



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Capital One, National Association
Charter Number: 13688

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McLean, Virginia 22102

Office of the Comptroller of the Currency

Large Bank Supervision
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Washington, DC 20219-0001

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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Overall Community Reinvestment Act (CRA) Rating

Institution’s CRA Rating: This institution is rated **Outstanding**.

The following table indicates the performance level of Capital One, National Association (N.A) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Capital One, 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:

- Good lending activity.
- Excellent distribution of loans among geographies of different income levels.
- Adequate distribution of loans among borrowers of different income levels.
- Community development lending had a significantly positive impact on the Lending Test. In the larger assessment areas, they took a leadership role in investments that were complex and involved multiple partners. A majority of the investments served significant community development needs.
- Product innovation and flexibility had a positive impact on the Lending Test.
- Excellent level of community development investments including prior evaluation periods, which are responsive to the assessment area (AA) needs.
- The bank exhibited leadership and used an innovative and complex method to continue investing in Low Income Housing Tax Credits (LIHTCs).
- The bank’s branches are accessible to geographies and individuals of different income levels given consideration of bordering branches in middle- and upper-income geographies.

- The bank provides community development services that are responsive to the needs of the bank's AAs.
- Although this Rating included lending practices that were used by the former Chevy Chase Bank after it was acquired by COF, the volume of activity was minimal and had no impact on CONA's overall CRA performance.

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.

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

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 multi-family 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 low- and moderate-income individuals.

Community Reinvestment Act (CRA): the statute that requires the Office of the Comptroller of the Currency (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 multi-family (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% 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% of the area median income, or a median family income that is less than 50%, 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% and less than 120% of the area median income, or a median family income that is at least 80% and less than 120%, in the case of a geography

Moderate-Income: Individual income that is at least 50% and less than 80% of the area median income, or a median family income that is at least 50% and less than 80%, in the case of a geography.

Multi-family: 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 thousand 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% of the area median income, or a median family income that is at least 120%, in the case of a geography.

Description of Institution

Capital One, National Association (CONA) is an interstate bank headquartered in McLean, Virginia. CONA is a wholly-owned subsidiary of Capital One Financial Corporation (COF), a multi-bank holding company headquartered in McLean, Virginia. CONA provides various banking services to individual, corporate, and institutional clients in the United States. The bank also provides personal and corporate trust services, cash management services, investment banking and capital markets products, international banking services, and investment management services. As of December 31, 2010, CONA reported total assets of \$127 billion, total domestic deposits of \$89 billion, and Tier 1 capital of \$9.1 billion.

Significant merger and organizational changes occurred within CONA and COF during the evaluation period. In December 2006, COF acquired North Fork Bancorp. North Fork Bank was merged into CONA on August 1, 2007. In July 2007, Capital One Federal Savings Bank was merged into CONA. In the third quarter of 2007, Greenpoint Mortgage, an operating subsidiary of CONA ceased operations. In March 2008, Superior Savings of New England, N.A. was merged into CONA. Lastly, in February 2009, COF acquired Chevy Chase Bank, F.S.B. (CCB) and its affiliate, B.F. Saul Mortgage Corporation and merged it into CONA on July 29, 2009.

As of December 31, 2010, the bank operated 976 retail banking branches and 2,232 automated teller machines at 1,329 locations in eight states and the District of Columbia. CONA's retail footprint includes branches in Connecticut, Delaware, District of Columbia, Louisiana, Maryland, New Jersey, New York, Texas, and Virginia. CONA's most significant presences are in the metro areas of New York City, Washington, DC, and New Orleans.

CONA's loans represent 56% of total assets. The loan portfolio consists of approximately 44% real estate, 15% commercial loans, 29% loans to individuals and the remaining 12% to other banks, non-depository institutions, states and U.S. political subdivisions and similar type entities. Farm and agricultural loans comprise a very small percentage of the loan portfolio.

The bank's investment strategy has been to focus most of its activity toward affordable housing, primarily using Low Income Housing Tax Credits (LIHTC).

We considered loans, investments, and grants from the following affiliates and subsidiaries: Capital One Community Development Corporation II (COCDC II); Capital One National Community Development Corporation (CONCDC); Capital One Foundation; Capital One Bank (USA) National Association (COBNA), a credit card-issuing bank, and Capital One N.A. LIHTC, Inc. For a complete list of subsidiaries and affiliates and products considered, refer to Appendix A.

CONA's examination period of January 1, 2007 through December 31, 2010, includes a period of economic volatility, triggered by a liquidity crisis in the United States banking system. Throughout the United States, the housing market suffered, resulting in an increase in evictions and foreclosures and prolonged vacancies. This time period has been described as the worst financial crisis since the Great Depression and resulted in tremendous declines in consumer wealth, substantial financial commitments by governments, and a significant decline in economic activity. The bank has endeavored not to let these factors impede its ability to

help meet the credit needs in its communities, but the economic climate is a significant performance context issue for the bank.

There are no financial or legal impediments that would impact the bank's ability to meet its CRA obligation.

At the previous CRA evaluation dated April 30, 2007, CONA was rated Satisfactory.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation periods covered by this evaluation vary by AA due to the corporate activity that took place within CONA. The evaluation considers home mortgage loan products (home purchase, home improvement, home refinance, and multi-family, where applicable), small loans to businesses, retail services, and qualified community development lending, investments, and services. Evaluation dates for individual AAs are noted in Appendix A Scope of Examination and on Table 1 of each applicable table in Appendix D Tables of Performance Data.

CONA's volume of small loans to farms was insignificant, which precludes any meaningful analysis and conclusion. Small loans to farms are not part of the bank's strategic focus. Accordingly, this product was not evaluated, nor included in our analysis. Small loans to farms data is presented in Appendix D Tables of Performance Data for informational purposes, where applicable.

Data Integrity

Examiners tested the accuracy of the bank's reported data used in this evaluation. This testing revealed some errors in the reporting of farm loans in several geographies. The loans should have been reported as small loans to businesses. The errors were corrected, but peer market shares were not adjusted in the analyses. Additionally, bank management informed the OCC that the bank's CRA Small Business data submission for 2007 was unreliable and should not be used in the CRA evaluation. Community development loans, investments, and services were also reviewed to ensure their qualification and found to be reliable.

Selection of Areas for Full-Scope Review

A minimum of one AA was selected for a full-scope review in each state and multi-state metropolitan area where the bank has an office. Refer to the "Scope of Evaluation" section under each State and Multi-state Metropolitan Area Rating section (as applicable) for details regarding how the area was selected.

Ratings

The bank's overall rating is a blend of the multi-state metropolitan area ratings and state ratings. However, performance in both the New York-Northern New Jersey-Long Island Multi-state Metropolitan Area, the Washington, DC Multi-state Metropolitan Area, and the State of Louisiana were weighted considerably more than the other states and drives the overall rating. This reflects the fact that 90% of the bank's deposits are booked in branches located in these areas. Likewise, CONA's lending volume and branch locations are most heavily concentrated therein.

The multi-state metropolitan area ratings and state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State and Multi-state

Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Community Contacts

OCC Community Affairs Officers updated or completed contacts specifically related to this evaluation in key AAs during the first quarter of 2010. Additionally, we reviewed information from contacts made during 2009 and 2010 with community groups, local government leaders, realtors, or business leaders within the bank's various AAs. These interviews were made with low-income housing specialists, community action groups, small business development organizations, and social service groups. Relevant comments were included as appropriate in our performance context considerations. Information from community contacts for the full-scope areas is summarized, as needed, in Appendix C Market Profiles For Full-Scope Areas.

Other Information

Lending Gap Analysis

We reviewed summary reports and maps and analyzed CONA's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. All of the bank's AAs consist of whole geographies, meet the requirements of the CRA regulation, and do not arbitrarily exclude any low- or moderate-income areas.

In/Out Ratio

This analysis was performed at the bank level and does not include affiliate lending being considered under the other performance criteria. During the evaluation period, 81% of the bank's loans to small businesses were originated within the AAs. Of the bank's home mortgage loans, 40% were originated in the bank's AAs. A further breakdown reveals 89% of home purchase, 33% of home improvement, and 90% of home refinance loans were originated in the AAs. A large majority (80%) of home mortgage loans originated during the evaluation period are attributed to a nationwide telemarketing home improvement program. Therefore, many of the originations were in markets where the bank did not have a branch footprint. This performance was factored into the overall analysis of the geographic distribution of lending by income level of geography.

Fair Lending or Other Illegal Credit Practices Review

This Performance Evaluation (PE) was not impacted by fair lending issues noted at the former Chevy Chase Bank prior to its acquisition by COF. The underlying issues were initially self-identified by COF fair lending bank associates shortly after Chevy Chase Bank was acquired by COF but before the merger into CONA on July 29, 2009. Our analysis determined that CONA took appropriate actions to address the identified issues.

After the evaluation period but prior to the issuance of this PE, a fair lending related complaint was filed against CONA. It is currently under investigation. The impact of this complaint is uncertain and is therefore excluded from this evaluation.

Multi-state Metropolitan Area Rating

New York-Northern New Jersey-Long Island, NY Multi-state Metropolitan Area Rating

CRA rating for the New York-Northern New Jersey-Long Island, NY Multi-state Metropolitan Statistical Area (MMA)¹: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent lending activity, given competition and the business lending strategy.
- Excellent distribution of loans by income level of geography.
- Adequate level of distribution among borrowers of different income levels.
- Community development lending had a significantly positive impact on the Lending Test.
- Product flexibility had a positive impact on the Lending Test.
- An excellent level of community development investments.
- The bank's branches are accessible to geographies and individuals of different income levels given the level of branches located in low- and moderate-income geographies and the proximity of other branches to low- and moderate-income geographies.
- An excellent level of community development services that are responsive to the needs of the bank's AA.

Description of Institution's Operations in New York- Northern New Jersey-Long Island, NY MMA

On August 1, 2007, North Fork Bank was merged into CONA. The merger added four new AAs that make up the New York-Northern New Jersey-Long Island, NY MMA. They are: NYC Metro AA (all counties in the New York-White Plains-Wayne Multi-state MD excluding Putnam County), Edison AA (entire MD), Newark AA (excludes Hunterdon and Sussex counties) and the Nassau/Suffolk AA (entire MD).

CONA operates 353 branches and had \$36.6 billion of deposits in the MMA. These deposits represent 41.6% of the bank's total domestic deposits. In terms of deposit market share,

¹ This rating reflects performance within the multi-state metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multi-state metropolitan area.

CONA ranks seventh with nearly 4%, compared to 32% held by JP Morgan Chase, 9.4% held by Bank of America, and 7.5% held by Citibank. There are 230 FDIC insured depository institutions in the rating area, providing strong competition for the bank.

Refer to the market profile for the New York-Northern New Jersey-Long Island, NY MMA in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in New York-Northern NJ-Long Island, NY MMA

We conducted a full-scope review of the NYC Metro AA. This AA accounts for the largest percentage of deposits (58%), loans (53%), and branches (56%) in the MMA. The evaluation period for home mortgage lending is August 1, 2007 to December 31, 2010, while the evaluation period for small loans to business is January 1, 2008 to December 31, 2010.

We evaluated all home mortgage products, including multi-family loans in the NYC Metro AA and small loans to businesses. For the Lending Test, small business lending received greater weight than home mortgage, based on the volume of lending and the bank's lending strategy. Home mortgage lending has not been a focus of the bank's lending strategy in the MMA. Prior to the merger, North Fork Bank was primarily a small business lender.

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, NY MMA is rated Outstanding. Based on the full-scope review, the bank's performance in the NYC Metro AA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the New York-Northern New Jersey-Long Island, NY MMA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the NYC Metro AA is excellent, considering the strong competition in the market for all types of loans and the business strategy of the bank.

CONA ranks sixth in deposits with nearly a 3% market share. Market share comparison for lending is only applicable for home improvement and small loans to businesses. The bank has insignificant market share for overall home mortgage including, home purchase, home refinance, and multi-family lending in the AA. For home improvement lending, CONA ranks fifth with a 6.25% market share.

In this AA, there is very strong competition for home mortgage lending. There are 671 mortgage lenders, many without a depository presence. There are 171 depository institutions in the AA. Additionally, home mortgage lending is not a primary business focus of the bank in the AA.

For small loans to businesses, CONA ranks fourth with nearly a 6% market share by number of loans. Business lending is one of the bank's primary business focuses. The nationwide credit card lenders ahead of CONA by number of loans have a combined market share of 71% and individual market shares ranging from 8% to 42%. In the AA, there are 210 lenders making small loans to businesses.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is excellent. This is based on both excellent distribution for home mortgage loans and small loans to businesses.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the New York-Northern New Jersey-Long Island, NY MMA 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.

The geographic distribution of home mortgage loans in the New York City AA is excellent.

The distribution of home purchase, home improvement, and home refinance loans is excellent. The bank's percentage of lending for each of the home mortgage products exceeded the percentage of owner-occupied housing in both low- and moderate-income geographies. For home improvement loans, the market share in both low- and moderate-income geographies exceeds the bank's overall market share. Market share for home purchase and home refinance loans are too small for any meaningful analysis.

The distribution of multi-family loans is good. The percentage of lending in low- and moderate-income geographies is somewhat below the percent of multi-family units in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is excellent.

The percentage of small loans to businesses made in both low- and moderate-income geographies exceeds the percentage of businesses located within these geographies. The market share in low-income geographies significantly exceeds and in moderate-income geographies exceeds the bank's overall market share.

Distribution of Loans by Income Level of the Borrower

The distribution of loans to borrowers of different income levels is adequate. This is based on good distribution of home mortgage loans and adequate distribution of small loans to businesses.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the New York-Northern New Jersey-Long Island, NY MMA 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.

The distribution of home mortgage loans is good, considering the impact that the economic downturn had on housing, the high cost of housing, the fact that the majority (62%) of housing is rental, and the high household poverty level of 17% in the AA. Recent data from the National Association of Realtors shows that the median sales price of an existing single family home in the AA at the end of 2010 was \$450 thousand. The updated median family income for the AA indicates that a low-income individual earns less than \$33 thousand a year and a moderate-income individual earns less than \$53 thousand a year making homeownership very difficult for most LMI individuals.

For all products, the percentage of loans made to low-income borrowers was well below the percentage of low-income families. For home purchase and home refinance, the percentage of loans to moderate-income borrowers slightly exceeded the percentage of such families. For home improvement loans, the percentage of loans to moderate-income borrowers was somewhat below the percentage of such families. The market share of home improvement loans to low- and moderate-income borrowers significantly exceeded the bank's overall market share. Market share for home purchase and home refinance loans was too small for a meaningful analysis.

Small Loans to Businesses

Refer to Table 11 in the New York-Northern New Jersey-Long Island, NY MMA 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.

The distribution of small loans to businesses of different sizes is adequate.

The percentage of loans made to businesses with revenues of \$1 million or less is much lower than the percentage of such businesses however, 60% of the loans reported no revenues. In this AA, the majority of the lending is done through credit cards and a legacy credit line product, for which business revenue is not considered in the underwriting. The bank's market share to businesses with revenue of \$1 million or less exceeds the bank's overall market share.

Community Development Lending

Refer to Table 1 Lending Volume in the New York-Northern New Jersey-Long Island, NY MMA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. The table includes all community development loans, including multi-family loans that also qualify as such. In addition, Table 5 Geographic Distribution of Multi-Family Loans includes geographic lending data on all multi-family loans, including those that qualify as community development loans, but without separately identifying the loans.

Community development lending in the NYC Metro AA is excellent and has had a significantly positive impact on the Lending Test in the AA. CONA originated 300 community development loans totaling \$1.1 billion. The loans reflect a variety of community development purposes such as affordable housing, revitalization/stabilization of low- and moderate-income geographies, and funding for organizations providing community services targeted to low- and moderate-income individuals and families. For example, CONA originated a series of community development loans in conjunction with state housing organizations that provide affordable housing using LIHTCs.

Following are two examples that illustrate the complexity and responsiveness of CONA's community development loans.

- CONA provided \$13.3 million in construction loans to a non-profit organization to finance the two phases of a mixed-use development in Brooklyn, NY. The development includes 116 affordable residential rental units, and retail/commercial space. It represents the final phases of a multifaceted brownfield redevelopment effort, and is part of a larger NYC Department of Housing Preservation and Development (HPD) urban renewal plan. In addition, the complex financing structure included (for the two phases) \$14 million from 15 state and local government sources. All residential units are affordable to LMI households, and will likely remain affordable as the sponsor of the development is a non-profit organization whose mission includes providing affordable housing to LMI individuals. When the apartments are completed, they will serve as the physical gateway to the larger 6.7-acre redevelopment that, in its entirety, will contain over 500 units of affordable rental and for-sale housing.
- CONA has made a major effort to combat poverty, foster entrepreneurship and economic development, and provide services to the unbanked, through its support of an international organization that provides micro-financing to entrepreneurs living in poverty. CONA and CONCDC provided \$1 million in financing originally to be used to aid the organization's expansion into the Washington, DC market; however, when it was unable to secure additional funding to support this expansion, the funds were instead used to support its ongoing operations in New York City.

Other Loan Data

CONA issued eight letters of credit (LC) totaling \$124 million, and two leases totaling \$11 million, in the AA that have a community development purpose. These transactions are considered as other loan data and listed in Table 1 Other Products in the New York-Northern New Jersey-Long Island, NY MMA section.

Many LIHTC developments in the AA must utilize a credit enhancement structure involving a LC. The following is an example that illustrates complexity and responsiveness of CONA's community development LC:

- The bank issued a \$21.95 million irrevocable direct-pay LC to a nationally recognized non-profit organization devoted to serving and advocating for men and women exiting the criminal justice system. CONA's financing supported the construction of a 114-unit

affordable housing development that will expand the organization's existing operations in New York City. This complex and innovative transaction also involves eight sources of public funding that have a variety of requirements. All units are affordable to LMI households, with a preference for formerly incarcerated individuals; 63 of the units are for formerly homeless tenants. Accordingly, a critical component is the comprehensive array of on-site services available to residents, including substance abuse treatment, health services, education, and career development.

Product Innovation and Flexibility

CONA's product flexibility had a positive impact on the Lending Test.

The bank offers flexible loan products that support affordable housing for low- and moderate-income borrowers, including the bank's Community Home Buyers (CHB) portfolio product. This product serves LMI homebuyers who would otherwise be unable to purchase a home by providing expanded underwriting criteria, grants, and subsidies. The CHB product is also available to borrowers purchasing homes in low- and moderate-income geographies.

As a member of the New York Mortgage Coalition (NYMC), the bank lends to LMI homebuyers who are referred by non-profit NYMC members for the bank's CHB product

The bank originated 41 CHB loans totaling \$5.6 million during the examination period in this AA. This product is responsive to the needs of low- and moderate-income families purchasing homes in a very high-cost real estate market.

CONCDC offers flexible loan facilities to Community Development Financial Institutions (CDFI) and other non-profit entities engaged in economic development, affordable housing, and social services. For example, in the NYC Metro AA, CONCDC provided a flexible loan of \$500 thousand to a CDFI that provides interest-free financing to other CDFIs. CONCDC's loan enabled the CDFI to continue its Cash Flow Loan Program during a time of heavy demand. Through this program, the CDFI makes short-term loans to other CDFIs awaiting payments on city, state, or federal contracts or grants.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Edison, Newark, and Nassau/Suffolk AAs is not inconsistent with the bank's overall Outstanding performance under the Lending Test in New York-Northern New Jersey-Long Island, NY MMA. Refer to the Tables 1 through 13 in the New York-Northern New Jersey-Long Island, NY MMA section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the New York-Northern New Jersey-Long Island, NY MMA is rated Outstanding. Based on a full-scope review, the bank's performance in the NYC Metro AA is excellent.

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

CONA has an excellent level of qualified investments and grants, exhibits an excellent responsiveness to the community development needs in this AA, and makes extensive use of innovative and/or complex investments to support community development initiatives.

CONA made 643 current and prior period investments and grants totaling \$541.6 million in this AA. During the current evaluation period, CONA originated 625 qualified investments totaling \$494.4 million in this AA. Of these, 66 investments, totaling \$476.5 million provided 7,054 units of affordable housing. In addition, the bank made a \$13 million investment in CONCDC. Of this \$13 million, \$7 million directly benefited this AA and \$2 million benefitted a broader statewide area with potential to benefit one or more of CONA's AAs. CONCDC focuses on economic development and assists in the creation, development, and expansion of small businesses across the bank's footprint. The remaining current investments consist of 558 qualified grants totaling \$10.6 million. These grants were made to a variety of community development organizations, projects, and funds that support affordable housing or community services for primarily low- and moderate-income households, small business development, or revitalization and stabilization of low- and moderate-income geographies.

In addition to current period investments, CONA made 18 prior period qualified investments that remain outstanding and with a combined book value of \$47 million as of December 31, 2010. These prior period investments continue to provide value to the AA and show the bank's continuing commitment to help meet the community needs of the area.

The following examples demonstrate CONA's leadership, excellent responsiveness to the community development needs in the area, innovativeness, and strong commitment to this AA:

- In 2010, CONA provided a \$9 million LIHTC investment to help finance a 76 unit affordable, supportive housing development in Bronx, NY. This project links affordable housing for formerly homeless people with mental illness or chemical addiction and the supportive services that are needed to help them live more independent and stable lives. This project required four layers of financing, making this a complex transaction, and creative structuring was required due to the financing restrictions imposed by the NYC HPD Supportive Housing Program.
- In 2010, CONA provided a \$15.3 million LIHTC investment for an affordable, supportive housing development in Brooklyn, NY. All 161 units are for low- and moderate-income households, including formerly homeless individuals and others with special needs. CONA was engaged as the sole tax credit equity investor only four weeks before closing. The quick turnaround was needed because the original syndicator withdrew from the transaction. Once CONA became the investor in this development, the bank developed a creative structure within a short time frame that enabled the transaction and the development to proceed. The bank showed excellent responsiveness, leadership, and flexibility by stepping into the role of equity investor and closing the transaction within an unusually short timeframe.

- In 2009 and 2010, CONA provided LIHTC investments, totaling \$49 million, for two phases of affordable housing in a low-income geography in the Bronx. This project was part of a broader HPD urban renewal plan for the South Bronx, and it created a total of 474 units of affordable housing to replace a blighted three-block area. This transaction was complex and required multiple sources of financing, including tax exempt bonds that were issued by the NYC Housing Development Corporation. The bonds were credit enhanced in the form of \$41 million in construction stand-by letters of credit, provided by CONA. Further, the bank used its proprietary fund to close the transactions promptly. As the sole tax credit equity investor in the development, CONA provided stability in a volatile credit environment when many multi-investor funds were not closing transactions due to an insufficient number of investors.

CONA also made four investments in prior periods that were targeted to a statewide area with potential benefit to one or more AAs. These four prior period investments have a combined current book value of approximately \$11.7 million as of December 31, 2010.

The bank made four LIHTC investments, totaling \$5.5 million, in the broader regional New York area during the evaluation period. These investments did not benefit the bank's AA and have no potential to benefit the bank's AA; however, the bank received positive consideration for these investments because the needs of their AAs have been adequately met. These investments enhanced the bank's overall performance under the Investment Test.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Edison and Newark AAs is not inconsistent with the bank's overall Outstanding performance under the Investment Test in the New York-Northern New Jersey-Long Island, NY MMA. In the Nassau/Suffolk AA, the bank's performance is weaker, but good, than the overall performance of Outstanding under the Investment Test. The weaker performance did not impact the overall New York-Northern New Jersey-Long Island, NY MMA rating. Refer to Table 14 in the New York-Northern New Jersey-Long Island, NY MMA 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 New York-Northern New Jersey-Long Island, NY MMA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the NYC Metro AA is good.

Retail Banking Services

Refer to Table 15 in the New York-Northern New Jersey-Long Island, NY MMA 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.

CONA's delivery systems are accessible to all portions of the full-scope AA.

In the NYC Metro AA, the distribution of CONA's branches in low-income geographies is less than the population living in such geographies. However, when giving consideration to branch locations that are in close proximity to low- and moderate-income geographies, the accessibility of CONA's branches to low- and moderate-income geographies improves and is considered good.

Several of CONA's branches that are not located in LMI census tracts nonetheless are accessible and serve LMI populations and geographies. Besides being within walking distance of these low- and moderate-income geographies, many branches are located in areas with easy accessibility by subway, bus, or ferry. Also, many of these branches are located in busy business districts where people work or in commercial strip malls where local residents go to shop. Eighty-seven branches in middle- and upper-income geographies are located within one mile of a moderate-income geography. Additionally, 47 of these branches are located within one mile of a low-income geography.

The bank's record of opening and closing branches has improved the accessibility of its delivery systems. The bank had net increases of four branches in low-income geographies and three branches in moderate-income geographies during the examination period.

The bank's alternative delivery systems enhance the bank's overall delivery of services to its AA. CONA provided information demonstrating that these other alternative delivery systems were effective at serving customers living in low- and moderate-income geographies in the AA. Specifically, 41% of customers living in LMI geographies in the AA used an ATM during a 6-month period analyzed by the bank, compared to 30% of customers living in non-LMI geographies in the same time period. In addition, 18% of customers living in LMI geographies in the AA used online banking and 28% used bank-by-phone (compared to 19% and 26%, respectively, of customers living in non-LMI geographies in the AA) during a 6-month period analyzed by the bank.

CONA's hours and services offered throughout the AA do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies and individuals. Hours are generally 8:30 a.m. to 5:30 p.m. Most branches are open Saturday and six branches are open Sunday.

Community Development Services

The bank provides an excellent level of community development services. The services were responsive to identified needs in the AA. Bank associates were involved with 188 different organizations. The distribution of services is 10% affordable housing, 78% community services and 12% economic development. Eleven bank associates hold leadership positions as board or committee members of community development organizations. Highlights of community development services that benefited the NYC Metro AA include the following:

Student-Run Branch Program

The bank established two student-run branches in high schools in underserved areas in Bronx and Harlem. Student bankers receive training, obtain hands-on experience as tellers and

customer service representatives, and teach other students the importance of budgeting and saving. This is responsive to the need for comprehensive financial education in public schools serving low- and moderate-income students. Fifty-four students have participated in the student banker programs since 2007.

Grameen Bank

The bank assisted small business owners in gaining access to financing and building entrepreneurial skills through mentoring programs and its partnership with Grameen Bank. A bank associate in CONA's Community Development Banking group serves as a member of Grameen's National Advisory Board as well as serving on the Finance and Development Committee. The Advisory Board provides input on program development and fundraising activities. The bank also worked in partnership with Grameen Bank to offer micro businesses access to savings accounts at the Wyckoff Branch in Brooklyn. The partnership is responsive to the economic development of low- and moderate-income geographies and small businesses.

Restored Homes Housing Development Finance Corporation (RHHDFC)

RHHDFC, a not-for-profit corporation, was established to respond to the growing foreclosure crisis in New York City. They successfully negotiated an agreement with U.S. Department of Housing and Urban Development to purchase foreclosed home at discounted prices, renovating the homes and then selling them to low- and moderate-income buyers. The bank has assisted Restored Homes by providing technical assistance in their planning, strategy and purchase of homes. A bank associate serves as the Board President and led the strategic planning process which positioned RHHDFC to concentrate its efforts on expanding bank-owned foreclosures in designated areas to anchor stabilization efforts. Through year-end 2010, the bank facilitated the purchase and rehabilitation of 99 foreclosed properties in low- and moderate-income geographies with high concentrations of foreclosed homes.

New York State Banking Development District Program

This program encourages banks to establish branches in underserved neighborhoods. Three bank branches have the Banking Development District designation in under-served neighborhoods. They are located in the Lower East Side in Manhattan, in East Harlem in Manhattan, and in Central Brooklyn. At these branches, the bank offers reduced insufficient fund fees, waives foreign ATM fees, and emphasizes financial education. The Lower Manhattan and Harlem branches are located within five blocks of over 23,000 public housing residents. In response to a need for those tenants, and to encourage residents to utilize mainstream banking services, the bank successfully implemented a program to accept rent payments from non-customers at the two branches. The bank also successfully encouraged area residents to discuss checking and savings accounts with bank associates which resulted in 1,322 new accounts opened at the two branches.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Nassau/Suffolk AA is stronger than the bank's overall High Satisfactory performance due to

the distribution of branches in low- and moderate-income geographies. In the Edison and Newark AAs, the bank's performance is not inconsistent with the overall performance of High Satisfactory due to the distribution of branches in low- and moderate- income geographies. Refer to Table 15 New York-Northern New Jersey-Long Island, NY MMA in Appendix D for the facts and data that support these conclusions.

Multi-state Metropolitan Area Rating

Washington, DC-Maryland-Virginia Multi-state Metropolitan Area Rating

CRA Rating for Washington, DC-Maryland-Virginia MMA²:	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:

- Good lending activity, given the growth of the AA over the evaluation period.
- Good geographic distribution of loans.
- Adequate distribution of loans by borrower income.
- Community development lending had a positive impact on the Lending Test.
- Product flexibility had a positive impact on the Lending Test.
- Excellent level of community development investments responsive to the needs of the AA.
- The bank's branches are accessible to geographies and individuals of different income levels given the level of branches located in low- and moderate-income geographies and the proximity of other branches to low- and moderate-income geographies.
- CONA provides a good level of community development services.

Description of Institution's Operations in Washington, DC-Maryland-Virginia MMA

On July 30, 2009, CCB and its affiliate B.F. Saul Mortgage Corporation were merged into CONA. The merger significantly expanded CONA's presence in the Washington, DC-Maryland-Virginia MMA, expanded the existing AA, and added a new AA consisting of the entire Bethesda-Rockville-Frederick, MD. Prior to the merger, CONA had a single office located in Northern Virginia.

CONA now operates 210 branches in the MMA, including 141 in the Washington, DC AA and 69 in the Bethesda AA. Total deposits of \$26.6 billion represent 29.9% of the bank's total domestic deposits. The bank ranks second in the MMA with an unadjusted deposit market

² For institutions with branches in two or more states in a multi-state metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multi-state metropolitan area. Refer to the multi-state metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

share of 16.1%. A significant portion of the Washington, DC AA deposits reflect broker and internet deposits that are established in the main office located in Northern Virginia.

