.00	27.08	23.45	29.85	38.94	33.69	9.92	11.56	10.59	10.17	9.11		
Knoxville, TN MSA	3,115	10.98	20.14	15.05	18.11	27.17	21.88	25.65	39.87	32.13	13.86	13.71	13.43	14.78	13.63		
Memphis, TN MSA	5,012	17.67	22.83	9.98	16.28	26.38	19.27	28.48	41.62	35.17	18.36	19.51	19.78	20.62	15.75		
Tennessee Non-MSA	1,224	4.32	16.76	5.17	16.74	25.29	21.97	29.39	44.52	40.15	16.37	11.81	17.96	16.65	16.13		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: Tennessee					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	426	52.53	19.23	10.19	18.34	21.09	23.56	26.30	38.86	42.42	8.59	5.08	6.82	8.35	12.14	
<b>Limited Review:</b>																
Chattanooga, TN MSA	69	8.51	19.38	8.70	17.15	26.09	21.28	26.09	42.18	39.13	6.68	2.22	10.20	7.55	6.43	
Clarksville, TN/KY MSA	41	5.06	15.10	4.88	18.88	24.39	24.16	34.15	41.85	36.59	7.66	6.67	13.51	9.84	4.17	
Johnson City, TN MSA	15	1.85	19.61	7.14	18.00	21.43	23.45	35.71	38.94	35.71	0.00	0.00	0.00	0.00	0.00	
Knoxville, TN MSA	128	15.78	20.14	10.32	18.11	23.81	21.88	24.60	39.87	41.27	5.13	1.34	6.36	4.28	7.11	
Memphis, TN MSA	56	6.91	22.83	9.09	16.28	12.73	19.27	27.27	41.62	50.91	3.91	0.00	4.80	4.27	4.55	
Tennessee Non-MSA	76	9.37	16.76	10.53	16.74	25.00	21.97	23.68	44.52	40.79	4.61	7.27	2.04	5.98	4.35	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Tennessee					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	19,380	51.16	19.23	9.48	18.34	22.76	23.56	27.03	38.86	40.73	18.91	20.65	22.25	19.72	16.70	
<b>Limited Review:</b>																
Chattanooga, TN MSA	2,578	6.80	19.38	7.42	17.15	22.80	21.28	26.91	42.18	42.88	15.72	15.85	19.56	17.36	13.58	
Clarksville, TN/KY MSA	1,512	3.99	15.10	3.92	18.88	19.35	24.16	26.51	41.85	50.21	19.22	16.04	25.00	19.81	17.75	
Johnson City, TN MSA	912	2.41	19.61	7.66	18.00	21.80	23.45	28.80	38.94	41.74	11.42	11.28	11.96	15.18	9.59	
Knoxville, TN MSA	5,902	15.58	20.14	8.59	18.11	23.04	21.88	27.03	39.87	41.34	15.49	15.61	16.99	17.23	14.04	
Memphis, TN MSA	5,214	13.76	22.83	4.62	16.28	14.74	19.27	23.00	41.62	57.63	13.62	16.67	17.73	14.97	12.35	
Tennessee Non-MSA	2,386	6.30	16.76	3.85	16.74	18.04	21.97	25.94	44.52	52.17	17.90	15.33	19.72	18.48	17.35	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.3% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: TENNESSEE			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	2,750	43.64	68.07	58.33	92.55	3.27	4.18	4.51	5.87
<b>Limited Review:</b>									
Chattanooga, TN MSA	627	9.95	68.08	58.53	95.69	2.23	2.07	5.42	7.88
Clarksville, TN/KY MSA	201	3.19	70.09	57.71	96.52	2.49	1.00	6.23	8.57
Johnson City, TN MSA	199	3.16	69.19	52.26	95.48	1.01	3.52	4.06	4.55
Knoxville, TN MSA	1,051	16.68	67.54	57.09	92.86	2.95	4.19	4.76	6.46
Memphis, TN MSA	1,088	17.27	67.25	59.56	94.21	1.93	3.86	4.01	7.18
Tennessee Non-MSA	385	6.11	71.72	55.84	92.47	3.90	3.64	6.29	7.23

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 26.01% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: TENNESSEE			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	27	44.26	98.10	55.56	96.30	3.70	0.00	2.84	2.06
<b>Limited Review:</b>									
Chattanooga, TN MSA	1	1.64	97.53	100.00	100.00	0.00	0.00	0.00	0.00
Clarksville, TN/KY MSA	8	13.11	98.61	100.00	100.00	0.00	0.00	7.69	12.50
Johnson City, TN MSA	1	1.64	97.85	100.00	100.00	0.00	0.00	0.00	0.00
Knoxville, TN MSA	6	9.84	97.61	83.33	100.00	0.00	0.00	5.88	9.09
Memphis, TN MSA	8	13.11	95.92	75.00	100.00	0.00	0.00	3.33	2.70
Tennessee Non-MSA	10	16.39	98.85	80.00	100.00	0.00	0.00	2.52	2.19

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 26.67% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: TENNESSEE									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	42	9,517	131	34,460	173	43,977	54.83	0	0
<b>Limited Review:</b>									
Chattanooga, TN MSA	4	7,615	19	376	23	7,991	9.96	0	0
Clarksville, TN/KY MSA	4	404	9	519	13	922	1.15	0	0
Johnson City, TN MSA	2	4,440	10	193	12	4,633	5.78	0	0
Knoxville, TN MSA	5	844	14	703	19	1,547	1.93	0	0
Memphis, TN MSA	11	11,393	35	1,351	46	12,745	15.89	0	0
Tennessee Non-MSA	6	582	27	1,485	33	2,067	2.58	0	0
Statewide investments with potential to benefit one or more AAs	0	0	10	38	10	38	0.05	0	0
Statewide investments with no potential to benefit one or more AAs	7	5,489	30	802	37	6,290	7.84	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: TENNESSEE																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Nashville-Davidson-Murfreesboro-Franklin, TN MSA	78.32	37	45.68	2.70	35.14	35.14	27.03	1	3	0	0	-2	0	3.97	21.41	54.45	20.18
<b>Limited Review:</b>																	
Chattanooga, TN MSA	2.37	4	4.94	25.00	0.00	25.00	50.00	0	1	0	0	-1	0	5.26	18.37	46.16	30.21
Clarksville, TN/KY MSA	2.57	5	6.17	0.00	20.00	60.00	20.00	0	1	0	0	-1	0	0.00	8.08	67.28	24.64
Johnson City, TN MSA	1.01	2	2.47	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	13.40	69.79	16.82
Knoxville, TN MSA	2.87	5	6.17	20.00	40.00	20.00	20.00	0	0	0	0	0	0	5.62	16.48	53.99	23.88
Memphis, TN MSA	7.73	17	20.99	5.88	17.65	29.41	47.06	0	0	0	0	0	0	10.05	26.80	30.09	32.57
Tennessee Non-MSA	5.13	11	13.58	0.00	0.00	90.91	9.09	0	1	0	0	0	-1	0.00	5.23	68.35	26.41

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: TEXAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Dallas-Plano-Irving, TX MD	22.42	50,403	8,728,712	9,498	459,951	61	666	7	26,550	59,969	9,215,879	63.70
Ft Worth-Arlington, TX MD	10.24	23,947	3,603,367	3,413	139,778	30	448	6	17,547	27,396	3,761,140	4.24
San Antonio-New Braunfels, TX MSA	10.29	24,848	3,964,870	2,615	128,540	51	2,123	5	25,249	27,519	4,120,782	4.22
<b>Limited Review:</b>												
Abilene, TX MSA	0.47	1,097	136,753	160	2,856	10	87	0	0	1,267	139,696	0.20
Amarillo, TX MSA	1.28	3,125	417,435	285	16,623	17	1,205	0	0	3,427	435,263	0.40
Austin-Round Rock-San Marcos, TX MSA	10.77	24,831	4,491,214	3,935	184,083	35	739	2	27,600	28,803	4,703,636	5.28
Beaumont-Port Arthur, TX MSA	0.84	1,897	241,463	341	8,454	3	22	1	1,315	2,242	251,254	0.86
Brownsville-Harlingen, TX MSA	0.73	1,781	200,800	158	6,080	7	646	1	42	1,947	207,568	0.14
College Station-Bryan, TX MSA	0.78	1,848	284,837	215	8,339	12	103	0	0	2,075	293,279	0.23
Corpus Christi, TX MSA	1.48	3,443	480,600	479	20,700	30	4,096	2	7,706	3,954	513,102	0.61
El Paso, TX MSA	2.30	5,517	710,737	635	19,749	1	3	10	59,485	6,163	789,974	1.04
Houston-Sugar Land-Baytown, TX MSA	27.76	63,897	10,235,332	10,286	458,835	58	891	17	121,065	74,258	10,816,123	14.67
Killeen-Temple-Fort Hood, TX MSA	1.57	3,856	539,578	345	7,710	9	150	0	0	4,210	547,438	0.24

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume

LENDING VOLUME												
GEOGRAPHY: TEXAS												
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Limited Review:</b>												
Laredo, TX MSA	0.83	2,045	285,263	159	4,719	4	16	1	11,500	2,209	301,498	0.10
Longview, TX MSA	0.45	973	128,494	226	3,474	15	825	0	0	1,214	132,793	0.06
Lubbock, TX MSA	1.22	3,007	394,719	242	6,959	6	57	0	0	3,255	401,735	0.35
McAllen-Edinburg-Mission, TX MSA	1.42	3,279	396,432	504	11,507	11	83	1	44	3,795	408,066	0.34
Midland, TX MSA	0.39	834	127,055	217	16,253	3	510	0	0	1,054	143,818	1.02
Odessa, TX MSA	0.32	710	88,615	147	2,575	1	20	0	0	858	91,210	0.12
San Angelo, TX MSA	0.28	595	73,941	157	4,690	5	223	0	0	757	78,854	0.11
Sherman-Denison, TX MSA	0.44	1,004	120,489	166	4,222	13	90	0	0	1,183	124,801	0.09
Tyler, TX MSA	0.81	1,806	273,159	350	10,828	6	43	0	0	2,162	284,030	0.44
Victoria, TX MSA	0.30	678	89,790	108	1,333	7	280	0	0	793	91,403	0.08
Waco, TX MSA	0.80	1,854	246,270	279	10,753	5	322	1	2,300	2,139	259,645	0.30
Wichita Falls, TX MSA	0.46	1,069	124,661	147	2,789	5	44	0	0	1,221	127,494	0.15
Texas Non-MSA	1.36	2,866	370,472	705	17,042	69	3,476	0	0	3,640	390,990	1.03

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: TEXAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Dallas-Plano-Irving, TX MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	63.70
Ft Worth-Arlington, TX MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4.24
San Antonio-New Braunfels, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4.22
<b>Limited Review:</b>														
Abilene, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.20
Amarillo, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.40
Austin-Round Rock-San Marcos, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	5.28
Beaumont-Port Arthur, TX MSA	20.00	1	15,096	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.86
Brownsville-Harlingen, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.14
College Station-Bryan, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.23
Corpus Christi, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.61
El Paso, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.04
Houston-Sugar Land-Baytown, TX MSA	80.00	4	50,078	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	14.67
Killeen-Temple-Fort Hood, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.24

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: TEXAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Limited Review:</b>														
Laredo, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.10
Longview, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.06
Lubbock, TX MSA														0.35
McAllen-Edinburg-Mission, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.34
Midland, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.02
Odessa, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.12
San Angelo, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.11
Sherman-Denison, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.09
Tyler, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.44
Victoria, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.08
Waco, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.30
Wichita Falls, TX MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.15
Texas Non-MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.03