The size and demographics of the AA changed significantly with the merger. Prior to the merger, the bank's AA in Northern Virginia consisted of 173 census tracts, including one low- and thirteen moderate-income tracts. The current Washington, DC AA consists of 797 census tracts, including 71 low- and 195 moderate-income census tracts.

Refer to the market profile for the Washington, DC-Maryland-Virginia MMA in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Washington, DC-Maryland-Virginia MMA

We conducted a full-scope review of the Washington, DC AA. This AA accounts for the largest percentage of deposits (72%), loans (79%), and branches (67%) within the MMA. The evaluation period for home mortgage lending is July 1, 2007 to December 31, 2010, while the evaluation period for small loans to business is January 1, 2008 to December 31, 2010. All market share data for 2009 includes CCB and its affiliate.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Washington, DC-Maryland-Virginia MMA is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Washington, DC AA is good.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the Washington, DC-Maryland-Virginia MMA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Washington, DC AA is good.

During the entire evaluation period, the bank originated 4,574 home mortgage loans (1,389 home purchase, 638 home improvement, and 2,545 home refinance) and 7,118 small loans to businesses. Over 80% of the home purchase and home refinance loans and nearly 33% of the home improvement loans are attributed to the post-merger period. In the early part of the evaluation period, the bank had a nationwide telemarketing program for its home improvement loans, which accounted for the majority of the home improvement volume. Additionally, nearly half of the small loans to businesses are attributed to the post-merger period.

In the AA, CONA has a deposit market share of 14.4% and ranks second among 82 depository institutions. In overall home mortgage lending, the bank ranks sixteenth with a 1.3% market share in a very competitive market of 810 lenders. CONA ranks sixteenth in home purchase

lending with a 1% market share, ranks fourth in home improvement lending with an 8.2% market share, and ranks fifteenth in home refinance lending with a 1.3% market share.

For small loans to businesses, CONA ranks ninth with a 3.3% market share among 146 lenders. Four nationwide credit card lenders dominated the market with a combined market share of 64%. Their individual market shares ranged from 8.2% to 32.4%.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is good after taking into consideration the change in demographics of the AA following the merger of CCB. This is based on good distribution of both home mortgage and small loans to businesses.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Washington, DC-Maryland-Virginia MMA 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.

The distribution of home purchase loans is excellent. The percentage of loans made in low-income geographies exceeded and in moderate-income geographies was near to the percentage of owner-occupied housing in those geographies. The bank's market share in low-income geographies exceeded and in moderate-income geographies substantially met the overall market share.

The distribution of home improvement loans is adequate. The percentage of loans made in low-income geographies was substantially below and in moderate-income geographies was below the percentage of owner-occupied housing in those geographies. The bank's market share in low-income geographies exceeded and in moderate-income geographies met the overall market share.

The distribution of home refinance loans is good. The percentage of loans made in low-income geographies exceeds and in moderate-income geographies is below the percentage of owner-occupied housing in those geographies. The bank's market share in low-income geographies exceeded and in moderate-income geographies was below the overall market share.

Small Loans to Businesses

Refer to Table 6 in the Washington, DC-Maryland-Virginia MMA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good when taking into account the change in demographics of the AA following the merger of CCB. Prior to the merger, there were very few businesses located in the one low-income geography. Over the evaluation period, the percentage of loans made in both low- and moderate-income geographies was below the percentage of businesses located in those geographies.

Distribution of Loans by Income Level of the Borrower

The distribution of loans to borrowers of different income levels is adequate. This is based on good distribution of home mortgage loans and adequate distribution of small loans to businesses.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Washington, DC-Maryland-Virginia 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.

The overall distribution of home mortgage loans is good, given the high cost of housing in the Washington, DC AA. Although home prices have declined from their peak, there remains an affordability gap between the median income of the AA and the median home price. With a median home price of \$331,100 at the end of 2010, home ownership remains very difficult for most low-income and many moderate-income persons, especially in Washington, DC.

For home purchase and refinance loans, the percentage of loans made to low-income borrowers was somewhat below, and for home improvement loans was well below the percentage of low-income families, respectively. For all three product types, the percentage of loans to moderate-income borrowers exceeded the percentage of such families. The market share to low- and moderate-income borrowers for all loan types either exceeded or substantially met the bank's overall market share.

Small Loans to Businesses

Refer to Table 11 in the Washington, DC-Maryland-Virginia MMA 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.

The distribution of small loans to businesses of different sizes is adequate. The majority of small loans to business are through CONA's credit card affiliate for which business revenue was not a determining factor in the credit decision. Nearly 39% of the loans in the AA did not have revenue information. The bank's market share to businesses with revenue of \$1 million or less exceeds its overall market share.

Community Development Lending

Refer to Table 1 Lending Volume in the Washington, DC-Maryland-Virginia MMA 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 multi-family 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. However, Table 5 does not separately list community development loans.

Community development lending in the Washington, DC AA had a positive impact on the Lending Test in the Washington, DC-Maryland-Virginia MMA. CONA originated 12 loans totaling \$143 million in the AA. This is a strong volume, particularly in light of the fact that these loans were originated within a relatively short time after CONA's acquisition of CCB. This reflects a high level of responsiveness by CONA, as it normally takes several years for a bank to become an established community development lender in a competitive market such as this AA.

Eight of the community development loans totaling \$71 million supported the creation or rehabilitation of 831 affordable housing units, which is a critical need in the AA. Several of these loans were to non-profit developers thereby increasing the likelihood of permanent affordability. The remaining community development loans supported community revitalization and/or economic development. Some examples of the complexity, innovativeness, and responsiveness of bank's community development loans are presented below:

- In September 2010, CONA provided \$10.3 million in financing for the demolition of aged structures, and the construction of an affordable housing development located in a low-income geography in southeast Washington, DC. The 99-unit development is a component of the District of Columbia government's New Community Initiative, a large-scale revitalization effort. Of the 99 units, 35 will be reserved for low-income households earning 30% or less of Adjusted Median Income (AMI). The remaining 64 units will be reserved for low- and moderate-income households earning 60% or less of AMI. The development is innovative not only because it will house both seniors and families, but will also have numerous environmentally responsible elements which will help lower the development's operating costs and maintain affordability. In addition, an adjacent community center will provide supportive services including a medical clinic, social services center, dining room, and bookstore, among others. This complex transaction involved four sources of public financing, including two bond issuances. Initially, CONA entered the transaction as a participating bank, but stepped into the role of lead bank when the original lead realized that it did not have the capacity to handle the complexity of the transaction. This transaction is highly responsive as it will provide affordable, safe housing for low- and moderate-income seniors and families, and help revitalize a low-income geography long blighted by old public housing and urban decay.
- In June 2010, CONA provided a \$7.6 million loan to fund the construction and permanent financing for a 90-unit affordable housing property in Arlington, VA. All of the units will be affordable to low- and moderate-income families earning up to 60% of area median income, and nine units will be reserved for participants in Arlington County's Supportive Housing Program. Other funding sources were provided by Arlington County and the Virginia Housing Development Authority (VHDA). CONA showed flexibility by expediting its regular processing procedures, thereby allowing the developer to meet the established timetable for closing the transaction and funding of the tax credits. Without CONA's efforts to expedite closing, the tax credits would not have been available and the deal would have had a large gap in funding. The construction of this housing development addresses an important community need, as it will replace 24 apartments lost through a land trade and add 66 new apartments to Arlington's supply of affordable rental housing. In addition, the development is located in the growing Ballston corridor, which has seen the loss of many affordable units to rapid urbanization and conversion of rental units to high-end, for-sale

condominiums. The development's location provides ready access to everyday community services, as it is located within walking distance of bus lines and Metro lines providing access to employment centers.

- In August 2010, CONA provided a non-profit developer a \$13.6 million construction loan to fund the renovation of a 204-unit development in Alexandria, VA. A majority of the units (164) will be affordable to low- and moderate income households. The Washington, DC metropolitan area has seen a reduction in affordable units as property values significantly increased and older communities were converted to high-end for-sale housing. CONA is helping to preserve affordable housing in an area of extreme need for low- and moderate-income residents.

Other Loan Data

In addition, CONA issued one LC for \$3.8 million and one lease for \$35 million in the AA that have a community development purpose. These are considered as other loan data and listed in Table 1 Other Products.

The LC was part of a complex affordable housing transaction, involving multiple sources of funding from the bank, to support a development in Washington, DC. This transaction is described below in the Investment Test section.

Product Innovation and Flexibility

CONA's product flexibility had a positive impact on the Lending Test.

The bank offers flexible loan products for affordable housing, including loans made through the Washington, DC Bond Program and the VHDA.

The DC Bond Program supports below-market rate loans to first-time homebuyers. The bank originated eight loans totaling \$2.2 million to low- or moderate-income borrowers and/or in low- and moderate-income geographies under this program during the examination period.

The VHDA is a state government-sponsored lender that offers loan programs to first-time homebuyers and those who have not owned a home in the past three years. In this AA, CONA originated 19 VHDA loans totaling \$2.9 million to low- and moderate-income borrowers or in low- and moderate-income geographies during the examination period.

CONCDC offers loan facilities with flexible terms to CDFIs and other non-profit entities engaged in economic development, affordable housing, and social services. Examples of these types of loans are as follows:

- In 2010, CONCDC originated a \$200 thousand pre-development loan with a three-year term to a Washington, DC-based non-profit housing developer. The loan will pay for pre-development costs associated with the redevelopment of a 67-unit rental property for low- and moderate-income households in a moderate-income geography in Washington, DC. The funding will also allow the developer to secure a 9% LIHTC allocation, LIHTC and historic tax credit investors, and an FHA-insured loan. The bank's willingness to offer pre-

development funding at favorable interest rates is responsive to non-profit organizations, as this type of financing enables them to pay their pre-development costs without committing their own limited capital to long-term transactions.

- In 2009, the bank embarked on collaboration with a community based economic development corporation (EDC) in the Adams Morgan section of Washington, DC and Wheaton, Maryland. The EDC provides services in three fields—small business development, homeownership counseling, and affordable housing preservation. The CONA-EDC partnership is focused on micro-lending to expand the availability of credit to small businesses that are not yet bankable. CONA's small business channel originated a flexible small business line of credit for \$500 thousand to help ensure that the EDC has the funds to meet the demand for micro-loans. This facility is lower cost than the EDC's prior loan from a consortium, which reflects the bank's willingness to provide flexible terms to meet community credit needs

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the Lending Test in the Bethesda AA is stronger than the bank's overall High Satisfactory performance under the Lending Test in the Washington, DC-Maryland-Virginia MMA. Bethesda had a better geographic distribution of small loans to businesses and better borrower distribution of home mortgage loans. Refer to the Tables 1 through 13 in the Washington, DC-Maryland-Virginia MMA section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the Washington, DC-Maryland-Virginia MMA is rated Outstanding. Based on a full-scope review, the bank's performance in the Washington, DC AA is excellent.

Refer to Table 14 in the Washington, DC-Maryland-Virginia MMA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

CONA has an excellent level of qualified investments and grants, exhibits an excellent responsiveness to the community development needs in this AA, and makes extensive use of innovative and/or complex investments to support community development initiatives.

CONA made 250 current and prior period investments and grants totaling \$168.3 million in this AA. During the current evaluation period, CONA originated 232 qualified investments totaling \$113.3 million in this AA. Of these, 17 investments, totaling \$105.8 million provided 1,684 units of affordable housing in the bank's AA. In addition, the bank made a \$13 million investment in CONCDC. Of the \$13 million, \$528 thousand of the investment funds directly benefited this AA. CONCDC focuses on economic development and assists in the creation, development, and expansion of small businesses across the bank's footprint. The remaining current investments consist of 214 qualified grants totaling \$6.9 million. These grants were to a variety of community development organizations, projects, and funds that support affordable

housing or community services for primarily low- and moderate-income people, or economic development.

In addition, CONA made 18 prior period qualified investments that remain outstanding and have a combined book value of \$55.1 million as of December 31, 2010. These prior period investments continue to provide value to the AA and show the bank's continuing commitment to help meet the community needs of the area.

The following examples demonstrate CONA's leadership, excellent responsiveness to the community development needs in the area, innovativeness, and strong commitment to this community:

- In 2010, CONA provided a \$5.7 million LIHTC investment for a 99 unit affordable housing development located in a low-income geography in southeast Washington, DC. The development is a component of the District of Columbia government's New Community Initiative, a large-scale revitalization effort. This is an innovative development because it houses both seniors and families and has numerous environmentally responsible elements. In addition, an adjacent community center will provide supportive services. The project is highly responsive to local community development needs as it provides affordable and safe housing for low- and moderate-income seniors and families and helps revitalize a low-income geography that has been long blighted by old public housing and urban decay. The financing for this project was complex and required multiple sources of public and private funding as well as flexibility in delivering unique debt and equity solutions. In addition, CONA entered the transaction as a participating bank but demonstrated excellent leadership when they stepped into the role of lead bank when the initial lead bank realized they did not have the capacity to handle the complexity of the transaction.
- In 2010, CONA provided a LIHTC investment of \$6.5 million for a 90 unit affordable family housing development in Arlington, Virginia. This development demonstrates excellent responsiveness to the community needs as it replaces 24 apartments through land trade and adds 66 new units of affordable rental housing. The structure will be built on an underground parking podium, and it is located five blocks from the Ballston Metro stop. This project is a new and innovative concept for the community. Furthermore, this transaction is complex as it required seven layers of financing.
- In 2010, CONA provided a LIHTC investment of \$8.2 million to support the construction of an affordable housing development in Washington, DC. The property is located in a moderate-income geography, and it is the first phase of a larger revitalization effort under the District's New Communities Initiative. CONA's financing, along with two sources of City financing, will fund construction of 83 units, and all of the units are for low- and moderate-income households. Twenty-seven of the units will house residents of deteriorated public housing that will be demolished as part of the transaction. City agencies will provide supportive services to the residents, including job training and placement, GED courses, day care, after-school care and medical care.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance in the Bethesda AA is weaker than the bank's overall Outstanding performance under the Investment Test in the Washington, DC-Maryland-Virginia MMA. The weaker performance is due to lower levels of qualified investments. The weaker performance did not impact the overall Washington, DC-Maryland-Virginia MMA rating. This is based on the shorter time-frame in the AA and the continued responsiveness demonstrated by the prior period investments. Refer to the Table 14 in the Washington, DC-Maryland-Virginia MMA 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 is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Washington, DC AA is good.

Retail Banking Services

Refer to Table 15 in the Washington, DC-Maryland-Virginia MMA 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.

CONAs delivery systems are accessible to all portions of the full-scope AA. The distribution of branches are accessible to geographies and individuals of different income levels given the level of branches located in low- and moderate-income geographies and the proximity of other branches to low- and moderate-income geographies.

Eleven branches located in middle- and upper-income geographies are located within one mile of one or more low-income geographies, enhancing accessibility to banking services to individuals in those areas. Thirty-two branches located in middle- and upper-income geographies are located within one mile of one or more moderate-income geographies, also enhancing accessibility to banking services. Ten of the thirty-two are also within one mile of one or more low-income geographies. The accessibility to the bank's branches is also enhanced due to the area's excellent public transportation system.

The bank's record of opening and closing branches has not affected the accessibility of its delivery systems.

The bank's alternative delivery systems enhance the bank's overall delivery of services to its AA. CONA provided information demonstrating that these other alternative delivery systems were effective at serving customers living in low- and moderate-income geographies in the AA. Specifically, 11% of customers living in LMI geographies in the AA used online banking and 2% used bank-by-phone. This somewhat compares to 16% and 2%, respectively, of customers living in non-LMI geographies in the AA. ATMs are readily accessible to low-income populations and reasonable accessible to moderate-income populations. With the

exception of older ATMs, several language options are available. In the AA, English, Spanish, French, and Japanese languages are available when using an ATM.

CONA's hours and services offered throughout the AA do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies and individuals. Hours are generally 9:00 am through 5:00 p.m. Monday through Thursday and 9:00 am through 7:00 pm on Friday. Most branches are open Saturday and one branch is open Sunday.

Community Development Services

The bank provides a good level of community development services. The services were responsive to identified needs in the AA those being affordable housing, financing and technical assistance for small business, job training, services for unbanked and under-banked populations, and community revitalization. A substantial majority of services were geared toward community services such as providing financial education to students. Twelve bank associates held leadership positions as board or committee members in eleven organizations.

Bank associates serve on boards of the Latino Economic Development Corporation, Goodwill of Greater DC, the Latin American Youth Center, Robert Pierre Johnson Housing Development Corporation, and Communities in Schools of Virginia.

Community development services that benefited the AA included the following:

- The bank was heavily involved in creating and delivering financial education programs that served primarily low- and moderate-income audiences. Most notably, bank associates provided a total of 1,875 hours of service at 12 Junior Achievement events (including three Junior Achievement Finance Park events) that served students from six schools and other organizations.
- The bank collaborates with the Latino Economic Development Corporation (LEDC) to bolster the organization's small business development services in the AA. In addition to the bank's loan relationship with LEDC, a bank associate serves on the organization's board of directors and chairs its Governance Committee. LEDC provides services in three fields, small business development, homeownership counseling, and affordable housing preservation.
- The bank participates in the "Bank on DC" program, a partnership between the District of Columbia, local financial institutions, and local non-profit organizations. The program enables low- and moderate-income and unbanked and under-banked individuals to establish bank accounts, avoid check-cashing fees, and become financially literate. The program launched in early 2010.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance in the Bethesda AA is stronger than the bank's overall performance. This is due to the distribution of branches and ATMs in

moderate-income geographies. Refer to Table 15 in Appendix D of the Washington, DC-Maryland-Virginia MMA for the facts and data that support these conclusions.

State Rating

State of Louisiana

CRA Rating for Louisiana³:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Good lending activity within the bank’s AA.
- Excellent distribution of loans by income level of geography.
- Adequate distribution among borrowers of different income levels.
- Community development lending had a significantly positive impact on the Lending Test.
- Product flexibility had a positive impact on the Lending Test.
- Excellent level of community development investments, including prior period investments and the continuing impact of these investments.
- The bank’s branches are accessible to geographies and individuals of different income levels. When adding branches, in middle- and upper-income geographies, located within one mile of low- and moderate-income geographies, the distribution increases two and three times the population distribution, respectively.
- CONA provided a good level of community development services that are responsive to the needs of the bank’s AAs.

Description of Institution’s Operations in Louisiana

CONA operates 195 branches within nine AAs in the State of Louisiana. Statewide, the bank holds \$17.1 billion of deposits, which represents 19.2% of the bank’s total domestic deposits. In terms of market share, CONA ranks first with a 23.6% share compared to second and third ranked JP Morgan Chase and Regions Bank with 18.7% and 9.2% market share, respectively. CONA competes with 127 depository institutions within the state.

Refer to the market profiles for the State of Louisiana in Appendix C for detailed demographics and other performance context information for the AA receiving a full-scope review.

³ For institutions with branches in two or more states in a multi-state metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multi-state metropolitan area. Refer to the multi-state metropolitan area rating and discussion for the rating and evaluation of the institution’s performance in that area.

Scope of Evaluation in Louisiana

We evaluated the bank's performance in the State of Louisiana by performing a full-scope review of the New Orleans AA and limited-scope reviews of the remaining AAs (Alexandria, Baton Rouge, Houma, Lafayette, Lake Charles, Monroe, Shreveport, and the Non-MSA). We selected the New Orleans AA because this area contains 50% of the bank's Louisiana deposits, 36% of the state's loan originations, and 29% of the branches during the evaluation period. Small business lending, which is the bank's primary business strategy, was given the greatest weight under the Lending Test. The volume of multi-family and small farm loans was insufficient to result in any meaningful analysis or conclusion. Statistics are presented in Appendix D for informational purpose.

A challenge noted in comparing performance to demographics is the age of the census data (Census 2000), but it becomes even more challenging in New Orleans. Following the massive destruction caused by Hurricanes Katrina and Rita in 2005, there was a drastic population shift out of some of the poorest neighborhoods in New Orleans (including the Lower 9th Ward) and in some cases resulted in neighborhoods with dramatically reduced populations. Census 2010 data released in February 2011 shows that New Orleans population decreased by 29% from Census 2000. Additionally, it is estimated that some of the middle- and upper-income geographies, as defined by Census 2000 data, now have more significant low- and moderate-income populations. Similarly, it is estimated that the number of owner-occupied units in low- and moderate-income geographies decreased by 20% following the hurricanes and may not be well measured using 2000 census data. The reduction in units led to higher home prices, which has also been exacerbated by an increase in homeowner insurance rates. Other economic and demographic factors considered in our evaluation, such as the high poverty rate in the New Orleans AA, are discussed in the Market Profiles for Full Scope Areas in Appendix C.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Louisiana is rated Outstanding. Based on the full-scope review, the bank's performance in the New Orleans AA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume in the State of Louisiana section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the New Orleans AA is good.

In this AA, CONA has a deposit market share of 31% and ranks first among 39 depository institutions. In overall mortgage lending, the bank ranks ninth with a 2.56% market share in a very competitive market of 346 lenders. CONA ranks first in home improvement lending with a 26.5% market share, tenth in home refinance lending with a 1.8% market share, and twenty-

sixth in home purchase lending with a 0.73% market share. For small loans to businesses, CONA ranks fourth with a 10.6% market share among 62 lenders. Two nationwide credit card lenders dominated the market with a combined market share of 50%.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of Louisiana 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.

The geographic distribution of home mortgage loans is good.

For home purchase loans the distribution is excellent. The percentage of loans made in low-income geographies is somewhat below and in moderate-income geographies is near to the percentage of owner-occupied units. The bank's market share in both low- and moderate-income geographies exceeds the bank's overall market share.

For home improvement loans the distribution is adequate, while home refinance loan distribution is good. For home improvement and home refinance loans, the percentage of loans made in low-income geographies is well below and in moderate-income geographies is below the percentage of owner-occupied units in those geographies. The bank's market share for home improvement loans in low- income geographies is below and in moderate-income geographies exceeds the bank's overall market share. The bank's market share for home refinance loans in low-income geographies exceeds and in moderate-income geographies substantially meets the bank's overall market share.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is excellent.

CONA's portion of small loans to businesses in both low- and moderate-income geographies exceeded the percentage of businesses within those geographies. The bank's market share in both low- and moderate-income geographies significantly exceeds its overall market share.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level is adequate. This is based on good distribution of home mortgage lending and adequate distribution of small loans to businesses.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of Louisiana 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.

Economic factors, more fully discussed in Appendix C Market Profile for Full Scope Areas for the New Orleans AA and in the Scope of the Evaluation above, were considered in this analysis. The high poverty rate and cost of housing in the AA makes it difficult for many low-income people to obtain mortgage loans. Additionally, the cost and availability of insurance have exacerbated these barriers to home financing.

The distribution of home purchase loans by borrower income is good. Although the percentage of loans made to low-income borrowers is significantly below the percentage of such families, the bank's performance to these borrowers is considered adequate. The percentage of loans made to moderate-income borrowers exceeded the percentage of such families. The bank's market share to low-income families exceeded and to moderate-income families met the bank's overall market share.

The distribution of home improvement loans by borrower income is good. Although the percentage of loans made to low-income borrowers is below the percentage of such families, the bank's performance to these borrowers is considered good. The percentage of loans made to moderate-income borrowers exceeded the percentage of such families. The bank's market share to both low- and moderate-income families exceeded the bank's overall market share.

The distribution of home refinance loans by borrower income is good. Although the percentage of loans made to low-income borrowers is significantly below the percentage of such families, the bank's performance to these borrowers is considered adequate. The percentage of loans made to moderate-income borrowers is somewhat below the percentage of such families. The bank's market share to low-income families exceeded and to moderate-income families substantially met the bank's overall market share.

Small Loans to Businesses

Refer to Table 11 in the State of Louisiana 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.

The percentage of loans made to businesses with revenues of \$1 million or less is much lower than the percentage of such businesses, as over 46% of the loans reported no revenues. In this AA, the majority of lending is through credit cards, for which business revenue is not generally considered in the underwriting. The bank's market share to businesses with revenue of \$1 million or less exceeds, two times, the bank's overall market share.

Community Development Lending

Refer to Table 1 in the State of Louisiana 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 multi-family 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. However, Table 5 does not separately list community development loans.

Community development lending was very strong and had a significantly positive impact on the Lending Test in the New Orleans AA. CONA originated or renewed 38 loans and lines of credit totaling \$338 million. These included \$73 million in loans that supported the creation or rehabilitation of 1,047 units in affordable housing developments. Affordable housing is a key need of this AA. Several of these developments also included LIHTC investments by the bank.

Examples of the complexity, innovativeness, and responsiveness of the bank's community development loans are presented below:

- In October 2008, CONA provided a \$6.3 million construction loan to finance development of a 98-unit, 100% affordable multi-family property in the Marrero community of Jefferson Parish. Ten of the units are for households earning 20% or less of the AMI; ten units are for households earning 30% or less of AMI; and the remaining 78 units are for households earning 60% or less of AMI. Marrero is part of the greater metro New Orleans community located on the "west bank" of the Mississippi River. The original apartment complex was destroyed by Hurricane Katrina in 2005, leaving a boarded-up structure and displaced residents. The area immediately surrounding the site had several abandoned or severely damaged multi-family buildings. CONA was the first lender willing to invest in the neighborhood as other lenders held back due to uncertainty about rebuilding. By the end of 2008, the tax credit investment market had shrunk dramatically and real estate lending had also halted. When another lender reneged on its commitment to this development due to its complexity, CONA stepped in and provided the financing needed to start construction and expedite the return of the displaced residents. Since its completion, neighborhood blight has declined. In April 2010, CONA funded a \$1.9 million permanent loan for the property.
- In August 2009, CONA provided a \$7.6 million construction loan to finance the full rehabilitation of a 150-unit multi-family property in the Gentilly neighborhood of New Orleans. This two-building development has 23 units reserved for households with incomes at or below 40% of AMI, 31 units at or below 60% AMI, 16 units at or below 80% of AMI, and 8 units reserved for project-based Section 8 tenants, who will pay 30% of their adjusted income toward rent. The remaining 72 units will be leased at market rates. The original apartment complex was damaged by Hurricane Katrina. CONA's participation in this development was in partnership with a national non-profit organization. This complex transaction involved additional financing from diverse sources. CONA demonstrated leadership by investing in an area that was experiencing neglect and blight resulting from the hurricane. The development was highly responsive to pressing needs as it completely renovated an old, storm-damaged multi-family property and served as a catalyst for revitalization of the community.

- In November 2009, CONA provided a \$5.1 million construction loan to finance construction of a 49-unit multi-family property on the outer edge of the French Quarter of New Orleans. The development supported ongoing disaster-recovery efforts and includes 21 affordable units (5 units for households earning 20% or less of AMI, another 5 units at 40% or less, and 11 units at 60% or less of AMI). Additional financing was provided through a loan from the city and a Community Development Block Grant. The development responds to the need for workforce housing in the historic center of New Orleans, where many hotels and restaurants operate. There had been little investment in this section of the city since Hurricane Katrina. As the apartments will be a new building at the intersection of three historic districts, the development will be a highly visible symbol of the City's recovery.

Other Loan Data

CONA issued one LC for \$3.1 million that has a community development purpose. This LC is considered as other loan data and listed in Table 1 Other Products.

Product Innovation and Flexibility

CONA's product flexibility had a positive impact on the Lending Test.

In Louisiana, the bank's DREAM mortgage program provides flexible loans to finance the purchase of homes by low- and moderate-income borrowers or in low- and moderate-income geographies. This program's flexible aspects include expanded underwriting criteria including no minimum loan amount and credit score flexibility.

The bank originated 55 DREAM loans totaling \$4.9 million in the New Orleans AA during the examination period.

In addition, through its subsidiary CDC, the bank provides high-impact construction financing to non-profit affordable housing developers in Louisiana. These loans fulfill an unmet need as they are small (averaging approximately \$500 thousand) to finance small developments and the transactions are complex. Further, the underwriting standards accommodate developers that do not meet traditional bank criteria. The loans are complex and labor-intensive in that bank associates work with the borrowers to help them access various affordable housing grants, and provide technical assistance to help build the non-profit organization's capacity and experience. An example transaction is a \$500 thousand line of credit to a local CDC to develop six single-family homes for low- and moderate-income families in New Orleans. Subsidies of up to \$65 thousand each, through a city program, facilitated the ultimate purchases of the homes by six families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the all of the limited-scope AAs, with the exception of the Lake Charles AA, is not inconsistent with the bank's overall Outstanding performance under the Lending Test in Louisiana. In the Lake Charles AA, performance was weaker than the overall Outstanding performance as there was no community development lending. This weaker performance did not impact the overall

conclusion for the state. Refer to the Tables 1 through 13 in the State of Louisiana section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the State of Louisiana is rated Outstanding. Based on a full-scope review, the bank's performance in the New Orleans AA is excellent.

Refer to Table 14 in the State of Louisiana Section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

CONA has an excellent level of qualified investments and grants, exhibits an excellent responsiveness to the community development needs in this AA, and makes extensive use of innovative and/or complex investments to support community development initiatives. Furthermore, CONA has demonstrated exceptional levels of commitment and leadership in supporting the area's recovery from the devastation of Hurricanes Katrina and Rita.

CONA made 221 current and prior period investments and grants totaling \$192.1 million in this AA. During the current evaluation period, CONA originated 215 qualified investments totaling \$181.1 million in this AA. Of these, 19 investments, totaling \$177.1 million are providing 1,913 units of affordable housing in the bank's AA. The remaining current investments consist of 196 qualified grants totaling \$4 million. These grants were to a variety of community development organizations, projects, and funds that support affordable housing or community services for primarily low- and moderate-income people, economic development, or revitalization and stabilization of low- and moderate-income geographies.

In addition, CONA made six prior period qualified investments that remain outstanding and have a combined book value of \$11 million as of December 31, 2010. These prior period investments continue to provide value to the AA and show the bank's continuing commitment to help meet the community needs of the area.

The following examples demonstrate CONA's leadership, excellent responsiveness to the community development needs in the area, innovativeness, and strong commitment to this community:

- In July 2007, CONA provided a \$15.9 million LIHTC investment to help finance the redevelopment of a property destroyed during Hurricanes Katrina and Rita. The property is located in a low-income geography in New Orleans East. The bank's investment supported construction of a 209 unit, mixed-income development that contains 84 units for low- and moderate-income tenants. This was one of the first housing developments to be constructed following the hurricanes and was undertaken at a time when many investors were holding back due to uncertainty about the area's ability to recover. The development was highly responsive to the need for housing (including affordable units) in a neighborhood that had been devastated by the hurricanes. Mixed-income developments are particularly valuable in circumstances like this because they bring economic stability to

devastated neighborhoods.