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE															GEOGRAPHY: TEXAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Dallas-Plano-Irving, TX MD	24,574	18.83	2.57	0.97	20.21	10.06	36.31	39.88	40.91	49.08	13.97	13.62	15.10	15.37	12.85									
Ft Worth-Arlington, TX MD	12,878	9.87	3.14	0.75	18.57	8.66	43.89	46.64	34.39	43.95	14.52	17.17	14.20	15.46	13.67									
San Antonio-New Braunfels, TX MSA	16,046	12.30	1.49	0.27	28.43	11.66	37.16	30.57	32.91	57.50	17.36	16.33	19.28	17.49	16.97									
<b>Limited Review:</b>																								
Abilene, TX MSA	683	0.52	0.00	0.00	17.54	8.35	54.63	44.22	27.83	47.44	10.89	0.00	12.89	11.62	9.98									
Amarillo, TX MSA	2,010	1.54	1.19	0.15	22.92	10.30	44.82	53.08	31.06	36.47	22.12	11.11	23.30	22.44	21.45									
Austin-Round Rock-San Marcos, TX MSA	12,947	9.92	2.79	1.55	18.90	13.99	42.63	57.35	35.68	27.11	13.87	10.80	16.40	16.36	10.01									
Beaumont-Port Arthur, TX MSA	1,205	0.92	3.21	0.83	15.67	5.48	54.46	58.34	26.66	35.35	13.96	25.81	19.14	14.46	12.23									
Brownsville-Harlingen, TX MSA	1,167	0.89	0.87	4.37	21.06	5.48	43.90	43.19	34.18	46.96	15.77	20.00	11.00	19.18	13.81									
College Station-Bryan, TX MSA	1,053	0.81	0.06	0.00	21.07	15.00	49.53	35.04	29.34	49.95	12.75	0.00	14.55	13.94	11.47									
Corpus Christi, TX MSA	1,887	1.45	3.53	1.06	23.89	9.91	43.52	37.20	29.06	51.83	13.67	15.38	15.83	13.27	13.54									
El Paso, TX MSA	3,640	2.79	0.92	0.11	26.70	12.99	34.90	49.51	37.48	37.39	15.10	0.00	14.89	15.35	14.91									
Houston-Sugar Land-Baytown, TX MSA	37,379	28.64	2.87	1.26	23.19	10.82	32.97	35.51	40.97	52.40	16.95	15.05	18.12	19.60	15.40									
Killeen-Temple-Fort Hood, TX MSA	2,663	2.04	0.17	0.08	8.68	1.92	61.34	51.56	29.81	46.45	13.48	0.00	10.05	12.09	15.62									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: TEXAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Limited Review:</b>																
Laredo, TX MSA	1,514	1.16	0.12	0.00	34.45	13.47	33.06	24.44	32.37	62.09	25.35	0.00	21.45	29.46	24.65	
Longview, TX MSA	533	0.41	0.00	0.00	13.63	9.01	68.94	61.35	17.43	29.64	8.00	0.00	6.41	7.29	10.44	
Lubbock, TX MSA	1,885	1.44	0.26	0.11	23.78	7.00	43.81	41.64	32.15	51.25	14.14	0.00	10.56	14.14	14.83	
McAllen-Edinburg-Mission, TX MSA	1,958	1.50	0.00	0.00	27.56	13.07	48.45	41.78	23.99	45.15	16.11	0.00	15.72	15.94	16.35	
Midland, TX MSA	419	0.32	4.50	2.86	18.42	16.95	44.68	45.58	32.40	34.61	6.57	12.50	15.14	6.98	4.29	
Odessa, TX MSA	445	0.34	2.25	1.57	15.94	5.62	43.46	28.54	38.35	64.27	11.91	12.00	11.63	13.63	11.33	
San Angelo, TX MSA	368	0.28	0.93	0.00	15.85	5.16	54.08	54.62	29.15	40.22	9.20	0.00	9.40	9.86	8.36	
Sherman-Denison, TX MSA	546	0.42	0.00	0.00	13.89	10.26	75.65	77.84	10.46	11.90	13.56	0.00	12.67	13.57	14.29	
Tyler, TX MSA	890	0.68	2.09	0.34	17.19	6.29	55.58	57.98	25.14	35.39	11.96	6.67	9.60	12.30	12.20	
Victoria, TX MSA	416	0.32	1.51	0.00	19.84	12.26	54.88	45.91	23.77	41.83	13.02	0.00	12.08	11.56	15.52	
Waco, TX MSA	1,042	0.80	4.80	1.06	18.68	9.31	36.55	25.14	39.97	64.49	12.92	2.06	11.39	10.48	14.71	
Wichita Falls, TX MSA	807	0.62	1.52	0.00	16.68	7.43	51.23	54.52	30.57	38.04	13.18	0.00	10.00	12.89	14.38	
Texas Non-MSA	1,550	1.19	0.00	0.00	6.79	2.52	69.17	63.23	24.05	34.26	13.74	0.00	11.54	13.38	14.73	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: TEXAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Dallas-Plano-Irving, TX MD	372	21.35	2.57	1.61	20.21	6.99	36.31	28.76	40.91	62.63	6.09	10.00	5.00	4.89	6.85	
Ft Worth-Arlington, TX MD	193	11.08	3.14	0.52	18.57	8.29	43.89	27.98	34.39	63.21	4.58	0.00	2.68	3.43	6.39	
San Antonio-New Braunfels, TX MSA	138	7.92	1.49	0.72	28.43	20.29	37.16	31.88	32.91	47.10	1.96	0.00	2.31	1.39	2.31	
<b>Limited Review:</b>																
Abilene, TX MSA	16	0.92	0.00	0.00	17.54	0.00	54.63	43.75	27.83	56.25	2.68	0.00	0.00	2.86	3.48	
Amarillo, TX MSA	19	1.09	1.19	0.00	22.92	10.53	44.82	47.37	31.06	42.11	3.72	0.00	2.04	4.48	4.65	
Austin-Round Rock-San Marcos, TX MSA	169	9.70	2.79	2.37	18.90	15.38	42.63	36.09	35.68	46.15	3.72	13.64	2.10	3.67	3.98	
Beaumont-Port Arthur, TX MSA	21	1.21	3.21	0.00	15.67	14.29	54.46	57.14	26.66	28.57	1.58	0.00	3.23	2.37	0.00	
Brownsville-Harlingen, TX MSA	13	0.75	0.87	0.00	21.06	0.00	43.90	23.08	34.18	76.92	2.28	0.00	0.00	2.25	3.70	
College Station-Bryan, TX MSA	7	0.40	0.06	0.00	21.07	0.00	49.53	42.86	29.34	57.14	2.23	0.00	0.00	1.14	4.48	
Corpus Christi, TX MSA	58	3.33	3.53	0.00	23.89	13.79	43.52	31.03	29.06	55.17	5.61	0.00	5.26	2.78	9.26	
El Paso, TX MSA	57	3.27	0.92	0.00	26.70	17.54	34.90	35.09	37.48	47.37	2.16	0.00	1.65	2.70	1.93	
Houston-Sugar Land-Baytown, TX MSA	427	24.51	2.87	1.41	23.19	12.65	32.97	26.46	40.97	59.48	4.31	6.35	3.34	4.18	4.59	
Killeen-Temple-Fort Hood, TX MSA	23	1.32	0.17	0.00	8.68	4.35	61.34	60.87	29.81	34.78	3.26	0.00	0.00	3.52	3.36	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: TEXAS				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Limited Review:</b>																
Laredo, TX MSA	7	0.40	0.12	0.00	34.45	0.00	33.06	42.86	32.37	57.14	3.19	0.00	0.00	4.35	3.85	
Longview, TX MSA	9	0.52	0.00	0.00	13.63	11.11	68.94	55.56	17.43	33.33	0.40	0.00	0.00	0.52	0.00	
Lubbock, TX MSA	17	0.98	0.26	0.00	23.78	5.88	43.81	47.06	32.15	47.06	3.25	0.00	0.00	2.65	5.26	
McAllen-Edinburg-Mission, TX MSA	44	2.53	0.00	0.00	27.56	9.09	48.45	50.00	23.99	40.91	6.74	0.00	2.99	8.70	5.83	
Midland, TX MSA	18	1.03	4.50	5.56	18.42	16.67	44.68	44.44	32.40	33.33	3.91	0.00	5.13	3.90	3.51	
Odessa, TX MSA	13	0.75	2.25	7.69	15.94	7.69	43.46	23.08	38.35	61.54	2.41	50.00	0.00	0.00	2.56	
San Angelo, TX MSA	11	0.63	0.93	9.09	15.85	9.09	54.08	36.36	29.15	45.45	2.66	33.33	0.00	2.06	3.08	
Sherman-Denison, TX MSA	9	0.52	0.00	0.00	13.89	22.22	75.65	77.78	10.46	0.00	2.38	0.00	0.00	3.08	0.00	
Tyler, TX MSA	23	1.32	2.09	0.00	17.19	4.35	55.58	60.87	25.14	34.78	3.27	0.00	0.00	3.82	4.30	
Victoria, TX MSA	5	0.29	1.51	0.00	19.84	0.00	54.88	20.00	23.77	80.00	1.98	0.00	0.00	2.04	2.78	
Waco, TX MSA	21	1.21	4.80	14.29	18.68	0.00	36.55	19.05	39.97	66.67	4.89	8.33	0.00	3.80	6.82	
Wichita Falls, TX MSA	5	0.29	1.52	0.00	16.68	0.00	51.23	60.00	30.57	40.00	0.74	0.00	0.00	1.69	0.00	
Texas Non-MSA	47	2.70	0.00	0.00	6.79	4.26	69.17	59.57	24.05	36.17	3.23	0.00	0.00	2.85	5.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: TEXAS		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Dallas-Plano-Irving, TX MD	25,454	25.75	2.57	0.66	20.21	5.68	36.31	28.82	40.91	64.84	13.76	17.66	18.43	15.15	12.94						
Ft Worth-Arlington, TX MD	10,874	11.00	3.14	0.33	18.57	5.52	43.89	35.87	34.39	58.28	14.01	13.95	17.10	13.83	13.85						
San Antonio-New Braunfels, TX MSA	8,664	8.77	1.49	0.09	28.43	7.57	37.16	27.89	32.91	64.45	11.52	7.69	13.15	12.28	11.06						
<b>Limited Review:</b>																					
Abilene, TX MSA	398	0.40	0.00	0.00	17.54	2.51	54.63	36.68	27.83	60.80	9.21	0.00	5.13	9.42	9.49						
Amarillo, TX MSA	1,096	1.11	1.19	0.00	22.92	5.47	44.82	48.18	31.06	46.35	13.83	0.00	7.60	14.46	14.32						
Austin-Round Rock-San Marcos, TX MSA	11,715	11.85	2.79	1.55	18.90	9.57	42.63	42.05	35.68	46.84	11.96	14.75	13.25	13.25	10.74						
Beaumont-Port Arthur, TX MSA	670	0.68	3.21	0.15	15.67	3.88	54.46	49.25	26.66	46.72	9.79	8.33	9.42	9.74	9.89						
Brownsville-Harlingen, TX MSA	601	0.61	0.87	3.83	21.06	4.99	43.90	36.11	34.18	55.07	15.22	20.41	9.41	17.13	14.32						
College Station-Bryan, TX MSA	788	0.80	0.06	0.00	21.07	10.53	49.53	30.08	29.34	59.39	11.79	0.00	19.70	11.15	11.18						
Corpus Christi, TX MSA	1,498	1.52	3.53	0.73	23.89	6.34	43.52	36.92	29.06	56.01	14.50	13.73	12.15	13.37	15.70						
El Paso, TX MSA	1,819	1.84	0.92	0.22	26.70	9.68	34.90	33.15	37.48	56.95	11.39	0.00	12.05	11.96	10.98						
Houston-Sugar Land-Baytown, TX MSA	25,976	26.28	2.87	0.92	23.19	8.21	32.97	25.20	40.97	65.67	13.73	12.83	16.38	15.45	12.92						
Killeen-Temple-Fort Hood, TX MSA	1,170	1.18	0.17	0.00	8.68	3.42	61.34	51.11	29.81	45.47	8.31	0.00	11.03	8.08	8.43						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: TEXAS		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Limited Review:</b>																					
Laredo, TX MSA	524	0.53	0.12	0.00	34.45	4.20	33.06	18.51	32.37	77.29	22.35	0.00	16.13	23.60	22.59						
Longview, TX MSA	431	0.44	0.00	0.00	13.63	5.57	68.94	64.04	17.43	30.39	9.75	0.00	8.40	9.95	9.64						
Lubbock, TX MSA	1,105	1.12	0.26	0.00	23.78	4.43	43.81	35.29	32.15	60.27	13.43	0.00	9.40	14.86	13.10						
McAllen-Edinburg-Mission, TX MSA	1,277	1.29	0.00	0.00	27.56	13.55	48.45	40.41	23.99	46.05	20.18	0.00	16.93	20.93	20.41						
Midland, TX MSA	397	0.40	4.50	0.76	18.42	7.30	44.68	43.58	32.40	48.36	8.66	10.00	17.17	9.23	7.27						
Odessa, TX MSA	252	0.25	2.25	0.00	15.94	3.97	43.46	29.76	38.35	66.27	11.74	0.00	11.36	11.68	11.86						
San Angelo, TX MSA	216	0.22	0.93	0.00	15.85	2.78	54.08	53.70	29.15	43.52	5.72	0.00	3.57	5.74	5.89						
Sherman-Denison, TX MSA	449	0.45	0.00	0.00	13.89	4.68	75.65	81.07	10.46	14.25	14.78	0.00	6.94	15.60	13.11						
Tyler, TX MSA	893	0.90	2.09	0.11	17.19	7.50	55.58	52.97	25.14	39.42	13.59	7.69	16.77	12.75	14.42						
Victoria, TX MSA	257	0.26	1.51	0.39	19.84	7.78	54.88	49.03	23.77	42.80	10.61	50.00	10.26	11.39	9.56						
Waco, TX MSA	791	0.80	4.80	0.76	18.68	3.41	36.55	25.28	39.97	70.54	13.21	9.30	6.70	11.25	14.91						
Wichita Falls, TX MSA	257	0.26	1.52	0.00	16.68	5.45	51.23	49.42	30.57	45.14	6.78	0.00	6.73	6.81	6.77						
Texas Non-MSA	1,269	1.28	0.00	0.00	6.79	2.21	69.17	61.47	24.05	36.33	13.83	0.00	19.70	12.85	15.44						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: TEXAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Dallas-Plano-Irving, TX MD	0	0.00	14.32	0.00	30.42	0.00	33.46	0.00	21.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Ft Worth-Arlington, TX MD	2	50.00	7.03	0.00	28.60	100.00	45.61	0.00	18.76	0.00	1.56	0.00	8.33	0.00	0.00	0.00	0.00							
San Antonio-New Braunfels, TX MSA	0	0.00	1.81	0.00	35.34	0.00	40.82	0.00	22.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
<b>Limited Review:</b>																								
Abilene, TX MSA	0	0.00	0.00	0.00	11.89	0.00	74.70	0.00	13.41	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Amarillo, TX MSA	0	0.00	2.20	0.00	28.94	0.00	38.55	0.00	30.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Austin-Round Rock-San Marcos, TX MSA	0	0.00	18.86	0.00	30.99	0.00	35.24	0.00	14.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Beaumont-Port Arthur, TX MSA	1	25.00	6.11	0.00	27.01	0.00	35.64	100.00	31.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Brownsville-Harlingen, TX MSA	0	0.00	2.93	0.00	15.31	0.00	19.84	0.00	61.92	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
College Station-Bryan, TX MSA	0	0.00	7.28	0.00	31.15	0.00	52.47	0.00	9.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Corpus Christi, TX MSA	0	0.00	7.25	0.00	14.32	0.00	46.80	0.00	31.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
El Paso, TX MSA	1	25.00	11.43	0.00	31.34	0.00	26.23	100.00	31.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Houston-Sugar Land-Baytown, TX MSA	0	0.00	9.84	0.00	35.87	0.00	30.30	0.00	23.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Killeen-Temple-Fort Hood, TX MSA	0	0.00	3.31	0.00	34.62	0.00	47.21	0.00	14.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: TEXAS					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Limited Review:</b>																								
Laredo, TX MSA	0	0.00	2.50	0.00	18.94	0.00	41.52	0.00	37.04	0.00	0.00	0.00	0.00	0.00	0.00									
Longview, TX MSA	0	0.00	0.00	0.00	17.94	0.00	50.91	0.00	31.14	0.00	0.00	0.00	0.00	0.00	0.00									
Lubbock, TX MSA	0	0.00	9.24	0.00	29.60	0.00	43.18	0.00	17.98	0.00	0.00	0.00	0.00	0.00	0.00									
McAllen-Edinburg-Mission, TX MSA	0	0.00	0.00	0.00	11.56	0.00	31.77	0.00	56.67	0.00	0.00	0.00	0.00	0.00	0.00									
Midland, TX MSA	0	0.00	2.26	0.00	4.69	0.00	42.21	0.00	50.85	0.00	0.00	0.00	0.00	0.00	0.00									
Odessa, TX MSA	0	0.00	0.72	0.00	15.47	0.00	29.62	0.00	54.19	0.00	0.00	0.00	0.00	0.00	0.00									
San Angelo, TX MSA	0	0.00	1.95	0.00	22.15	0.00	37.89	0.00	38.01	0.00	0.00	0.00	0.00	0.00	0.00									
Sherman-Denison, TX MSA	0	0.00	0.00	0.00	14.38	0.00	83.30	0.00	2.32	0.00	0.00	0.00	0.00	0.00	0.00									
Tyler, TX MSA	0	0.00	0.53	0.00	28.79	0.00	34.75	0.00	35.93	0.00	0.00	0.00	0.00	0.00	0.00									
Victoria, TX MSA	0	0.00	1.83	0.00	33.30	0.00	43.24	0.00	21.62	0.00	0.00	0.00	0.00	0.00	0.00									
Waco, TX MSA	0	0.00	26.63	0.00	38.25	0.00	18.33	0.00	16.78	0.00	0.00	0.00	0.00	0.00	0.00									
Wichita Falls, TX MSA	0	0.00	1.83	0.00	23.79	0.00	25.70	0.00	48.67	0.00	0.00	0.00	0.00	0.00	0.00									
Texas Non-MSA	0	0.00	0.00	0.00	11.73	0.00	68.14	0.00	20.13	0.00	0.00	0.00	0.00	0.00	0.00									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: TEXAS		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Dallas-Plano-Irving, TX MD	9,498	26.55	3.24	2.58	18.97	16.48	32.71	29.62	45.07	51.33	5.15	4.87	4.72	5.01	5.41						
Ft Worth-Arlington, TX MD	3,413	9.54	2.49	1.82	18.62	15.88	40.58	35.95	38.31	46.35	4.00	4.09	3.05	3.84	4.60						
San Antonio-New Braunfels, TX MSA	2,615	7.31	1.30	1.57	22.41	19.39	34.76	30.10	41.53	48.95	3.78	3.31	3.88	3.33	4.06						
<b>Limited Review:</b>																					
Abilene, TX MSA	160	0.45	0.00	0.00	20.37	17.50	51.21	60.62	28.42	21.88	3.56	0.00	4.20	4.45	1.45						
Amarillo, TX MSA	285	0.80	8.49	10.18	21.04	21.05	40.55	38.95	29.92	29.82	1.77	2.56	2.15	1.93	1.36						
Austin-Round Rock-San Marcos, TX MSA	3,935	11.00	3.45	2.90	16.11	12.12	38.77	39.29	41.68	45.69	4.70	5.35	3.76	5.15	4.61						
Beaumont-Port Arthur, TX MSA	341	0.95	2.57	0.88	17.25	13.78	49.33	54.25	30.85	31.09	2.96	2.13	2.37	3.35	2.69						
Brownsville-Harlingen, TX MSA	158	0.44	2.78	0.63	21.94	13.29	34.70	37.97	40.58	48.10	1.82	0.00	1.18	2.55	1.74						
College Station-Bryan, TX MSA	215	0.60	0.98	0.00	21.37	17.21	42.53	43.72	35.13	39.07	3.04	0.00	2.01	4.77	2.35						
Corpus Christi, TX MSA	479	1.34	9.00	8.56	20.22	18.58	40.41	40.71	30.37	32.15	3.57	2.61	2.68	4.23	3.67						
El Paso, TX MSA	635	1.78	6.19	5.51	26.37	26.77	28.59	25.98	38.85	41.73	2.90	3.53	2.55	2.90	3.01						
Houston-Sugar Land-Baytown, TX MSA	10,286	28.75	3.66	2.69	20.66	18.58	28.26	26.84	47.42	51.89	3.97	3.12	3.64	4.21	4.03						
Killeen-Temple-Fort Hood, TX MSA	345	0.96	2.66	2.61	14.20	12.75	53.61	53.33	29.54	31.30	4.99	3.08	5.00	5.68	4.11						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: TEXAS		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Limited Review:</b>																					
Laredo, TX MSA	159	0.44	4.33	6.29	18.94	11.95	21.74	16.98	54.99	64.78	2.08	2.63	2.65	1.60	2.04						
Longview, TX MSA	226	0.63	0.00	0.00	20.29	15.49	60.42	63.27	19.29	21.24	3.58	0.00	3.36	4.03	2.65						
Lubbock, TX MSA	242	0.68	0.46	0.00	18.87	15.70	41.50	33.06	39.17	51.24	2.05	0.00	1.52	2.43	1.98						
McAllen-Edinburg-Mission, TX MSA	504	1.41	0.00	0.00	19.10	17.06	40.58	34.92	40.32	48.02	3.19	0.00	3.04	2.96	3.40						
Midland, TX MSA	217	0.61	4.80	3.69	25.92	32.26	35.52	34.56	33.77	29.49	3.93	2.94	6.04	3.40	3.19						
Odessa, TX MSA	147	0.41	1.24	0.00	16.49	23.13	39.30	38.78	42.97	38.10	4.96	0.00	8.65	5.00	3.71						
San Angelo, TX MSA	157	0.44	1.56	1.91	12.58	8.28	53.52	52.23	32.35	37.58	7.03	10.00	5.93	7.73	6.39						
Sherman-Denison, TX MSA	166	0.46	0.00	0.00	16.31	21.69	74.75	67.47	8.93	10.84	6.01	0.00	7.61	5.42	7.95						
Tyler, TX MSA	350	0.98	2.94	2.57	20.06	20.57	46.07	43.43	30.94	33.43	4.53	3.48	5.46	4.54	4.11						
Victoria, TX MSA	108	0.30	0.89	0.93	25.42	29.63	48.76	43.52	24.94	25.93	1.83	7.69	2.36	1.63	1.50						
Waco, TX MSA	279	0.78	3.94	2.15	24.81	21.15	28.32	26.88	42.93	49.82	5.28	3.70	4.54	5.22	5.90						
Wichita Falls, TX MSA	147	0.41	0.74	0.00	25.57	23.13	38.22	43.54	35.47	33.33	4.81	0.00	4.78	6.07	3.80						
Texas Non-MSA	705	1.97	0.00	0.00	9.39	7.94	66.40	65.53	24.21	26.52	4.90	0.00	3.12	4.92	5.56						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS																
GEOGRAPHY: TEXAS																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Small Faram Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Dallas-Plano-Irving, TX MD	61	12.87	2.11	0.00	16.79	9.84	42.98	31.15	38.13	59.02	4.87	0.00	2.50	2.82	10.71	
Ft Worth-Arlington, TX MD	30	6.33	1.30	3.33	13.67	13.33	53.13	60.00	31.90	23.33	5.50	0.00	9.09	4.84	5.77	
San Antonio-New Braunfels, TX MSA	51	10.76	0.58	0.00	14.67	9.80	45.67	49.02	39.08	41.18	4.26	0.00	3.85	2.03	9.76	
<b>Limited Review:</b>																
Abilene, TX MSA	10	2.11	0.00	0.00	13.76	20.00	54.33	60.00	31.91	20.00	2.20	0.00	14.29	2.04	0.00	
Amarillo, TX MSA	17	3.59	5.04	0.00	6.45	0.00	55.21	64.71	33.30	35.29	3.93	0.00	0.00	4.55	4.82	
Austin-Round Rock-San Marcos, TX MSA	35	7.38	1.45	2.86	17.92	11.43	46.29	28.57	34.34	57.14	3.03	0.00	1.18	1.51	8.97	
Beaumont-Port Arthur, TX MSA	3	0.63	1.25	0.00	10.13	33.33	60.23	66.67	28.39	0.00	1.72	0.00	0.00	2.78	0.00	
Brownsville-Harlingen, TX MSA	7	1.48	1.09	0.00	8.21	0.00	54.20	85.71	36.50	14.29	5.36	0.00	0.00	10.00	0.00	
College Station-Bryan, TX MSA	12	2.53	0.09	0.00	12.56	8.33	50.86	58.33	36.49	33.33	2.37	0.00	0.00	2.54	3.85	
Corpus Christi, TX MSA	30	6.33	4.47	13.33	14.92	23.33	48.20	43.33	32.40	20.00	5.41	33.33	11.54	3.80	2.50	
El Paso, TX MSA	1	0.21	3.22	0.00	32.85	0.00	25.12	100.00	38.81	0.00	0.00	0.00	0.00	0.00	0.00	
Houston-Sugar Land-Baytown, TX MSA	58	12.24	2.48	0.00	18.32	13.79	38.18	37.93	41.02	48.28	3.23	0.00	2.56	3.07	3.83	
Killeen-Temple-Fort Hood, TX MSA	9	1.90	0.64	0.00	7.16	11.11	54.55	44.44	37.65	44.44	1.47	0.00	0.00	1.37	1.89	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS																
GEOGRAPHY: TEXAS																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid
<b>Limited Review:</b>																
Laredo, TX MSA	4	0.84	2.02	0.00	14.57	0.00	24.70	75.00	58.70	25.00	5.88	0.00	0.00	16.67	4.55	
Longview, TX MSA	15	3.16	0.00	0.00	12.05	26.67	71.41	40.00	16.54	33.33	4.10	0.00	7.69	2.22	16.67	
Lubbock, TX MSA	6	1.27	0.07	0.00	13.84	0.00	43.76	33.33	42.32	66.67	0.19	0.00	0.00	0.00	0.49	
McAllen-Edinburg-Mission, TX MSA	11	2.32	0.00	0.00	16.41	9.09	46.52	45.45	37.07	45.45	4.49	0.00	0.00	7.32	3.23	
Midland, TX MSA	3	0.63	2.38	0.00	23.38	33.33	42.42	33.33	31.82	33.33	0.00	0.00	0.00	0.00	0.00	
Odessa, TX MSA	1	0.21	0.00	0.00	5.14	0.00	46.26	0.00	48.60	100.00	14.29	0.00	0.00	0.00	20.00	
San Angelo, TX MSA	5	1.05	0.49	0.00	3.62	0.00	65.57	80.00	30.31	20.00	9.52	0.00	0.00	11.76	0.00	
Sherman-Denison, TX MSA	13	2.74	0.00	0.00	4.83	7.69	89.38	84.62	5.79	7.69	10.34	0.00	0.00	10.91	0.00	
Tyler, TX MSA	6	1.27	1.53	0.00	9.82	0.00	66.36	100.00	22.29	0.00	6.38	0.00	0.00	9.38	0.00	
Victoria, TX MSA	7	1.48	0.36	0.00	10.16	0.00	68.42	100.00	21.05	0.00	1.03	0.00	0.00	1.30	0.00	
Waco, TX MSA	5	1.05	1.39	0.00	8.74	0.00	47.30	60.00	42.57	40.00	2.74	0.00	0.00	5.41	0.00	
Wichita Falls, TX MSA	5	1.05	0.00	0.00	12.22	0.00	52.72	100.00	35.05	0.00	5.88	0.00	0.00	10.00	0.00	
Texas Non-MSA	69	14.56	0.00	0.00	3.68	0.00	72.78	82.61	23.54	17.39	6.45	0.00	0.00	7.38	2.90	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE																
GEOGRAPHY: TEXAS																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Dallas-Plano-Irving, TX MD	24,576	18.82	21.32	9.89	18.00	28.65	20.39	26.39	40.30	35.07	15.07	17.73	19.17	17.35	11.52	
Ft Worth-Arlington, TX MD	12,878	9.86	19.56	13.35	18.78	31.41	21.95	27.27	39.71	27.98	16.07	19.03	18.73	18.04	12.21	
San Antonio-New Braunfels, TX MSA	16,046	12.29	21.16	5.87	17.99	24.98	20.54	31.75	40.31	37.40	19.12	17.65	21.36	22.42	16.37	
<b>Limited Review:</b>																
Abilene, TX MSA	683	0.52	19.15	7.53	18.23	20.24	23.78	31.31	38.84	40.92	12.46	16.55	14.61	12.52	10.96	
Amarillo, TX MSA	2,010	1.54	19.77	12.95	18.63	25.86	21.81	28.90	39.78	32.29	25.21	27.93	28.34	28.97	20.41	
Austin-Round Rock-San Marcos, TX MSA	12,947	9.91	19.76	11.19	18.30	31.88	22.76	27.13	39.17	29.80	14.80	18.70	19.65	16.26	10.44	
Beaumont-Port Arthur, TX MSA	1,205	0.92	22.47	6.71	17.06	24.08	20.02	34.56	40.44	34.65	15.38	17.79	17.39	19.92	11.54	
Brownsville-Harlingen, TX MSA	1,167	0.89	23.75	0.97	16.04	16.70	17.82	23.06	42.40	59.28	17.59	15.79	27.84	22.18	14.59	
College Station-Bryan, TX MSA	1,053	0.81	23.88	5.26	16.53	19.89	18.30	26.96	41.29	47.90	13.75	18.18	16.45	16.15	11.60	
Corpus Christi, TX MSA	1,887	1.44	22.82	4.87	16.99	18.29	19.76	31.55	40.43	45.29	15.49	17.24	19.65	16.99	13.48	
El Paso, TX MSA	3,640	2.79	22.11	2.79	17.46	17.58	18.92	32.62	41.51	47.00	16.82	19.31	19.94	18.61	14.99	
Houston-Sugar Land-Baytown, TX MSA	37,462	28.69	22.61	7.61	17.36	29.21	18.97	27.69	41.06	35.48	18.25	22.07	23.79	21.61	13.48	
Killeen-Temple-Fort Hood, TX MSA	2,663	2.04	17.01	4.23	19.97	22.00	23.75	35.74	39.27	38.04	15.57	13.44	15.60	16.22	15.23	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by bank.

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE																
GEOGRAPHY: TEXAS																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
<b>Limited Review:</b>																
Laredo, TX MSA	1,514	1.16	22.96	1.73	16.89	14.60	18.19	25.33	41.96	58.33	27.61	16.00	20.61	28.57	29.58	
Longview, TX MSA	533	0.41	20.58	4.53	17.93	27.55	21.60	32.64	39.88	35.28	8.56	6.85	10.60	9.65	7.11	
Lubbock, TX MSA	1,885	1.44	21.02	6.86	17.88	22.97	20.74	26.90	40.36	43.27	15.64	13.42	18.48	17.97	13.66	
McAllen-Edinburg-Mission, TX MSA	1,958	1.50	23.48	0.67	16.86	8.58	17.67	20.01	41.98	70.73	17.49	10.20	16.46	20.05	17.10	
Midland, TX MSA	419	0.32	20.88	9.16	18.60	24.34	19.33	28.19	41.20	38.31	7.68	17.16	9.21	7.03	6.49	
Odessa, TX MSA	445	0.34	21.22	5.90	17.50	28.34	21.98	34.47	39.30	31.29	13.33	10.00	15.70	15.63	10.71	
San Angelo, TX MSA	368	0.28	19.37	10.08	18.37	26.43	22.73	30.79	39.53	32.70	10.39	10.78	12.19	12.21	8.48	
Sherman-Denison, TX MSA	546	0.42	19.46	15.01	18.09	28.71	23.05	25.70	39.40	30.58	14.33	15.70	17.72	15.53	11.13	
Tyler, TX MSA	890	0.68	20.31	4.42	18.42	23.67	20.71	30.69	40.55	41.22	13.19	9.30	13.83	15.82	11.89	
Victoria, TX MSA	416	0.32	21.10	4.59	17.47	27.29	20.57	31.64	40.86	36.47	14.04	10.00	19.31	14.29	12.17	
Waco, TX MSA	1,042	0.80	20.68	6.47	17.54	23.29	21.36	30.34	40.42	39.90	14.16	14.29	15.16	15.61	12.95	
Wichita Falls, TX MSA	807	0.62	18.22	6.59	19.08	22.89	23.92	34.45	38.78	36.07	15.38	13.38	16.03	19.12	13.00	
Texas Non-MSA	1,550	1.19	18.68	6.05	17.01	21.35	21.20	25.07	43.10	47.53	14.87	17.35	16.18	14.49	14.41	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement															Geography: Texas		Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*										
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Dallas-Plano-Irving, TX MD	372	21.35	21.32	3.23	18.00	14.96	20.39	23.75	40.30	58.06	5.80	3.36	6.98	8.19	5.13						
Ft Worth-Arlington, TX MD	193	11.08	19.56	5.03	18.78	11.17	21.95	30.17	39.71	53.63	4.49	2.60	1.64	6.33	4.74						
San Antonio-New Braunfels, TX MSA	138	7.92	21.16	5.79	17.99	23.97	20.54	25.62	40.31	44.63	1.64	0.43	3.52	1.59	1.39						
<b>Limited Review:</b>																					
Abilene, TX MSA	16	0.92	19.15	0.00	18.23	0.00	23.78	26.67	38.84	73.33	2.74	0.00	0.00	1.72	4.02						
Amarillo, TX MSA	19	1.09	19.77	5.56	18.63	16.67	21.81	27.78	39.78	50.00	3.53	0.00	2.70	5.71	4.24						
Austin-Round Rock-San Marcos, TX MSA	169	9.70	19.76	5.84	18.30	18.18	22.76	20.13	39.17	55.84	3.40	1.64	2.33	2.85	4.27						
Beaumont-Port Arthur, TX MSA	21	1.21	22.47	0.00	17.06	6.67	20.02	46.67	40.44	46.67	0.98	0.00	1.32	2.78	0.28						
Brownsville-Harlingen, TX MSA	13	0.75	23.75	0.00	16.04	0.00	17.82	8.33	42.40	91.67	2.40	0.00	0.00	2.33	3.33						
College Station-Bryan, TX MSA	7	0.40	23.88	0.00	16.53	16.67	18.30	0.00	41.29	83.33	1.78	0.00	0.00	0.00	2.70						
Corpus Christi, TX MSA	58	3.33	22.82	4.00	16.99	6.00	19.76	26.00	40.43	64.00	4.52	8.33	2.13	7.59	3.63						
El Paso, TX MSA	57	3.27	22.11	0.00	17.46	6.52	18.92	21.74	41.51	71.74	1.89	0.00	0.89	1.61	2.18						
Houston-Sugar Land-Baytown, TX MSA	427	24.51	22.61	4.88	17.36	13.88	18.97	19.28	41.06	61.95	3.89	2.27	4.70	3.80	3.96						
Killeen-Temple-Fort Hood, TX MSA	23	1.32	17.01	9.09	19.97	22.73	23.75	22.73	39.27	45.45	3.31	3.85	6.38	1.45	3.16						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 9.8% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: Texas					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Limited Review:</b>																
Laredo, TX MSA	7	0.40	22.96	14.29	16.89	0.00	18.19	14.29	41.96	71.43	3.66	25.00	0.00	0.00	3.64	
Longview, TX MSA	9	0.52	20.58	0.00	17.93	25.00	21.60	12.50	39.88	62.50	0.21	0.00	0.00	0.00	0.42	
Lubbock, TX MSA	17	0.98	21.02	0.00	17.88	5.88	20.74	29.41	40.36	64.71	3.51	0.00	0.00	6.52	3.97	
McAllen-Edinburg-Mission, TX MSA	44	2.53	23.48	0.00	16.86	15.38	17.67	23.08	41.98	61.54	6.80	0.00	6.52	5.56	7.82	
Midland, TX MSA	18	1.03	20.88	0.00	18.60	41.18	19.33	29.41	41.20	29.41	3.45	0.00	15.79	2.04	2.30	
Odessa, TX MSA	13	0.75	21.22	0.00	17.50	27.27	21.98	27.27	39.30	45.45	1.23	0.00	10.00	0.00	0.00	
San Angelo, TX MSA	11	0.63	19.37	12.50	18.37	0.00	22.73	75.00	39.53	12.50	2.19	0.00	0.00	7.69	1.09	
Sherman-Denison, TX MSA	9	0.52	19.46	0.00	18.09	28.57	23.05	0.00	39.40	71.43	2.52	0.00	2.78	0.00	4.11	
Tyler, TX MSA	23	1.32	20.31	0.00	18.42	23.81	20.71	28.57	40.55	47.62	3.08	0.00	2.38	3.64	3.41	
Victoria, TX MSA	5	0.29	21.10	0.00	17.47	25.00	20.57	25.00	40.86	50.00	2.13	0.00	5.26	0.00	1.96	
Waco, TX MSA	21	1.21	20.68	0.00	17.54	11.76	21.36	17.65	40.42	70.59	3.98	0.00	0.00	2.17	5.73	
Wichita Falls, TX MSA	5	0.29	18.22	0.00	19.08	50.00	23.92	50.00	38.78	0.00	0.00	0.00	0.00	0.00	0.00	
Texas Non-MSA	47	2.70	18.68	8.89	17.01	8.89	21.20	11.11	43.10	71.11	3.19	0.00	3.85	0.72	4.58	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 9.8% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance															Geography: Texas					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Dallas-Plano-Irving, TX MD	25,455	25.74	21.32	4.47	18.00	14.36	20.39	21.19	40.30	59.98	14.11	21.97	19.90	15.78	12.50									
Ft Worth-Arlington, TX MD	10,874	11.00	19.56	5.03	18.78	15.64	21.95	23.93	39.71	55.40	14.84	21.36	19.16	17.04	13.02									
San Antonio-New Braunfels, TX MSA	8,664	8.76	21.16	4.16	17.99	11.65	20.54	22.72	40.31	61.46	13.21	18.56	15.46	15.37	12.11									
<b>Limited Review:</b>																								
Abilene, TX MSA	398	0.40	19.15	2.22	18.23	12.66	23.78	17.09	38.84	68.04	9.85	6.98	11.88	8.58	9.98									
Amarillo, TX MSA	1,096	1.11	19.77	3.64	18.63	13.18	21.81	24.87	39.78	58.31	14.10	9.16	14.43	15.03	14.08									
Austin-Round Rock-San Marcos, TX MSA	11,715	11.85	19.76	5.72	18.30	16.32	22.76	25.06	39.17	52.89	12.56	18.30	15.82	14.13	10.89									
Beaumont-Port Arthur, TX MSA	670	0.68	22.47	2.27	17.06	10.65	20.02	23.39	40.44	63.70	9.53	10.94	9.64	10.38	9.21									
Brownsville-Harlingen, TX MSA	601	0.61	23.75	1.34	16.04	5.34	17.82	13.17	42.40	80.15	17.08	36.36	25.58	22.88	15.95									
College Station-Bryan, TX MSA	788	0.80	23.88	2.25	16.53	9.55	18.30	21.91	41.29	66.29	12.47	12.50	16.98	17.66	10.82									
Corpus Christi, TX MSA	1,498	1.52	22.82	2.48	16.99	7.92	19.76	21.84	40.43	67.76	15.32	23.61	15.05	17.05	14.65									
El Paso, TX MSA	1,819	1.84	22.11	2.11	17.46	6.53	18.92	17.01	41.51	74.36	12.29	11.76	11.89	12.31	12.33									
Houston-Sugar Land-Baytown, TX MSA	26,008	26.30	22.61	3.74	17.36	12.31	18.97	20.82	41.06	63.14	14.38	21.87	20.02	17.31	12.76									
Killeen-Temple-Fort Hood, TX MSA	1,170	1.18	17.01	2.73	19.97	13.77	23.75	22.41	39.27	61.09	13.23	15.49	16.26	12.82	12.83									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.2% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance															Geography: Texas					Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Limited Review:</b>																								
Laredo, TX MSA	524	0.53	22.96	1.84	16.89	8.74	18.19	12.64	41.96	76.78	24.42	9.09	39.47	23.58	23.88									
Longview, TX MSA	431	0.44	20.58	2.25	17.93	14.65	21.60	29.86	39.88	53.24	9.72	7.27	10.95	12.57	8.50									
Lubbock, TX MSA	1,105	1.12	21.02	2.68	17.88	12.99	20.74	20.62	40.36	63.71	15.01	18.28	19.53	17.19	13.66									
McAllen-Edinburg-Mission, TX MSA	1,277	1.29	23.48	0.83	16.86	4.50	17.67	9.17	41.98	85.50	21.48	25.00	20.65	16.84	21.98									
Midland, TX MSA	397	0.40	20.88	2.58	18.60	13.47	19.33	28.65	41.20	55.30	9.01	15.38	9.32	11.59	7.89									
Odessa, TX MSA	252	0.25	21.22	1.38	17.50	14.29	21.98	23.50	39.30	60.83	12.34	8.33	15.12	11.23	12.39									
San Angelo, TX MSA	216	0.22	19.37	5.43	18.37	13.59	22.73	27.17	39.53	53.80	5.88	10.87	4.95	6.10	5.60									
Sherman-Denison, TX MSA	449	0.45	19.46	4.82	18.09	18.27	23.05	23.35	39.40	53.55	16.22	20.83	25.74	15.26	14.29									
Tyler, TX MSA	893	0.90	20.31	2.75	18.42	13.38	20.71	22.75	40.55	61.12	14.21	6.78	19.25	16.42	13.18									
Victoria, TX MSA	257	0.26	21.10	2.42	17.47	13.04	20.57	17.39	40.86	67.15	10.22	11.11	13.64	11.03	9.44									
Waco, TX MSA	791	0.80	20.68	1.61	17.54	11.14	21.36	21.41	40.42	65.84	14.34	2.56	13.95	15.60	14.36									
Wichita Falls, TX MSA	257	0.26	18.22	3.76	19.08	14.55	23.92	24.88	38.78	56.81	7.27	2.94	8.76	9.36	6.55									
Texas Non-MSA	1,269	1.28	18.68	2.55	17.01	7.57	21.20	20.77	43.10	69.10	14.69	18.52	17.99	16.84	13.88									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.2% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: TEXAS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Dallas-Plano-Irving, TX MD	9,498	26.55	66.93	60.51	90.33	3.90	5.77	5.01	8.45
Ft Worth-Arlington, TX MD	3,413	9.54	67.66	61.06	92.41	2.67	4.92	3.82	5.38
San Antonio-New Braunfels, TX MSA	2,615	7.31	67.62	59.01	90.59	3.56	5.85	3.64	5.92
<b>Limited Review:</b>									
Abilene, TX MSA	160	0.45	67.02	53.13	97.50	1.25	1.25	3.42	3.54
Amarillo, TX MSA	285	0.80	68.12	44.21	89.12	5.61	5.26	1.74	2.45
Austin-Round Rock-San Marcos, TX MSA	3,935	11.00	66.32	62.19	90.93	3.38	5.69	4.51	6.83
Beaumont-Port Arthur, TX MSA	341	0.95	67.35	56.01	95.89	1.76	2.35	2.83	3.80
Brownsville-Harlingen, TX MSA	158	0.44	67.57	66.46	90.51	3.80	5.70	1.74	2.91
College Station-Bryan, TX MSA	215	0.60	68.84	57.67	93.02	1.86	5.12	2.84	2.88
Corpus Christi, TX MSA	479	1.34	65.11	59.71	92.07	2.09	5.85	3.39	4.49
El Paso, TX MSA	635	1.78	63.44	61.57	94.17	2.20	3.62	2.82	3.94
Houston-Sugar Land-Baytown, TX MSA	10,286	28.75	67.35	59.27	91.68	3.32	5.01	3.86	7.06
Killeen-Temple-Fort Hood, TX MSA	345	0.96	67.09	67.25	97.10	0.58	2.32	4.74	6.13