- In October 2008, CONA provided an \$11 million LIHTC investment to finance the development of a 98 unit, 100% affordable multi-family property in the Marrero community of Jefferson Parish. Marrero is part of the greater metro New Orleans community located on the “west bank” of the Mississippi River. The original apartment complex was destroyed by Hurricane Katrina in 2005, leaving a boarded-up structure and displaced residents. The area immediately surrounding the site had several abandoned or severely damaged multi-family buildings. CONA was the first lender willing to invest in the neighborhood as other lenders held back due to uncertainty about rebuilding. By the end of 2008, the tax credit investment market had shrunk dramatically and real estate lending had also halted. When another lender backed out of its commitment to this development due to the complexity, CONA stepped in and provided the financing needed to start construction and expedite the return of the displaced residents. Since the completion of this project, neighborhood blight has declined.
- In December 2008, CONA provided a \$24.9 million LIHTC investment to help finance the new construction of 310 apartments in a low-income geography in the Lower Garden District of New Orleans. A majority of the units are reserved for low- or moderate-income tenants. CONA entered the transaction when it replaced another investor that failed to provide the anticipated capital after closing. CONA acted promptly to purchase the investment and provide the capital needed to complete the development, thereby preventing the property from possibly becoming an abandoned construction site adjacent to the earlier completed phases. The development provides high-quality affordable rental housing in an area still recovering from the devastation of the hurricanes. In addition, the development included multiple layers and sources of financing.

CONA also has 11 prior period investments that were targeted to a statewide area with potential benefit to one or more AAs. These investments have a combined current book value of approximately \$10.3 million as of December 31, 2010.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance in all of the AAs, with the exception of Houma, is not inconsistent with the bank’s overall Outstanding performance in the State of Louisiana. In the Houma AA, the bank’s performance is weaker than the bank’s overall performance in the state. The weaker performance is due to lower levels of qualified investments. The weaker performance does not impact the State of Louisiana Investment Test rating. Refer to the Table 14 in the State of Louisiana 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 Louisiana is rated High Satisfactory. Based on a full-scope review, the bank’s performance in the New Orleans AA is good.

Retail Banking Services

Refer to Table 15 in the State of Louisiana 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.

Delivery systems are accessible to all portions of the full-scope AA. This is largely because of the positive impact of those branches located within one mile of one or more low- and moderate-income geographies.

Several of CONA's branches that are not located in LMI census tracts nonetheless are accessible and serve LMI population and geographies. Twelve branches located in middle- and upper-income geographies are located within one mile of one or more low-income geographies, thereby enhancing accessibility to residents and workers in those geographies. When these accessible branches are added to the portion of branches located in low-income geographies, the percentage distribution increases to 25%, which is more than twice the population distribution. In addition, 28 branches located in middle- and upper-income geographies are located within one mile of one or more moderate-income geographies. When accessible middle- and upper-income branches are included, the percentage of branches increases to 66%, which is three times the population distribution in moderate-income geographies.

The bank's record of opening and closing branches has improved the accessibility of its delivery systems. The bank had a net increase of five branches in New Orleans; two of which are located in low-income tracts.

The bank's alternative delivery systems, significantly supplement the branch network, and provide consumers and small business account holders access to funds both during and outside traditional banking hours. Other alternative delivery systems include debit cards, bank-by-mail and online banking with a bill-payment feature. The bank also offers free telephone banking with service in English and Spanish.

CONA's banking services and hours offered throughout the AA do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies and individuals. Hours are generally 9 a.m. to 4 p.m. Most branches are open Saturday. Some branch offices are closed on Saturdays; however, this is largely due to decreased weekend business in those locations, and there is no apparent correlation that Saturday closing resulted because the branch was in a LMI area.

Community Development Services

The level of community development services is good. The services were responsive to identified needs in the AA. Bank associates were involved with 216 different organizations. Twenty-seven bank associates hold leadership positions as board or committee members of community development organizations. Highlights of CONA's community development services that benefited New Orleans AA include the following:

- Bank employees are very active in providing expertise to non-profit organizations regarding community and economic development, community action, affordable home loan programs, and project management. These employees lend expertise as members of the Boards of Directors and planning committees. Organizations benefiting from these contributions include the Jefferson Parish Economic Development Commission which seeks to attract and retain new businesses to the area and Boys Hope Girls Hope of Greater New Orleans which provides educational and developmental opportunities to children from economically disadvantaged homes. Additionally, employees served in various capacities on the board of Community Christian Concern of Slidell whose mission is to provide assistance to the local homeless community.
- The majority of volunteer hours were spent teaching financial literacy skills to students from predominantly low- and moderate-income families. Also, hours were devoted to the New Orleans Neighborhood Development Foundation which assists low- and moderate-income residents in obtaining affordable housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in Baton Rouge, Lake Charles, and Shreveport AAs is not inconsistent with the bank's overall High Satisfactory performance under the Service Test in the State of Louisiana. Based on limited-scope reviews, the bank's performance under the Service Test in the Alexandria and non-MSA AAs is stronger than the bank's overall High Satisfactory performance. For limited-scope reviews of Houma, Lafayette and Monroe AAs, the bank's performance is weaker than the bank's overall High Satisfactory performance. The weaker performance did not impact the overall State of Louisiana Service Test rating. Refer to Table 15 in Appendix D for the facts and data that support these conclusions.

State Rating

State of Connecticut

CRA Rating for Connecticut⁴:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity, given the limited AA presence and business lending strategy.
- Excellent distribution of loans by income level of geography and good distribution among borrowers of different income levels.
- Community development lending had a significantly positive impact on the Lending Test.
- Excellent level of community development investments including those from prior periods and the continuing impact of these investments.
- The bank's branch is reasonably accessible to geographies and individuals of different income levels.
- An adequate level of community development services that are responsive to the needs of the bank's AAs.

Description of Institution's Operations in Connecticut

CONA has a very limited presence in Connecticut. The bank operates one branch within the state. The AA became effective on March 10, 2008, when Superior Savings Bank was merged into CONA. With \$226 million in deposits, the bank ranks thirteenth among 27 insured depository institutions in the AA with a deposit market share of 1.18%. These deposits represent 0.3% of the bank's total domestic deposits.

Refer to the market profiles for the State of Connecticut in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Connecticut

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

We conducted a full-scope review of the New Haven AA which is defined as the New Haven-Milford MA. In evaluating overall lending performance, greater weight was placed on small loans to businesses, which represented 89% of lending volume. Additionally, small business lending is the major focus of the bank in this market. The volume of home refinance, and multi-family loans was insufficient to result in any meaningful analysis or conclusion. There were no home purchase loans or small loans to farms; therefore, Tables 2 and 7 are not included. Statistics are presented in Appendix D for informational purpose.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Connecticut is rated Outstanding. Based on full-scope reviews, the bank's performance in the New Haven AA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume in the State of Connecticut section of Appendix D for the facts and data used to evaluate the bank's lending activity.

CONA's lending activity in Connecticut is excellent based on its limited branch presence, small business lending focus, home improvement loans, small loans to businesses and deposit market shares, and competition.

CONA ranks thirteenth in deposit market share in this AA. For small loans to businesses, CONA ranks seventh with a 4.16% market share among 68 lenders. Nearly 69% of the number of small loans to businesses was made by four nationwide credit card lenders. Their individual market shares ranged from 8.9% to 29.3%.

For home improvement lending, the bank ranks eleventh with a 3.21% market share. While there are 27 depository institutions, there are 387 mortgage lenders in the AA, providing intense competition for home mortgage lending.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Tables 3, 4, and 5 in the State of Connecticut 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.

The geographic distribution of home improvement lending is good. The percentage of loans made in low- income geographies is below and in moderate-income geographies is near to the percentage of owner-occupied units. The bank's market share in both low- and moderate-income geographies exceeded the bank's overall market share.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is excellent. CONA's portion of small loans to businesses in both low- and moderate-income geographies exceeded the percentage of businesses within those geographies.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level is good. This is based on good distribution of home mortgage lending and good distribution of small loans to businesses.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of Connecticut 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.

The distribution of home improvement loans by borrower income is good. The percentage of home improvement loans made to low-income borrowers was below the percentage of low-income families and the percentage to moderate-income borrowers was somewhat below the percentage of such families. The market share to both low- and moderate-income borrowers was slightly below the bank's overall market share.

Small Loans to Businesses

Refer to Table 11 in the State of Connecticut 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.

The percentage of loans made to businesses with revenues of \$1 million or less is much lower than the percentage of such businesses, however, 44% of the loans reported no revenues. In this AA, the majority of the lending is done through credit cards and a legacy credit line product, for which business revenue is not considered in the underwriting. The bank's market share to businesses with revenue of \$1 million or less exceeds the bank's overall market share.

Community Development Lending

Refer to Table 1 Lending Volume in the State of Connecticut section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table

includes all loans, including multi-family 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. However, Table 5 does not separately list community development loans.

Community development lending had a significantly positive impact on the Lending Test in the New Haven AA. CONA originated 3 loans totaling \$14.3 million, each to support affordable housing for low- and moderate-income individuals.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the State of Connecticut is rated Outstanding. Based on a full-scope review, the bank's performance in the New Haven AA is excellent.

Refer to Table 14 in the State of Connecticut Section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

CONA has an excellent level of qualified investments and grants and exhibits an excellent responsiveness to the community development needs in this AA.

CONA made eleven current and prior period investments and grants totaling \$16.3 million in this AA. During the current evaluation period, CONA originated four qualified investments totaling \$8.4 million. One investment, totaling \$8.4 million provided 102 units of affordable housing in the bank's AA. The remaining current investments consist of three qualified grants totaling \$11 thousand. These grants were to three community development organizations that provide community services for primarily low- and moderate-income people.

CONA made seven prior period qualified investments that remain outstanding and have a combined book value of \$7.9 million as of December 31, 2010. These prior period investments continue to provide value to the AA and show the bank's continuing commitment to help meet the community needs of the area.

An example of CONA's responsiveness to the community development needs of the AA is the \$8.4 million investment to help finance a 102 unit affordable housing development in New Haven. The transaction involved the rehabilitation of 90 existing units and new construction of 12 handicap-accessible units. All units are for low- and moderate-income households. The redevelopment of this site helped to revitalize what had been a blighted property.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the New Haven AA is adequate.

Retail Banking Services

Refer to Table 15 in the State of Connecticut 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.

The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels.

There is one branch located in a middle-income geography. Forty-three percent of low- and moderate-income families reside in middle-income geographies, while 52% of owner-occupied housing and 43% of businesses are located in middle-income geographies.

The bank's alternative delivery systems enhance the bank's overall delivery of services to its AA. CONA provided information demonstrating that these other alternative delivery systems were effective at serving customers living in low- and moderate-income geographies in the AA. Specifically, 18% of the bank's customers living in LMI geographies used the ATM in a 6-month period analyzed by the bank, compared to 10% of customers living in non-LMI geographies over the same time period. With the exception of older ATMs, several language options are available. In the AA, English, Spanish, Chinese and Russian languages are available when using an ATM. Of customers living in LMI geographies, 18% used online banking and 29% used bank-by-phone, compared to 11% and 19%, respectively, of customers living in non-LMI geographies.

CONA's hours and services offered throughout the AA do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies and individuals. Hours are generally 9:00 a.m. through 3:00 p.m. Monday through Wednesday, and 9:00 a.m. through 4:00 p.m. Thursday and Friday. The branch is open three hours on Saturday morning. Longer drive-up hours are available Monday through Friday. No branches were opened or closed during the evaluation period.

Community Development Services

The bank provided an adequate level of community development services. Community development service needs in the AA are first time homebuyer and affordable rental housing assistance, foreclosure prevention and counseling, and pre- and post-home purchase counseling. However, with the current economic situation they focused their support in providing financial education to the jobless, homeless, and elementary school students.

In 2010, bank associates lead 6 hour-long financial education workshops for unemployed and homeless adults. The topics were about budgeting, money management, balancing check books, and other banking services. In total, about 600 individuals attended the sessions.

Pathways Region School offers special education and a day treatment program designed to meet the needs of 40 high school students who present severe challenges in their behavior, socialization or academic growth. In 2008 and 2010 bank associates offered seven financial education sessions about budgeting, savings and basic banking to about 180 students from low- and moderate-income families.

State Rating

State of Delaware

CRA Rating for Delaware⁵:	Satisfactory
The Lending Test is rated:	Outstanding
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity, given the evaluation time period, level of deposits, and small business focus.
- Good loan distribution among businesses of different income levels.
- Community development lending had a significantly positive impact on the Lending Test.
- A good level of community development investments including prior period investments which are responsive to the needs of the AA.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.
- An adequate level of community development services that are responsive to the needs of the bank's AAs, given the limited staffing resources.

Description of Institution's Operations in Delaware

CONA had a very limited presence in Delaware during this evaluation. The bank's operations in Delaware began on July 30, 2009 with the merger of CCB into CONA. CONA operates one branch in a non-metropolitan area that consists of Sussex County in its entirety. Deposits of \$40 million in the AA represent 0.05% of the bank's total domestic deposits. Within the AA, CONA ranks twelfth out of 15 depository institutions with a 0.11% market share. The bank's performance in this state had a minimal impact on its overall CRA rating.

Refer to the market profiles for the State of Delaware in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in Delaware

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

We conducted a full-scope review of the Sussex County Non MA AA. There are no low- or moderate-income geographies in the AA so a geographic distribution analysis is not meaningful. The evaluation period for home mortgage and small loans to businesses lending is July 30, 2009 to December 31, 2010. Only small loans to businesses were evaluated as the volume of home mortgage lending was insufficient to result in any meaningful analysis. Statistics are provided in the tables in Appendix D for informational purposes.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Delaware is Outstanding. Based on a full-scope review, the bank's performance in the Sussex County Non-MSA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume in the State of Delaware section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the AA is excellent, given the duration of the evaluation period, the level of deposits, and the bank's small business lending focus.

During the evaluation period, home mortgage loans accounted for 22% of total loans while small loans to businesses accounted for 78%. For small loans to businesses, the bank ranked sixth with a 2.99% market share. For home mortgage lending, the bank ranked twenty-ninth with a 0.46% market share among 339 mortgage lenders. It should be noted that market share reflects the entire year although the bank's AA began on July 30, 2009.

Distribution of Loans by Income Level of the Geography

There are no low- or moderate-income geographies in the AA and a geographic analysis is not meaningful.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of Delaware 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.

There are no low- or moderate-income geographies in the AA. A geographic distribution analysis is not meaningful.

Small Loans to Businesses

Refer to Table 6 in the State of Delaware 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.

There are no low- or moderate-income geographies in the AA. A geographic distribution analysis is not meaningful.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level is good.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of Delaware 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.

The volume of home mortgage lending was insufficient for a meaningful analysis.

Small Loans to Businesses

Refer to Table 11 in the State of Delaware 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.

The distribution of small loans to businesses of different sizes is good.

CONA's portion of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) is somewhat below the percentage of small businesses. The bank's market share to businesses with revenue of \$1 million exceeds the bank's overall market share.

Community Development Lending

Refer to Table 1 Lending Volume in the State of Delaware section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development lending was very strong and had a significantly positive impact on the Lending Test. CONA originated a \$6.9 million loan to support a skilled nursing and rehabilitation facility that primarily serves low- and moderate-income patients.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the State of Delaware is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Sussex County AA is good.

Refer to Table 14 in the State of Delaware Section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

CONA has a good level of qualified investments and grants and exhibits a good responsiveness to the community development needs in this AA.

CONA made four current and prior period investments and grants totaling \$525 thousand in this AA. During the current evaluation period, CONA made two qualified grants totaling \$20 thousand in this AA. Both of the grants supported community services for primarily low- and moderate-income people. In addition, CONA made two prior period qualified investments that remain outstanding and have a combined book value of \$505 thousand as of December 31, 2010. These prior period investments provide value to the AA and show the bank's continuing commitment to help meet the community needs of the area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Sussex County AA is adequate.

Retail Banking Services

Refer to Table 15 in the State of Delaware section of Appendix D for the facts and data used to evaluate the distribution of the bank's ranch delivery systems and branch openings and closings.

There is one branch located in a middle-income geography acquired with the CCB merger. There are no low- or moderate- income geographies in the AA. Extended branch hours are offered on Friday evening and four hours on Saturday. No branches were opened or closed during the evaluation period.

Alternative delivery systems are available to geographies and individuals of different income levels. There are three full service ATMs available at the branch location. Two limited service ATMs are also available. All five ATMs are located in middle-income tracts. Ninety-five percent of low- and moderate-income families live in middle-income tracts. With the exception of older ATMs, several language options are available. In the AA, English, Spanish, French, and Japanese languages are available when using an ATM. There was no volume or usage data for ATM activity.

Community Development Services

The level of services is adequate, given the limited resources. In conjunction with the Communities in Schools of Delaware, Inc., five bank associates presented one financial education course for students in a local elementary school. A majority of the students come from low- and moderate-income families.

State Rating

State of Maryland

CRA Rating for Maryland⁶:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Low Satisfactory

The major factors that support this rating:

- Excellent lending activity, given the evaluation time period, level of deposits, and small business focus.
- Excellent distribution of loans by income level of geography and good distribution among borrowers of different income levels.
- Community development lending had a significantly positive impact upon its performance under the Lending Test
- Product innovation and flexibility had a positive impact on the Lending Test.
- Excellent level of community development investments.
- The bank’s branches are reasonably accessible to geographies and individuals of different income levels.
- CONA provided an adequate level of community development services that are responsive to the needs of the bank’s AA.

Description of Institution’s Operations in Maryland

The bank’s operations in Maryland began on July 30, 2009 with the merger of CCB into CONA. The merger added three new AAs for the bank - Baltimore, Hagerstown, and the non-MSA area consisting of St. Mary’s and Talbot Counties. Within Maryland, the bank operates thirty branches with \$732 million in deposits. The bank ranks thirteenth out of 88 depository institutions with a market share of 1.24%. The deposits within Maryland represent 0.82% of total domestic deposits. Major competitors (and their associated market shares) are Bank of America (25.4%), M&T Bank (19.2%) and PNC Bank (9.6%). The bank’s performance in this state had a minimal impact on its overall CRA rating.

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

Refer to the market profiles for the State of Maryland in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Maryland

We conducted a full-scope review of the Baltimore AA. This AA represents both 89% of the lending and deposits within the State of Maryland. The Hagerstown and Non-MSA area received limited-scope reviews. In the full-scope AA, home purchase and home refinance loans and small loans to businesses were evaluated. We did not include home improvement loans in the evaluation as the volume of these types of loans originated was insufficient to result in any meaningful analysis or conclusion. In evaluating overall lending performance, greater weight was placed on small loans to businesses, which represented 76% of the lending volume. In the limited-scope areas, the volume of home mortgage lending for all products was insufficient to result in any meaningful analysis or conclusion. Statistics are presented in Appendix D for informational purpose.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Maryland is rated Outstanding. Based on a full-scope review, the bank's performance in the Baltimore AA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume in the State of Maryland section of Appendix D for the facts and data used to evaluate the bank's lending activity.

It is important to note that the following lending market share data includes lending activity for all of 2009, whereas the evaluation period for Maryland began on July 30, 2009.

Lending activity in the AA is excellent, given the bank's limited presence, length of the evaluation period, and competition. CONA ranks thirteenth in deposits with a 1.24% market share. In overall mortgage lending, the bank ranks twenty-sixth with a 0.65% market share. For home purchase lending, CONA ranked fortieth with a 0.34% market share. The bank's market share and ranking for home refinance is not meaningful for an analysis. Although CONA made a limited number of home improvement loans, the bank ranked fifth with a 4% market share.

The lending market shares are skewed when compared to the deposit market shares based on the number of lenders and depository institutions. In the Baltimore AA, there is strong competition for home mortgage lending. There are 603 lenders, many without a depository presence while there are 88 depository institutions in the AA.

For small loans to businesses, CONA ranks eighth with a 3.8% market share among 106 lenders. Two nationwide credit card lenders dominated the market each with a 24% market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is excellent. This is based on excellent distribution of both home mortgage and small loans to businesses.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of Maryland 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.

The geographic distribution of home mortgage loans is excellent.

For home purchase loans, the percentage of loans made in low-income geographies exceeded and in moderate-income geographies equaled the percentage of owner-occupied units. For home refinance loans, the percentage of loans made in low-income geographies was somewhat below and in moderate-income geographies equaled the percentage of owner-occupied units.

Market share analysis was not performed given the bank only operated in this AA for five months during 2009.

Small Loans to Businesses

Refer to Table 6 in the State of Maryland 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.

The geographic distribution of small loans to businesses is excellent.

CONA's portion of small loans to businesses in both low- and moderate-income geographies exceeded the percentage of businesses within those geographies. The bank's market share in both low- and moderate-income geographies significantly exceeded the bank's overall market share. This is especially significant due to the fact the bank was only in the AA for a portion of the evaluation period.

Distribution of Loans by Income Level of the Borrower

CONA's distribution of loans by income level is excellent. The distribution of both home mortgage loans and small loans to businesses is excellent.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of Maryland 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.

The overall distribution of home mortgage loans is excellent.

The borrower distribution of home purchase loans is excellent. The percentage of home purchase loans to low-income borrowers was near to the percentage of low-income families in the AA. The percentage of home purchase loans to moderate-income borrowers exceeded the percentage of moderate-income families.

The borrower distribution of home refinance loans is excellent. The percentage of loans to low-income borrowers was somewhat below and to moderate-income borrowers exceeded the percentage of low- and moderate-income families, respectively.

Market share analysis was not performed given the bank only operated in this AA for five months during 2009.

Small Loans to Businesses

Refer to Table 11 in the State of Maryland 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.

The distribution of small loans to businesses of different sizes is good.

The percentage of loans made to businesses with revenues of \$1 million or less is lower than the percentage of such businesses. The bank did not have revenue information on nearly 32% of the loans originated. The bank's market share to businesses with revenues of \$1 million or less exceeds the overall market share.

Community Development Lending

Refer to Table 1 in the State of Maryland section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development lending was very strong, especially considering the short review period, and had a significantly positive impact on the Lending Test in the Baltimore AA. CONA originated or renewed 5 loans totaling \$40.5 million in this AA.

Examples of the complexity, innovativeness, and responsiveness of the bank's community development loans in the AA are presented below:

- In December 2009, CONA provided a \$7.1 million construction loan to finance the construction of an 86-unit, affordable housing property for seniors in Owings Mills, MD. All units will be affordable to low- and moderate-income households. Specifically, 13 units are for households earning 30% or less of AMI; 14 units are for households earning 40% or less; 30 units are for households earning 50% or less; and the remaining 29 units are for households earning 60% or less. The complex transaction involved additional financing from diverse sources including a state housing bond, state housing funds, grant monies from a private foundation, and a private land donation. CONA took a leadership position by

quickly providing detailed financing proposals and meeting the developer's short closing timeline at a time when other banks were either no longer financing such developments or unable to close by the year-end 2009 deadline.

- In August 2010, CONA provided a \$10.2 million construction loan to finance the construction of a 90-unit affordable housing property for seniors in Brooklyn Park (Anne Arundel County). All units will be affordable to low- and moderate-income households. Specifically, nine units are for households earning 30% or less of the AMI; six units are for households earning 40% or less of AMI; 27 units are for households earning 50% or less of AMI; and the remaining 48 units are for households earning 60% or less of the AMI. This development also involved public financing in the form of HOME funds and a grant from the Multi-family Energy Efficiency and Housing Affordability (MEEHA) program. This development meets a need for affordable senior housing in a county in which the senior population has grown three times as fast as the general population during the last 20 years, and where 54% of all senior renters pay more than 30% of their income for housing,

Product Innovation and Flexibility

CONA's product flexibility had a positive impact on its Lending Test conclusions.

In Maryland, the bank offers flexible loan products directed toward affordable housing, including loans made through Maryland's Community Development Administration (CDA).

Maryland's CDA mortgage program is a Maryland State bond program designed to offer below-market rates on FHA-underwritten loans. Another major advantage of CDA is the ability to use the Downpayment Settlement Expense Loan Program to help fund down payment and closing costs. CONA provided four CDA loans to low- and moderate-income borrowers and/or in low- and moderate-income geographies totaling \$582 thousand during the examination period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Hagerstown and the Maryland Non-MSA areas is not inconsistent with the bank's overall Outstanding performance under the Lending Test in Maryland. Refer to the Tables 1 through 13 in the State of Maryland section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the State of Maryland is rated Outstanding. Based on a full-scope review, the bank's performance in the Baltimore AA is excellent.

Refer to Table 14 in the State of Maryland Section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

CONA has an excellent level of qualified investments and grants that exhibits an excellent responsiveness to the community development needs in this AA.

CONA made 13 current and prior period investments and grants totaling \$43.5 million in this AA. During the current evaluation period, CONA originated 12 qualified investments totaling \$41.5 million. Six investments, totaling \$41.4 million are providing 560 units of affordable housing. The remaining current investments consist of six qualified grants totaling \$71 thousand. These grants were to community development organizations, projects, and funds that support affordable housing or community services for primarily low- and moderate-income people.

In addition, CONA made one prior period qualified investment that remains outstanding and has a book value of \$2 million as of December 31, 2010. This investment continues to show the bank's continuing commitment to help meet the community needs of the area.

The following examples demonstrate CONA's leadership, excellent responsiveness to the community development needs in the area, innovativeness, and strong commitment to this community:

- In December 2009, CONA made a \$9.6 million LIHTC investment to finance the construction of an 86 unit affordable housing property for seniors in Owings Mills, MD described earlier in the Community Development Lending section.
- In August 2010, CONA made an \$11.2 million LIHTC investment to finance the construction of a 90 unit affordable housing property for seniors in Brooklyn Park (Anne Arundel County). All units will be for low- and moderate-income households. This development meets a need for affordable senior housing for low- and moderate-income seniors and is described earlier in the Community Development Lending section.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Non-Metropolitan Area AA is not inconsistent with the bank's overall Outstanding performance under the Investment Test in the State of Maryland. In the Hagerstown AA, the bank's performance is weaker than the bank's overall performance in the state. The weaker performance is due to lower levels of qualified investments. The weaker performance did not impact the overall State of Maryland Investment Test rating. Refer to the Table 14 in the State of Maryland 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 Maryland is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the Baltimore AA is adequate.

Retail Banking Services

Refer to Table 15 in the State of Maryland 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.

Delivery systems are reasonably accessible to all portions of the full-scope AA.

The bank operates two branches in low-income census tracts, which approximates the percentage of the population residing in these areas. Two branches located in middle- and upper-income geographies are located within one mile of one or more moderate-income geographies, enhancing accessibility to residents and workers in those geographies. Besides being within one mile of one or more moderate-income geographies, the percentage of branches increases to 16%, which is near to the population distribution in moderate-income geographies.

During the evaluation period, there were no branch openings or closings in low- and moderate-income geographies.

CONA's alternative delivery systems enhance the branch network, and provide consumers and small business account holders access to funds both during and outside traditional banking hours. All CONA ATMs have English, Spanish, French, and Japanese language screens. Other alternative delivery systems include debit cards, bank-by-mail, online banking with a bill-payment feature and telephone banking. The bank also offers free telephone banking with service in English and Spanish.

CONA's hours and services offered throughout the AA do not vary in a way that inconvenience certain portions of AA, particularly low- and moderate-income geographies and individuals. Hours are generally 9 a.m. to 5 p.m. Most branches are open Saturday. Some branch offices are closed on Saturdays; however, this is largely due to decreased weekend business in those locations, and there is no apparent correlation that Saturday closing resulted because the branch was in a LMI area.

Community Development Services

The level of community development services is adequate. The services were responsive to identified needs in the AA. Bank associates were involved with eight different organizations. One bank associate holds a leadership position as board or committee member of a community development organization. The majority of volunteer hours were spent teaching financial literacy skills to students.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Hagerstown and non-MSA AAs is stronger than the bank's overall Low Satisfactory performance. This is mainly due to the percentage of ATMs operated in the LMI census tracts being higher than the percentage of population living in LMI geographies. However, this performance does not impact the overall Service Test rating. Refer to Table 15 in Appendix D for the facts and data that support these conclusions.

State Rating

State of New Jersey

CRA Rating for New Jersey⁷:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity, given the limited branch presence, business lending strategy, and market shares.
- Excellent distribution of loans by income level of geography and adequate distribution among borrowers of different income levels.
- The lack of community development lending had a neutral impact on the Lending Test.
- Product innovation and flexibility had a neutral impact on the Lending Test
- Excellent level of community development investments.
- The bank's branch is reasonably accessible to geographies and individuals of different income levels.
- CONA provided an adequate level of community development services that are responsive to the needs of the bank's AAs.

Description of Institution's Operations in New Jersey

Outside of the NYC/Northern NJ multi-state, CONA has a very limited presence in New Jersey. The bank operates one branch in the Trenton AA, which consists of Mercer County in its entirety, also referred to as the Trenton-Ewing MA. The bank has \$49 million in deposits and ranks twenty-second out of 26 depository institutions with a 0.42% market share. These deposits also represent 0.05% of the bank's total domestic deposits. Major competitors (and their deposit market share) in the AA include Wells Fargo (19.7%), PNC Bank (16.3%) and Bank of America (12.8%). The bank's performance in this state had a minimal impact on its overall CRA rating.

⁷ For institutions with branches in two or more states in a multi-state metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multi-state metropolitan area. Refer to the multi-state metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the market profiles for the State of New Jersey in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

Scope of Evaluation in New Jersey

We performed a full-scope review of the Trenton AA. In evaluating overall lending performance, greater weight was placed on small loans to businesses, which represented 86% of lending volume. Additionally, small business lending is a major focus of the bank in this market. For home mortgage lending, we evaluated home improvement loans. The volume of home purchase and home refinance lending was insufficient to provide for a meaningful analysis. Statistics are provided in the tables in Appendix D for informational purpose.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in New Jersey is rated Outstanding. Based on the full-scope review, the bank's performance in the Trenton AA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume in the State of New Jersey section of Appendix D for the facts and data used to evaluate the bank's lending activity.