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 24.45% of small loans to businesses originated and purchased by the bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: TEXAS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
Laredo, TX MSA	159	0.44	66.09	55.35	94.97	1.26	3.77	2.02	2.09
Longview, TX MSA	226	0.63	69.18	55.75	98.67	0.44	0.88	3.35	5.10
Lubbock, TX MSA	242	0.68	62.12	54.55	96.69	0.83	2.48	1.95	2.02
McAllen-Edinburg-Mission, TX MSA	504	1.41	68.17	67.26	96.63	0.99	2.38	3.00	5.05
Midland, TX MSA	217	0.61	64.39	48.85	88.48	2.30	9.22	3.56	5.19
Odessa, TX MSA	147	0.41	67.52	55.10	97.28	1.36	1.36	4.66	8.48
San Angelo, TX MSA	157	0.44	65.63	54.78	94.27	3.82	1.91	6.65	7.61
Sherman-Denison, TX MSA	166	0.46	68.68	53.61	95.78	0.60	3.61	5.61	6.50
Tyler, TX MSA	350	0.98	69.23	58.00	95.71	0.86	3.43	4.42	5.23
Victoria, TX MSA	108	0.30	66.73	50.93	99.07	0.93	0.00	1.70	1.35
Waco, TX MSA	279	0.78	68.04	54.48	94.27	2.51	3.23	4.92	6.32
Wichita Falls, TX MSA	147	0.41	70.21	60.54	97.28	1.36	1.36	4.32	6.60
Texas Non-MSA	705	1.97	69.00	54.18	95.60	2.70	1.70	4.48	5.36

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 24.45% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms									
GEOGRAPHY: TEXAS									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Dallas-Plano-Irving, TX MD	61	12.87	96.99	73.77	100.00	0.00	0.00	4.68	4.14
Ft Worth-Arlington, TX MD	30	6.33	97.88	66.67	96.67	3.33	0.00	5.29	4.38
San Antonio-New Braunfels, TX MSA	51	10.76	97.85	56.86	90.20	5.88	3.92	3.90	2.02
<b>Limited Review:</b>									
Abilene, TX MSA	10	2.11	98.17	70.00	100.00	0.00	0.00	2.69	1.80
Amarillo, TX MSA	17	3.59	96.82	47.06	82.35	11.76	5.88	3.77	4.14
Austin-Round Rock-San Marcos, TX MSA	35	7.38	97.67	74.29	94.29	5.71	0.00	2.87	3.16
Beaumont-Port Arthur, TX MSA	3	0.63	98.75	100.00	100.00	0.00	0.00	1.67	2.08
Brownsville-Harlingen, TX MSA	7	1.48	97.08	57.14	85.71	0.00	14.29	4.62	5.88
College Station-Bryan, TX MSA	12	2.53	97.59	66.67	100.00	0.00	0.00	2.69	1.64
Corpus Christi, TX MSA	30	6.33	97.77	50.00	56.67	16.67	26.67	5.00	3.81
El Paso, TX MSA	1	0.21	95.97	100.00	100.00	0.00	0.00	0.00	0.00
Houston-Sugar Land-Baytown, TX MSA	58	12.24	97.29	67.24	96.55	3.45	0.00	3.00	2.26
Killeen-Temple-Fort Hood, TX MSA	9	1.90	98.71	55.56	100.00	0.00	0.00	1.44	1.15

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 30.41% of small loans to farms originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: TEXAS			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Limited Review:</b>									
Laredo, TX MSA	4	0.84	95.55	50.00	100.00	0.00	0.00	5.56	0.00
Longview, TX MSA	15	3.16	98.21	53.33	80.00	20.00	0.00	4.07	2.65
Lubbock, TX MSA	6	1.27	96.97	83.33	100.00	0.00	0.00	0.19	0.24
McAllen-Edinburg-Mission, TX MSA	11	2.32	93.51	54.55	100.00	0.00	0.00	3.92	1.69
Midland, TX MSA	3	0.63	98.70	33.33	66.67	0.00	33.33	0.00	0.00
Odessa, TX MSA	1	0.21	97.66	100.00	100.00	0.00	0.00	11.11	33.33
San Angelo, TX MSA	5	1.05	97.69	40.00	100.00	0.00	0.00	7.69	5.26
Sherman-Denison, TX MSA	13	2.74	99.14	53.85	100.00	0.00	0.00	9.09	5.36
Tyler, TX MSA	6	1.27	97.44	66.67	100.00	0.00	0.00	6.25	5.26
Victoria, TX MSA	7	1.48	98.73	57.14	85.71	14.29	0.00	1.02	1.14
Waco, TX MSA	5	1.05	98.70	60.00	80.00	0.00	20.00	2.67	1.75
Wichita Falls, TX MSA	5	1.05	98.53	80.00	100.00	0.00	0.00	4.76	4.00
Texas Non-MSA	69	14.56	96.86	53.62	88.41	5.80	5.80	5.58	4.93

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 30.41% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: TEXAS									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Dallas-Plano-Irving, TX MD	148	86,989	390	260,985	538	347,974	41.82	3	10,517
Ft Worth-Arlington, TX MD	30	13,848	137	77,399	167	91,247	10.97	3	6,506
San Antonio-New Braunfels, TX MSA	39	65,184	61	14,373	100	79,556	9.56	1	1,781
<b>Limited Review:</b>									
Abilene, TX MSA	3	3,081	11	238	14	3,319	0.40	0	0
Amarillo, TX MSA	2	52	29	605	31	658	0.08	0	0
Austin-Round Rock-San Marcos, TX MSA	45	11,231	93	39,456	138	50,688	6.09	3	18,565
Beaumont-Port Arthur, TX MSA	5	7,353	22	1,441	27	8,794	1.06	0	0
Brownsville-Harlingen, TX MSA	4	4,349	22	184	26	4,534	0.54	0	0
College Station-Bryan, TX MSA	3	195	12	275	15	471	0.06	0	0
Corpus Christi, TX MSA	6	6,319	40	897	46	7,215	0.87	0	0
El Paso, TX MSA	17	15,761	34	7,320	51	23,081	2.77	1	6,904
Houston-Sugar Land-Baytown, TX MSA	86	66,294	128	76,688	214	142,982	17.19	5	34,453
Killeen-Temple-Fort Hood, TX MSA	0	0	14	463	14	463	0.06	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: TEXAS									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Limited Review:</b>									
Laredo, TX MSA	1	35	10	16,527	11	16,562	1.99	1	12,084
Longview, TX MSA	2	254	8	104	10	358	0.04	0	0
Lubbock, TX MSA	4	216	13	388	17	603	0.07	0	0
McAllen-Edinburg-Mission, TX MSA	4	2,538	27	792	31	3,331	0.40	0	0
Midland, TX MSA	1	46	28	1,521	29	1,567	0.19	0	0
Odessa, TX MSA	0	0	10	204	10	204	0.02	0	0
San Angelo, TX MSA	1	1,056	8	179	9	1,235	0.15	0	0
Sherman-Denison, TX MSA	1	1,215	16	540	17	1,755	0.21	0	0
Tyler, TX MSA	3	101	43	799	46	900	0.11	0	0
Victoria, TX MSA	2	252	13	315	15	567	0.07	0	0
Waco, TX MSA	2	12,019	31	588	33	12,606	1.52	0	0
Wichita Falls, TX MSA	1	855	14	142	15	998	0.12	0	0
Texas Non-MSA	14	7,177	69	1,673	83	8,850	1.06	0	0
Statewide investments with potential to benefit one or more AAs	0	0	33	815	33	815	0.10	0	0
Statewide investments with no potential to benefit one or more AAs	14	20,343	54	352	68	20,695	2.49	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: TEXAS																	
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Dallas-Plano-Irving, TX MD	63.70	116	25.66	5.17	25.86	28.45	40.52	5	18	1	0	-7	-7	7.60	27.39	34.04	30.98
Ft Worth-Arlington, TX MD	4.24	40	8.85	0.00	32.50	30.00	37.50	1	7	0	-1	-3	-2	5.10	24.80	41.72	28.37
San Antonio-New Braunfels, TX MSA	4.22	40	8.85	2.50	30.00	32.50	35.00	2	5	0	-1	-2	0	2.45	35.31	35.83	26.41
<b>Limited Review:</b>																	
Abilene, TX MSA	0.20	3	0.66	0.00	33.33	33.33	33.33	0	0	0	0	0	0	0.00	19.80	56.43	22.84
Amarillo, TX MSA	0.40	7	1.55	28.57	42.86	14.29	14.29	0	0	0	0	0	0	1.78	29.05	44.10	25.06
Austin-Round Rock-San Marcos, TX MSA	5.28	40	8.85	2.50	17.50	32.50	47.50	1	3	1	-1	0	0	8.31	25.66	39.38	26.46
Beaumont-Port Arthur, TX MSA	0.86	3	0.66	0.00	33.33	33.33	33.33	0	0	0	0	0	0	4.06	20.33	49.45	24.22
Brownsville-Harlingen, TX MSA	0.14	3	0.66	33.33	66.67	0.00	0.00	0	0	0	0	0	0	2.26	25.87	42.69	29.18
College Station-Bryan, TX MSA	0.23	1	0.22	0.00	100.0	0.00	0.00	0	0	0	0	0	0	1.87	28.66	42.54	21.66
Corpus Christi, TX MSA	0.61	9	1.99	33.33	11.11	33.33	22.22	0	0	0	0	0	0	5.95	26.89	41.64	25.52
El Paso, TX MSA	1.04	11	2.43	9.09	9.09	9.09	72.73	0	2	0	0	-2	0	3.70	30.92	33.98	31.40
Houston-Sugar Land-Baytown, TX MSA	14.67	117	25.88	3.42	29.91	17.09	49.57	8	4	1	2	0	1	6.43	30.28	31.45	31.74
Killeen-Temple-Fort Hood, TX MSA	0.24	4	0.88	0.00	0.00	75.00	25.00	0	2	0	-2	0	0	0.71	17.12	60.90	21.27

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		
GEOGRAPHY: TEXAS																		
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																		
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Limited Review:</b>																		
Laredo, TX MSA	0.10	2	0.44	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0	0.52	38.06	33.72	27.69
Longview, TX MSA	0.06	1	0.22	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	18.67	65.00	16.33	
Lubbock, TX MSA	0.35	3	0.66	0.00	33.33	33.33	33.33	0	1	0	0	-1	0	1.23	30.78	43.24	24.74	
McAllen-Edinburg-Mission, TX MSA	0.34	6	1.33	0.00	16.67	33.33	50.00	1	0	0	1	0	0	0.00	29.73	48.29	21.98	
Midland, TX MSA	1.02	3	0.66	0.00	66.67	0.00	33.33	0	0	0	0	0	0	5.79	19.81	43.64	30.76	
Odessa, TX MSA	0.12	2	0.44	0.00	100.0	0.00	0.00	0	0	0	0	0	0	1.84	19.77	42.31	36.08	
San Angelo, TX MSA	0.11	2	0.44	0.00	0.00	50.00	50.00	0	1	0	0	0	-1	1.49	17.76	53.45	27.30	
Sherman-Denison, TX MSA	0.09	1	0.22	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	17.24	73.81	8.94	
Tyler, TX MSA	0.44	5	1.11	0.00	40.00	20.00	40.00	0	0	0	0	0	0	3.06	24.26	49.91	22.77	
Victoria, TX MSA	0.08	1	0.22	0.00	0.00	0.00	100.0	0	0	0	0	0	0	1.88	25.41	51.40	21.31	
Waco, TX MSA	0.30	3	0.66	0.00	33.33	0.00	66.67	0	0	0	0	0	0	10.94	25.71	31.10	32.24	
Wichita Falls, TX MSA	0.15	2	0.44	0.00	50.00	0.00	50.00	0	0	0	0	0	0	1.65	23.49	48.15	26.70	
Texas Non-MSA	1.03	27	5.97	0.00	25.93	70.37	3.70	0	0	0	0	0	0	0.00	9.27	67.75	22.98	

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: VIRGINIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Richmond, VA MSA	33.51	19,821	3,941,917	2,260	128,178	31	946	1	2,800	22,113	4,073,841	71.99
<b>Limited Review:</b>												
Blacksburg-Christiansburg-Radford, VA MSA	2.44	1,431	233,722	172	6,852	6	48	0	0	1,609	240,622	0.80
Charlottesville, VA MSA	5.28	2,911	678,542	566	23,068	7	157	0	0	3,484	701,767	4.26
Danville, VA MSA	1.13	611	73,770	132	3,693	1	15	0	0	744	77,478	0.65
Harrisonburg, VA MSA	1.20	665	113,914	120	2,485	5	41	0	0	790	116,440	0.94
Lynchburg, VA MSA	4.34	2,566	414,760	288	9,183	8	57	0	0	2,862	424,000	1.12
Roanoke, VA MSA	6.10	3,598	600,331	421	17,304	7	42	0	0	4,026	617,677	2.14
Virginia Beach-Norfolk-Newport News, VA MSA	38.92	23,293	4,961,728	2,371	113,850	11	964	6	31,821	25,681	5,108,363	13.84
Virginia Non-MSA	7.09	3,963	639,616	665	26,245	45	2,134	2	12,327	4,675	680,322	4.26

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: VIRGINIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Richmond, VA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	71.99
<b>Limited Review:</b>														
Blacksburg-Christiansburg-Radford, VA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.80
Charlottesville, VA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4.26
Danville, VA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.65
Harrisonburg, VA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.94
Lynchburg, VA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.12
Roanoke, VA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.14
Virginia Beach-Norfolk-Newport News, VA MSA	10.00	1	10,115	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	13.84
Virginia Non-MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4.26

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE																
GEOGRAPHY: VIRGINIA																
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011																
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Richmond, VA MSA	5,664	30.12	2.89	1.54	17.41	15.59	47.12	45.09	32.58	37.78	11.51	8.42	12.32	11.56	11.34	
<b>Limited Review:</b>																
Blacksburg-Christiansburg-Radford, VA MSA	560	2.98	0.00	0.00	4.88	2.32	86.82	88.75	8.30	8.93	12.30	0.00	9.30	12.89	8.09	
Charlottesville, VA MSA	904	4.81	1.07	2.10	11.96	6.31	63.77	62.28	23.21	29.31	11.64	8.06	9.29	11.13	13.72	
Danville, VA MSA	223	1.19	0.00	0.00	12.48	9.42	76.30	76.23	11.22	14.35	9.94	0.00	11.76	10.26	8.05	
Harrisonburg, VA MSA	147	0.78	0.00	0.00	9.44	14.29	76.87	70.75	13.68	14.97	3.82	0.00	2.48	4.53	2.16	
Lynchburg, VA MSA	925	4.92	0.99	0.54	9.45	7.68	68.72	63.57	20.84	28.22	11.09	5.88	11.11	11.55	10.24	
Roanoke, VA MSA	1,199	6.38	2.02	1.33	9.99	9.76	57.64	57.71	30.35	31.19	10.93	11.48	10.88	11.25	10.39	
Virginia Beach-Norfolk-Newport News, VA MSA	8,106	43.10	1.82	1.90	15.61	16.83	44.99	45.93	37.58	35.34	12.60	13.09	14.16	13.29	11.17	
Virginia Non-MSA	1,078	5.73	0.00	0.00	6.32	4.55	72.93	63.36	20.74	32.10	8.99	0.00	7.12	9.23	8.87	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: VIRGINIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Richmond, VA MSA	290	29.53	2.89	1.38	17.41	15.52	47.12	43.45	32.58	39.66	5.86	5.56	5.80	4.77	7.45
<b>Limited Review:</b>															
Blacksburg-Christiansburg-Radford, VA MSA	19	1.93	0.00	0.00	4.88	5.26	86.82	84.21	8.30	10.53	1.38	0.00	0.00	1.03	6.90
Charlottesville, VA MSA	62	6.31	1.07	0.00	11.96	14.52	63.77	54.84	23.21	30.65	2.71	0.00	0.00	2.11	6.49
Danville, VA MSA	8	0.81	0.00	0.00	12.48	12.50	76.30	75.00	11.22	12.50	2.72	0.00	5.56	1.75	6.67
Harrisonburg, VA MSA	19	1.93	0.00	0.00	9.44	15.79	76.87	78.95	13.68	5.26	5.30	0.00	5.88	5.36	4.55
Lynchburg, VA MSA	44	4.48	0.99	0.00	9.45	9.09	68.72	70.45	20.84	20.45	3.65	0.00	0.00	3.03	6.86
Roanoke, VA MSA	60	6.11	2.02	1.67	9.99	6.67	57.64	50.00	30.35	41.67	2.80	0.00	1.18	2.86	3.33
Virginia Beach-Norfolk-Newport News, VA MSA	402	40.94	1.82	2.24	15.61	12.19	44.99	44.53	37.58	41.04	3.56	6.67	3.50	4.02	2.97
Virginia Non-MSA	78	7.94	0.00	0.00	6.32	3.85	72.93	69.23	20.74	26.92	2.23	0.00	1.14	2.58	1.41

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: VIRGINIA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Richmond, VA MSA	13,867	35.49	2.89	1.09	17.41	10.97	47.12	42.79	32.58	45.15	15.00	15.41	16.32	15.25	14.51						
<b>Limited Review:</b>																					
Blacksburg-Christiansburg-Radford, VA MSA	852	2.18	0.00	0.00	4.88	3.40	86.82	84.74	8.30	11.85	11.39	0.00	18.52	11.40	9.90						
Charlottesville, VA MSA	1,945	4.98	1.07	1.29	11.96	8.74	63.77	62.78	23.21	27.20	11.98	12.50	13.36	11.94	11.61						
Danville, VA MSA	380	0.97	0.00	0.00	12.48	5.00	76.30	79.47	11.22	15.53	13.10	0.00	18.60	13.05	12.21						
Harrisonburg, VA MSA	499	1.28	0.00	0.00	9.44	7.82	76.87	77.15	13.68	15.03	6.31	0.00	7.28	6.78	4.49						
Lynchburg, VA MSA	1,597	4.09	0.99	0.31	9.45	6.26	68.72	62.24	20.84	31.18	10.57	6.67	12.26	10.95	9.70						
Roanoke, VA MSA	2,339	5.99	2.02	1.07	9.99	6.88	57.64	54.90	30.35	37.15	12.27	20.41	17.09	13.29	10.32						
Virginia Beach-Norfolk-Newport News, VA MSA	14,785	37.84	1.82	1.43	15.61	13.67	44.99	43.77	37.58	41.13	12.55	17.46	16.42	13.58	10.62						
Virginia Non-MSA	2,807	7.18	0.00	0.00	6.32	4.06	72.93	60.99	20.74	34.95	11.14	0.00	14.54	11.72	9.95						