CONA's lending activity in New Jersey is excellent based on its limited branch presence, small business lending strategy and market share in relationship to deposits, and competition.

CONA ranks twenty-second in deposit market share in this AA. For small loans to businesses, CONA ranks eighth with a 3.66% market share among 60 lenders. Over 50% of the number of small loans to businesses was made by two nationwide credit card lenders. For home improvement lending, the bank ranked second out of 69 home improvement mortgage lenders in the AA with an 11% market share.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of New Jersey 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.

The geographic distribution of home mortgage loans is good.

For home improvement lending, the percentage of loans made in moderate-income geographies exceeded the percentage of owner-occupied units. The percentage of loans made in low-income geographies was below the percentage of owner-occupied units. The bank did not have any market share in low-income geographies. However, there were only ten lenders that made sixteen home improvement loans in low-income geographies in 2009. A credit union dominated the market with four (25%) of these loans. The bank's market share in moderate-income geographies was below its overall market share, but again, is skewed by the large number of loans originated and lenders in 2009.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is excellent.

CONA's percentage of small loans to businesses made in both low- and moderate-income geographies equal the percentage of businesses therein. The bank's market share in low-income geographies significantly exceeds and in moderate-income geographies exceeds its overall market share.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level is adequate. This is based on good distribution of home mortgage lending and adequate distribution of small loans to businesses.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of New Jersey 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.

The distribution of home improvement lending is good. The percentage of loans made to low-income borrowers is below and to moderate-income borrowers is somewhat below the percentage of such families, respectively. The bank's overall market share to low-income borrowers exceeds and to moderate-income borrowers is below the bank's overall market share.

Small Loans to Businesses

Refer to Table 11 in the State of New Jersey 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.

The distribution of small loans to businesses of different sizes is adequate. The majority of small loans to business are through CONA's credit card affiliate and a legacy North Fork line

product for which business revenue was not a determining factor in the credit decision. Forty-eight percent of the loans in the AA did not have revenue information. The bank's market share to businesses with revenue of \$1 million or less exceeds its overall market share.

Community Development Lending

Refer to Table 1 in the New Jersey section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

There were no community development loans in this AA during the examination period. The lack of community development lending had a neutral impact on the Lending Test.

Product Innovation and Flexibility

CONA's product flexibility had a neutral impact on the Lending Test.

In the Trenton AA, CONCDC provided a \$500 thousand line of credit to a CDFI that provides financing to not-yet-bankable entities engaged in community development ventures such as building affordable housing, child care centers, and other community facilities.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the State of New Jersey is Outstanding. Based on a full-scope review, the bank's performance in the Trenton AA is excellent.

Refer to Table 14 in the State of New Jersey Section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

CONA has an excellent level of qualified investments and grants and exhibits an excellent responsiveness to the community development needs in this AA.

CONA has 13 current period investments and grants totaling \$1.6 million in this AA. During the current evaluation period, CONA provided a \$1.4 million investment to help finance the construction of a 72 unit affordable housing property. All units are for low- and moderate-income households. In addition, CONA made 12 grants totaling \$235 thousand. These grants were to six community development organizations that support affordable housing or community services for primarily low- and moderate-income people. There were no prior period investments.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in New Jersey is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the Trenton AA is adequate.

Retail Banking Services

Refer to Table 15 in the State of New Jersey 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.

The bank's service delivery systems are reasonably accessible to all portions of the AA.

In the Trenton AA, there are no branches in low-income geographies. There is one branch and two ATMs in one upper-income geography that came with the North Fork Bank acquisition. The full service ATMs are at the same branch location. The branch is immediately surrounded by middle and other upper-income geographies. Thirty-four percent of geographies in the AA are low- or moderate-income.

Branch hours are 8:30 a.m. through 6:00 p.m. Monday through Thursday, and hours are extended on Friday to 7:00 p.m. Drive-up hours mirror lobby hours. The branch is open six hours on Saturday. One branch previously in an upper-income geography was closed during the evaluation period.

Alternative delivery systems are reasonably accessible to low- and moderate-income individuals and in low- and moderate-income geographies. There are two full-service, deposit-taking ATMs at the branch location. With the exception of older ATMs, several language options are available. In the AA, English, Spanish, Chinese and Russian languages are available. During a recent six month period, 49% of customers living in LMI geographies in the AA used the ATMs. This compares favorably to 29% of customers living in non-LMI geographies over the same time period. Of customers living in LMI geographies, 25% used online banking and 34% used bank-by-phone compared to 31% and 27%, respectively, of customers living in non-LMI geographies. Although there are a wide array of credit and deposit products and services available, there are no services specifically tailored to meet the needs of the AA.

Community Development Services

The level of services is adequate, as there is a limited level of community development services. Services provided in 2010 are detailed below. No community development services were reported in 2008 and 2009.

- One bank associate serves on the loan committee of the New Jersey Community Development Entity (NJCDE) whose purpose is to create employment through extension of loans and guarantees with a focus on urban municipalities. As a member of the loan committee, the bank associate reviews requests for extensions of loans and guarantees from members of the NJCDE and New Jersey Economic Development Authority.
- The bank partners with Junior Achievement of New Jersey to provide financial education programs at Lincoln Elementary School, Cadwalader Elementary School, and Village Charter School. The majority of each school's populations are from low- and moderate-income families.

State Rating

State of Texas

CRA rating for Texas⁸:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent lending activity in the bank’s primary AAs.
- Excellent geographic distribution of loans.
- Adequate distribution of loans by borrower income.
- Community development lending had a significantly positive impact on the Lending Test.
- Product innovation and flexibility had a positive impact on the Lending Test.
- Excellent level of community development investments.
- The bank’s branches are accessible to geographies and individuals of different income levels given the level of branches located in low-and moderate-income geographies and the proximity of other branches to low- and moderate-income geographies.
- CONA provided a good level of community development services that are responsive to the needs of the bank’s AAs.

Description of Institution’s Operations in Texas

CONA operates 182 branches within 14 AAs in the State of Texas. Statewide, the bank holds \$7.5 billion of deposits, which represents 8.4% of the bank’s total domestic deposits. CONA has a 1.9% market share and ranks ninth out of 357 depository institutions. JP Morgan Chase (19.2%) and Bank of America (16.8%) rank first and second, respectively. The bank’s primary business focus is small business lending.

Refer to the market profiles for the State of Texas in Appendix C for detailed demographics and other performance context information for AA that received a full-scope review.

⁸ This rating reflects performance within the multi-state metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multi-state metropolitan area.

Scope of Evaluation in Texas

We evaluated the bank's performance in the State of Texas by performing a full-scope review of the Houston AA and limited-scope reviews of the remaining AAs (Austin, Beaumont, Brownsville, Corpus Christi, Dallas, Fort Worth, Longview, McAllen, San Antonio, Texarkana, Tyler, Victoria, and the Non-MA). We selected the Houston AA because this area contains 32% of the bank's Texas deposits, 33% of the state's loan originations, and 29% of the branches during the evaluation period.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Texas is rated Outstanding. Based on a full-scope review, the bank's performance in the Houston AA is excellent.

Lending Activity

Refer to Tables 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.

Lending activity in the Houston AA is excellent when considering competition and the bank's primary business focus. In this AA, CONA ranks ninth in deposits with a 1.77% market share. For small loans to businesses, CONA ranks sixth among 163 lenders with a 4.8% market share. Four nationwide credit card lenders dominate the market with a combined market share of 76%. Their individual market shares ranged from 12.9% to 25.8%.

In overall home mortgage lending, the bank ranked 53rd with a 0.23% market share. There are 767 home mortgage lenders in the Houston AA, reflecting intense competition. The bank had a very small market share in home purchase and home refinancing lending. In home improvement lending, CONA ranks third with a 7.01% market share.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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 and purchases.

The geographic distribution of home mortgage loans in the Houston AA is good.

The geographic distribution of home purchase loans is excellent. The percentage of loans in low-income geographies is near to the percentage of owner-occupied units in those

geographies. In moderate-income geographies, the percentage of loans is somewhat below the percentage of owner-occupied units.

The geographic distribution of home improvement loans is adequate. The percentage of loans in low-income geographies is significantly below the percentage of owner-occupied units. In moderate-income geographies, the percentage of loans is well below the percentage of owner-occupied units. The bank's market share in low-income geographies exceeds and in moderate-income geographies is below the overall market share.

The geographic distribution of home refinance loans is good. The percentage of loans in both low- and moderate-income geographies is somewhat below the percentage of owner-occupied units.

Market share data for home purchase and home refinance loans is too small for a meaningful analysis.

Small Loans to Businesses

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 and purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

CONA's portion of small loans to businesses in both low- and moderate-income geographies exceeded the percentage of businesses within those geographies. The bank's market share in both low- and moderate-income geographies significantly exceeded the bank's overall market share.

Distribution of Loans by Income Level of the Borrower

The distribution of loans to borrowers of different income levels is adequate. This is based on good distribution of home mortgage loans and adequate distribution of small loans to businesses.

Home Mortgage Loans

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.

The borrower distribution of home purchase loans is good. The percentage of loans made to low-income borrowers is below the percentage of low-income families in the AA. The percentage of loans made to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

The borrower distribution of home improvement loans is good. The percentage of loans made to low- and moderate-income borrowers is below the percentage of low- and moderate-income

families in the AA, respectively. The bank's market share to both low- and moderate- income borrowers exceeds the overall market share.

The borrower distribution of home refinance loans is good. The percentage of loans made to low-income borrowers is significantly below the percentage of low-income families in the AA. The percentage of loans made to moderate income borrowers exceeds the percentage of moderate-income families in the AA.

Market share comparisons for home purchase and home refinance are too small for a meaningful analysis.

Small Loans to Businesses

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.

The distribution of small loans to businesses of different sizes is adequate. The majority of small loans to business are through CONA's credit card affiliate for which business revenue was not a determining factor in the credit decision. Forty-nine percent of the loans in the AA did not have revenue information. The bank's market share to businesses with revenue of \$1 million or less exceeds its overall market share.

Community Development Lending

Refer to Table 1 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 community development loans, including multi-family 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.

Community development lending was very strong and had a significantly positive impact on the Lending Test in the Houston AA. CONA originated or renewed 19 loans and lines of credit totaling \$116 million in the AA. These included \$75 million in loans that supported the creation or rehabilitation of 1,494 housing units in affordable housing developments. Two examples are included below.

- The bank provided a \$13.6 million construction loan to fund a 172-unit affordable rental community in Houston. All of the units are affordable to low- and moderate-income households. Nine of the units are for households earning 30% or less of AMI; 78 units are for households earning 50% or less; and the remaining 85 units are for households earning 60% or less. The City of Houston provided additional financing through its HOME funds program.
- The bank provided a total of \$17.3 million in construction loans to finance a two-phase development consisting of 128 single-family detached rental homes in Houston. Of the 128 units, 125 are affordable to low- and moderate-income households. The development also

included public financing in the form of loans from the City of Houston and from HUD; the bank's role is considered flexible and innovative as the bank is administering both public-sector construction loans.

Other Loan Data

CONA issued two LC totaling \$1.7 million that had a community development purpose. These LC are considered as other loan data and are listed in Table 1 Other Products.

Product Innovation and Flexibility

CONA's product flexibility had a positive impact on the Lending Test.

In Texas, the bank's DREAM program provides flexible loans to finance the purchase of homes by low- and moderate-income borrowers or in low- and moderate-income geographies. The program's flexible aspects include expanded underwriting criteria including no minimum loan amount and credit score flexibility.

The bank originated 60 DREAM loans totaling \$4.4 million in the AA during the review period.

In addition, through its subsidiary CDC, the bank provides high-impact construction financing to non-profit affordable housing developers in Texas. These loans fulfill an unmet need as they are in lower amounts (averaging approximately \$500 thousand) to finance small developments, and the transactions are complex. Further, the underwriting standards accommodate developers that do not meet traditional bank criteria. The loans are complex and labor-intensive in that bank associates work with the borrowers to help them access various affordable housing grants, and provide technical assistance to help build the non-profit organization's capacity and experience. An example transaction is a line of credit for \$888 thousand to a local CDC to develop 10 single-family homes for low- and moderate-income families in Houston. The families that purchase the homes will have access to a city subsidy program for down-payment assistance.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in seven of the thirteen AAs is not inconsistent with the bank's overall Outstanding performance under the Lending Test in Texas. In the Austin, Corpus Christi, Longview, Texarkana, Victoria, and Tyler AAs the bank's performance is weaker than the bank's overall performance in the state but is still considered good. This weaker performance is due to lower community development lending volumes and did not impact the overall state Lending Test rating. Refer to Tables 1 through 13 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

The bank's performance under the Investment Test in the State of Texas is rated Outstanding. Based on a full-scope review, the bank's performance in the Houston AA is excellent.

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.

CONA has an excellent level of qualified investments and grants, exhibits an excellent responsiveness to the community development needs in this AA, and makes extensive use of innovative and/or complex investments to support community development initiatives.

CONA made 209 current and prior period investments and grants totaling \$93.6 million in this AA. During the current evaluation period, CONA originated 202 qualified investments totaling \$84.1 million. Eight investments, totaling \$80.4 million are providing 902 units of affordable housing in the bank's AA. In addition, the bank made a \$13 million investment in CONCDC. Of the \$13 million, \$792 thousand of the investment funds directly benefited this AA and \$1 million benefited a broader statewide area with potential to benefit one or more of CONA's AAs. CONCDC focuses on economic development and assists in the creation, development, and expansion of small businesses across the bank's footprint. The remaining current investments consist of 193 qualified grants totaling \$2.9 million. These grants were to a variety of community development organizations, projects, and funds that support affordable housing or community services for primarily low- and moderate-income people, economic development, or revitalization and stabilization of low- and moderate-income geographies.

In addition, CONA made seven prior period qualified investments that remain outstanding and have a combined book value of \$9.5 million as of December 31, 2010. These prior period investments continue to provide value to the AA and show the bank's continuing commitment to help meet the area's community needs.

The following examples demonstrate CONA's leadership, excellent responsiveness to the community development needs in the area, innovativeness, and strong commitment to this community:

- The bank provided a \$15.9 million LIHTC investment to fund the construction of a 172 affordable rental community in Houston described earlier in Community Development Lending. This project required four layers of financing, making this a complex transaction.
- The bank provided \$20.3 million in LIHTC investments to finance the construction of a two phase development consisting of 128 single-family detached rental units in Houston described earlier in Community Development Lending.
- The bank provided an \$11.4 million LIHTC investment to fund the construction of a 118 unit affordable rental community in Houston. The project is designed exclusively for low- and moderate-income seniors who are 55 and older.

CONA also made four prior period investments in a statewide area with potential benefit to one or more AAs in Texas. These investments have a combined book value of \$1.3 million as of December 31, 2010.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Austin AA, Beaumont AA, Brownsville AA, Corpus Christi AA, Dallas AA, Fort Worth AA, Longview AA, McAllen AA, and San Antonio AA is not inconsistent with the bank's overall Outstanding performance under the Investment Test in the State of Texas. In the Texarkana AA, Texas Non MA AA, Tyler AA, and Victoria AA, the bank's performance is weaker than the bank's overall performance in the state and considered very poor. The weaker performance is due to lower levels of qualified investments. The weaker performance does not impact the State of Texas Investment Test rating. Refer to 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 Texas is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Houston AA is good.

Retail Banking Services

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.

Delivery systems are accessible to all portions of the full-scope AA. Several of CONA's branches that are located in middle- and upper-income geographies are located within one mile of one or more low-income geographies, thereby enhancing accessibility to residents in those geographies.

CONA's banking services and hours offered throughout the AA do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies and individuals. CONA offers extended lobby and drive-up hours at a majority of its locations, including Saturday banking hours. In addition, 17 branches located in middle- and upper-income geographies are located within one mile of one or more moderate-income geographies, thereby enhancing accessibility to residents in those geographies.

To the extent changes have been made to the bank's opening and closing of branches, it has improved the accessibility of its delivery systems, particularly in low- and moderate-income geographies. During the evaluation period, ten branches were opened in the Houston AA; two of which are located in low-income tracts and six in moderate-income tracts.

The bank's alternative delivery systems, significantly supplement the branch network, and provide consumers and small business account holders access to funds both during and outside traditional banking hours. Other alternative delivery systems include debit cards, bank-by-mail and online banking with a bill-payment feature. All CONA ATMs have bilingual (English and Spanish) screens.

Community Development Services

The bank provides a good level of community development services. In addition to the services discussed below, CONA offers bank-wide community development services listed under the Service Test in the Louisiana section of this Public Disclosure.

The bank's level of community development services is good in the Houston AA. Bank employees are very active in providing expertise to non-profit organizations regarding community and economic development, revitalization and stabilization, and affordable home loan programs. These employees lend expertise as members of the Boards of Directors and planning committees. Organizations benefiting from these contributions include the Bay Area Habitat for Humanity whose mission is to provide affordable housing to low- and moderate-income residents, and the Houston Minority Business Council which provides support to minority business owners.

The majority of volunteer hours were spent teaching financial literacy skills to students in schools where a significant percentage of children are from low- and moderate-income families. Also, hours were devoted to ACCION Texas which provides credit and services to small businesses.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Austin, Dallas, and San Antonio AAs is not inconsistent with the bank's overall High Satisfactory performance under the Service Test in the State of Texas. In the Beaumont, Brownsville, Fort Worth, Texarkana, Tyler, and TX Non MA AAs, performance is stronger than the bank's overall High Satisfactory performance. In the Corpus Christi, Longview, McAllen, and Victoria AAs, the bank's performance is weaker than the bank's overall High Satisfactory performance. The stronger and weaker performance is based on the distribution of the bank's branches in these areas. This performance did not impact the State of Texas Service Test rating. Refer to Table 15 in Appendix D for the facts and data that support these conclusions.

State Rating

State of Virginia

CRA rating for Virginia⁹:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity, given the evaluation period, level of deposits, and the bank's business lending strategy.
- Excellent geographic distribution of small loans to businesses.
- Adequate distribution of small loans to businesses.
- Adequate distribution of loans by geographic and borrower income.
- Community development lending had a neutral impact on the Lending Test.
- Good level of community development investments.
- The bank's branches are reasonably accessible to geographies and individuals of different income levels.
- CONA provided an adequate level of community development services that are responsive to the needs of the bank's AAs.

Description of Institution's Operations in Virginia

The bank operations in Virginia, outside of the multi-state MA, became effective July 30, 2009 following the merger of CCB into CONA. This added three new AAs to the bank's footprint (Charlottesville, Richmond, and a non-metropolitan area). CONA operates one branch in each of the three AAs. Total state deposits (outside of the multi-state MA) of \$32.5 million represent 0.04% of total domestic deposits.

Refer to the market profile for the State of Virginia in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

⁹ This rating reflects performance within the multi-state metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multi-state metropolitan area.

Scope of Evaluation in Virginia

We conducted a full-scope review of the Charlottesville AA. This AA represents the highest share of deposits and lending in the state. The Richmond and VA Non MA AAs received limited-scope reviews. In the full-scope area, only small loans to businesses were evaluated. The volume of home mortgage lending was insignificant to result in a meaningful analysis or conclusion. Additionally, there are no low- or moderate-income geographies in either of the limited-scope AAs. Statistics are presented in the tables in Appendix D for informational purposes.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Virginia is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Charlottesville AA is good.

Lending Activity

Refer to Tables 1 Lending Volume in the State of Virginia section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity is excellent. We based our conclusion primarily on the volume of loans the bank originated, given the five months the evaluation period for the AA was in effect during 2009. We did not compare lending product market shares to 2009 peer data for this reason.

During the 17 month evaluation period, CONA originated 12 (11%) home mortgage loans and 98 (89%) small loans to businesses in the AA. Over 72% of the small loans to businesses were originated during 2010.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is excellent.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the State of Virginia 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.

The volume of home mortgages was insufficient to result in a meaningful geographic analysis or conclusion.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is excellent. The volume of loans made in low-income geographies significantly exceeds the volume of businesses located in these geographies. The volume of loans made in moderate-income geographies exceeds the volume of businesses in these geographies.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level is adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the State of Virginia 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.

The volume of home mortgages was insufficient to result in a meaningful borrower distribution analysis or conclusion.

Small Loans to Businesses

Refer to Table 11 in the State of Virginia 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.

The distribution of small loans to businesses of different sizes is adequate.

The percentage of loans made to businesses with revenues of \$1 million or less is lower than the percentage of such businesses. It is noted that nearly 35% of the loans reported no revenues. Most of the business loans are originated by CONA's affiliate bank that originates credit card loans.

Community Development Lending

Refer to Table 1 Lending Volume in the State of Virginia 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 multi-family loans that also qualify as community development loans.

There were no community development loans made in the AA during the evaluation period. This had a neutral effect on the overall Lending Test.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the State of Virginia is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Charlottesville AA is

excellent. Performance in the VA Non MA AA of the limited-scope areas had a negative impact on the performance in the state.

Refer to Table 14 in the State of Virginia Section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

CONA has an excellent level of qualified investments and grants and exhibits an excellent responsiveness to the community development needs in this AA.

CONA made three current and prior period investments and grants totaling \$1.3 million in this AA. During the current evaluation period, CONA originated two qualified investments totaling \$1 million. One investment is in a project that is providing 88 units of affordable housing in the bank's AA. The remaining current investment is a qualifying grant totaling \$10 thousand to a community development organization that supports community services for primarily low- and moderate-income people.

In addition, CONA has one prior period qualified investment that remains outstanding and has a book value of \$288 million as of December 31, 2010. This prior period investment continues to provide value to the AA and shows the bank's continuing commitment to help meet the area's community needs.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Richmond AA is not inconsistent with the bank's overall High Satisfactory performance under the Investment Test in the State of Virginia. In the VA Non MA AA, the bank's performance is significantly weaker than the bank's overall performance in the state. The weaker performance is due to no current or prior period qualified investments. The weaker performance had a negative impact on the overall State of Virginia Investment Test rating. Refer to the Table 14 in the State of Virginia 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 Virginia is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Charlottesville AA is adequate.

Retail Banking Services

Refer to Table 15 in the State of Virginia 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.

CONA's delivery systems are reasonably accessible to all portions of the full-scope AA.

CONA's banking services and hours offered throughout the AA do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies

and individuals. CONA offers extended lobby and drive-up hours, including Saturday banking hours. These services enhance the accessibility of the branch.

No branches have been opened or closed during the evaluation period.

In the Charlottesville AA, CONA operates one branch, representing 33.3% of all bank branches in the State of Virginia. The bank does not operate any branches in LMI areas in this market. The bank's alternative delivery systems, significantly supplement the branch network, and provide consumers and small business account holders access to funds both during and outside traditional banking hours. Other alternative delivery systems include debit cards, bank-by-mail and online banking with a bill-payment feature. All CONA ATMs have bilingual (English and Spanish) screens.

Community Development Services

The bank's level of community development services is adequate in the Charlottesville AA considering its smaller presence in the market. The majority of volunteer hours were spent teaching financial literacy skills to students in schools where a significant percentage of the students are from low- and moderate-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Richmond and VA Non MA AAs is not inconsistent with the bank's overall Low Satisfactory performance. Refer to Table 15 in Appendix D for the facts and data that support these 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 non-metropolitan 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”).

Financial Institution		Products Reviewed		
Capital One, National Association (CONA) McLean, Virginia		Home Loans, Small Business, Small Farm Loans, Community Development Loans, Investments, Services		
Activities and Time Periods Reviewed				
Multi-state MMAs and States Reviewed	Home Loans	Small Business	Community Development Lending, Investment Test, Service Test	
New York-Northern New Jersey-Long Island, NY MMA	8/1/07 – 12/31/10	1/1/08 – 12/31/10	8/1/07 – 12/31/10	
Washington, DC-Bethesda (MD) MMA	7/1/07 – 12/31/10	1/1/08 – 12/31/10	7/1/07 – 12/31/10	
Louisiana	1/1/07 – 12/31/10	1/1/08 – 12/31/10	5/1/07 – 12/31/10	
Connecticut	3/10/08 – 12/31/10	3/10/08 – 12/31/10	3/10/08 – 12/31/10	
Delaware	7/30/09 – 12/31/10	7/30/09 – 12/31/10	7/30/09 – 12/31/10	
Maryland	7/30/09 – 12/31/10	7/30/09 – 12/31/10	7/30/09 – 12/31/10	
New Jersey	8/1/07 – 12/31/10	1/1/08 – 12/31/10	8/1/07 – 12/31/10	
Texas	1/1/07 – 12/31/10	1/1/08 – 12/31/10	5/1/07 – 12/31/10	
Virginia	7/30/09 – 12/31/10	7/30/09 – 12/31/10	7/30/09 – 12/31/10	
Affiliates		Relationship	Products Reviewed	
All Points Capital Corporation		Subsidiary	Small Loans to Businesses and Farms	
B.F. Saul Mortgage Company		Affiliate	Home Loans (2/27/09-7/29/09)	
Capital One Bank, USA, National Association (COBNA)		Affiliate	Small Loans to Businesses and Farms	
Capital One Community Development Corporation		Affiliate	Investments	
Capital One Community Development Corporation II (COCDC II)		Subsidiary	Community Development Loans	
Capital One Community Renewal Fund, LLC		Subsidiary	Community Development Loans	
Capital One Foundation		Affiliate	Investments (Grants)	
Capital One Home Loans (COHL)		Subsidiary	Home Mortgage Loans	
Capital One MR New Markets, LLC		Subsidiary	Community Development Loans	
Capital One NA Low Income Housing Tax Credit, Inc.		Subsidiary	Investments	
Capital One National Community Development Corporation (CONCDC)		Subsidiary	Investments	
Chevy Chase Bank (CCB)		Affiliate	Home Loans (2/27/09-7/29/09), Small Loans to Businesses and Farms (2/27/09 – 7/29/09)	
COCRF Investor I, LLC		Subsidiary	Community Development Loans	
COCRF Investor II, LLC		Subsidiary	Community Development Loans	
COCRF Investor III, LLC		Subsidiary	CD Lending	
COCRF Investor IV, LLC		Subsidiary	CD Lending	

COCRF Investor V, LLC		Subsidiary	CD Lending
COCRF Investor VI, LLC		Subsidiary	CD Lending
COCRF Investor VII, LLC		Subsidiary	CD Lending
GreenPoint Mortgage Funding, Inc. (GPM)		Affiliate	HMDA (2007)
North Fork Bank (NFB)		Affiliate	HMDA (2007)
List of Assessment Areas and Type of Examination			
Assessment Area	MSA# / MD#	Type of Exam	Other Information (Reflects counties/parishes in non-MSA areas and/or counties/parishes in MSAs or MDs where whole MSAs or MDs were not selected)
Multistate MSAs			
New York-New Jersey MSA 35620			
New York City MD	35644	Full-scope	In NJ: Bergen, Hudson, Passaic In NY: Bronx, Kings, Queens, New York, Richmond, Rockland, Westchester
Edison MD	20764	Limited-scope	In NJ: Middlesex, Monmouth, Ocean, Somerset
Nassau-Suffolk MD	35004	Limited-scope	In NY: Nassau, Suffolk
Newark MD	35084	Limited-scope	In NJ: Essex, Morris, Union
Washington DC-Bethesda (MD) MSA 47900			
Washington-Arlington-Alexandria MD	47894	Full-scope	Washington DC In MD: Calvert, Charles, Prince George's In VA: Alexandria City, Arlington, City of Fairfax, City of Falls Church, City of Fredericksburg, City of Manassas, City of Manassas Park, Fairfax, Fauquier, Loudoun, Prince William, Spotsylvania, Stafford, Warren
Bethesda MD	13644	Limited-scope	In MD: Frederick, Montgomery
Louisiana			
New Orleans MD	35380	Full-scope	Jefferson, Orleans, St. Bernard, St. Charles, St. John the Baptist, St. Tammany
Alexandria MD	10780	Limited-scope	Rapides
Baton Rouge MD	12940	Limited-scope	Ascension, East Baton Rouge, Livingston, West Baton Rouge
Houma MD	26380	Limited-scope	Lafourche, Terrebonne
Louisiana Non-MSA	99999	Limited-scope	Allen, Assumption, Avoyelles, Claiborne, East Carroll, Iberia, Jefferson Davis, Madison, Morehouse, St. Mary, Tangipahoa, Vermillion, Washington, Webster, West Carroll
Lafayette MD	29180	Limited-scope	Lafayette
Lake Charles MD	29340	Limited-scope	Calcasieu, Cameron
Monroe MD	33740	Limited-scope	Ouachita
List of Assessment Areas and Type of Examination (continued)			
Assessment Area	MSA# / MD#	Type of Exam	Other Information (Reflects counties/parishes in non-MSA areas and/or counties/parishes in MSAs or MDs where whole MSAs or MDs were not selected)
Shreveport MD	43340	Limited-scope	Bossier, Caddo, De Soto
Connecticut			
New Haven MD	35300	Full-scope	New Haven
Delaware			
Sussex County	99999	Full-scope	Sussex
Maryland			

Baltimore MD	12580	Full-scope	Anne Arundel, Baltimore, Carroll, City of Baltimore, Howard, Queen Anne's
Hagerstown MD	25180	Limited-scope	Washington
Maryland Non-MSA	99999	Limited-scope	St. Mary's, Talbot
New Jersey			
Trenton MD	45940	Full-scope	Mercer
Texas			
Houston MD	26420	Full-scope	Austin, Fort Bend, Galveston, Harris, Montgomery
Austin MD	12420	Limited-scope	Travis, Williamson
Beaumont MD	13140	Limited-scope	Jefferson, Orange
Brownsville MD	15180	Limited-scope	Cameron
Corpus Christi MD	18580	Limited-scope	Nueces
Dallas MD	19124	Limited-scope	Collin, Dallas, Denton
Ft Worth MD	23104	Limited-scope	Tarrant
Longview MD	30980	Limited-scope	Gregg
McAllen MD	32580	Limited-scope	Hidalgo
San Antonio MD	41700	Limited-scope	Bexar, Guadalupe
Texarkana MD	45500	Limited-scope	In AR: Miller In TX: Bowie
Texas Non-MSA	99999	Limited-scope	Anderson, Angelina, Camp, Cass, Cherokee, Colorado, Fayette, Harrison, Lamar, Lee, Matagorda, Nacogdoches, Washington, Wharton, Wood
Tyler MD	46340	Limited-scope	Smith
Victoria MD	47020	Limited-scope	Calhoun, Victoria
Virginia			
Charlottesville MD	16820	Full-scope	Albemarle, City of Charlottesville
Richmond MD	40060	Limited-scope	Goochland
Virginia Non-MSA	99999	Limited-scope	Culpeper

Appendix B: Summary of Multi-state Metropolitan Area and State Ratings

RATINGS Capital One, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multi-state Rating
Capital One, N.A.	Outstanding	Outstanding	High Satisfactory	Outstanding
Multi-state Metropolitan Area or State:				
NY-NJ-LI MMA	Outstanding	Outstanding	High Satisfactory	Outstanding
DC-MD-VA Multi-state	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Louisiana	Outstanding	Outstanding	High Satisfactory	Outstanding
Connecticut	Outstanding	Outstanding	Low Satisfactory	Outstanding
Delaware	Outstanding	High Satisfactory	Low Satisfactory	Satisfactory
Maryland	Outstanding	Outstanding	Low Satisfactory	Outstanding
New Jersey	Outstanding	Outstanding	Low Satisfactory	Outstanding
Texas	Outstanding	Outstanding	High Satisfactory	Outstanding
Virginia	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

(*) 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

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New York-Northern New Jersey-Long Island Multi-state Metropolitan Area

New York City Metro AA

Demographic Information for Full-scope Area: NYC Metro AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,902	11.72	24.74	28.67	32.63	2.24
Population by Geography	11,200,632	12.50	26.28	26.38	34.68	0.16
Owner-Occupied Housing by Geography	1,565,425	2.03	11.98	26.93	59.05	0.00
Business by Geography	732,691	6.52	17.58	21.63	53.31	0.96
Farms by Geography	5,720	2.41	7.48	17.71	72.26	0.14
Family Distribution by Income Level	2,680,133	25.94	15.46	16.78	41.82	0.00
Distribution of Low and Moderate- income Families throughout AA Geographies	1,109,567	22.28	36.82	25.32	15.57	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below Poverty Level		\$49,461 \$65,600 17%	Median Housing Value Unemployment Rate	\$439,300 8.2%		

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

Source: 2010 Dun and Bradstreet, Bureau of Labor Statistics, National Association of Realtors-Quarterly Report

CONA has defined this AA to include 10 counties in the New York-White Plains-Wayne, NY-NJ MD. This includes the New Jersey counties of Bergen, Hudson and Passaic, and the New York counties of Bronx, Kings, New York, Queens, Richmond, Rockland and Westchester. The 2010 HUD adjusted median family income for the AA is approximately \$66 thousand; however, there are significant disparities in the income levels of the various counties or boroughs. New York County (Manhattan) is among the richest counties in the U.S. The other boroughs, especially Queens and Staten Island, have large middle-class populations. Also the poverty level of the AA (17%) is quite high, with the highest rates found within Bronx (27.1%) and Kings (21.9%) counties.