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY															GEOGRAPHY: VIRGINIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Richmond, VA MSA	0	0.00	13.52	0.00	29.71	0.00	38.24	0.00	18.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
<b>Limited Review:</b>																								
Blacksburg-Christiansburg-Radford, VA MSA	0	0.00	0.00	0.00	0.34	0.00	88.83	0.00	10.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Charlottesville, VA MSA	0	0.00	3.26	0.00	35.97	0.00	50.73	0.00	10.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Danville, VA MSA	0	0.00	0.00	0.00	35.90	0.00	54.29	0.00	9.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Harrisonburg, VA MSA	0	0.00	0.00	0.00	36.27	0.00	46.60	0.00	17.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Lynchburg, VA MSA	0	0.00	3.71	0.00	14.35	0.00	60.43	0.00	21.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Roanoke, VA MSA	0	0.00	8.62	0.00	17.47	0.00	57.44	0.00	16.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Virginia Beach-Norfolk-Newport News, VA MSA	0	0.00	8.90	0.00	36.06	0.00	38.35	0.00	16.69	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
Virginia Non-MSA	0	0.00	0.00	0.00	13.71	0.00	63.47	0.00	22.82	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															GEOGRAPHY: VIRGINIA		EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Richmond, VA MSA	2,260	32.31	7.26	6.19	16.08	14.78	41.60	40.18	35.05	38.85	6.31	6.92	6.09	6.56	6.05						
<b>Limited Review:</b>																					
Blacksburg-Christiansburg-Radford, VA MSA	172	2.46	0.00	0.00	2.10	7.56	88.58	80.81	9.32	11.63	6.14	0.00	25.93	5.89	3.67						
Charlottesville, VA MSA	566	8.09	0.87	0.88	11.17	10.07	60.46	60.60	27.50	28.45	9.28	6.25	7.64	9.99	8.67						
Danville, VA MSA	132	1.89	0.00	0.00	17.01	14.39	71.70	71.21	11.29	14.39	5.58	0.00	3.60	5.41	7.80						
Harrisonburg, VA MSA	120	1.72	0.00	0.00	12.35	15.00	61.99	61.67	25.66	23.33	2.91	0.00	2.92	3.36	2.03						
Lynchburg, VA MSA	288	4.12	3.53	2.43	10.28	8.68	62.15	55.90	24.04	32.99	4.98	4.82	2.90	5.23	5.40						
Roanoke, VA MSA	421	6.02	2.61	3.33	11.96	11.64	55.37	54.63	30.07	30.40	4.95	5.15	4.04	5.36	4.65						
Virginia Beach-Norfolk-Newport News, VA MSA	2,371	33.90	2.39	1.69	19.36	17.00	40.88	39.18	37.37	42.13	5.74	5.57	5.16	6.07	5.71						
Virginia Non-MSA	665	9.51	0.00	0.00	5.78	4.51	70.78	71.88	23.45	23.61	4.57	0.00	3.02	4.89	4.11						

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: VIRGINIA				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Richmond, VA MSA	31	25.62	1.91	0.00	18.03	16.13	49.88	67.74	30.17	16.13	11.29	0.00	3.70	19.12	0.00	
<b>Limited Review:</b>																
Blacksburg-Christiansburg-Radford, VA MSA	6	4.96	0.00	0.00	2.39	0.00	89.89	100.00	7.71	0.00	10.71	0.00	0.00	12.50	0.00	
Charlottesville, VA MSA	7	5.79	0.40	0.00	10.38	14.29	65.81	57.14	23.42	28.57	21.43	0.00	0.00	18.18	33.33	
Danville, VA MSA	1	0.83	0.00	0.00	3.15	0.00	90.80	100.00	6.05	0.00	2.86	0.00	0.00	2.94	0.00	
Harrisonburg, VA MSA	5	4.13	0.00	0.00	9.28	0.00	78.22	80.00	12.50	20.00	5.26	0.00	0.00	8.33	0.00	
Lynchburg, VA MSA	8	6.61	1.19	0.00	6.90	0.00	72.17	62.50	19.74	37.50	4.17	0.00	0.00	0.00	20.00	
Roanoke, VA MSA	7	5.79	0.99	0.00	4.63	0.00	61.34	57.14	33.04	42.86	19.05	0.00	0.00	11.11	66.67	
Virginia Beach-Norfolk-Newport News, VA MSA	11	9.09	1.23	0.00	14.20	9.09	47.05	54.55	37.52	36.36	5.33	0.00	50.00	1.75	12.50	
Virginia Non-MSA	45	37.19	0.00	0.00	2.38	0.00	73.39	80.00	24.23	20.00	5.57	0.00	0.00	5.45	7.32	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: VIRGINIA					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011										
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*						
	#	% of Total**	% Families***	% BANK Loans***	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Richmond, VA MSA	5,664	30.12	19.79	13.44	18.40	30.66	22.83	28.13	38.99	27.77	12.68	11.77	12.93	13.93	11.80		
<b>Limited Review:</b>																	
Blacksburg-Christiansburg-Radford, VA MSA	560	2.98	20.15	9.29	17.69	28.57	23.23	29.46	38.93	32.68	13.31	11.25	14.18	15.14	11.94		
Charlottesville, VA MSA	904	4.81	19.18	9.14	18.34	24.41	23.26	29.32	39.21	37.12	13.08	11.63	14.31	14.89	11.65		
Danville, VA MSA	223	1.19	20.64	12.67	17.93	33.94	22.05	27.15	39.38	26.24	11.11	12.05	14.71	10.73	8.10		
Harrisonburg, VA MSA	147	0.78	17.33	6.85	19.26	28.77	25.06	23.29	38.36	41.10	4.15	2.78	4.59	4.96	3.59		
Lynchburg, VA MSA	925	4.92	19.36	11.96	18.36	31.63	23.19	27.93	39.10	28.48	12.42	11.03	13.26	13.50	11.41		
Roanoke, VA MSA	1,199	6.38	18.02	13.41	18.98	31.53	24.06	28.58	38.94	26.48	11.92	10.56	13.62	13.29	10.04		
Virginia Beach-Norfolk-Newport News, VA MSA	8,106	43.10	19.21	8.09	18.61	31.28	23.23	31.36	38.95	29.27	14.41	17.28	15.92	14.56	12.44		
Virginia Non-MSA	1,078	5.73	18.63	5.31	17.44	24.58	23.21	31.38	40.71	38.73	9.74	8.40	9.07	11.15	9.48		

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: Virginia					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Richmond, VA MSA	290	29.53	19.79	16.73	18.40	27.40	22.83	24.91	38.99	30.96	5.83	6.88	5.90	5.04	5.78	
<b>Limited Review:</b>																
Blacksburg-Christiansburg-Radford, VA MSA	19	1.93	20.15	0.00	17.69	22.22	23.23	27.78	38.93	50.00	1.46	0.00	1.11	0.00	3.79	
Charlottesville, VA MSA	62	6.31	19.18	12.90	18.34	19.35	23.26	24.19	39.21	43.55	2.79	1.12	0.99	2.56	6.67	
Danville, VA MSA	8	0.81	20.64	14.29	17.93	42.86	22.05	42.86	39.38	0.00	2.10	3.57	2.78	2.63	0.00	
Harrisonburg, VA MSA	19	1.93	17.33	21.05	19.26	26.32	25.06	10.53	38.36	42.11	5.48	5.56	8.33	2.44	5.88	
Lynchburg, VA MSA	44	4.48	19.36	5.13	18.36	17.95	23.19	35.90	39.10	41.03	3.60	0.00	1.05	4.39	5.92	
Roanoke, VA MSA	60	6.11	18.02	6.90	18.98	25.86	24.06	37.93	38.94	29.31	2.89	1.78	2.58	3.15	3.73	
Virginia Beach-Norfolk-Newport News, VA MSA	402	40.94	19.21	11.31	18.61	25.71	23.23	27.76	38.95	35.22	3.70	6.12	4.36	2.74	3.63	
Virginia Non-MSA	78	7.94	18.63	4.00	17.44	17.33	23.21	38.67	40.71	40.00	2.23	0.00	1.95	4.42	2.08	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.5% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Virginia					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Richmond, VA MSA	13,867	35.49	19.79	9.14	18.40	21.54	22.83	26.40	38.99	42.92	16.33	17.50	17.82	16.32	15.47	
<b>Limited Review:</b>																
Blacksburg-Christiansburg-Radford, VA MSA	852	2.18	20.15	6.37	17.69	18.99	23.23	28.09	38.93	46.55	12.67	14.46	13.67	12.78	12.08	
Charlottesville, VA MSA	1,945	4.98	19.18	9.78	18.34	20.53	23.26	26.36	39.21	43.34	12.51	12.54	12.59	13.40	12.07	
Danville, VA MSA	380	0.97	20.64	5.54	17.93	20.12	22.05	26.24	39.38	48.10	14.36	20.00	11.76	16.03	13.64	
Harrisonburg, VA MSA	499	1.28	17.33	8.14	19.26	22.09	25.06	27.44	38.36	42.33	6.50	8.76	8.31	6.28	5.58	
Lynchburg, VA MSA	1,597	4.09	19.36	7.79	18.36	22.29	23.19	29.57	39.10	40.35	11.54	15.64	13.11	12.42	10.13	
Roanoke, VA MSA	2,339	5.99	18.02	10.11	18.98	23.09	24.06	27.18	38.94	39.62	13.06	15.09	15.70	13.48	11.19	
Virginia Beach-Norfolk-Newport News, VA MSA	14,785	37.84	19.21	7.93	18.61	23.80	23.23	28.31	38.95	39.96	14.38	18.52	18.46	16.13	11.55	
Virginia Non-MSA	2,807	7.18	18.63	5.63	17.44	20.09	23.21	26.18	40.71	48.09	11.31	13.95	12.08	11.20	10.77	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.4% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: VIRGINIA			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Richmond, VA MSA	2,260	32.31	68.51	52.88	87.74	5.80	6.46	6.09	8.98
<b>Limited Review:</b>									
Blacksburg-Christiansburg-Radford, VA MSA	172	2.46	66.55	54.65	91.86	2.33	5.81	5.72	7.29
Charlottesville, VA MSA	566	8.09	68.17	56.18	91.17	4.24	4.59	8.86	11.79
Danville, VA MSA	132	1.89	70.12	56.82	96.21	0.76	3.03	5.45	5.05
Harrisonburg, VA MSA	120	1.72	69.84	58.33	97.50	1.67	0.83	2.81	3.21
Lynchburg, VA MSA	288	4.12	69.23	54.51	93.40	2.78	3.82	4.63	5.71
Roanoke, VA MSA	421	6.02	68.17	53.21	91.45	4.51	4.04	4.74	5.83
Virginia Beach-Norfolk-Newport News, VA MSA	2,371	33.90	67.68	56.60	90.68	3.80	5.53	5.62	8.95
Virginia Non-MSA	665	9.51	71.22	57.44	93.98	1.50	4.51	4.28	5.17

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 27.50% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: Virginia			Evaluation Period: April 1, 2009 to December 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Richmond, VA MSA	31	25.62	97.80	80.65	93.55	0.00	6.45	10.94	10.99
<b>Limited Review:</b>									
Blacksburg-Christiansburg-Radford, VA MSA	6	4.96	97.34	66.67	100.00	0.00	0.00	10.34	9.09
Charlottesville, VA MSA	7	5.79	97.83	85.71	100.00	0.00	0.00	16.67	33.33
Danville, VA MSA	1	0.83	99.52	100.00	100.00	0.00	0.00	2.86	3.70
Harrisonburg, VA MSA	5	4.13	97.52	100.00	100.00	0.00	0.00	5.00	9.09
Lynchburg, VA MSA	8	6.61	99.14	100.00	100.00	0.00	0.00	4.17	5.56
Roanoke, VA MSA	7	5.79	97.58	71.43	100.00	0.00	0.00	18.18	17.65
Virginia Beach-Norfolk-Newport News, VA MSA	11	9.09	96.38	63.64	81.82	0.00	18.18	5.00	3.17
Virginia Non-MSA	45	37.19	98.39	46.67	91.11	4.44	4.44	5.48	5.35

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 23.33% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: VIRGINIA									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Richmond, VA MSA	34	27,851	179	60,204	213	88,055	52.01	1	2,698
<b>Limited Review:</b>									
Blacksburg-Christiansburg-Radford, VA MSA	4	2,808	5	315	9	3,123	1.84	0	0
Charlottesville, VA MSA	5	594	32	1,921	37	2,515	1.49	0	0
Danville, VA MSA	2	2,944	2	220	4	3,164	1.87	0	0
Harrisonburg, VA MSA	1	68	12	725	13	794	0.47	0	0
Lynchburg, VA MSA	3	394	19	392	22	786	0.46	0	0
Roanoke, VA MSA	6	5,284	26	810	32	6,094	3.60	0	0
Virginia Beach-Norfolk-Newport News, VA MSA	33	28,106	71	26,128	104	54,235	32.03	2	15,183
Virginia Non-MSA	9	6,181	31	1,417	40	7,597	4.49	0	0
Statewide investments with potential to benefit one or more AAs	1	799	11	117	12	915	0.54	0	0
Statewide investments with no potential to benefit one or more AAs	12	1,898	16	142	28	2,040	1.20	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: VIRGINIA								EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Richmond, VA MSA	71.99	31	25.41	12.90	22.58	38.71	25.81	1	5	0	0	-3	-1	6.04	22.14	43.83	27.99
<b>Limited Review:</b>																	
Blacksburg-Christiansburg-Radford, VA MSA	0.80	3	2.46	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	3.60	82.76	8.18
Charlottesville, VA MSA	4.26	9	7.38	0.00	11.11	66.67	22.22	0	0	0	0	0	0	1.78	17.53	57.63	23.06
Danville, VA MSA	0.65	3	2.46	0.00	33.33	33.33	33.33	0	0	0	0	0	0	0.00	18.76	70.58	10.66
Harrisonburg, VA MSA	0.94	3	2.46	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	15.13	66.75	18.12
Lynchburg, VA MSA	1.12	3	2.46	0.00	33.33	33.33	33.33	0	2	0	0	-1	-1	3.38	11.42	66.12	19.08
Roanoke, VA MSA	2.14	8	6.56	0.00	25.00	62.50	12.50	0	0	0	0	0	0	4.02	12.58	57.22	26.04
Virginia Beach-Norfolk-Newport News, VA MSA	13.84	45	36.89	2.22	37.78	40.00	20.00	0	4	0	-1	-1	-2	4.35	23.97	42.02	29.65
Virginia Non-MSA	4.26	17	13.93	0.00	5.88	82.35	11.76	0	0	0	0	0	0	0.00	7.40	72.55	20.05

Table 1. Lending Volume

LENDING VOLUME		GEOGRAPHY: WASHINGTON				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Seattle-Bellevue-Everett, WA MD	52.90	60,138	16,679,889	13,848	577,824	149	6,064	28	115,385	74,163	17,379,162	77.51
<b>Limited Review:</b>												
Bellingham, WA MSA	2.36	2,574	578,445	701	16,102	36	453	1	438	3,312	595,438	1.59
Bremerton-Silverdale, WA MSA	4.03	4,851	1,077,146	793	35,185	7	56	2	18,342	5,653	1,130,729	2.14
Kennewick-Pasco-Richland, WA MSA	2.85	3,514	571,807	437	12,154	42	1,200	1	15,570	3,994	600,731	1.23
Lewiston, WA MSA	0.28	345	51,737	42	2,436	3	30	0	0	390	54,203	0.18
Longview, WA MSA	1.22	1,498	244,935	199	10,105	7	590	0	0	1,704	255,630	0.36
Mount Vernon-Anacortes, WA MSA	1.42	1,626	347,918	331	5,951	33	2,227	0	0	1,990	356,096	0.80
Olympia, WA MSA	3.70	4,541	957,929	637	15,375	14	749	0	0	5,192	974,053	1.21
Spokane, WA MSA	6.35	7,827	1,190,105	1,058	38,611	21	676	1	12,250	8,907	1,241,642	3.44
Tacoma, WA MD	13.56	16,941	3,640,781	2,029	60,030	30	1,878	7	20,852	19,007	3,723,541	5.60
Wenatchee-East Wenatchee, WA MSA	1.29	1,487	307,342	296	9,734	28	1,294	0	0	1,811	318,370	0.55
Yakima, WA MSA	1.94	2,217	321,557	442	12,342	52	4,379	4	16,146	2,715	354,424	0.99
Washington Non-MSA	8.10	9,398	1,726,160	1,733	44,321	228	15,383	2	3,681	11,361	1,789,545	4.39