New York City, consisting of Bronx, Kings, New York, Queens, and Richmond Counties, is the most significant economic contributor to the AA. New York City is home to a diversified mix of businesses, including headquarters of many national and international corporations. Historically, the downtown area has been dominated by the financial services industry. Industries operating in the midtown area include advertising, publishing, and garment production. The retail sector is a major employer along with health and social care. In addition, light manufacturing and wholesale trades provide a significant level of job opportunities in Bronx County. Some of the assessment area's largest employers are New York Presbyterian Healthcare Systems, Citigroup, JP Morgan Chase, Verizon, and Federated Department Stores.

The New York City economy has struggled following the recession that began in late 2008. The unemployment rate for the metropolitan area has more than doubled since 2006 and now stands at 8.2%, compared to 7.6% for New York State. Wall Street is a significant contributor to employment in the area and suffered significant layoffs following the financial crisis.

Housing prices have dropped significantly over the past several years, but remain relatively high. The median single family housing value for the AA as of March 2011 was approximately \$439 thousand, which is down from approximately \$494 thousand in 2008 and approximately \$540 thousand in 2007. The high cost of living associated with this area makes home ownership difficult, especially for low- and moderate-income populations. Of the approximately 1.5 million owner-occupied housing units, just 2% are in low-income areas and 12% are in moderate-income areas.

During this evaluation, we met with representatives from seven community-based organizations operating in the AA. The contacts were with organizations supporting affordable housing, public education, economic development, social services targeted toward low- and moderate-income families, immigrant assistance, small businesses, and neighborhood development. These organizations confirmed the community needs identified by the bank, as well as the need for volunteer services to teach, raise money and provide facilities support for small schools, no cost bank accounts, and additional grants for non-profit organizations. There are numerous opportunities for community development involvement and participation in the AA.

Washington, DC-Maryland-Virginia Multi-state Metropolitan Area

Washington, DC AA

Demographic Information for Full-scope Area: Washington, DC AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	797	8.91	24.47	37.14	28.48	1.00
Population by Geography	3,672,723	6.00	22.96	40.21	30.68	0.15
Owner-Occupied Housing by Geography	855,033	2.13	16.23	43.86	37.78	0.00
Business by Geography	324,560	4.55	15.54	38.59	39.54	1.78
Farms by Geography	4,796	1.13	12.53	50.75	35.45	0.15
Family Distribution by Income Level	903,840	20.05	17.72	22.19	40.04	0.00
Distribution of Low and Moderate-income Families throughout AA Geographies	341,411	11.50	35.63	38.82	14.05	0.00
Median Family Income		\$71,100	Median Housing Value	\$294,800		
HUD Adjusted Median Family Income for 2010		\$101,700	Unemployment Rate	5.7%		
Households Below Poverty Level		7%				

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

Source: 2010 Dun and Bradstreet, Bureau of Labor Statistics, National Association of Realtors-Quarterly Report

Effective July 30, 2009, CONA significantly expanded its presence in the Washington-Bethesda multi-state metropolitan area when it merged Chevy Chase Bank (CCB). CONA had only a single office in the area before the merger. In contrast, CONA now has 210 branches in the multi-state area, including 141 in the Washington-Arlington-Alexandria AA and 69 in the Bethesda-Frederick AA.

Before this expansion, there were 173 geographies (including only 1 low-income and 13 moderate-income) in CONA's AA, which consisted of part of Northern Virginia. The bank's Washington-Arlington-Alexandria AA now consists of 797 geographies, including 71 low-income and 195 moderate-income geographies, respectively. Thus, as a result of the merger, the portion of low- and moderate-income geographies in the AA more than quadrupled, from 8% to 33% of all geographies.

Currently, CONA's AA in the Washington-Arlington-Alexandria MD consists of the following counties and cities: Washington, DC; Calvert, Charles, and Prince George's counties in Maryland; Arlington, Fairfax, Fauquier, Loudoun, Prince William, Spotsylvania, Stafford, and Warren counties in Virginia; and the independent cities of Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas, and Manassas Park (also in Virginia).

Mortgage lending fell dramatically during the recession. Total HMDA originations by all reporting lenders nationwide dropped 40% from 2007 through 2009. In the Washington, DC AA, that drop was 33%.

Investments in LIHTCs fell as many investors exited the market due to the financial crisis. This created a large gap in funding of affordable housing developments. But state and local funding, which is often a source of this needed gap financing, was also stressed as revenues from sources such as property, business and income taxes declined. Furthermore, the recession, and declining or negative earnings, reduced the ability of some banks and other credit providers to finance affordable housing.

Small business loan applications and originations also declined sharply. As these businesses experienced lower demand for their products and services, their demand for credit was reduced. Lenders experienced higher defaults and losses, and subsequently tightened their credit standards. Nationwide data comparing 2007 small business and small farm (revenue \$1 million or less) originations and purchases to 2009 originations and purchases showed a 68% drop in number of loans versus a 75% decrease in the AA.

Washington, D.C., the nation's capital, is the economic hub for the Washington Metropolitan Area, an area that includes portions of Northern Virginia and Central and Southern Maryland. The presence of the federal government helps to create a stable employment base for the region. Historically, greater Washington's unemployment rate has been at least two percentage points below the national average, with the exception of the District of Columbia. In the District, the unemployment rate peaked at 12% in 2010, while the other major jurisdictions in the AA had significantly lower peak rates.

For this evaluation, we met with representatives from several community-based organizations supporting affordable housing, community development services, small business development, and social services targeted to low- and moderate-income families. The representatives identified affordable housing, funding for community development projects, lack of business partners, and homeownership funding as needs in the assessment area. Until recently, the drop in value of LIHTCs made it difficult to attract investors and limited the number of economically viable projects. Therefore, there were limited opportunities for community development involvement and participation in the AA.

The bank has also identified the need for financing and technical assistance for small businesses, job training, mainstream banking services for unbanked and under-banked populations, and community revitalization.

State of Louisiana

New Orleans AA

Demographic Information for Full-scope Area: New Orleans AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	380	15.26	23.95	33.68	26.58	0.53
Population by Geography	1,289,753	10.62	21.56	37.90	29.91	0.01
Owner-Occupied Housing by Geography	299,498	4.52	16.34	42.05	37.09	0.00
Business by Geography	85,270	5.82	18.91	36.72	38.54	0.01
Farms by Geography	1,198	3.67	13.69	46.83	35.81	0.00
Family Distribution by Income Level	330,651	23.85	16.31	18.86	40.99	0.00
Distribution of Low and Moderate- income Families throughout AA Geographies	132,779	18.29	29.99	36.48	15.24	0.00
Median Family Income		\$42,770	Median Housing Value		\$147,900	
HUD Adjusted Median Family Income for 2010		\$61,200	Unemployment Rate		7.1%	
Households Below Poverty Level		17%				

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

Source: 2010 Dun and Bradstreet, Bureau of Labor Statistics, National Association of Realtors-Quarterly

CONA has defined its New Orleans AA to include six of the seven Parishes in the New Orleans-Metairie-Kenner MSA (Jefferson, Orleans, St. Bernard, St. Charles, St. John the Baptist and St. Tammany).

Although Hurricanes Katrina and Rita occurred in 2005, their damaging effects still have substantial influence on the AA's economy. Hurricane Katrina significantly damaged 160,000 homes in the New Orleans area. Approximately 20% of the owner-occupied housing stock, a high percentage of rental properties, and much of the public housing was damaged or destroyed by both hurricanes. Home improvement and refinance lending declined sharply as there were fewer homes to lend on, and many were awaiting receipt of insurance proceeds and government grants to make repairs.

In Orleans Parish, 42% of the housing was destroyed or significantly damaged by the two hurricanes. The population dropped dramatically as residents left the area to find housing and jobs elsewhere. Some residents have returned, but the population is still less than pre-hurricane levels and many who returned are living outside of New Orleans. Many large and small businesses were destroyed.

Rebuilding has been slow, with a gap in affordable rental housing still an issue. Finally, the B.P. oil spill in April 2010 hurt the area's economy as tourism was reduced and key industries that depended on the Gulf waters, like fishing, and oil drilling and related services, suffered downturns.

As of September 2010, there were 43,755 blighted homes and empty lots in New Orleans, down from 65,428 in early 2008. This significant reduction is a result of the very large infusion of federal dollars to rebuild homes and rental properties post-Katrina.

After the hurricanes, resident employment decreased by 22% and the unemployment rate rose to 15.2%. In the New Orleans metropolitan area, almost 78,000 jobs were lost. The financial crisis of 2007-2010 also negatively affected employment in the New Orleans AA.

According to HMDA data, total home mortgage loan originations nationwide dropped 40% from 2007 through 2009. In the New Orleans AA, that drop was 43%.

Small business loan originations also declined sharply. As these businesses experienced lower demand for their products and services, their demand for credit was reduced. Lenders experienced higher defaults and losses and subsequently increased their credit standards. Nationwide data comparing 2007 small business and small farm (less than \$1 million in revenues) originations and purchases to 2009 originations and purchases show a 68% drop in number of loans. There was a similar decline in the New Orleans AA.

The New Orleans AA has a very significant level of opportunities and capacity for community development, as they are still rebuilding due to the aftermath of both hurricanes and the B.P. oil spill. The bank, through their involvement with various community organizations, has identified a need for affordable housing, financial literacy, job training and small business development within the AA.

We met with representatives from nine community based organizations supporting affordable housing, community development services, small business development and financing, personal credit counseling, education and family services. The representatives confirmed the need for affordable multi-family housing, job training and workforce development, small business financing, comprehensive neighborhood revitalization planning and rebuilding of public facilities. They also identified the need for foreclosure prevention assistance programs and funding for non-profit organizations within the AA.

State of Connecticut

New Haven AA

Demographic Information for Full-scope Area: New Haven AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	185	12.43	19.46	43.24	24.32	0.54
Population by Geography	824,008	9.45	19.46	45.77	25.31	0.01
Owner-Occupied Housing by Geography	201,349	3.04	12.33	52.39	32.24	0.00
Business by Geography	64,388	7.52	17.31	43.44	31.71	0.02
Farms by Geography	1,437	2.09	9.81	42.17	45.93	0.00
Family Distribution by Income Level	211,878	20.85	17.34	22.55	39.26	0.00
Distribution of Low and Moderate-income Families throughout AA Geographies	80,907	16.50	26.95	42.83	13.72	0.00
Median Family Income		\$60,512	Median Housing Value	\$211,700		
HUD Adjusted Median Family Income for 2010		\$78,900	Unemployment Rate	9.4%		
Households Below Poverty Level		10%				

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

Source: 2010 Dun and Bradstreet, Bureau of Labor Statistics, National Association of Realtors-Quarterly Report.

The New Haven AA consists of the County of New Haven, Connecticut. The county comprises the New Haven MSA.

The financial crisis of 2007-2010 affected New Haven as it did elsewhere. Unemployment in the New Haven MSA rose from 4.6% in 2007 to 9.7% in April 2011.

In conducting our evaluation of the AAs needs, we considered information received from other contacts made with the OCC. The area has suffered from significant foreclosures and unemployment remains a major problem. The contacts identified small business lending, lines of credit for non-profit organizations, and financing the development of commercial industrial and residential units as primary credits need in the area. They also indicated a need for community development and better access to financial services. There are numerous opportunities for community development involvement and participation.

State of Delaware

Sussex County AA

Demographic Information for Full-scope Area: Sussex County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	36	0.00	0.00	91.67	8.33	0.00
Population by Geography	156,638	0.00	0.00	92.26	7.74	0.00
Owner-Occupied Housing by Geography	50,505	0.00	0.00	90.18	9.82	0.00
Business by Geography	13,138	0.00	0.00	83.85	16.15	0.00
Farms by Geography	611	0.00	0.00	96.40	3.60	0.00
Family Distribution by Income Level	44,090	18.14	19.53	23.99	38.34	0.00
Distribution of Low and Moderate-income Families throughout AA Geographies	16,611	0.00	0.00	95.53	4.47	0.00
Median Family Income		\$45,190	Median Housing Value	\$204,500		
HUD Adjusted Median Family Income for 2010		\$57,100	Unemployment Rate	8%		
Households Below Poverty Level		10%				

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

Source: 2010 Dun and Bradstreet, Bureau of Labor Statistics, National Association of Realtors-Quarterly Report

The bank's single AA in Delaware consists of Sussex County. It is located in the southern part of the state and is a non-metropolitan area.

During the financial crisis, unemployment in Sussex County grew from 2.8% in 2007 to 8.8% in 2010, after peaking at 11.1%.

According to HMDA data, total home mortgage loan originations nationwide dropped 40% from 2007 through 2009. In Sussex County, the drop was 47%.

Small business loan originations also declined sharply. As these businesses experienced lower demand for their products and services, their demand for credit was reduced. Lenders experienced higher defaults and losses and subsequently increased their credit standards. Nationwide data comparing 2007 small business and small farm (\$1 million or less in revenue) originations and purchases to 2009 originations and purchases show a 68% drop in number of loans. There was a decline of 65% in Sussex County.

There were few opportunities to make qualified investments in the AA during the evaluation period. For example, according to the Delaware State Housing Authority, the state's 2009 LIHTC allocation was only \$1.3 million for three developments; one of these developments was in Sussex County, a 37-unit apartment complex that received an allocation of \$559,171.

In conducting our evaluation of the AAs needs, we considered information received from other contacts made with the OCC. These contacts included discussions with the executive

directors of two community-based organizations. One organization specializes in affordable housing programs, and the other is a community development financial institution. The need for affordable housing and small business financing were identified as primary needs of the AA.

State of Maryland

Baltimore AA

Demographic Information for Full-scope Area: Baltimore AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	580	13.45	22.07	38.28	25.34	0.86
Population by Geography	2,334,404	9.66	20.33	38.79	30.78	0.44
Owner-Occupied Housing by Geography	586,572	4.97	16.65	41.15	37.23	0.00
Business by Geography	162,614	5.23	15.38	40.92	38.343	0.04
Farms by Geography	3,438	0.79	6.40	43.05	49.77	0.00
Family Distribution by Income Level	597,466	21.17	17.70	22.12	39.01	0.00
Distribution of Low and Moderate- income Families throughout AA Geographies	232,211	17.67	30.34	36.25	15.74	0.00
Median Family Income		\$59,301	Median Housing Value		\$212,600	
HUD Adjusted Median Family Income for 2010		\$82,200	Unemployment Rate		7%	
Households Below Poverty Level		10%				

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

Source: 2010 Dun and Bradstreet, Bureau of Labor Statistics, National Association of Realtors-Quarterly Report

The Baltimore AA consists of Baltimore City, Anne Arundel County, Baltimore County, Carroll County, Howard County and Queen Anne's County. The AA consists of most of the Baltimore-Towson MSA, with the exception of Harford County. The bank does not include Harford County in its AA since it has no offices in that county.

The financial crisis of 2007-2010 affected the Baltimore AA as it did elsewhere. Unemployment in the Baltimore-Towson MSA grew from 3.7% in 2007 to 8.5% in 2010.

According to HMDA data, total home mortgage loan originations nationwide dropped 40% from 2007 through 2009. In the Baltimore AA, the drop was 46%. Affordability was also a key factor in this AA.

Small business loan originations also declined sharply. As these businesses experienced lower demand for their products and services, their demand for credit was reduced. Lenders experienced higher defaults and losses and subsequently increased their credit standards. Nationwide CRA data comparing 2007 small business and small farm (less than \$1 million in revenues) originations and purchases to 2009 originations and purchases show a 68% drop in number of loans. There was an even larger decline of 74% in the Baltimore AA.

In conducting our evaluation of the AAs needs, we considered information received from other contacts made with the OCC. The first contact was a non-profit organization focused on sustaining and creating affordable housing and opportunities for homeownership in the Baltimore region. The community contact identified a need for safe and affordable housing; foreclosure prevention and intervention services; financial literacy and education; access to basic banking services (particularly in low- and very low-income neighborhoods); financial assistance for local non-profit organizations that work with low- to moderate-income communities and individuals; as well as monetary assistance (in the form of low cost loans or loan modifications) for homeowners who are facing foreclosure.

The second community contact was a regional economic development organization that brings businesses, government, and educational institutions together to promote the region as a good place to live and work. The community contact identified a need for technical and financing assistance for existing and new small businesses, as well as a need to support local community development activities in the area. There was a limited number of investment opportunities in the AA during the evaluation period. LIHTCs are a major investment driver. However due to the volatile LIHTC market, the LIHTC prices dropped, resulting in less equity being contributed to transactions and fewer viable developments being available.

State of New Jersey

Trenton AA

Demographic Information for Full-scope Area: Trenton AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	73	17.81	16.44	34.25	30.14	1.37
Population by Geography	350,761	11.94	14.87	35.29	37.37	0.52
Owner-Occupied Housing by Geography	84,325	6.07	12.82	38.98	42.12	0.00
Business by Geography	22,549	10.36	9.85	33.43	46.35	0.00
Farms by Geography	482	3.73	7.88	34.23	54.15	0.00
Family Distribution by Income Level	86,757	20.71	17.30	21.40	40.58	0.00
Distribution of Low and Moderate-income Families throughout AA Geographies	32,980	21.92	22.47	35.32	20.29	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below Poverty Level		\$68,261 \$91,300 9%	Median Housing Value Unemployment Rate		\$218,700 7.5%	

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

Source: 2010 Dun and Bradstreet, Bureau of Labor Statistics, National Association of Realtors-Quarterly Report

The Trenton AA consists of Mercer County in its entirety which comprises the Trenton-Ewing MSA. The county seat is the City of Trenton, which is the state capital of New Jersey.

While the median household income for Mercer County was \$72,883 in 2008, it was \$35,259 for the City of Trenton. The 2000 homeownership rates were 67% for Mercer County and 45.5% for Trenton. The median home and condominium value in 2010 for Mercer County was \$317,600 compared to Trenton at \$138 thousand.

In conducting our evaluation of the AAs needs, we considered information received from other contacts made with the OCC. These contacts included discussions with the executive directors of two community-based organizations. One organization specializes in affordable housing programs and the other is a community development financial institution. They identified a need for retail businesses, affordable housing, development and revitalization of distressed areas. There are a limited number of community development opportunities in the AA. Trenton had been a major industrial city and many of the former plants have environmental issues that make redevelopment challenging.

State of Texas

Houston AA

Demographic Information for Full-scope Area: Houston AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	820	8.54	32.07	28.66	29.76	0.98
Population by Geography	4,322,546	6.93	30.99	29.58	32.44	0.05
Owner-Occupied Housing by Geography	907,051	3.15	23.36	30.84	42.65	0.00
Business by Geography	404,885	4.45	23.26	27.57	44.08	0.63
Farms by Geography	7,103	3.13	17.99	36.70	41.97	0.21
Family Distribution by Income Level	1,088,148	22.68	17.35	18.71	41.25	0.00
Distribution of Low and Moderate-income Families throughout AA Geographies	435,650	12.26	44.57	28.58	14.59	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below Poverty Level		\$51,431 \$65,100 12%	Median Housing Value Unemployment Rate	\$148,500 8%		

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

Source: 2010 Dun and Bradstreet, Bureau of Labor Statistics, National Association of Realtors-Quarterly

There are five counties that comprise the Houston AA; Fort Bend, Montgomery, Galveston and Austin. Harris County is the third largest county in the state and Houston is the fourth largest city in the United States by population.

The effects of Hurricane Katrina, which made landfall in New Orleans in August 2005, significantly affected migration into the Houston area because many evacuees relocated into the city of Houston and surrounding areas. Many of these people needed affordable housing.

The economic downturn impacted banks' ability and opportunity to lend to consumers, support homebuyers through mortgages, refinance homes, and make home improvement loans as home values and equity dropped and unemployment increased. Lending to small businesses declined as they experienced reduced demand for their goods and services. Unemployment peaked at 8.4% for the Houston MSA in 2010. In the City of Houston, the unemployment rate grew from 4.0% in May of 2007 to a high of 8.5% in January of 2010.

According to national HMDA data, total home mortgage loan originations dropped 40% from 2007 through 2009. In the Houston AA, the drop was 49%.

Small business loan applications and originations also declined sharply. As these businesses experienced lower demand for their products and services, their demand for credit was reduced. Lenders experienced higher defaults and losses, and subsequently

increased their credit standards. Nationwide data comparing 2007 small business and small farm (\$1 million or less in revenue) originations and purchases to 2009 originations and purchases shows a 67.9% drop in number of loans. The decline in the Houston AA was 71%.

For this evaluation, we met with representatives from seven community based organizations supporting affordable housing, economic development, social services targeted to low- and moderate-income families, small businesses, and education. The representatives identified the following as needs in the assessment area: homebuyer education and counseling, small business loans and technical assistance, credit counseling, programs and services for youth including mentoring programs, affordable housing grants and subsidies, support for asset building programs, and greater collaboration between local government, non-profit organizations and large national banks. There are numerous opportunities for community development involvement and participation in the AA.

State of Virginia

Charlottesville AA

Demographic Information for Full-scope Area: Charlottesville AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	29	3.45	24.14	44.83	27.59	0.00
Population by Geography	124,285	2.49	16.68	48.55	32.28	0.00
Owner-Occupied Housing by Geography	27,870	1.66	7.44	54.69	36.21	0.00
Business by Geography	11,947	1.14	9.95	54.30	34.61	0.00
Farms by Geography	375	1.07	3.20	57.60	38.13	0.00
Family Distribution by Income Level	28,947	18.44	16.47	21.54	43.55	0.00
Distribution of Low and Moderate-income Families throughout AA Geographies	10,106	5.20	18.65	55.24	20.90	0.00
Median Family Income		\$54,165	Median Housing Value		\$248,000	
HUD Adjusted Median Family Income for 2010		\$73,800	Unemployment Rate		4.7%	
Households Below Poverty Level		12%				

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

Source: 2010 Dun and Bradstreet, Bureau of Labor Statistics, National Association of Realtors-Quarterly Report

The Charlottesville AA consists of the City of Charlottesville and the County of Albemarle in the State of Virginia. The county is located approximately 110 miles southwest of Washington, D.C. and 70 miles west of Richmond. Charlottesville is an independent city that is geographically surrounded by, but legally separate from, Albemarle County.

There is great need for affordable rental housing in the AA and consequently significant need to preserve and create more units, including through the use of federal low-income housing tax credits.

According to HMDA data, total home mortgage loan originations nationwide dropped 40% from 2007 through 2009. In the Charlottesville AA, that drop was 44%.

Small business loan originations also declined sharply. As these businesses experienced lower demand for their products and services, their demand for credit was reduced. Lenders experienced higher defaults and losses and subsequently increased their credit standards. Nationwide CRA data comparing 2007 small business and small farm (\$1 million in revenue or less) originations and purchases to 2009 originations and purchases show a 68% drop in number of loans. There was a similar decline in the Charlottesville AA.

During the financial crisis, unemployment in the City of Charlottesville grew from 2.7% in 2007 to 5.9% in 2010 but has since declined.

We considered information received from other contacts made with the OCC for our evaluation in the AA. The contacts were with a regional non-profit organization focused on the housing and community development needs of low and moderate-income families and another non-profit organization focused in revitalizing communities through affordable housing and community development. Although the AA has a relatively stable economy, there are still a number of community development and credit needs in the area. Primary needs identified are affordable housing and support services for the growing homeless population in the area. There are numerous opportunities for community development involvement and participation.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multi-state 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 and 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 30th 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. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- 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 Multi-family Loans** - Compares the percentage distribution of the number of multi-family loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multi-family 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 thousand) 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 (OPTIONAL)** - Compares the percentage distribution of the number of small loans (less than or equal to \$500

thousand) 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 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table 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 households within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

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. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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.

Table 15. Distribution of Branch Delivery System and ATM Delivery System - 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 ATMs in each MA/AA.

Tables of Performance Data

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Washington, DC-Maryland-Virginia Multi-state Metropolitan Area.....D-19

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Table 1. Lending Volume

LENDING VOLUME		Geography: MULTI-STATE-NY-NJ-LI				Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010-MORTGAGE, JANUARY 1, 2008 TO DECEMBER 31, 2010 – SMALL BUSINESS						
Assessment Area (2010):	% 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)	
Full Review:												
NYC Metro AA	52.55	4,310	872,637	59,187	2,313,219	0	0	300	1,066,055	63,797	4,251,911	57.62
Limited Review:												
Edison AA	11.27	1,503	141,642	12,181	168,319	0	0	3	66,500	13,687	376,461	2.02
Nassau-Suffolk AA	27.23	2,559	328,330	30,467	1,471,494	0	0	28	146,504	33,054	1,946,328	36.83
Newark AA	8.94	1,013	176,329	9,826	220,613	0	0	16	104,304	10,855	501,246	3.54

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from August 01, 2007 to December 31, 2010.

*** Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: MULTI-STATE-NY-NJ-LI						Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010						
Assessment Area (2010):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		CD Letters of Credit**		CD Leases**		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)	
Full Review:														
NYC Metro AA	90.91	10	134,606	8	123,683	2	10,923	0	0	0	0	0	0	57.62
Limited Review:														
Edison AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	2.02
Nassau-Suffolk AA	9.09	1	9,164	1	9,164	0	0	0	0	0	0	0	0	36.83
Newark AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	3.54

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from August 01, 2007 to December 31, 2010.

*** Deposit Data as of June 30, 2010. 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: MULTI-STATE-NY-NJ-LI				Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010									
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	
Full Review:																
NYC Metro AA	420	50.24	2.03	4.76	11.98	15.95	26.93	30.24	59.06	49.05	0.09	0.39	0.07	0.11	0.07	
Limited Review:																
Edison AA	88	10.53	3.50	4.55	14.87	19.32	51.71	59.09	29.93	17.05	0.04	0.00	0.04	0.06	0.02	
Nassau-Suffolk AA	269	32.18	0.22	0.00	12.21	21.93	66.17	67.29	21.40	10.78	0.17	0.00	0.34	0.16	0.08	
Newark AA	59	7.06	3.82	5.08	13.82	25.42	32.75	40.68	49.61	28.81	0.07	0.07	0.12	0.13	0.02	

* Based on 2009 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: MULTI-STATE-NY-NJ-LI						Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010							
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
Full Review:															
NYC Metro AA	2,753	44.40	2.03	3.09	11.98	14.49	26.93	35.38	59.06	47.04	6.25	14.15	11.00	9.50	4.16
Limited Review:															
Edison AA	1,093	17.63	3.50	1.92	14.87	13.54	51.71	60.02	29.93	24.52	3.46	6.15	2.90	3.79	2.93
Nassau-Suffolk AA	1,648	26.58	0.22	0.18	12.21	17.84	66.17	69.72	21.40	12.26	8.57	0.00	10.59	8.81	6.15
Newark AA	706	11.39	3.82	6.94	13.82	23.80	32.75	38.24	49.61	31.02	3.62	13.21	5.32	4.21	2.30

* Based on 2009 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: MULTI-STATE-NY-NJ-LI					Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010				
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						
Full Review:																					
NYC Metro AA	883	43.45	2.03	3.06	11.98	13.82	26.93	30.46	59.06	52.66	0.09	0.05	0.11	0.08	0.10						
Limited Review:																					
Edison AA	308	15.16	3.50	2.92	14.87	15.58	51.71	57.14	29.93	24.35	0.06	0.00	0.01	0.06	0.06						
Nassau-Suffolk AA	621	30.56	0.22	0.32	12.21	18.20	66.17	68.28	21.40	13.20	0.20	0.00	0.24	0.21	0.16						
Newark AA	220	10.83	3.82	8.18	13.82	17.27	32.75	36.36	49.61	38.18	0.04	0.06	0.04	0.06	0.03						

* Based on 2009 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 Multi-family Loans

Geographic Distribution: MULTI-FAMILY			Geography: MULTI-STATE-NY-NJ-LI				Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Multi-family 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						
Full Review:																
NYC Metro AA	254	80.13	17.74	16.54	29.37	25.59	21.21	22.44	31.69	35.43	0.95	1.33	1.11	0.40	1.09	
Limited Review:																
Edison AA	14	4.42	7.81	7.14	24.08	42.86	53.46	21.43	14.66	28.57	2.82	0.00	3.13	0.00	14.29	
Nassau-Suffolk AA	21	6.62	3.51	0.00	27.94	23.81	58.07	47.62	10.49	28.57	3.75	0.00	6.67	1.96	7.69	
Newark AA	28	8.83	26.54	17.86	34.26	60.71	24.43	10.71	14.77	10.71	1.75	0.00	1.45	2.17	8.33	

* Based on 2009 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 multi-family housing units in the area based on 2000 Census information.

**** Multi-family 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: MULTI-STATE-NY-NJ-LI		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
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 Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp											
Full Review:																										
NYC Metro AA	58,654	52.78	6.52	7.87	17.58	19.38	21.63	24.63	53.31	48.13	5.57	15.13	8.60	5.73	3.85											
Limited Review:																										
Edison AA	12,174	10.96	3.04	3.59	13.18	14.39	51.46	50.20	32.21	31.82	3.77	8.41	6.40	3.40	3.00											
Nassau-Suffolk AA	30,467	27.42	0.66	1.05	13.28	14.86	62.78	63.58	23.27	20.52	9.35	31.58	13.28	9.37	6.90											
Newark AA	9,826	8.84	10.08	11.63	16.63	19.05	30.67	28.49	42.63	40.83	6.42	23.10	15.94	4.04	3.45											

* Based on 2009 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 (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MULTI-STATE-NY-NJ-LI								Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010					
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
Full Review:															
NYC Metro AA	420	50.24	25.94	2.85	15.46	15.80	16.78	23.06	41.82	58.29	0.10	0.54	0.21	0.21	0.04
Limited Review:															
Edison AA	88	10.53	19.11	15.48	18.58	34.52	22.73	14.29	39.58	35.71	0.05	0.04	0.09	0.02	0.04
Nassau-Suffolk AA	269	32.18	18.03	11.81	18.61	33.07	24.19	21.26	39.18	33.86	0.19	0.33	0.38	0.12	0.09
Newark AA	59	7.06	23.67	13.21	16.72	30.19	19.69	26.42	39.92	30.19	0.10	0.44	0.24	0.04	0.03

* Based on 2009 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 7.1% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: MULTI-STATE-NY-NJ-LI						Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010						
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
Full Review:															
NYC Metro AA	2,753	44.40	25.94	5.05	15.46	13.23	16.78	18.54	41.82	63.18	6.48	14.47	15.01	6.30	5.05
Limited Review:															
Edison AA	1,093	17.63	19.11	8.51	18.58	19.49	22.73	32.75	39.58	39.25	3.53	1.59	2.89	4.37	3.88
Nassau-Suffolk AA	1,648	26.58	18.03	10.77	18.61	18.49	24.19	30.11	39.18	40.63	8.91	12.93	9.67	7.76	8.61
Newark AA	706	11.39	23.67	8.22	16.72	15.58	19.69	26.06	39.92	50.14	3.75	5.17	1.40	5.03	3.70

* Based on 2009 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 0.1% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MULTI-STATE-NY-NJ-LI				Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total **	% Families ***	% BANK Loans ****	% Families *****	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp	
Full Review:																
NYC Metro AA	883	43.45	25.94	5.97	15.46	15.65	16.78	21.15	41.82	57.23	0.11	0.31	0.11	0.17	0.09	
Limited Review:																
Edison AA	308	15.16	19.11	14.95	18.58	25.91	22.73	30.90	39.58	28.24	0.07	0.04	0.07	0.07	0.07	
Nassau-Suffolk AA	621	30.56	18.03	10.61	18.61	33.17	24.19	28.69	39.18	27.53	0.23	0.38	0.37	0.21	0.15	
Newark AA	220	10.83	23.67	11.11	16.72	25.93	19.69	27.78	39.92	35.19	0.05	0.00	0.06	0.07	0.05	

* Based on 2009 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 3.7% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTI-STATE-NY-NJ-LI			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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
Full Review:									
NYC Metro AA	59,187	53.01	75.66	32.29	93.36	3.05	3.59	5.57	6.77
Limited Review:									
Edison AA	12,181	10.91	78.21	45.39	98.19	0.91	0.90	3.77	7.48
Nassau-Suffolk AA	30,467	27.29	80.65	26.49	92.31	4.83	2.85	9.35	10.58
Newark AA	9,826	8.80	76.87	37.23	96.32	1.61	2.08	6.42	7.56

* Based on 2009 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 - 2010).

**** 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 60.22% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MULTI-STATE-NY-NJ-LI				Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
NYC Metro AA	18	47,048	625	494,412	643	541,640	79.95	0	0
Limited Review:									
Edison AA	3	2,278	15	15,928	18	18,206	2.69	0	0
Nassau-Suffolk AA	4	23,529	88	29,969	92	53,498	7.90	0	0
Newark AA	14	15,924	132	48,189	146	64,113	9.47	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: MULTI-STATE-NY-NJ-LI Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010																	
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
Full Review:																	
NYC Metro AA	57.62	196	55.52	5.10	21.43	26.02	46.94	25	20	4	3	-2	0	12.50	26.28	26.38	34.68
Limited Review:																	
Edison AA	2.02	15	4.25	6.67	6.67	66.67	20.00	5	6	0	1	1	-3	3.91	17.20	51.81	26.93
Nassau-Suffolk AA	36.83	122	34.56	.82	13.11	69.67	16.37	3	2	0	1	1	-1	12.85	24.47	28.20	34.48
Newark AA	3.54	20	5.67	15.00	10.00	25.00	50.00	10	5	3	1	-2	-3	0.76	16.02	64.36	18.86

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System		Geography: MULTI-STATE-NY-NJ-LI						Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010									
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
NYC Metro AA	57.62	196	55.52	5.10	21.43	26.02	46.94	328	62.36	3.66	23.17	22.26	50.91	12.50	26.28	26.38	34.68
Limited Review:																	
Edison AA	2.02	15	4.25	6.67	6.67	66.67	20.00	16	3.04	6.25	6.25	62.50	25.00	3.91	17.20	51.81	26.93
Nassau-Suffolk AA	36.83	122	34.56	.82	13.11	69.67	16.37	158	30.04	.64	12.04	72.76	14.57	0.76	16.02	64.36	18.86
Newark AA	3.54	20	5.67	15.00	10.00	25.00	50.00	24	4.56	12.50	8.33	29.17	50.00	12.85	24.47	28.20	34.48

Table 1. Lending Volume

LENDING VOLUME JANUARY 1, 2008 TO DECEMBER 31, 2010-SMALL BUSINESS(1)		Geography: MULTI-STATE - DC-MD-VA				Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010 – MORTGAGE,						
	% 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)	
Full Review:												
Washington, DC AA	79.28	4,574	1,279,986	7,118	88,141	0	0	12	143,334	11,704	1,511,461	71.81
Limited Review:												
Bethesda AA	20.72	1,518	453,303	1,538	25,601	0	0	3	9,840	3,059	488,744	28.19

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 01, 2007 to December 31, 2010.

*** Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

(1) Assessment area was expanded upon the acquisition of Chevy Chase Bank in July 2009.

Table 1. Other Products

LENDING VOLUME		Geography: MULTI-STATE - DC-MD-VA						Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010						
Assessment Area (2010):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		CD Letters of Credit**		CD Leases**		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)	
Full Review:														
Washington, DC AA	100.00	2	38,657	1	3,752	1	34,905	0	0	0	0	0	0	71.81
Limited Review:														
Bethesda AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	28.19

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from July 01, 2007 to December 31, 2010.

*** Deposit Data as of June 30, 2010. 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: MULTI-STATE - DC-MD-VA					Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
Washington, DC AA	1,389	79.64	2.13	3.53	16.23	15.84	43.86	35.93	37.78	44.71	1.02	1.17	0.92	0.92	1.17	
Limited Review:																
Bethesda AA	355	20.36	0.57	0.85	16.20	13.80	49.83	51.55	33.40	33.80	1.33	1.20	1.08	1.28	1.65	

* Based on 2009 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: MULTI-STATE - DC-MD-VA						Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010							
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
Full Review:															
Washington, DC AA	638	82.11	2.13	0.63	16.23	9.87	43.86	33.07	37.78	56.43	8.22	11.93	8.13	7.88	8.30
Limited Review:															
Bethesda AA	139	17.89	0.57	0.72	16.20	13.67	49.83	51.80	33.40	33.81	12.96	6.67	16.88	12.95	11.39

* Based on 2009 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: MULTI-STATE - DC-MD-VA					Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010				
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						
Full Review:																					
Washington, DC AA	2,545	71.31	2.13	2.28	16.23	13.40	43.86	28.96	37.78	55.36	1.29	1.68	0.96	0.98	1.60						
Limited Review:																					
Bethesda AA	1,024	28.69	0.57	0.49	16.20	14.94	49.83	43.95	33.40	40.63	2.11	1.92	1.91	1.84	2.49						

* Based on 2009 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 Multi-family Loans

Geographic Distribution: MULTI-FAMILY		Geography: MULTI-STATE - DC-MD-VA					Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010								
Assessment Area:	Total Multi-family 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
Full Review:															
Washington, DC AA	2	100.00	12.46	0.00	37.52	50.00	29.13	50.00	20.89	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Bethesda AA	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

* Based on 2009 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 multi-family housing units in the area based on 2000 Census information.

**** Multi-family 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: MULTI-STATE - DC-MD-VA Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010															
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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington, DC AA	7,097	82.19	4.55	2.49	15.54	10.74	38.59	35.80	39.54	50.97	3.31	5.58	4.56	2.86	3.05
Limited Review:															
Bethesda AA	1,538	17.81	1.05	1.37	21.73	25.23	46.29	43.04	30.92	30.36	4.70	3.42	6.49	4.36	4.06

* Based on 2009 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 (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MULTI-STATE - DC-MD-VA						Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010							
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
Full Review:															
Washington, DC AA	1,389	79.64	20.05	14.21	17.72	23.93	22.19	25.02	40.04	36.84	1.16	1.42	1.06	1.12	1.16
Limited Review:															
Bethesda AA	355	20.36	18.47	19.15	19.10	22.82	23.46	24.79	38.97	33.24	1.52	2.06	1.46	1.40	1.39

* Based on 2009 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.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: MULTI-STATE - DC-MD-VA						Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010						
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
Full Review:															
Washington, DC AA	638	82.11	20.05	6.74	17.72	18.18	22.19	28.21	40.04	46.87	8.53	9.43	8.25	8.59	8.37
Limited Review:															
Bethesda AA	139	17.89	18.47	16.55	19.10	31.65	23.46	31.65	38.97	20.14	13.51	15.22	14.52	13.29	12.45

* Based on 2009 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 0.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MULTI-STATE - DC-MD-VA								Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010				
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
Full Review:															
Washington, DC AA	2,545	71.31	20.05	11.46	17.72	17.95	22.19	25.87	40.04	44.73	1.63	1.94	1.70	1.74	1.51
Limited Review:															
Bethesda AA	1,024	28.69	18.47	15.36	19.10	21.23	23.46	23.19	38.97	40.22	2.49	3.74	2.84	2.24	2.27

* Based on 2009 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 1.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: MULTI-STATE - DC-MD-VA			Evaluation Period: JANUARY 1,2008 TO DECEMBER 31, 2010	
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
Full Review:									
Washington, DC AA	7,118	82.23	77.77	50.87	98.52	0.72	0.76	3.31	6.98
Limited Review:									
Bethesda AA	1,538	17.77	79.44	59.56	97.59	1.56	0.85	4.70	10.82

* Based on 2009 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 - 2010).

**** 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 38.47% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MULTI-STATE - DC-MD-VA				Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Washington, DC AA	18	55,086	232	113,260	250	168,346	90.3	0	0
Limited Review:									
Bethesda AA	2	6,087	25	10,503	27	16,590	9.7	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: MULTI-STATE - DC-MD-VA Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010																	
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
Full Review:																	
Washington, DC AA	71.81	141	67.14	3.55	14.18	39.72	39.01	6	7	0	0	-1	0	6.00	22.96	40.21	30.68
Limited Review:																	
Bethesda AA	28.19	69	32.86	0.00	23.19	49.28	27.54	2	4	0	0	-1	-1	1.30	24.13	46.78	27.78

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																	
Geography: MULTI-STATE - DC-MD-VA																	
Evaluation Period: JULY 1, 2007 TO DECEMBER 31, 2010																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Washington, DC AA	71.81	141	67.14	3.55	14.18	39.72	39.01	556	73.06	7.55	13.85	36.33	37.05	6.00	22.96	40.21	30.68
Limited Review:																	
Bethesda AA	28.19	69	32.86	0	23.19	49.28	27.54	205	26.94	0	24.39	46.83	28.78	1.30	24.13	46.78	27.78

Table 1. Lending Volume

LENDING VOLUME		Geography: LOUISIANA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010-MORTGAGE,						
JANUARY 1, 2008 TO DECEMBER 31, 2010 – SMALL BUSINESS												
Assessment Area (2010):	% 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)	
Full Review:												
New Orleans AA	35.96	7,081	710,061	12,783	503,630	19	1,573	39	340,464	19,922	1,555,728	50.16
Limited Review:												
Alexandria AA	3.08	810	57,659	885	47,618	8	958	3	5,008	1,706	111,243	2.50
Baton Rouge AA	18.93	4,219	395,065	6,257	254,392	3	185	8	75,416	10,487	725,058	15.22
Houma AA	8.01	2,476	205,756	1,939	132,050	18	888	3	19,102	4,436	357,796	7.81
LA Non MA AA	11.79	3,127	176,580	2,868	89,128	529	68,296	6	50,024	6,530	384,028	6.41
Lafayette AA	4.27	719	60,172	1,644	63,130	2	70	1	6,550	2,366	129,922	2.68
Lake Charles AA	5.53	1,452	102,350	1,544	69,384	65	8,670	0	0	3,061	180,404	4.89
Monroe AA	2.58	442	30,798	987	39,942	1	50	2	10,624	1,432	81,414	1.50
Shreveport AA	9.86	2,009	120,782	3,434	117,920	13	728	4	49,698	5,460	289,128	8.83

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from May 01, 2007 to December 31, 2010.

*** Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: LOUISIANA						Evaluation Period: MAY 1, 2007 TO DECEMBER 31, 2010						
Assessment Area (2010):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		CD Letters of Credit**		CD Lease**		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)	
Full Review:														
New Orleans AA	50.00	1	3,079	1	3,079	0	0	0	0	0	0	0	0	50.16
Limited Review:														
Alexandria AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	2.50
Baton Rouge AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	15.22
Houma AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	7.81
LA Non MA AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	6.41
Lafayette AA	50.00	1	1,645	1	0	0	1,645	0	0	0	0	0	0	2.68
Lake Charles AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	4.89
Monroe AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	1.50
Shreveport AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	8.83

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from May 01, 2007 to December 31, 2010.

*** Deposit Data as of June 30, 2010. 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: LOUISIANA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
New Orleans AA	893	28.01	4.52	4.14	16.34	16.01	42.05	35.27	37.09	44.57	0.74	1.67	1.11	0.60	0.71	
Limited Review:																
Alexandria AA	139	4.36	2.68	0.72	15.76	16.55	42.72	38.85	38.83	43.88	0.68	0.00	2.72	0.71	0.11	
Baton Rouge AA	782	24.53	4.29	3.07	14.95	13.04	43.95	40.15	36.81	43.73	0.39	0.00	0.96	0.30	0.43	
Houma AA	421	13.21	0.78	0.95	14.52	8.08	69.72	70.31	14.98	20.67	1.59	0.00	1.41	1.56	1.80	
LA Non MA AA	319	10.01	1.98	0.94	11.50	6.58	56.20	64.58	30.33	27.90	0.39	3.13	0.71	0.39	0.28	
Lafayette AA	112	3.51	3.23	1.79	12.70	9.82	42.62	35.71	41.44	52.68	0.13	0.00	0.28	0.00	0.19	
Lake Charles AA	200	6.27	1.30	1.00	17.64	20.00	47.96	40.00	33.10	39.00	0.82	16.67	2.46	0.51	0.64	
Monroe AA	71	2.23	6.97	1.41	15.00	12.68	43.46	38.03	34.57	47.89	0.17	0.00	0.00	0.18	0.18	
Shreveport AA	251	7.87	4.37	3.59	21.02	20.72	32.08	30.28	42.54	45.42	0.19	0.00	0.31	0.23	0.15	

* Based on 2009 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: LOUISIANA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
New Orleans AA	3,238	32.49	4.52	2.90	16.34	15.01	42.05	45.86	37.09	36.23	26.73	21.95	26.94	28.48	25.25	
Limited Review:																
Alexandria AA	349	3.50	2.68	1.43	15.76	8.88	42.72	47.28	38.83	42.41	17.77	50.00	23.08	17.11	16.67	
Baton Rouge AA	1,650	16.56	4.29	1.52	14.95	12.18	43.95	51.33	36.81	34.97	16.48	16.67	21.26	15.88	15.53	
Houma AA	942	9.45	0.78	0.21	14.52	8.28	69.72	75.27	14.98	16.24	24.51	0.00	15.94	27.14	19.30	
LA Non MA AA	1,606	16.12	1.98	1.93	11.50	9.15	56.20	61.27	30.33	27.65	15.56	11.11	11.54	17.55	13.26	
Lafayette AA	330	3.31	3.23	0.91	12.70	6.06	42.62	38.18	41.44	54.85	9.98	0.00	9.80	9.95	10.50	
Lake Charles AA	642	6.44	1.30	1.40	17.64	18.38	47.96	51.09	33.10	29.13	22.03	33.33	30.49	21.60	18.54	
Monroe AA	186	1.87	6.97	8.06	15.00	11.29	43.46	45.16	34.57	35.48	11.23	0.00	8.33	14.71	7.41	
Shreveport AA	1,022	10.26	4.37	3.62	21.02	20.25	32.08	33.95	42.54	42.17	29.04	37.50	33.60	32.45	22.97	

* Based on 2009 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: LOUISIANA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
New Orleans AA	2,904	31.92	4.52	2.44	16.34	12.43	42.05	41.36	37.09	43.77	1.82	2.04	1.59	1.90	1.80	
Limited Review:																
Alexandria AA	320	3.52	2.68	0.00	15.76	9.38	42.72	45.00	38.83	45.63	1.65	0.00	1.52	2.23	1.35	
Baton Rouge AA	1,773	19.49	4.29	1.07	14.95	10.60	43.95	49.29	36.81	39.03	1.36	1.97	2.06	1.42	1.21	
Houma AA	1,108	12.18	0.78	0.45	14.52	7.40	69.72	70.49	14.98	21.66	4.96	0.00	6.74	4.93	4.65	
LA Non MA AA	1,195	13.13	1.98	0.84	11.50	7.53	56.20	62.26	30.33	29.37	2.24	2.00	3.30	2.44	1.84	
Lafayette AA	275	3.02	3.23	0.73	12.70	4.00	42.62	43.64	41.44	51.64	0.77	2.63	0.00	0.97	0.70	
Lake Charles AA	605	6.65	1.30	0.66	17.64	11.57	47.96	45.79	33.10	41.98	2.91	0.00	3.59	3.45	2.40	
Monroe AA	184	2.02	6.97	0.54	15.00	10.87	43.46	40.22	34.57	48.37	1.16	0.00	2.96	0.73	1.38	
Shreveport AA	734	8.07	4.37	2.72	21.02	17.57	32.08	31.20	42.54	48.50	1.24	0.00	2.81	1.30	1.03	

* Based on 2009 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 Multi-family Loans

Geographic Distribution: MULTI-FAMILY			Geography: LOUISIANA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Multi-family 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						
Full Review:																
New Orleans AA	46	54.76	16.43	4.35	27.22	28.26	32.61	32.61	23.74	34.78	3.55	0.00	1.96	6.25	4.55	
Limited Review:																
Alexandria AA	2	2.38	5.46	0.00	20.33	50.00	24.71	50.00	49.51	0.00	0.00	0.00	0.00	0.00	0.00	
Baton Rouge AA	14	16.67	15.85	7.14	21.16	0.00	26.14	42.86	36.86	50.00	0.00	0.00	0.00	0.00	0.00	
Houma AA	5	5.95	1.72	20.00	8.01	0.00	61.93	60.00	28.34	20.00	0.00	0.00	0.00	0.00	0.00	
LA Non MA AA	7	8.33	5.13	0.00	20.86	14.29	46.24	14.29	27.77	71.43	0.00	0.00	0.00	0.00	0.00	
Lafayette AA	2	2.38	3.97	0.00	7.84	0.00	50.03	50.00	38.16	50.00	0.00	0.00	0.00	0.00	0.00	
Lake Charles AA	5	5.95	1.23	0.00	41.68	20.00	25.53	60.00	31.56	20.00	2.78	0.00	0.00	6.25	0.00	
Monroe AA	1	1.19	8.84	0.00	8.06	0.00	33.17	100.00	49.93	0.00	0.00	0.00	0.00	0.00	0.00	
Shreveport AA	2	2.38	9.23	0.00	19.86	0.00	40.26	50.00	30.65	50.00	7.69	0.00	0.00	25.00	0.00	

* Based on 2009 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 multi-family housing units in the area based on 2000 Census information.

**** Multi-family 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: LOUISIANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
New Orleans AA	12,782	39.53	5.82	8.34	18.91	23.72	36.72	30.43	38.54	37.51	10.61	27.35	18.73	7.35	6.94					
Limited Review:																				
Alexandria AA	885	2.74	8.23	8.81	16.04	17.40	39.25	35.03	36.47	38.76	5.38	6.43	12.90	2.69	4.65					
Baton Rouge AA	6,257	19.35	5.56	6.55	17.50	23.67	40.92	33.21	36.02	36.57	11.25	30.75	27.17	7.11	6.77					
Houma AA	1,931	5.97	1.48	1.71	13.11	14.45	68.14	65.30	17.02	18.54	10.47	30.43	23.62	8.23	6.49					
LA Non MA AA	2,868	8.87	2.46	2.34	13.01	14.02	55.98	52.72	28.56	30.93	6.39	20.90	15.60	4.82	4.08					
Lafayette AA	1,644	5.08	3.29	3.47	8.96	9.73	42.57	36.74	45.17	50.06	4.57	13.45	11.80	2.81	3.62					
Lake Charles AA	1,544	4.78	1.39	1.36	27.41	29.60	43.95	38.15	27.25	30.89	7.03	18.42	12.08	4.59	4.80					
Monroe AA	987	3.05	10.55	10.54	20.91	23.00	37.25	31.91	31.30	34.55	7.32	16.77	14.17	3.43	4.05					
Shreveport AA	3,434	10.62	6.46	8.21	24.07	32.53	34.38	24.08	35.10	35.18	10.37	21.96	20.58	6.58	5.58					

* Based on 2009 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 (2010).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: LOUISIANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
New Orleans AA	19	2.89	3.67	0.00	13.69	31.58	46.83	42.11	35.81	26.32	59.21	71.43	93.75	44.44	50.00	
Limited Review:																
Alexandria AA	8	1.22	2.01	0.00	7.38	62.50	52.01	25.00	38.59	12.50	13.58	33.33	33.33	7.14	16.67	
Baton Rouge AA	3	0.46	2.69	0.00	9.97	66.67	43.78	33.33	43.56	0.00	43.86	100.00	90.91	30.77	23.53	
Houma AA	18	2.74	0.31	0.00	11.91	27.78	68.65	50.00	19.12	22.22	57.69	0.00	0.00	66.67	60.00	
LA Non MA AA	529	80.40	1.01	1.13	9.33	13.61	66.37	64.27	23.30	20.98	49.87	0.00	69.44	42.65	57.63	
Lafayette AA	2	0.30	2.02	0.00	10.66	0.00	42.07	50.00	45.24	50.00	42.86	0.00	0.00	25.00	50.00	
Lake Charles AA	65	9.88	0.32	0.00	14.29	0.00	47.30	70.77	38.10	29.23	45.76	0.00	100.00	38.30	57.14	
Monroe AA	1	0.15	2.80	0.00	12.40	0.00	49.20	100.00	35.60	0.00	26.67	0.00	100.00	12.50	33.33	
Shreveport AA	13	1.98	3.13	7.69	15.05	15.38	35.42	53.85	46.39	23.08	37.78	0.00	53.85	21.43	31.25	

* Based on 2009 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 (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: LOUISIANA						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010						
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
Full Review:															
New Orleans AA	893	28.01	23.85	8.01	16.31	16.72	18.86	20.33	40.99	54.94	0.79	2.05	0.77	0.40	0.86
Limited Review:															
Alexandria AA	139	4.36	23.02	8.03	16.69	19.71	18.56	16.79	41.73	55.47	0.78	7.04	1.35	0.53	0.23
Baton Rouge AA	782	24.53	21.99	5.34	16.11	19.23	19.28	22.83	42.62	52.60	0.39	0.00	0.14	0.28	0.67
Houma AA	421	13.21	22.82	2.93	16.00	15.37	20.83	27.56	40.36	54.15	1.65	1.23	1.57	2.35	1.32
LA Non MA AA	319	10.01	23.97	2.57	15.47	15.11	18.46	20.58	42.10	61.74	0.45	0.66	0.37	0.37	0.50
Lafayette AA	112	3.51	21.48	7.21	15.76	21.62	19.09	17.12	43.67	54.05	0.15	0.00	0.15	0.00	0.25
Lake Charles AA	200	6.27	22.43	6.70	16.77	18.56	19.63	25.77	41.17	48.97	0.82	1.32	0.22	1.04	0.88
Monroe AA	71	2.23	23.24	1.41	16.12	8.45	18.50	16.90	42.15	73.24	0.21	0.00	0.26	0.00	0.35
Shreveport AA	251	7.87	24.01	8.71	15.99	14.94	19.34	20.33	40.65	56.02	0.20	0.00	0.08	0.06	0.37

* Based on 2009 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 3.2% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: LOUISIANA				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share*				
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 ****						
Full Review:																
New Orleans AA	3,238	32.49	23.85	11.95	16.31	19.81	18.86	25.32	40.99	42.93	29.57	31.19	34.28	28.28	27.83	
Limited Review:																
Alexandria AA	349	3.50	23.02	8.05	16.69	17.53	18.56	23.85	41.73	50.57	20.07	20.59	27.27	17.86	18.75	
Baton Rouge AA	1,650	16.56	21.99	8.86	16.11	18.58	19.28	25.08	42.62	47.48	17.70	23.30	18.34	18.77	15.94	
Houma AA	942	9.45	22.82	10.48	16.00	13.69	20.83	20.75	40.36	55.08	26.09	31.34	20.72	25.00	27.36	
LA Non MA AA	1,606	16.12	23.97	7.92	15.47	14.60	18.46	19.84	42.10	57.64	16.38	10.07	15.98	16.14	17.71	
Lafayette AA	330	3.31	21.48	6.38	15.76	12.77	19.09	23.40	43.67	57.45	10.36	4.88	11.11	8.26	12.25	
Lake Charles AA	642	6.44	22.43	15.81	16.77	17.21	19.63	21.44	41.17	45.54	23.08	37.70	32.00	21.00	17.55	
Monroe AA	186	1.87	23.24	9.73	16.12	14.05	18.50	24.32	42.15	51.89	12.14	15.79	4.17	6.98	16.09	
Shreveport AA	1,022	10.26	24.01	12.72	15.99	18.69	19.34	23.29	40.65	45.30	30.36	36.25	35.87	33.91	24.58	

* Based on 2009 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 0.3% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 2010		Geography: LOUISIANA						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31,							
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
Full Review:															
New Orleans AA	2,904	31.92	23.85	5.89	16.31	15.23	18.86	21.47	40.99	57.40	2.05	3.44	1.90	1.63	2.15
Limited Review:															
Alexandria AA	320	3.52	23.02	2.84	16.69	11.67	18.56	19.24	41.73	66.25	1.88	1.30	1.83	1.13	2.12
Baton Rouge AA	1,773	19.49	21.99	5.24	16.11	15.04	19.28	23.13	42.62	56.58	1.53	1.58	1.33	1.54	1.56
Houma AA	1,108	12.18	22.82	4.57	16.00	10.06	20.83	20.86	40.36	64.50	5.35	6.59	3.82	4.27	5.91
LA Non MA AA	1,195	13.13	23.97	2.10	15.47	9.68	18.46	19.19	42.10	69.02	2.49	0.97	1.55	2.72	2.62
Lafayette AA	275	3.02	21.48	3.64	15.76	12.00	19.09	22.18	43.67	62.18	0.86	0.00	0.81	0.64	1.00
Lake Charles AA	605	6.65	22.43	4.69	16.77	11.06	19.63	20.77	41.17	63.48	3.16	2.46	2.56	3.67	3.15
Monroe AA	184	2.02	23.24	4.49	16.12	10.11	18.50	21.91	42.15	63.48	1.09	0.00	0.34	0.89	1.39
Shreveport AA	734	8.07	24.01	5.79	15.99	16.69	19.34	21.24	40.65	56.28	1.40	1.15	2.82	1.39	1.16

* Based on 2009 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 1.5% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: LOUISIANA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010	
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
Full Review:									
New Orleans AA	12,783	39.53	78.34	42.41	93.16	2.90	3.93	10.61	21.28
Limited Review:									
Alexandria AA	885	2.74	77.17	42.49	90.06	4.41	5.54	5.38	6.89
Baton Rouge AA	6,257	19.35	77.35	38.40	91.99	3.45	4.55	11.25	18.10
Houma AA	1,939	6.00	78.60	38.58	86.33	6.09	7.58	10.47	23.70
LA Non MA AA	2,868	8.87	78.26	45.19	94.77	2.13	3.10	6.39	12.33
Lafayette AA	1,644	5.08	76.41	42.09	93.86	2.68	3.47	4.57	11.47
Lake Charles AA	1,544	4.77	77.79	41.77	89.83	5.89	4.27	7.03	12.80
Monroe AA	987	3.05	79.39	37.89	92.00	3.34	4.66	7.32	15.43
Shreveport AA	3,434	10.62	78.89	38.09	93.16	3.55	3.29	10.37	16.07

* Based on 2009 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 - 2010).