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from April 01, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		GEOGRAPHY: WASHINGTON				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011								
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Seattle-Bellevue-Everett, WA MD	100.00	4	31,724	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	77.51
<b>Limited Review:</b>														
Bellingham, WA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.59
Bremerton-Silverdale, WA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.14
Kennewick-Pasco-Richland, WA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.23
Lewiston, WA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.18
Longview, WA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.36
Mount Vernon-Anacortes, WA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.80
Olympia, WA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.21
Spokane, WA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3.44
Tacoma, WA MD	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	5.60
Wenatchee-East Wenatchee, WA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.55
Yakima, WA MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.99
Washington Non-MSA	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4.39

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from April 1, 2009 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

GEOGRAPHIC DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: WASHINGTON				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Seattle-Bellevue-Everett, WA MD	18,527	47.74	0.49	1.07	15.58	19.01	55.45	56.03	28.48	23.89	18.97	23.31	21.07	18.98	17.51	
<b>Limited Review:</b>																
Bellingham, WA MSA	788	2.03	0.00	0.00	8.83	8.12	71.28	71.19	19.90	20.69	10.91	0.00	11.07	11.31	9.52	
Bremerton-Silverdale, WA MSA	1,390	3.58	1.75	4.24	9.31	15.54	69.62	68.56	19.32	11.65	14.94	29.90	19.31	14.59	11.20	
Kennewick-Pasco-Richland, WA MSA	1,898	4.89	2.95	4.21	13.08	9.06	55.11	59.91	28.86	26.82	14.31	29.86	14.96	14.86	11.49	
Lewiston, WA MSA	108	0.28	0.00	0.00	23.09	36.11	51.87	37.96	25.04	25.93	17.01	0.00	21.33	12.90	22.41	
Longview, WA MSA	484	1.25	2.18	2.69	10.31	12.60	66.32	70.66	21.20	14.05	18.06	22.22	23.76	17.89	15.49	
Mount Vernon-Anacortes, WA MSA	437	1.13	0.00	0.00	9.11	8.47	71.16	75.97	19.73	15.56	11.39	0.00	13.21	10.93	13.04	
Olympia, WA MSA	1,616	4.16	0.00	0.00	12.34	8.48	68.09	77.66	19.57	13.86	15.51	0.00	17.79	15.90	12.68	
Spokane, WA MSA	3,210	8.27	0.28	0.47	21.71	32.31	44.82	45.95	33.20	21.28	17.57	14.58	24.04	18.23	12.01	
Tacoma, WA MD	6,246	16.10	0.50	0.54	10.96	11.98	63.09	65.71	25.46	21.77	20.25	16.67	24.62	20.63	17.41	
Wenatchee-East Wenatchee, WA MSA	391	1.01	0.00	0.00	18.55	24.04	54.40	45.01	27.04	30.95	12.73	0.00	17.19	10.12	15.14	
Yakima, WA MSA	985	2.54	1.43	0.20	22.04	16.55	38.95	40.71	37.58	42.54	18.11	7.69	19.00	18.88	17.29	
Washington Non-MSA	2,726	7.02	0.08	0.37	10.99	8.73	71.38	65.48	17.55	25.42	13.33	23.08	13.26	13.02	14.08	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

GEOGRAPHIC DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: WASHINGTON				EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	791	45.86	0.49	0.25	15.58	14.29	55.45	51.07	28.48	34.39	13.79	6.67	11.86	13.60	15.01
<b>Limited Review:</b>															
Bellingham, WA MSA	52	3.01	0.00	0.00	8.83	5.77	71.28	76.92	19.90	17.31	6.74	0.00	4.17	6.63	8.06
Bremerton-Silverdale, WA MSA	112	6.49	1.75	0.89	9.31	14.29	69.62	56.25	19.32	28.57	13.58	0.00	16.67	11.01	21.13
Kennewick-Pasco-Richland, WA MSA	34	1.97	2.95	2.94	13.08	5.88	55.11	52.94	28.86	38.24	2.47	0.00	3.33	3.26	1.38
Lewiston, WA MSA	10	0.58	0.00	0.00	23.09	30.00	51.87	50.00	25.04	20.00	9.68	0.00	0.00	9.52	25.00
Longview, WA MSA	27	1.57	2.18	0.00	10.31	7.41	66.32	59.26	21.20	33.33	12.39	0.00	16.67	10.00	18.75
Mount Vernon-Anacortes, WA MSA	34	1.97	0.00	0.00	9.11	8.82	71.16	64.71	19.73	26.47	10.07	0.00	12.50	10.00	9.76
Olympia, WA MSA	67	3.88	0.00	0.00	12.34	7.46	68.09	79.10	19.57	13.43	9.70	0.00	11.11	11.45	2.27
Spokane, WA MSA	112	6.49	0.28	0.00	21.71	16.96	44.82	40.18	33.20	42.86	4.35	0.00	7.30	3.37	4.21
Tacoma, WA MD	199	11.54	0.50	0.50	10.96	9.55	63.09	64.82	25.46	25.13	10.62	0.00	14.29	11.78	6.95
Wenatchee-East Wenatchee, WA MSA	35	2.03	0.00	0.00	18.55	17.14	54.40	40.00	27.04	42.86	8.18	0.00	9.09	5.66	11.11
Yakima, WA MSA	48	2.78	1.43	0.00	22.04	8.33	38.95	43.75	37.58	47.92	3.45	0.00	0.00	4.62	3.76
Washington Non-MSA	204	11.83	0.08	0.49	10.99	9.31	71.38	65.20	17.55	25.00	8.16	0.00	9.64	8.20	7.56

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

GEOGRAPHIC DISTRIBUTION: HOME MORTGAGE REFINANCE															GEOGRAPHY: WASHINGTON					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Seattle-Bellevue-Everett, WA MD	40,817	53.41	0.49	0.58	15.58	13.56	55.45	54.22	28.48	31.65	17.12	19.93	20.74	17.40	15.49									
<b>Limited Review:</b>																								
Bellingham, WA MSA	1,732	2.27	0.00	0.00	8.83	9.01	71.28	68.01	19.90	22.98	8.80	0.00	10.31	8.77	8.33									
Bremerton-Silverdale, WA MSA	3,349	4.38	1.75	2.54	9.31	9.17	69.62	70.77	19.32	17.53	13.91	28.13	16.99	14.61	9.78									
Kennewick-Pasco-Richland, WA MSA	1,582	2.07	2.95	1.39	13.08	7.21	55.11	53.10	28.86	38.31	9.71	11.11	11.38	10.29	8.83									
Lewiston, WA MSA	227	0.30	0.00	0.00	23.09	17.62	51.87	57.71	25.04	24.67	16.08	0.00	19.63	16.22	13.61									
Longview, WA MSA	987	1.29	2.18	2.43	10.31	7.40	66.32	68.79	21.20	21.38	15.47	35.14	17.80	15.94	12.31									
Mount Vernon-Anacortes, WA MSA	1,155	1.51	0.00	0.00	9.11	7.10	71.16	74.46	19.73	18.44	10.81	0.00	12.29	10.98	9.89									
Olympia, WA MSA	2,858	3.74	0.00	0.00	12.34	9.59	68.09	66.90	19.57	23.51	12.58	0.00	13.58	12.55	12.27									
Spokane, WA MSA	4,505	5.89	0.28	0.33	21.71	19.13	44.82	44.79	33.20	35.74	12.29	8.93	15.08	13.47	10.25									
Tacoma, WA MD	10,496	13.73	0.50	0.36	10.96	7.90	63.09	61.11	25.46	30.63	18.11	17.28	19.25	18.56	17.01									
Wenatchee-East Wenatchee, WA MSA	1,061	1.39	0.00	0.00	18.55	16.87	54.40	52.59	27.04	30.54	12.68	0.00	13.84	13.05	11.48									
Yakima, WA MSA	1,183	1.55	1.43	0.59	22.04	13.02	38.95	36.26	37.58	50.13	12.42	12.00	17.15	12.52	11.46									
Washington Non-MSA	6,468	8.46	0.08	0.20	10.99	8.41	71.38	65.99	17.55	25.40	13.50	24.00	17.09	13.82	11.84									

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

GEOGRAPHIC DISTRIBUTION: MULTIFAMILY		GEOGRAPHY: WASHINGTON					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Seattle-Bellevue-Everett, WA MD	3	50.00	3.72	33.33	36.96	0.00	43.29	66.67	16.04	0.00	0.31	0.00	0.00	0.64	0.00	
<b>Limited Review:</b>																
Bellingham, WA MSA	2	33.33	0.00	0.00	27.18	0.00	62.25	50.00	10.58	50.00	0.00	0.00	0.00	0.00	0.00	
Bremerton-Silverdale, WA MSA	0	0.00	9.25	0.00	28.01	0.00	54.98	0.00	7.76	0.00	0.00	0.00	0.00	0.00	0.00	
Kennewick-Pasco-Richland, WA MSA	0	0.00	18.46	0.00	22.92	0.00	45.18	0.00	13.44	0.00	0.00	0.00	0.00	0.00	0.00	
Lewiston, WA MSA	0	0.00	0.00	0.00	48.58	0.00	30.70	0.00	20.73	0.00	0.00	0.00	0.00	0.00	0.00	
Longview, WA MSA	0	0.00	0.64	0.00	42.57	0.00	55.16	0.00	1.62	0.00	0.00	0.00	0.00	0.00	0.00	
Mount Vernon-Anacortes, WA MSA	0	0.00	0.00	0.00	13.16	0.00	84.67	0.00	2.16	0.00	0.00	0.00	0.00	0.00	0.00	
Olympia, WA MSA	0	0.00	0.00	0.00	31.69	0.00	66.41	0.00	1.90	0.00	0.00	0.00	0.00	0.00	0.00	
Spokane, WA MSA	0	0.00	9.33	0.00	54.66	0.00	25.88	0.00	10.14	0.00	0.00	0.00	0.00	0.00	0.00	
Tacoma, WA MD	0	0.00	8.47	0.00	29.99	0.00	52.41	0.00	9.13	0.00	0.00	0.00	0.00	0.00	0.00	
Wenatchee-East Wenatchee, WA MSA	0	0.00	0.00	0.00	38.67	0.00	51.29	0.00	10.04	0.00	0.00	0.00	0.00	0.00	0.00	
Yakima, WA MSA	1	16.67	15.70	0.00	38.09	100.00	29.23	0.00	16.99	0.00	0.00	0.00	0.00	0.00	0.00	
Washington Non-MSA	0	0.00	9.47	0.00	20.25	0.00	62.46	0.00	7.81	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO BUSINESSES															
GEOGRAPHY: WASHINGTON															
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	13,848	61.42	2.15	1.96	21.37	19.11	48.65	45.90	27.84	33.03	10.50	9.14	10.14	10.10	11.45
<b>Limited Review:</b>															
Bellingham, WA MSA	701	3.11	0.00	0.00	11.60	13.41	73.15	72.75	15.25	13.84	8.43	0.00	9.09	8.50	7.47
Bremerton-Silverdale, WA MSA	793	3.52	3.88	3.53	9.73	8.20	62.08	57.12	24.31	31.15	8.73	16.88	10.32	7.79	9.57
Kennewick-Pasco-Richland, WA MSA	437	1.94	3.97	1.14	18.66	21.51	47.66	46.45	29.70	30.89	6.26	4.29	7.83	6.31	5.37
Lewiston, WA MSA	42	0.19	0.00	0.00	33.87	35.71	47.65	38.10	18.47	26.19	7.95	0.00	8.64	6.67	10.53
Longview, WA MSA	199	0.88	1.60	2.01	19.90	26.13	62.77	58.79	15.73	13.07	8.42	18.18	9.28	8.19	7.26
Mount Vernon-Anacortes, WA MSA	331	1.47	0.00	0.00	15.02	15.41	68.86	63.44	16.12	21.15	7.47	0.00	8.14	7.46	7.08
Olympia, WA MSA	637	2.83	0.00	0.00	19.87	21.35	64.73	59.50	15.40	19.15	9.91	0.00	10.78	9.30	11.07
Spokane, WA MSA	1,058	4.69	3.44	1.89	33.32	31.95	36.19	33.74	27.05	32.42	6.33	3.69	6.49	5.85	7.01
Tacoma, WA MD	2,029	9.00	1.60	1.08	18.88	17.74	56.75	51.11	22.77	30.06	9.03	9.40	9.56	8.32	10.06
Wenatchee-East Wenatchee, WA MSA	296	1.31	0.00	0.00	23.12	24.32	57.30	54.05	19.57	21.62	5.65	0.00	6.54	5.73	4.52
Yakima, WA MSA	442	1.96	8.36	9.05	21.82	21.72	36.97	36.65	32.86	32.58	7.42	4.69	8.03	7.21	8.09
Washington Non-MSA	1,733	7.69	0.44	0.06	12.82	13.39	69.10	67.40	17.64	19.16	7.38	3.57	7.85	7.54	6.65

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

GEOGRAPHIC DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: WASHINGTON					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Seattle-Bellevue-Everett, WA MD	149	22.92	0.92	0.00	16.54	9.40	59.03	59.73	23.51	30.87	23.50	0.00	24.00	21.71	28.57	
<b>Limited Review:</b>																
Bellingham, WA MSA	36	5.54	0.00	0.00	5.71	0.00	88.05	91.67	6.23	8.33	4.58	0.00	0.00	5.19	0.00	
Bremerton-Silverdale, WA MSA	7	1.08	2.22	0.00	5.00	14.29	66.94	28.57	25.83	57.14	11.11	0.00	100.00	0.00	0.00	
Kennewick-Pasco-Richland, WA MSA	42	6.46	0.95	0.00	21.35	16.67	63.97	71.43	13.73	11.90	10.06	0.00	4.65	13.39	4.55	
Lewiston, WA MSA	3	0.46	0.00	0.00	9.41	0.00	61.18	100.00	29.41	0.00	2.17	0.00	0.00	2.86	0.00	
Longview, WA MSA	7	1.08	2.33	0.00	15.18	0.00	59.53	100.00	22.96	0.00	37.50	0.00	0.00	60.00	0.00	
Mount Vernon-Anacortes, WA MSA	33	5.08	0.00	0.00	7.40	6.06	62.66	60.61	29.93	33.33	16.87	0.00	20.00	15.91	17.65	
Olympia, WA MSA	14	2.15	0.00	0.00	17.87	7.14	65.31	71.43	16.82	21.43	25.81	0.00	12.50	33.33	25.00	
Spokane, WA MSA	21	3.23	0.37	0.00	15.86	0.00	45.01	33.33	38.77	66.67	7.79	0.00	0.00	8.11	9.09	
Tacoma, WA MD	30	4.62	0.89	0.00	12.29	0.00	62.38	63.33	24.44	36.67	27.78	0.00	0.00	28.57	29.41	
Wenatchee-East Wenatchee, WA MSA	28	4.31	0.00	0.00	17.02	10.71	60.34	60.71	22.64	28.57	9.59	0.00	5.26	10.99	8.33	
Yakima, WA MSA	52	8.00	1.18	0.00	10.25	13.46	67.86	69.23	20.72	17.31	6.33	0.00	5.26	5.26	14.29	
Washington Non-MSA	228	35.08	0.27	0.88	14.17	13.16	71.30	75.44	14.26	10.53	8.56	0.00	6.10	9.51	7.20	

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

BORROWER DISTRIBUTION: HOME PURCHASE		GEOGRAPHY: WASHINGTON					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Seattle-Bellevue-Everett, WA MD	18,527	47.74	18.50	11.65	18.70	30.56	24.54	27.90	38.26	29.90	20.54	23.85	23.58	20.46	17.57	
<b>Limited Review:</b>																
Bellingham, WA MSA	788	2.03	18.16	8.43	18.66	32.69	23.94	30.78	39.24	28.10	13.34	15.71	19.46	12.85	9.56	
Bremerton-Silverdale, WA MSA	1,390	3.58	17.45	9.10	19.02	36.34	24.52	28.90	39.02	25.65	16.48	17.39	19.78	16.51	13.26	
Kennewick-Pasco-Richland, WA MSA	1,898	4.89	20.23	12.41	18.40	34.18	21.76	29.58	39.61	23.82	16.27	17.48	20.10	17.23	12.12	
Lewiston, WA MSA	108	0.28	21.81	8.33	19.80	34.26	21.68	26.85	36.71	30.56	17.88	13.51	21.74	16.22	18.09	
Longview, WA MSA	484	1.25	20.36	10.17	17.47	36.51	23.64	27.80	38.53	25.52	19.23	19.10	24.33	20.56	14.07	
Mount Vernon-Anacortes, WA MSA	437	1.13	18.11	5.29	18.93	28.74	23.36	38.16	39.60	27.82	13.46	12.50	17.63	15.53	9.14	
Olympia, WA MSA	1,616	4.16	17.26	8.31	18.90	35.11	25.85	33.75	37.98	22.83	17.31	20.17	20.33	17.12	13.83	
Spokane, WA MSA	3,210	8.27	18.88	22.23	18.97	36.91	22.97	24.11	39.18	16.76	19.39	27.46	24.45	18.44	11.34	
Tacoma, WA MD	6,246	16.10	18.66	9.66	18.89	36.44	23.23	29.93	39.22	23.98	22.44	25.54	26.58	22.12	17.77	
Wenatchee-East Wenatchee, WA MSA	391	1.01	19.86	4.62	19.12	25.64	21.01	32.05	40.01	37.69	14.76	12.07	17.18	17.75	12.04	
Yakima, WA MSA	985	2.54	20.45	9.16	18.68	31.57	20.51	34.01	40.36	25.25	20.03	23.35	26.25	22.85	13.16	
Washington Non-MSA	2,726	7.02	19.41	6.85	18.36	25.18	22.99	31.11	39.24	36.86	15.10	14.75	17.45	17.41	12.46	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

BORROWER DISTRIBUTION: HOME IMPROVEMENT		GEOGRAPHY: WASHINGTON					EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Seattle-Bellevue-Everett, WA MD	791	45.86	18.50	10.47	18.70	21.07	24.54	30.50	38.26	37.96	14.14	15.58	13.02	15.19	13.77	
<b>Limited Review:</b>																
Bellingham, WA MSA	52	3.01	18.16	7.84	18.66	27.45	23.94	19.61	39.24	45.10	6.85	9.09	11.59	7.04	3.09	
Bremerton-Silverdale, WA MSA	112	6.49	17.45	10.81	19.02	16.22	24.52	37.84	39.02	35.14	14.16	22.22	12.70	17.14	12.26	
Kennewick-Pasco-Richland, WA MSA	34	1.97	20.23	11.76	18.40	29.41	21.76	26.47	39.61	32.35	2.49	8.82	3.28	4.65	0.67	
Lewiston, WA MSA	10	0.58	21.81	0.00	19.80	20.00	21.68	20.00	36.71	60.00	10.00	0.00	25.00	10.00	9.09	
Longview, WA MSA	27	1.57	20.36	11.54	17.47	11.54	23.64	19.23	38.53	57.69	12.50	14.29	9.52	7.14	16.33	
Mount Vernon-Anacortes, WA MSA	34	1.97	18.11	9.09	18.93	18.18	23.36	39.39	39.60	33.33	11.11	20.00	23.08	12.20	6.45	
Olympia, WA MSA	67	3.88	17.26	15.63	18.90	28.13	25.85	23.44	37.98	32.81	9.69	19.05	20.00	8.47	5.36	
Spokane, WA MSA	112	6.49	18.88	9.62	18.97	28.85	22.97	26.92	39.18	34.62	4.07	8.11	5.00	3.50	3.24	
Tacoma, WA MD	199	11.54	18.66	8.25	18.89	25.77	23.23	30.41	39.22	35.57	11.08	15.79	18.88	5.81	9.68	
Wenatchee-East Wenatchee, WA MSA	35	2.03	19.86	0.00	19.12	18.75	21.01	25.00	40.01	56.25	8.02	5.00	8.33	8.51	8.26	
Yakima, WA MSA	48	2.78	20.45	8.33	18.68	27.08	20.51	22.92	40.36	41.67	3.54	4.76	3.51	3.28	3.49	
Washington Non-MSA	204	11.83	19.41	9.63	18.36	17.65	22.99	25.67	39.24	47.06	7.68	9.09	7.19	8.47	7.33	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Washington					Evaluation Period: April 1, 2009 to December 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Seattle-Bellevue-Everett, WA MD	40,817	53.41	18.50	8.55	18.70	20.42	24.54	29.20	38.26	41.82	18.28	26.49	22.41	18.90	15.73	
<b>Limited Review:</b>																
Bellingham, WA MSA	1,732	2.27	18.16	7.81	18.66	19.78	23.94	28.43	39.24	43.98	10.21	15.56	11.74	9.39	9.63	
Bremerton-Silverdale, WA MSA	3,349	4.38	17.45	9.00	19.02	20.16	24.52	31.73	39.02	39.11	15.71	22.39	19.51	16.94	13.12	
Kennewick-Pasco-Richland, WA MSA	1,582	2.07	20.23	6.47	18.40	19.55	21.76	30.01	39.61	43.97	10.37	16.80	13.65	11.18	8.48	
Lewiston, WA MSA	227	0.30	21.81	8.08	19.80	21.21	21.68	24.24	36.71	46.46	16.95	17.50	18.28	20.18	14.83	
Longview, WA MSA	987	1.29	20.36	5.83	17.47	20.36	23.64	32.26	38.53	41.55	15.85	14.73	18.68	17.34	14.14	
Mount Vernon-Anacortes, WA MSA	1,155	1.51	18.11	6.63	18.93	17.75	23.36	30.05	39.60	45.56	11.52	16.53	12.58	11.36	10.90	
Olympia, WA MSA	2,858	3.74	17.26	8.31	18.90	20.43	25.85	32.68	37.98	38.59	14.89	22.11	16.31	15.84	12.88	
Spokane, WA MSA	4,505	5.90	18.88	10.11	18.97	22.09	22.97	29.56	39.18	38.24	13.34	16.73	15.84	13.48	11.87	
Tacoma, WA MD	10,496	13.73	18.66	6.67	18.89	19.40	23.23	29.73	39.22	44.20	20.05	25.73	21.60	21.56	18.19	
Wenatchee-East Wenatchee, WA MSA	1,061	1.39	19.86	3.58	19.12	16.93	21.01	23.66	40.01	55.84	14.19	12.50	16.85	14.47	13.59	
Yakima, WA MSA	1,183	1.55	20.45	4.99	18.68	18.67	20.51	24.34	40.36	52.00	13.85	16.33	19.02	13.10	12.83	
Washington Non-MSA	6,468	8.46	19.41	5.94	18.36	15.75	22.99	26.49	39.24	51.82	15.16	19.82	15.91	16.32	14.14	

\* Based on 2010 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

BORROWER DISTRIBUTION: SMALL LOANS TO BUSINESSES		GEOGRAPHY: WASHINGTON			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Seattle-Bellevue-Everett, WA MD	13,848	61.42	68.13	53.65	92.36	3.50	4.14	10.17	13.85
<b>Limited Review:</b>									
Bellingham, WA MSA	701	3.11	71.93	53.35	96.58	2.00	1.43	8.13	9.71
Bremerton-Silverdale, WA MSA	793	3.52	72.40	57.38	92.43	2.90	4.67	8.13	11.18
Kennewick-Pasco-Richland, WA MSA	437	1.94	69.49	52.17	94.97	3.20	1.83	6.05	9.05
Lewiston, WA MSA	42	0.19	72.62	52.38	90.48	0.00	9.52	7.72	6.45
Longview, WA MSA	199	0.88	70.97	45.73	92.96	2.01	5.03	8.00	10.26
Mount Vernon-Anacortes, WA MSA	331	1.47	71.10	54.68	97.58	0.91	1.51	7.05	8.52
Olympia, WA MSA	637	2.83	70.43	56.83	95.92	2.35	1.73	9.35	14.11
Spokane, WA MSA	1,058	4.69	69.52	55.77	93.48	2.55	3.97	6.12	7.55
Tacoma, WA MD	2,029	9.00	72.08	54.16	95.22	1.87	2.91	8.63	10.69
Wenatchee-East Wenatchee, WA MSA	296	1.31	72.16	58.11	94.93	2.36	2.70	5.28	5.98
Yakima, WA MSA	442	1.96	69.74	51.81	95.70	1.36	2.94	6.99	8.36
Washington Non-MSA	1,733	7.69	72.43	56.15	95.56	2.25	2.19	6.69	8.21

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 27.09% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

BORROWER DISTRIBUTION: SMALL LOANS TO FARMS		GEOGRAPHY: WASHINGTON			EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Seattle-Bellevue-Everett, WA MD	149	22.92	96.15	56.38	91.95	4.03	4.03	22.82	22.67
<b>Limited Review:</b>									
Bellingham, WA MSA	36	5.54	96.02	58.33	97.22	2.78	0.00	4.55	3.61
Bremerton-Silverdale, WA MSA	7	1.08	97.92	85.71	100.00	0.00	0.00	9.09	11.11
Kennewick-Pasco-Richland, WA MSA	42	6.46	92.94	50.00	95.24	2.38	2.38	9.94	8.41
Lewiston, WA MSA	3	0.46	100.00	100.00	100.00	0.00	0.00	2.13	2.38
Longview, WA MSA	7	1.08	96.50	57.14	85.71	0.00	14.29	25.00	16.67
Mount Vernon-Anacortes, WA MSA	33	5.08	94.08	36.36	84.85	6.06	9.09	16.67	10.42
Olympia, WA MSA	14	2.15	96.06	35.71	78.57	14.29	7.14	22.22	15.00
Spokane, WA MSA	21	3.23	97.14	80.95	90.48	9.52	0.00	7.50	8.62
Tacoma, WA MD	30	4.62	96.05	56.67	80.00	6.67	13.33	26.79	30.30
Wenatchee-East Wenatchee, WA MSA	28	4.31	95.72	42.86	89.29	3.57	7.14	8.54	3.28
Yakima, WA MSA	52	8.00	91.60	34.62	71.15	17.31	11.54	6.22	2.70
Washington Non-MSA	228	35.08	96.78	53.07	83.77	9.21	7.02	8.19	7.26

\* Based on 2010 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 30.84% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
GEOGRAPHY: WASHINGTON									
EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Seattle-Bellevue-Everett, WA MD	95	133,141	209	110,446	304	243,587	75.14	4	84,010
<b>Limited Review:</b>									
Bellingham, WA MSA	10	3,793	16	708	26	4,501	1.39	0	0
Bremerton-Silverdale, WA MSA	5	2,766	20	26,192	25	28,958	8.93	1	12,234
Kennewick-Pasco-Richland, WA MSA	5	1,976	17	782	22	2,759	0.85	0	0
Lewiston, WA MSA	1	94	8	135	9	229	0.07	0	0
Longview, WA MSA	1	94	7	363	8	456	0.14	0	0
Mount Vernon-Anacortes, WA MSA	2	3,533	13	501	15	4,034	1.24	0	0
Olympia, WA MSA	3	455	14	762	17	1,217	0.38	0	0
Spokane, WA MSA	5	1,642	42	1,562	47	3,203	0.99	0	0
Tacoma, WA MD	13	16,592	41	2,365	54	18,957	5.85	0	0
Wenatchee-East Wenatchee, WA MSA	4	2,517	12	332	16	2,849	0.88	0	0
Yakima, WA MSA	8	1,659	13	450	21	2,109	0.65	0	0
Washington Non-MSA	22	4,680	35	6,172	57	10,852	3.35	0	0
Statewide investments with potential to benefit one or more AAs	0	0	26	451	26	451	0.14	0	0
Statewide investments with no potential to benefit one or more AAs	0	0	5	8	5	8	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
GEOGRAPHY: WASHINGTON								EVALUATION PERIOD: APRIL 1, 2009 TO DECEMBER 31, 2011									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Seattle-Bellevue-Everett, WA MD	77.51	117	54.42	3.42	26.50	47.01	23.08	7	12	1	0	-3	-1	1.93	21.89	52.39	23.79
<b>Limited Review:</b>																	
Bellingham, WA MSA	1.59	6	2.79	0.00	16.67	83.33	0.00	0	1	0	0	-1	0	0.00	13.44	70.37	16.19
Bremerton-Silverdale, WA MSA	2.14	8	3.72	12.50	0.00	75.00	12.50	0	1	0	0	-1	0	3.15	16.39	63.80	16.66
Kennewick-Pasco-Richland, WA MSA	1.23	5	2.33	0.00	40.00	40.00	20.00	0	0	0	0	0	0	6.87	18.55	51.89	22.69
Lewiston, WA MSA	0.18	1	0.47	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	28.17	50.48	21.35
Longview, WA MSA	0.36	2	0.93	0.00	0.00	100.00	0.00	0	1	0	-1	0	0	4.85	16.59	61.75	16.81
Mount Vernon-Anacortes, WA MSA	0.80	5	2.33	0.00	40.00	60.00	0.00	0	0	0	0	0	0	0.00	9.71	74.25	16.04
Olympia, WA MSA	1.21	4	1.86	0.00	25.00	75.00	0.00	0	2	0	-1	-1	0	0.00	15.50	68.02	16.48
Spokane, WA MSA	3.44	12	5.58	8.33	25.00	50.00	16.67	0	1	0	-1	0	0	1.61	30.19	40.90	27.30
Tacoma, WA MD	5.60	19	8.84	0.00	31.58	63.16	5.26	0	0	0	0	0	0	2.73	18.13	58.48	20.44
Wenatchee-East Wenatchee, WA MSA	0.55	4	1.86	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	24.88	52.36	22.75
Yakima, WA MSA	0.99	6	2.79	16.67	33.33	50.00	0.00	0	0	0	0	0	0	3.68	29.57	38.98	27.77
Washington Non-MSA	4.39	26	12.09	0.00	23.08	69.23	7.69	0	1	0	0	-1	0	1.16	15.48	67.73	15.63