**** 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 46.41% 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: LOUISIANA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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
Full Review:									
New Orleans AA	19	2.89	95.58	73.68	78.95	5.26	15.79	59.21	62.79
Limited Review:									
Alexandria AA	8	1.22	94.63	87.50	62.50	37.50	0.00	13.58	10.00
Baton Rouge AA	3	0.46	95.74	33.33	66.67	33.33	0.00	43.86	43.75
Houma AA	18	2.74	95.92	94.44	88.89	11.11	0.00	57.69	57.89
LA Non MA AA	529	80.40	95.98	81.85	59.17	23.44	17.39	49.87	49.32
Lafayette AA	2	0.30	97.41	100.00	100.00	0.00	0.00	42.86	85.71
Lake Charles AA	65	9.88	96.51	93.85	63.08	9.23	27.69	45.76	41.67
Monroe AA	1	0.15	98.40	100.00	100.00	0.00	0.00	26.67	16.67
Shreveport AA	13	1.98	95.45	76.92	84.62	15.38	0.00	37.78	21.43

* Based on 2009 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 - 2010).

**** 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 5.32% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: LOUISIANA				Evaluation Period: MAY 1, 2007 TO DECEMBER 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
New Orleans AA	6	10,976	215	181,113	221	192,089	60.05	0	0
Limited Review:									
Alexandria AA	0	0	54	6,711	54	6,711	2.10	0	0
Baton Rouge AA	11	13,897	89	30,727	100	44,624	13.95	0	0
Houma AA	0	0	22	44	22	44	0.01	0	0
LA Non MA AA	1	13	14	31,327	15	31,340	9.80	0	0
Lafayette AA	2	557	27	6,691	29	7,248	2.27	0	0
Lake Charles AA	1	2,245	30	8,520	31	10,765	3.37	0	0
Monroe AA	0	0	33	6,825	33	6,825	2.13	0	0
Shreveport AA	1	71	42	9,847	43	9,918	3.10	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: LOUISIANA Evaluation Period: MAY 1, 2007 TO DECEMBER 31, 2010																	
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
Full Review:																	
New Orleans AA	50.16	56	28.72	3.57	16.07	42.86	37.50	5	1	2	0	2	0	10.62	21.56	37.90	29.91
Limited Review:																	
Alexandria AA	2.50	9	4.62	33.33	0.00	33.33	33.33	0	0	0	0	0	0	4.77	20.21	41.19	33.84
Baton Rouge AA	15.22	29	14.87	3.45	20.69	44.83	31.03	2	0	1	0	1	0	8.55	18.94	40.13	32.37
Houma AA	7.81	15	7.69	0.00	6.67	73.33	20.00	0	0	0	0	0	0	1.28	15.59	68.29	14.53
LA Non MA AA	6.41	36	18.46	2.78	19.44	63.89	13.89	0	0	0	0	0	0	2.96	13.39	55.53	28.12
Lafayette AA	2.68	8	4.10	0.00	0.00	62.50	37.50	1	0	0	0	1	0	5.14	13.48	43.93	37.45
Lake Charles AA	4.89	14	7.18	0.00	28.57	50.00	21.43	0	0	0	0	0	0	2.03	23.18	44.76	30.03
Monroe AA	1.50	4	2.05	0.00	0.00	75.00	25.00	0	0	0	0	0	0	12.01	18.66	38.12	31.21
Shreveport AA	8.83	24	12.31	0.00	20.83	58.33	20.83	2	0	0	0	1	1	7.27	25.05	32.27	35.41

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: LOUISIANA				Evaluation Period: MAY 1, 2007 TO DECEMBER 31, 2010									
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
New Orleans AA	50.16	56	28.72	3.57	16.07	42.86	37.50	158	35.99	2.53	17.09	32.91	47.47	10.62	21.56	37.90	29.91
Limited Review:																	
Alexandria AA	2.50	9	4.62	33.33	0	33.33	33.33	13	2.96	15.38	15.38	38.47	30.77	4.77	20.21	41.19	33.84
Baton Rouge AA	15.22	29	14.87	3.45	20.69	44.83	31.03	61	13.90	6.56	36.07	37.70	19.67	8.55	18.94	40.13	32.37
Houma AA	7.81	15	7.69	0	6.67	73.33	20.00	24	5.47	0	8.33	70.83	16.67	1.28	15.59	68.29	14.53
LA Non MA AA	6.41	36	18.46	2.78	19.44	63.89	13.89	57	12.98	1.75	8.77	50.88	38.60	2.96	13.39	55.53	28.12
Lafayette AA	2.68	8	4.10	0	0	62.50	37.50	11	2.51	0	0	54.55	45.45	5.14	13.48	43.93	37.45
Lake Charles AA	4.89	14	7.18	0	28.57	50.00	21.43	50	11.39	0	10.0	58.0	32.0	2.03	23.18	44.76	30.03
Monroe AA	1.50	4	2.05	0	0	75.00	25.00	5	1.14	0	0	80.0	20.0	12.01	18.66	38.12	31.21
Shreveport AA	8.83	24	12.31	0	20.83	58.33	20.83	60	13.67	18.33	35.0	26.67	20.0	7.27	25.05	32.27	35.41

Table 1. Lending Volume

LENDING VOLUME		Geography: CONNECTICUT						Evaluation Period: MARCH 10, 2008 TO DECEMBER 31, 2010				
Assessment Area (2010):	% 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)	
Full Review:												
New Haven AA	100.00	327	32,016	3,601	24,056	0	0	3	14,300	3,931	70,372	100.00

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from March 10, 2008 to December 31, 2010.

*** Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: CONNECTICUT				Evaluation Period: MARCH 10, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
New Haven AA	283	100.00	3.04	2.47	12.33	11.66	52.39	55.48	32.24	30.39	3.21	5.88	4.11	3.29	2.71	

* Based on 2009 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: MARCH 10, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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	
Full Review:																
New Haven AA	38	100.00	3.04	0.00	12.33	13.16	52.39	52.63	32.24	34.21	0.00	0.00	0.00	0.01	0.01	

* Based on 2009 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 Multi-family Loans

Geographic Distribution: MULTI-FAMILY		Geography: CONNECTICUT				Evaluation Period: MARCH 10, 2008 TO DECEMBER 31, 2010									
Assessment Area:	Total Multi-family 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
Full Review:															
New Haven AA	6	100.00	20.52	33.33	29.27	16.67	42.05	50.00	8.16	0.00	4.00	0.00	10.00	4.00	0.00

* Based on 2009 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 multi-family housing units in the area based on 2000 Census information.

**** Multi-family 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: MARCH 10, 2008 TO DECEMBER 31, 2010					
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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
New Haven AA	3,601	100.00	7.52	9.16	17.31	19.41	43.44	40.60	31.71	30.82	4.16	9.79	5.95	3.31	3.57

* Based on 2009 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 (2010).

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CONNECTICUT						Evaluation Period: MARCH 10, 2008 TO DECEMBER 31, 2010							
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
Full Review:															
New Haven AA	283	100.00	20.85	7.77	17.34	15.55	22.55	27.56	39.26	49.12	3.30	2.94	2.73	3.76	3.31

* Based on 2009 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 0.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: CONNECTICUT				Evaluation Period: MARCH 10, 2008 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families*****	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
New Haven AA	38	100.00	20.85	16.22	17.34	27.03	22.55	29.73	39.26	27.03	0.01	0.00	0.02	0.00	0.01	

* Based on 2009 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 2.6% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CONNECTICUT			Evaluation Period: MARCH 10, 2008 TO DECEMBER 31, 2010				
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
Full Review:									
New Haven AA	3,601	100.00	78.65	50.04	99.56	0.31	0.14	4.16	8.89

* Based on 2009 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 - 2010).

**** 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 43.65% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CONNECTICUT				Evaluation Period: MARCH 10, 2008 TO DECEMBER 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
New Haven AA	7	7,868	4	8,411	11	16,278	100.0	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: MARCH 10, 2008 TO DECEMBER 31, 2010																	
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
Full Review:																	
New Haven AA	100.00	1	100.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	9.45	19.46	45.77	25.31

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: CONNECTICUT				Evaluation Period: MARCH 10, 2008 TO DECEMBER 31, 2010									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
New Haven AA	100.00	1	100.00	0	0	100.0	0	1	100	0	0	100.0	0	9.45	19.46	45.77	25.31

Table 1. Lending Volume

LENDING VOLUME		Geography: DELAWARE				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010						
Assessment Area (2010):	% 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)	
Full Review:												
DE Non MA AA	100.00	56	18,699	194	2,464	0	0	1	6,900	251	28,063	100.00

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 30, 2009 to December 31, 2010.

*** Deposit Data as of June 30, 2010. 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: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
DE Non MA AA	4	100.00	0.00	0.00	0.00	0.00	90.18	100.00	9.82	0.00	0.21	0.00	0.00	0.21	0.19	

* Based on 2009 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: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
DE Non MA AA	2	100.00	0.00	0.00	0.00	0.00	90.18	0.00	9.82	100.00	1.47	0.00	0.00	1.11	4.08	

* Based on 2009 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: JULY 30, 2009 TO DECEMBER 31, 2010						
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
Full Review:															
DE Non MA AA	50	100.00	0.00	0.00	0.00	0.00	90.18	56.00	9.82	44.00	0.52	0.00	0.00	0.39	1.03

* Based on 2009 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: DELAWARE				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans						
Full Review:																
DE Non MA AA	194	100.00	0.00	0.00	0.00	0.00	83.85	81.44	16.15	18.56	2.99	0.00	0.00	2.72	3.39	

* Based on 2009 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 (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: DELAWARE						Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010							
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
Full Review:															
DE Non MA AA	4	100.00	18.14	0.00	19.53	25.00	23.99	25.00	38.34	50.00	0.23	0.00	0.43	0.15	0.22

* Based on 2009 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 0.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: DELAWARE								Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010					
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
Full Review:															
DE Non MA AA	2	100.00	18.14	0.00	19.53	50.00	23.99	0.00	38.34	50.00	1.52	0.00	1.39	1.89	1.73

* Based on 2009 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 0.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: DELAWARE						Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010						
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
Full Review:															
DE Non MA AA	50	100.00	18.14	4.00	19.53	6.00	23.99	22.00	38.34	68.00	0.60	0.51	0.31	0.19	0.78

* Based on 2009 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 0.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: DELAWARE		Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010				
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
Full Review:									
DE Non MA AA	194	100.00	78.01	71.65	96.39	3.09	0.52	2.99	6.12

* Based on 2009 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 - 2010).

**** 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 21.65% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: DELAWARE				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
DE Non MA AA	2	505	2	20	4	525	100.00	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: DELAWARE valuation Period: JULY 30, 2009 TO DECEMBER 31, 2010																	
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
Full Review:																	
DE Non MA AA	100.00	1	100.00	0.00	0.00	100.0	0.00	0	1	0	0	0	-1	0.00	0.00	92.26	7.74

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																	
Geography: DELAWARE																	
Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
DE Non MA AA	100.00	1	100.00	0	0	100	0	5	100.00	0	0	100.00	0	0.00	0.00	92.26	7.74

Table 1. Lending Volume

LENDING VOLUME		Geography: MARYLAND				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010						
Assessment Area (2010):	% 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)	
Full Review:												
Baltimore AA	90.17	596	135,318	2,107	25,153	0	0	5	40,465	2,708	200,936	89.92
Limited Review:												
Hagerstown AA	5.39	14	2,479	148	1,504	0	0	0	0	162	3,983	4.75
MD Non MA AA	4.43	29	8,654	102	934	0	0	2	8,167	133	17,755	5.32

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 30, 2009 to December 31, 2010.

*** Deposit Data as of June 30, 2010. 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: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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****						
Full Review:																
Baltimore AA	138	96.50	4.97	5.80	16.65	16.67	41.15	31.88	37.23	45.65	0.34	0.45	0.28	0.28	0.42	
Limited Review:																
Hagerstown AA	2	1.40	0.52	0.00	8.65	50.00	57.98	50.00	32.84	0.00	0.22	0.00	0.45	0.20	0.17	
MD Non MA AA	3	2.10	0.00	0.00	1.79	0.00	40.80	66.67	57.40	33.33	0.16	0.00	0.00	0.15	0.18	

* Based on 2009 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: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
Baltimore AA	47	92.16	4.97	0.00	16.65	4.26	41.15	25.53	37.23	70.21	4.98	5.44	5.39	4.72	5.09	
Limited Review:																
Hagerstown AA	3	5.88	0.52	0.00	8.65	0.00	57.98	33.33	32.84	66.67	4.62	100.00	4.35	4.23	4.26	
MD Non MA AA	1	1.96	0.00	0.00	1.79	0.00	40.80	0.00	57.40	100.00	2.76	0.00	0.00	3.09	2.67	

* Based on 2009 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 2010			Geography: MARYLAND						Evaluation Period: JULY 30, 2009 TO DECEMBER 31,						
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
Full Review:															
Baltimore AA	411	92.36	4.97	3.89	16.65	16.06	41.15	28.22	37.23	51.82	0.58	0.32	0.21	0.40	0.84
Limited Review:															
Hagerstown AA	9	2.02	0.52	0.00	8.65	11.11	57.98	77.78	32.84	11.11	0.37	0.00	0.44	0.39	0.33
MD Non MA AA	25	5.62	0.00	0.00	1.79	4.00	40.80	56.00	57.40	40.00	0.35	0.00	1.25	0.54	0.19

* Based on 2009 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES				Geography: MARYLAND				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010							
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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore AA	2,107	89.39	5.23	6.64	15.38	19.32	40.92	38.82	38.43	35.22	3.82	7.11	6.27	3.24	3.33
Limited Review:															
Hagerstown AA	148	6.28	5.75	7.43	16.37	15.54	48.91	46.62	28.82	30.41	2.03	2.47	2.91	1.63	2.05
MD Non MA AA	102	4.33	0.00	0.00	6.81	10.78	47.36	45.10	45.83	44.12	2.70	0.00	5.17	2.18	2.15

* Based on 2009 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 (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MARYLAND						Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010							
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
Full Review:															
Baltimore AA	138	96.50	21.17	20.29	17.70	26.09	22.12	15.22	39.01	38.41	0.39	0.71	0.35	0.29	0.40
Limited Review:															
Hagerstown AA	2	1.40	16.80	0.00	17.74	50.00	23.90	0.00	41.56	50.00	0.26	0.00	0.47	0.22	0.18
MD Non MA AA	3	2.10	13.66	0.00	14.93	0.00	22.46	0.00	48.94	100.00	0.19	0.00	0.59	0.00	0.18

* Based on 2009 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 0.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: MARYLAND				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share*				
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 ****						
Full Review:																
Baltimore AA	47	92.16	21.17	10.64	17.70	10.64	22.12	23.40	39.01	55.32	5.22	4.43	3.76	5.31	6.22	
Limited Review:																
Hagerstown AA	3	5.88	16.80	66.67	17.74	0.00	23.90	0.00	41.56	33.33	4.86	5.88	7.84	5.88	2.13	
MD Non MA AA	1	1.96	13.66	0.00	14.93	0.00	22.46	100.00	48.94	0.00	2.89	0.00	9.38	1.69	2.34	

* Based on 2009 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 0.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MARYLAND				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share*				
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 ****						
Full Review:																
Baltimore AA	411	92.36	21.17	11.44	17.70	18.66	22.12	24.38	39.01	45.52	0.76	0.47	0.60	0.84	0.84	
Limited Review:																
Hagerstown AA	9	2.02	16.80	0.00	17.74	33.33	23.90	22.22	41.56	44.44	0.50	0.54	0.57	0.66	0.37	
MD Non MA AA	25	5.62	13.66	0.00	14.93	8.00	22.46	36.00	48.94	56.00	0.46	0.00	0.45	0.41	0.50	

* Based on 2009 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 2.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: MARYLAND			Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010	
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
Full Review:									
Baltimore AA	2,107	89.39	77.48	57.95	98.39	1.04	0.57	3.82	7.49
Limited Review:									
Hagerstown AA	148	6.28	73.77	56.08	99.32	0.00	0.68	2.03	4.33
MD Non MA AA	102	4.33	76.89	62.75	99.02	0.00	0.98	2.70	4.97

* Based on 2009 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 - 2010).

**** 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 31.23% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MARYLAND				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Baltimore AA	1	1,979	12	41,513	13	43,492	81.17	0	0
Limited Review:									
Hagerstown AA	1	101	0	0	1	101	0.19	0	0
MD Non MA AA	0	0	2	9,987	2	9,987	18.64	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: JULY 30, 2009 TO DECEMBER 31, 2010																	
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
Full Review:																	
Baltimore AA	89.92	25	83.33	8.00	8.00	20.00	64.00	0	0	0	0	0	0	9.66	20.33	38.79	30.78
Limited Review:																	
Hagerstown AA	4.75	2	6.67	0.00	50.00	50.00	0.00	0	1	-1	0	0	0	1.75	13.92	51.67	27.40
MD Non MA AA	5.32	3	10.00	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	5.31	43.35	51.34

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: MARYLAND				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010									
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Baltimore AA	89.92	25	83.33	8.00	8.00	20.00	64.00	94	85.45	8.51	6.38	23.4	61.8	9.66	20.33	38.79	30.78
Limited Review:																	
Hagerstown AA	4.75	2	6.67	0	50.00	50.00	0	7	6.37	0	42.85	57.15	0	1.75	13.92	51.67	27.40
MD Non MA AA	5.32	3	10.00	0	33.33	66.67	0	9	8.18	0	33.33	66.67	0	0.00	5.31	43.35	51.34

Table 1. Lending Volume

LENDING VOLUME JANUARY 1, 2008 TO DECEMBER 31, 2010-SMALL BUSINESS		Geography: NEW JERSEY				Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010-MORTGAGE,						
Assessment Area (2010):	% 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)	
Full Review:												
Trenton AA	100.00	263	11,112	1,550	17,900	0	0	0	0	1,813	29,012	100.00

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2010 to December 31, 2010.

*** Deposit Data as of June 30, 2010. 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: AUGUST 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	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						
Full Review:																
Trenton AA	3	100.00	6.07	0.00	12.82	66.67	38.98	33.33	42.12	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2009 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: AUGUST 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
Trenton AA	224	100.00	6.07	2.23	12.82	14.29	38.98	52.68	42.12	30.80	11.11	0.00	6.67	15.47	8.43	

* Based on 2009 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 2010			Geography: NEW JERSEY						Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31,						
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
Full Review:															
Trenton AA	34	100.00	6.07	11.76	12.82	11.76	38.98	58.82	42.12	17.65	0.04	0.00	0.00	0.10	0.02

* Based on 2009 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 Multi-family Loans

Geographic Distribution: MULTI-FAMILY			Geography: NEW JERSEY				Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Multi-family 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						
Full Review:																
Trenton AA	2	100.00	19.55	50.00	8.94	0.00	40.17	0.00	31.35	50.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2009 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 multi-family housing units in the area based on 2000 Census information.

**** Multi-family 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: JANUARY 1, 2008 TO DECEMBER 31, 2010		
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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Trenton AA	1,550	100.00	10.36	10.19	9.85	9.87	33.43	32.71	46.35	47.23	3.66	13.21	6.26	2.93	2.61	

* Based on 2009 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 (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEW JERSEY								Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010					
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
Full Review:															
Trenton AA	3	100.00	20.71	50.00	17.30	0.00	21.40	0.00	40.58	50.00	0.00	0.00	0.00	0.00	0.00

* Based on 2009 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 33.3% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: NEW JERSEY						Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010							
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
Full Review:															
Trenton AA	224	100.00	20.71	11.16	17.30	16.07	21.40	26.79	40.58	45.98	11.36	16.28	3.37	14.56	12.42

* Based on 2009 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 0.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NEW JERSEY				Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total **	% Families ***	% BANK Loans ****	% Families *****	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Trenton AA	34	100.00	20.71	24.24	17.30	48.48	21.40	12.12	40.58	15.15	0.05	0.00	0.25	0.00	0.02	

* Based on 2009 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 2.9% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NEW JERSEY			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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
Full Review:									
Trenton AA	1,550	100.00	73.97	44.84	98.39	0.84	0.77	3.66	6.91

* Based on 2009 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 - 2010).

**** 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 48.32% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW JERSEY				Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Trenton AA	0	0	13	1,635	13	1,635	100.0	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: AUGUST 1, 2007 TO DECEMBER 31, 2010																	
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
Full Review:																	
Trenton AA	100.00	1	100.00	0.00	0.00	0.00	100.0	0	1	0	0	0	-1	11.94	14.87	35.29	37.37

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: NEW JERSEY				Evaluation Period: AUGUST 1, 2007 TO DECEMBER 31, 2010									
MA/Assessment Area:	Deposits	Branches				ATMs				Population							
	% of Total Bank Deposits	# of Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography				
			Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																	
Trenton AA	100.00	1	100.00	0	0	0	100	2	100.00	0	0	0	100.0	11.94	14.87	35.29	37.37

Table 1. Lending Volume

LENDING VOLUME		Geography: TEXAS				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010 – MORTGAGE,						
JANUARY 1, 2008 TO DECEMBER 31, 2010 – SMALL BUSINESS												
Assessment Area (2010):	% 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)	
Full Review:												
Houston AA	33.36	4,655	524,110	27,775	345,057	11	377	20	120,879	32,461	990,423	31.57
Limited Review:												
Austin AA	7.66	770	167,043	6,683	67,020	2	159	0	0	7,455	234,222	7.77
Beaumont AA	2.86	957	73,095	1,744	85,498	73	9,034	11	53,981	2,785	221,608	9.53
Brownsville AA	1.85	623	30,977	1,129	40,553	46	6,299	2	8,238	1,800	86,067	4.55
Corpus Christi AA	1.43	141	5,774	1,255	5,597	0	0	0	0	1,396	11,371	0.74
Dallas AA	25.79	3,727	252,348	21,347	253,529	7	435	14	166,004	25,095	672,316	15.55
Ft Worth AA	10.07	1,650	101,954	8,144	73,882	0	0	2	29,929	9,796	205,765	3.16
Longview AA	0.92	209	11,546	689	16,420	0	0	0	0	898	27,966	1.95
McAllen AA	1.94	512	25,244	1,377	22,599	2	54	1	7,000	1,892	54,897	2.26
San Antonio AA	6.62	570	35,211	5,867	47,337	0	0	8	106,595	6,445	189,143	2.23
Texarkana AA	1.14	455	26,553	644	22,815	8	253	0	0	1,107	49,621	3.45
TX Non MA AA	4.11	1,438	74,690	2,542	60,419	23	809	1	11,426	4,004	147,344	12.95
Tyler AA	1.66	419	23,767	1,191	27,551	1	25	0	0	1,611	51,343	2.60
Victoria AA	0.59	106	5,994	465	2,377	0	0	0	0	571	8,371	1.69

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from May 01, 2007 to December 31, 2010.

*** Deposit Data as of June 30, 2010. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: TEXAS						Evaluation Period: MAY 1, 2007 TO DECEMBER 31, 2010						
Assessment Area (2010):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		CD Letters of Credit**		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)	
Full Review:														
Houston AA	50.00	2	1,683	2	1,683	0	0	0	0	0	0	0	0	31.57
Limited Review:														
Austin AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	7.77
Beaumont AA	25.00	1	246	1	246	0	0	0	0	0	0	0	0	9.53
Brownsville AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	4.55
Corpus Christi AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.74
Dallas AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	15.55
Ft Worth AA	25.00	1	625	1	625	0	0	0	0	0	0	0	0	3.16
Longview AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	1.95
McAllen AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	2.26
San Antonio AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	2.23
Texarkana AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	3.45
TX Non MA AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	12.95
Tyler AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	2.60
Victoria AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	1.69

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.
 ** The evaluation period for Optional Product Line(s) is from May 01, 2007 to December 31, 2010.
 *** Deposit Data as of June 30, 2010. 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: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
Houston AA	1,530	41.67	3.15	3.07	23.36	20.00	30.84	36.54	42.66	40.39	0.09	0.57	0.20	0.10	0.05	
Limited Review:																
Austin AA	274	7.46	3.00	5.84	16.72	18.98	40.19	45.26	40.10	29.93	0.00	0.00	0.00	0.01	0.01	
Beaumont AA	187	5.09	3.76	1.60	18.35	16.04	48.52	36.90	29.36	45.45	0.39	0.00	1.80	0.18	0.42	
Brownsville AA	124	3.38	0.87	0.81	21.06	12.90	43.90	39.52	34.18	46.77	0.65	0.00	0.72	0.57	0.75	
Corpus Christi AA	18	0.49	4.68	0.00	24.99	27.78	35.81	27.78	34.52	44.44	0.00	0.00	0.00	0.00	0.00	
Dallas AA	620	16.88	2.80	3.06	19.87	18.06	33.85	40.00	43.49	38.87	0.01	0.11	0.01	0.01	0.02	
Ft Worth AA	320	8.71	3.85	3.44	19.76	16.88	36.48	45.00	39.91	34.69	0.01	0.00	0.00	0.00	0.01	
Longview AA	47	1.28	0.00	0.00	22.65	23.40	44.16	38.30	33.19	38.30	0.10	0.00	0.29	0.12	0.00	
McAllen AA	68	1.85	0.00	0.00	27.56	20.59	48.45	48.53	23.99	30.88	0.11	0.00	0.15	0.17	0.04	
San Antonio AA	108	2.94	1.79	1.85	32.84	22.22	29.73	13.89	35.64	62.04	0.00	0.00	0.00	0.00	0.00	
Texarkana AA	86	2.34	3.51	2.33	8.79	11.63	72.42	68.60	15.28	17.44	0.33	0.00	1.54	0.24	0.23	
TX Non MA AA	187	5.09	0.31	0.53	5.12	5.35	64.49	60.96	30.08	33.16	0.29	0.00	0.50	0.35	0.19	
Tyler AA	74	2.02	2.09	1.35	17.19	10.81	55.58	56.76	25.14	31.08	0.03	0.00	0.00	0.05	0.00	
Victoria AA	29	0.79	1.64	0.00	21.48	17.24	51.15	55.17	25.73	27.59	0.25	0.00	0.00	0.53	0.00	

* Based on 2009 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.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: TEXAS				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
Houston AA	2,049	22.18	3.15	1.22	23.36	14.30	30.84	32.70	42.66	51.78	7.01	12.33	5.82	7.91	6.69	
Limited Review:																
Austin AA	330	3.57	3.00	2.12	16.72	17.27	40.19	46.97	40.10	33.64	4.02	5.71	5.04	4.29	3.38	
Beaumont AA	541	5.86	3.76	2.40	18.35	16.08	48.52	52.50	29.36	29.02	11.95	37.50	12.73	15.38	6.91	
Brownsville AA	370	4.00	0.87	1.08	21.06	20.00	43.90	49.46	34.18	29.46	30.98	0.00	35.38	32.52	27.62	
Corpus Christi AA	96	1.04	4.68	2.08	24.99	12.50	35.81	46.88	34.52	38.54	1.38	0.00	0.00	2.26	1.25	
Dallas AA	2,561	27.72	2.80	1.44	19.87	12.07	33.85	36.55	43.49	49.94	9.51	11.43	11.43	11.11	8.43	
Ft Worth AA	1,137	12.31	3.85	1.32	19.76	11.43	36.48	41.69	39.91	45.56	9.97	9.52	10.61	11.18	9.08	
Longview AA	102	1.10	0.00	0.00	22.65	15.69	44.16	50.00	33.19	34.31	4.74	0.00	4.55	5.83	3.53	
McAllen AA	296	3.20	0.00	0.00	27.56	17.57	48.45	53.72	23.99	28.72	9.30	0.00	4.88	11.73	8.76	
San Antonio AA	362	3.92	1.79	0.83	32.84	16.85	29.73	33.15	35.64	49.17	2.35	7.69	2.08	2.32	2.42	
Texarkana AA	222	2.40	3.51	4.05	8.79	9.91	72.42	71.62	15.28	14.41	17.19	33.33	33.33	16.41	8.11	
TX Non MA AA	876	9.48	0.31	0.11	5.12	5.48	64.49	68.15	30.08	26.26	14.45	0.00	16.90	15.70	11.46	
Tyler AA	246	2.66	2.09	0.41	17.19	10.98	55.58	63.82	25.14	24.80	6.25	0.00	6.67	4.71	9.28	
Victoria AA	51	0.55	1.64	0.00	21.48	11.76	51.15	68.63	25.73	19.61	3.60	0.00	4.35	2.90	4.26	

* Based on 2009 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: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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	
Full Review:																
Houston AA	1,031	32.14	3.15	2.81	23.36	19.30	30.84	32.30	42.66	45.59	0.09	0.21	0.11	0.10	0.07	
Limited Review:																
Austin AA	158	4.93	3.00	3.80	16.72	11.39	40.19	40.51	40.10	44.30	0.02	0.00	0.03	0.02	0.02	
Beaumont AA	219	6.83	3.76	0.91	18.35	12.79	48.52	44.75	29.36	41.55	0.72	0.00	1.30	0.78	0.56	
Brownsville AA	123	3.83	0.87	0.81	21.06	12.20	43.90	48.78	34.18	38.21	0.43	0.00	0.51	0.65	0.28	
Corpus Christi AA	25	0.78	4.68	0.00	24.99	32.00	35.81	36.00	34.52	32.00	0.05	0.00	0.00	0.00	0.09	
Dallas AA	525	16.37	2.80	2.67	19.87	15.81	33.85	28.57	43.49	52.95	0.04	0.18	0.14	0.04	0.04	
Ft Worth AA	187	5.83	3.85	1.07	19.76	16.58	36.48	41.71	39.91	40.64	0.02	0.00	0.06	0.03	0.01	
Longview AA	60	1.87	0.00	0.00	22.65	26.67	44.16	38.33	33.19	35.00	0.42	0.00	1.03	0.38	0.30	
McAllen AA	147	4.58	0.00	0.00	27.56	17.69	48.45	48.30	23.99	34.01	0.49	0.00	1.09	0.48	0.32	
San Antonio AA	97	3.02	1.79	2.06	32.84	24.74	29.73	24.74	35.64	48.45	0.01	0.00	0.04	0.00	0.02	
Texarkana AA	143	4.46	3.51	0.70	8.79	11.89	72.42	69.23	15.28	18.18	0.61	0.00	2.88	0.42	0.61	
TX Non MA AA	371	11.56	0.31	0.00	5.12	2.96	64.49	70.89	30.08	26.15	0.86	0.00	0.96	1.11	0.49	
Tyler AA	96	2.99	2.09	0.00	17.19	4.17	55.58	64.58	25.14	31.25	0.19	0.00	0.00	0.11	0.32	
Victoria AA	26	0.81	1.64	0.00	21.48	23.08	51.15	42.31	25.73	34.62	0.00	0.00	0.00	0.00	0.00	

* Based on 2009 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 Multi-family Loans

Geographic Distribution: MULTI-FAMILY			Geography: TEXAS				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Multi-family 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						
Full Review:																
Houston AA	43	38.74	10.05	20.93	36.23	46.51	30.04	13.95	23.67	18.60	0.78	0.00	1.75	0.00	0.00	
Limited Review:																
Austin AA	8	7.21	17.82	25.00	30.83	25.00	35.62	25.00	15.72	25.00	0.00	0.00	0.00	0.00	0.00	
Beaumont AA	10	9.01	6.31	10.00	27.87	50.00	33.89	20.00	31.94	20.00	14.29	0.00	33.33	14.29	0.00	
Brownsville AA	6	5.41	2.93	0.00	15.31	16.67	19.84	33.33	61.92	50.00	4.76	0.00	0.00	16.67	0.00	
Corpus Christi AA	2	1.80	8.18	0.00	14.05	0.00	45.39	0.00	32.39	100.00	0.00	0.00	0.00	0.00	0.00	
Dallas AA	21	18.92	14.54	38.10	30.27	28.57	33.08	23.81	22.10	9.52	1.96	0.00	2.56	4.00	0.00	
Ft Worth AA	6	5.41	7.17	0.00	28.46	33.33	45.23	50.00	19.13	16.67	0.00	0.00	0.00	0.00	0.00	
Longview AA	0	0.00	0.00	0.00	19.87	0.00	45.64	0.00	34.49	0.00	0.00	0.00	0.00	0.00	0.00	
McAllen AA	1	0.90	0.00	0.00	11.56	0.00	31.77	0.00	56.67	100.00	0.00	0.00	0.00	0.00	0.00	
San Antonio AA	3	2.70	1.87	33.33	36.32	66.67	39.23	0.00	22.58	0.00	0.00	0.00	0.00	0.00	0.00	
Texarkana AA	4	3.60	9.15	0.00	21.05	0.00	48.59	100.00	21.22	0.00	0.00	0.00	0.00	0.00	0.00	
TX Non MA AA	4	3.60	0.24	0.00	19.83	50.00	45.49	50.00	34.44	0.00	0.00	0.00	0.00	0.00	0.00	
Tyler AA	3	2.70	0.53	0.00	28.79	66.67	34.75	33.33	35.93	0.00	0.00	0.00	0.00	0.00	0.00	
Victoria AA	0	0.00	1.85	0.00	33.54	0.00	42.83	0.00	21.78	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2009 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 multi-family housing units in the area based on 2000 Census information.

**** Multi-family 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: JANUARY 1, 2008 TO DECEMBER 31, 2010							
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 Business ses***	% BANK Loans	% of Business ses***	% BANK Loans	% of Business ses***	% BANK Loans	% of Business ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Houston AA	27,716	34.33	4.45	6.92	23.26	31.16	27.57	22.26	44.08	39.66	4.80	14.27	10.99	2.27	2.39
Limited Review:															
Austin AA	6,682	8.28	4.23	4.33	15.64	16.64	38.00	38.27	42.03	40.77	3.33	9.73	6.70	2.40	2.28
Beaumont AA	1,743	2.16	2.85	4.19	20.76	26.39	44.75	36.60	31.62	32.82	5.84	18.47	11.93	3.58	3.78
Brownsville AA	1,129	1.40	2.63	2.66	24.88	27.99	34.94	30.38	37.54	38.97	4.18	2.40	9.68	2.35	2.64
Corpus Christi AA	1,255	1.55	12.53	12.67	23.12	25.90	34.29	29.88	30.06	31.55	4.92	8.42	9.95	2.04	2.16
Dallas AA	21,294	26.38	4.10	6.07	21.02	30.09	31.77	25.22	42.00	38.62	5.66	17.75	13.13	2.59	2.98
Ft Worth AA	8,144	10.09	3.24	4.30	22.10	31.90	35.83	27.59	38.83	36.21	6.88	17.78	17.62	2.30	2.61
Longview AA	689	0.85	0.00	0.00	30.80	33.82	40.63	35.56	28.57	30.62	5.73	0.00	10.81	2.27	3.55
McAllen AA	1,377	1.71	0.00	0.00	19.75	19.75	42.20	32.61	38.05	47.64	2.17	0.00	5.80	1.24	1.09
San Antonio AA	5,861	7.26	1.78	1.96	28.13	32.03	29.56	24.26	40.32	41.75	5.03	10.09	11.70	1.91	2.30
Texarkana AA	644	0.80	6.31	9.94	13.67	15.68	62.47	53.88	17.56	20.50	5.87	13.51	12.05	3.21	4.24
TX Non MA AA	2,542	3.15	0.40	0.55	7.89	8.81	59.44	54.76	32.27	35.88	4.02	2.00	6.41	3.21	3.52
Tyler AA	1,191	1.48	3.36	3.69	21.90	25.10	45.66	40.55	29.08	30.65	5.47	8.64	11.95	3.05	2.78
Victoria AA	465	0.58	0.94	1.51	29.65	30.11	44.40	36.99	25.01	31.40	3.37	9.38	6.02	1.85	1.80

* Based on 2009 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 (2010).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: TEXAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
Houston AA	11	6.36	3.13	0.00	17.99	45.45	36.70	36.36	41.97	18.18	21.96	100.00	55.88	10.90	13.59	
Limited Review:																
Austin AA	2	1.16	2.02	0.00	15.37	50.00	47.42	50.00	35.18	0.00	9.64	0.00	5.77	5.88	20.29	
Beaumont AA	73	42.20	2.03	0.00	11.36	0.00	57.46	43.84	29.15	56.16	44.12	0.00	50.00	37.14	50.00	
Brownsville AA	46	26.59	0.66	0.00	8.41	0.00	57.52	56.52	33.41	43.48	29.33	0.00	0.00	31.82	47.62	
Corpus Christi AA	0	0.00	6.54	0.00	16.67	0.00	37.38	0.00	39.41	0.00	10.75	0.00	9.09	6.67	12.82	
Dallas AA	7	4.05	2.27	0.00	16.62	57.14	41.48	14.29	39.22	28.57	33.21	50.00	80.39	18.92	24.49	
Ft Worth AA	0	0.00	1.99	0.00	17.01	0.00	40.50	0.00	40.50	0.00	31.09	71.43	62.96	13.89	21.74	
Longview AA	0	0.00	0.00	0.00	15.25	0.00	49.83	0.00	34.92	0.00	21.43	0.00	0.00	16.67	20.00	
McAllen AA	2	1.16	0.00	0.00	15.96	0.00	49.70	50.00	34.34	50.00	5.33	0.00	0.00	6.67	3.85	
San Antonio AA	0	0.00	0.96	0.00	21.65	0.00	34.78	0.00	42.46	0.00	8.72	0.00	18.52	4.92	8.93	
Texarkana AA	8	4.62	1.82	0.00	8.73	0.00	76.00	100.00	13.45	0.00	5.71	0.00	16.67	3.64	5.26	
TX Non MA AA	23	13.29	0.24	0.00	3.05	0.00	60.00	86.96	36.71	13.04	5.19	0.00	0.00	4.81	2.12	
Tyler AA	1	0.58	0.95	0.00	9.36	0.00	70.01	0.00	19.67	100.00	0.00	0.00	0.00	0.00	0.00	
Victoria AA	0	0.00	0.63	0.00	12.93	0.00	65.62	0.00	20.82	0.00	1.03	0.00	0.00	1.48	0.00	

* Based on 2009 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 (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: TEXAS				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share*				
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 ****						
Full Review:																
Houston AA	1,531	41.68	22.68	9.32	17.35	23.84	18.71	18.16	41.25	48.68	0.10	0.78	0.07	0.05	0.05	
Limited Review:																
Austin AA	274	7.46	19.07	3.47	17.62	26.64	22.47	16.60	40.84	53.28	0.01	0.00	0.00	0.00	0.01	
Beaumont AA	187	5.09	23.21	7.18	16.66	12.71	19.64	19.89	40.49	60.22	0.40	0.00	0.00	0.74	0.38	
Brownsville AA	124	3.38	23.75	7.44	16.04	33.06	17.82	19.01	42.40	40.50	0.73	6.67	3.80	0.78	0.14	
Corpus Christi AA	18	0.49	22.72	0.00	16.60	6.67	19.41	26.67	41.27	66.67	0.00	0.00	0.00	0.00	0.00	
Dallas AA	620	16.88	21.32	10.55	17.79	21.65	20.00	14.85	40.89	52.95	0.02	0.05	0.02	0.01	0.01	
Ft Worth AA	320	8.71	19.49	8.22	18.35	16.10	21.37	13.70	40.80	61.99	0.01	0.00	0.01	0.01	0.00	
Longview AA	47	1.28	20.39	4.26	16.86	23.40	20.16	10.64	42.60	61.70	0.12	0.00	0.00	0.00	0.24	
McAllen AA	68	1.85	23.48	1.52	16.86	6.06	17.67	9.09	41.98	83.33	0.12	0.00	0.32	0.25	0.08	
San Antonio AA	108	2.94	21.56	1.12	18.04	6.74	20.43	22.47	39.97	69.66	0.00	0.00	0.00	0.00	0.01	
Texarkana AA	86	2.34	23.23	1.19	16.47	19.05	19.47	26.19	40.83	53.57	0.30	0.00	0.00	0.40	0.38	
TX Non MA AA	187	5.09	18.99	3.30	16.62	18.68	20.54	21.98	43.85	56.04	0.33	0.00	0.43	0.44	0.28	
Tyler AA	74	2.01	20.31	2.78	18.42	22.22	20.71	20.83	40.55	54.17	0.03	0.00	0.00	0.00	0.07	
Victoria AA	29	0.79	21.02	3.45	17.44	27.59	20.32	31.03	41.22	37.93	0.28	0.00	0.94	0.32	0.00	

* Based on 2009 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 5.3% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: TEXAS				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share*				
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 ****						
Full Review:																
Houston AA	2,049	22.18	22.68	5.62	17.35	14.61	18.71	21.93	41.25	57.84	7.27	12.68	8.04	7.55	6.55	
Limited Review:																
Austin AA	330	3.57	19.07	8.84	17.62	19.21	22.47	28.35	40.84	43.60	4.15	5.77	5.61	4.68	3.23	
Beaumont AA	541	5.86	23.21	9.81	16.66	16.85	19.64	26.85	40.49	46.48	11.88	17.14	16.67	17.95	7.89	
Brownsville AA	370	4.00	23.75	8.92	16.04	20.54	17.82	21.89	42.40	48.65	31.72	34.78	37.04	39.29	26.75	
Corpus Christi AA	96	1.04	22.72	4.17	16.60	11.46	19.41	15.63	41.27	68.75	1.45	0.00	0.00	0.00	2.23	
Dallas AA	2,561	27.72	21.32	5.86	17.79	17.11	20.00	22.81	40.89	54.22	9.89	8.57	14.24	12.08	8.62	
Ft Worth AA	1,137	12.31	19.49	5.72	18.35	18.49	21.37	23.77	40.80	52.02	10.24	9.89	19.71	10.38	8.04	
Longview AA	102	1.10	20.39	5.88	16.86	16.67	20.16	26.47	42.60	50.98	4.95	7.69	7.89	5.00	3.82	
McAllen AA	296	3.20	23.48	5.74	16.86	14.53	17.67	19.59	41.98	60.14	10.28	17.65	6.52	9.38	10.73	
San Antonio AA	362	3.92	21.56	4.97	18.04	15.75	20.43	28.18	39.97	51.10	2.42	1.01	2.87	3.41	2.13	
Texarkana AA	222	2.40	23.23	13.06	16.47	17.57	19.47	24.32	40.83	45.05	17.46	30.00	28.57	24.39	10.28	
TX Non MA AA	876	9.48	18.99	6.87	16.62	15.92	20.54	21.42	43.85	55.78	14.58	12.86	22.92	18.13	11.46	
Tyler AA	246	2.66	20.31	10.98	18.42	16.67	20.71	28.05	40.55	44.31	6.48	6.45	4.26	7.25	6.78	
Victoria AA	51	0.55	21.02	7.84	17.44	19.61	20.32	19.61	41.22	52.94	3.70	0.00	6.25	5.13	2.67	

* Based on 2009 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 0.1% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: TEXAS				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total **	% Families ***	% BANK Loans ****	% Families *****	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Houston AA	1,032	32.16	22.68	6.13	17.35	18.10	18.71	20.28	41.25	55.49	0.10	0.24	0.17	0.10	0.09	
Limited Review:																
Austin AA	158	4.92	19.07	6.41	17.62	19.87	22.47	21.79	40.84	51.92	0.02	0.08	0.05	0.01	0.02	
Beaumont AA	219	6.82	23.21	5.53	16.66	8.29	19.64	19.82	40.49	66.36	0.83	1.49	0.00	0.89	0.92	
Brownsville AA	123	3.83	23.75	1.67	16.04	5.00	17.82	19.17	42.40	74.17	0.58	4.55	1.11	1.04	0.40	
Corpus Christi AA	25	0.78	22.72	0.00	16.60	12.50	19.41	29.17	41.27	58.33	0.07	0.00	0.00	0.00	0.10	
Dallas AA	525	16.36	21.32	9.46	17.79	17.30	20.00	19.52	40.89	53.72	0.05	0.34	0.06	0.06	0.04	
Ft Worth AA	187	5.83	19.49	6.98	18.35	15.70	21.37	16.28	40.80	61.05	0.02	0.00	0.00	0.02	0.03	
Longview AA	60	1.87	20.39	3.39	16.86	5.08	20.16	22.03	42.60	69.49	0.47	0.00	0.00	0.63	0.51	
McAllen AA	147	4.58	23.48	0.68	16.86	8.16	17.67	12.24	41.98	78.91	0.64	0.00	1.91	0.36	0.60	
San Antonio AA	97	3.02	21.56	5.32	18.04	9.57	20.43	25.53	39.97	59.57	0.02	0.12	0.00	0.03	0.02	
Texarkana AA	143	4.46	23.23	4.93	16.47	13.38	19.47	23.24	40.83	58.45	0.65	0.00	2.42	0.59	0.41	
TX Non MA AA	371	11.56	18.99	1.36	16.62	11.11	20.54	15.45	43.85	72.09	1.04	0.00	0.35	0.96	1.15	
Tyler AA	96	2.99	20.31	2.22	18.42	13.33	20.71	17.78	40.55	66.67	0.22	1.05	0.71	0.19	0.11	
Victoria AA	26	0.81	21.02	3.85	17.44	7.69	20.32	19.23	41.22	69.23	0.00	0.00	0.00	0.00	0.00	

* Based on 2009 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 2.6% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: TEXAS			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010		
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	
Full Review:										
Houston AA	27,775	34.35	79.04	43.59	98.07	0.98	0.95	4.80	6.91	
Limited Review:										
Austin AA	6,683	8.27	78.61	47.06	99.04	0.45	0.51	3.33	4.64	
Beaumont AA	1,744	2.16	77.48	41.28	90.19	4.13	5.68	5.84	8.22	
Brownsville AA	1,129	1.40	75.36	43.05	91.41	4.34	4.25	4.18	5.01	
Corpus Christi AA	1,255	1.55	76.32	41.43	99.84	0.16	0.00	4.92	6.50	
Dallas AA	21,347	26.40	77.75	44.73	98.26	0.90	0.84	5.66	7.71	
Ft Worth AA	8,144	10.07	80.06	42.10	98.92	0.49	0.59	6.88	7.46	
Longview AA	689	0.85	74.11	43.25	95.94	1.89	2.18	5.73	13.05	
McAllen AA	1,377	1.70	76.36	44.66	97.82	0.80	1.38	2.17	2.39	
San Antonio AA	5,867	7.26	78.24	43.16	99.25	0.29	0.46	5.03	6.89	
Texarkana AA	644	0.80	76.61	43.63	92.39	4.19	3.42	5.87	9.23	
TX Non MA AA	2,542	3.14	77.63	48.31	95.99	2.01	2.01	4.02	8.16	
Tyler AA	1,191	1.47	79.53	44.92	95.21	2.52	2.27	5.47	7.44	
Victoria AA	465	0.58	76.75	42.58	100.00	0.00	0.00	3.37	3.45	

* Based on 2009 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 - 2010).

**** 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 48.84% 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: TEXAS			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
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
Full Review:									
Houston AA	11	6.36	96.04	45.45	90.91	9.09	0.00	21.96	17.33
Limited Review:									
Austin AA	2	1.16	96.04	50.00	50.00	50.00	0.00	9.64	10.53
Beaumont AA	73	42.20	98.64	91.78	58.90	28.77	12.33	44.12	43.55
Brownsville AA	46	26.59	95.80	91.30	47.83	39.13	13.04	29.33	32.14
Corpus Christi AA	0	0.00	97.51	0.00	0.00	0.00	0.00	10.75	11.86
Dallas AA	7	4.05	95.14	71.43	85.71	14.29	0.00	33.21	24.26
Ft Worth AA	0	0.00	96.30	0.00	0.00	0.00	0.00	31.09	27.54
Longview AA	0	0.00	98.31	0.00	0.00	0.00	0.00	21.43	27.27
McAllen AA	2	1.16	91.42	100.00	100.00	0.00	0.00	5.33	5.00
San Antonio AA	0	0.00	96.62	0.00	0.00	0.00	0.00	8.72	9.09
Texarkana AA	8	4.62	95.64	100.00	100.00	0.00	0.00	5.71	6.19
TX Non MA AA	23	13.29	96.63	82.61	91.30	8.70	0.00	5.19	4.13
Tyler AA	1	0.58	97.42	100.00	100.00	0.00	0.00	0.00	0.00
Victoria AA	0	0.00	97.79	0.00	0.00	0.00	0.00	1.03	1.65

* Based on 2009 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 - 2010).

**** 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 6.94% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: TEXAS			Evaluation Period: MAY 1, 2007 TO DECEMBER 31, 2010				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Houston AA	7	9,458	202	84,182	209	93,641	46.35	0	0
Limited Review:									
Austin AA	3	262	63	5,198	66	5,460	2.70	0	0
Beaumont AA	1	3,140	42	17,780	43	20,920	10.35	0	0
Brownsville AA	2	4,095	26	16,712	28	20,807	10.30	0	0
Corpus Christi AA	3	2,665	2	5,026	5	7,691	3.81	0	0
Dallas AA	4	11,372	182	3,440	186	14,812	7.33	0	0
Ft Worth AA	0	0	40	20,449	40	20,449	10.12	0	0
Longview AA	1	489	4	2	5	491	.24	0	0
McAllen AA	1	3,500	16	64	17	3,564	1.76	0	0
San Antonio AA	0	0	47	12,704	47	12,704	6.29	0	0
Texarkana AA	0	0	26	51	26	51	.03	0	0
TX Non MA AA	2	1,390	27	42	29	1,433	.71	0	0
Tyler AA	0	0	10	10	10	10	.00	0	0
Victoria AA	0	0	1	8	1	8	.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: TEXAS Evaluation Period: MAY 1, 2007 TO DECEMBER 31, 2010																	
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
Full Review:																	
Houston AA	31.57	53	29.12	3.77	16.98	32.08	47.17	10	3	2	6	1	-2	6.93	30.99	29.58	32.44
Limited Review:																	
Austin AA	7.77	14	7.69	7.14	14.29	28.57	50.0	5	0	1	1	2	1	8.82	24.08	37.58	29.29
Beaumont AA	9.53	11	6.04	9.09	18.18	36.36	36.36	1	0	0	0	1	0	4.64	23.23	43.77	26.15
Brownsville AA	4.55	10	5.49	0.00	30.0	30.0	40.0	0	0	0	0	0	0	2.26	25.87	42.69	29.18
Corpus Christi AA	0.74	2	1.10	0.00	0.00	50.0	50.0	0	0	0	0	0	0	7.65	27.78	35.18	29.39
Dallas AA	15.55	33	18.13	6.06	12.12	30.30	48.48	11	5	2	2	1	0	8.22	27.51	32.05	32.22
Ft Worth AA	3.16	9	4.95	11.11	22.22	22.22	44.44	4	1	1	1	2	-1	6.03	26.43	35.58	31.96
Longview AA	1.95	4	2.20	0.00	0.00	75.0	25.0	0	0	0	0	0	0	0.00	30.08	41.47	28.45
McAllen AA	2.26	6	3.30	0.00	16.67	33.33	50.0	1	2	0	-1	1	-1	0.00	29.73	48.29	21.98
San Antonio AA	2.23	7	3.85	0.00	28.57	14.29	57.14	2	0	0	0	0	2	2.83	39.55	29.81	27.80
Texarkana AA	3.45	7	3.85	28.57	14.29	57.14	0.00	0	0	0	0	0	0	6.42	11.22	68.55	13.81
TX Non MA AA	12.95	19	10.44	0.00	15.79	57.89	26.32	0	0	0	0	0	0	0.47	8.04	61.05	30.44
Tyler AA	2.60	5	2.75	20.0	0.00	40.0	40.0	0	0	0	0	0	0	3.06	24.26	49.91	22.77
Victoria AA	1.69	2	1.10	0.00	0.00	50.0	50.0	0	0	0	0	0	0	2.00	27.09	48.19	22.72

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: TEXAS				Evaluation Period: MAY 1, 2007 TO DECEMBER 31, 2010									
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Houston AA	31.57	53	29.12	3.77	16.98	32.08	47.17	84	30.43	2.38	13.09	33.34	51.19	6.93	30.99	29.58	32.44
Limited Review:																	
Austin AA	7.77	14	7.69	7.14	14.29	28.57	50.0	25	9.05	4.0	8.0	32.0	56.0	8.82	24.08	37.58	29.29
Beaumont AA	9.53	11	6.04	9.09	18.18	36.36	36.36	17	6.15	0	17.64	41.18	41.18	4.64	23.23	43.77	26.15
Brownsville AA	4.55	10	5.49	0	30.00	30.0	40.0	10	3.62	0	30.0	20.0	50.0	2.26	25.87	42.69	29.18
Corpus Christi AA	0.74	2	1.10	0	0	50.0	50.0	2	.73	0	0	50.0	50.0	7.65	27.78	35.18	29.39
Dallas AA	15.55	33	18.13	6.06	12.12	30.30	48.48	63	22.83	4.75	11.11	31.75	50.79	8.22	27.51	32.05	32.22
Ft Worth AA	3.16	9	4.95	11.11	22.22	22.22	44.44	15	5.43	6.67	13.33	26.67	53.33	6.03	26.43	35.58	31.96
Longview AA	1.95	4	2.20	0	0	75.0	25.0	3	1.08	0	0	66.67	33.33	0.00	30.08	41.47	28.45
McAllen AA	2.26	6	3.30	0	16.67	33.33	50.0	6	2.17	0	16.67	50.0	33.33	0.00	29.73	48.29	21.98
San Antonio AA	2.23	7	3.85	0	28.57	14.29	57.14	13	4.72	0	30.77	15.38	53.85	2.83	39.55	29.81	27.80
Texarkana AA	3.45	7	3.85	28.57	14.29	57.14	0	13	4.72	15.38	15.38	46.16	23.08	6.42	11.22	68.55	13.81
TX Non MA AA	12.95	19	10.44	0	15.79	57.89	26.32	17	6.15	0	29.41	52.94	17.65	0.47	8.04	61.05	30.44
Tyler AA	2.60	5	2.75	20.00	0	40.0	40.0	6	2.17	33.33	0	33.33	33.34	3.06	24.26	49.91	22.77
Victoria AA	1.69	2	1.10	0	0	50.0	50.0	2	.73	0	0	50.0	50.0	2.00	27.09	48.19	22.72

Table 1. Lending Volume

LENDING VOLUME RICHMOND AA (JULY 1, 2007-DECEMBER 31, 2010)		Geography: VIRGINIA				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010, EXCEPT FOR						
Assessment Area (2010):	% 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)	
Full Review:												
Charlottesville AA	41.04	12	3,314	98	1,203	0	0	0	0	110	4,517	45.52
Limited Review:												
Richmond AA	44.78	18	2,547	102	489	0	0	0	0	120	3,036	25.43
VA Non MA AA	14.18	9	1,897	29	260	0	0	0	0	38	2,157	29.05

* Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from July 30, 2009 to December 31, 2010.

*** Deposit Data as of June 30, 2010. 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: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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****						
Full Review:																
Charlottesville AA	2	40.00	1.66	0.00	7.44	0.00	54.69	50.00	36.21	50.00	0.14	0.00	0.00	0.19	0.12	
Limited Review:																
Richmond AA	2	40.00	0.00	0.00	0.00	0.00	46.83	100.00	53.17	0.00	0.00	0.00	0.00	0.00	0.00	
VA Non MA AA	1	20.00	0.00	0.00	0.00	0.00	19.05	100.00	80.95	0.00	0.22	0.00	0.00	0.81	0.00	

* Based on 2009 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: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
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						
Full Review:																
Charlottesville AA	1	9.09	1.66	0.00	7.44	0.00	54.69	0.00	36.21	100.00	1.87	0.00	0.00	0.65	4.71	
Limited Review:																
Richmond AA	9	81.82	0.00	0.00	0.00	0.00	46.83	11.11	53.17	88.89	2.17	0.00	0.00	0.00	3.57	
VA Non MA AA	1	9.09	0.00	0.00	0.00	0.00	19.05	0.00	80.95	100.00	4.00	0.00	0.00	0.00	4.55	

* Based on 2009 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: JULY 30, 2009 TO DECEMBER 31, 2010									
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	
Full Review:																
Charlottesville AA	9	39.13	1.66	0.00	7.44	11.11	54.69	22.22	36.21	66.67	0.30	0.00	0.29	0.31	0.31	
Limited Review:																
Richmond AA	7	30.43	0.00	0.00	0.00	0.00	46.83	57.14	53.17	42.86	0.08	0.00	0.00	0.00	0.14	
VA Non MA AA	7	30.43	0.00	0.00	0.00	0.00	19.05	0.00	80.95	100.00	0.37	0.00	0.00	0.45	0.35	

* Based on 2009 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 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES				Geography: VIRGINIA				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010							
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 Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Charlottesville AA	98	42.79	1.14	7.14	9.95	15.31	54.30	48.98	34.61	28.57	1.83	1.89	2.16	1.54	1.86
Limited Review:															
Richmond AA	102	44.54	0.00	0.00	0.00	0.00	36.61	30.39	63.39	69.61	3.30	0.00	0.00	1.51	3.97
VA Non MA AA	29	12.66	0.00	0.00	0.00	0.00	30.22	37.93	69.78	62.07	3.13	0.00	0.00	3.23	2.79

* Based on 2009 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 (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: VIRGINIA				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share*				
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 ****						
Full Review:																
Charlottesville AA	2	40.00	18.44	0.00	16.47	0.00	21.54	100.00	43.55	0.00	0.15	0.00	0.42	0.20	0.00	
Limited Review:																
Richmond AA	2	40.00	15.39	0.00	13.77	0.00	21.58	100.00	49.25	0.00	0.00	0.00	0.00	0.00	0.00	
VA Non MA AA	1	20.00	12.47	0.00	12.36	0.00	19.85	0.00	55.32	100.00	0.25	7.69	0.00	0.00	0.22	

* Based on 2009 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 0.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: VIRGINIA				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share*				
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 ****						
Full Review:																
Charlottesville AA	1	9.09	18.44	0.00	16.47	100.00	21.54	0.00	43.55	0.00	1.92	2.00	3.13	1.79	1.11	
Limited Review:																
Richmond AA	9	81.82	15.39	0.00	13.77	0.00	21.58	33.33	49.25	66.67	2.27	0.00	0.00	9.09	0.00	
VA Non MA AA	1	9.09	12.47	0.00	12.36	0.00	19.85	0.00	55.32	100.00	4.00	0.00	0.00	0.00	6.25	

* Based on 2009 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 0.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: VIRGINIA				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families*****	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Charlottesville AA	9	39.13	18.44	0.00	16.47	33.33	21.54	22.22	43.55	44.44	0.36	0.00	0.28	0.49	0.37	
Limited Review:																
Richmond AA	7	30.43	15.39	0.00	13.77	0.00	21.58	28.57	49.25	71.43	0.09	0.00	0.00	0.00	0.16	
VA Non MA AA	7	30.43	12.47	0.00	12.36	14.29	19.85	0.00	55.32	85.71	0.48	0.00	0.98	0.51	0.43	

* Based on 2009 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 0.0% of loans originated and purchased by bank.

***** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: VIRGINIA		Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010			
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
Full Review:									
Charlottesville AA	98	42.79	76.71	58.16	98.98	0.00	1.02	1.83	5.29
Limited Review:									
Richmond AA	102	44.54	81.72	40.20	100.00	0.00	0.00	3.30	8.18
VA Non MA AA	29	12.66	81.68	68.97	100.00	0.00	0.00	3.13	6.01

* Based on 2009 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 - 2010).

**** 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 38.43% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: VIRGINIA				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Charlottesville AA	1	288	2	1,010	3	1,298	95.30	0	0
Limited Review:									
Richmond AA	0	0	5	64	5	64	4.70	0	0
VA Non MA AA	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: VIRGINIA																	
Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010																	
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
Full Review:																	
Charlottesville AA	45.52	1	33.33	0.00	0.00	0.00	100.0	0	0	0	0	0	0	2.49	16.68	48.55	32.28
Limited Review:																	
Richmond AA	25.43	1	33.33	0.00	0.00	0.00	100.0	1	0	0	0	0	1	0.00	0.00	45.35	54.65
VA Non MA AA	29.05	1	33.33	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	0.00	23.85	76.15

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: VIRGINIA				Evaluation Period: JULY 30, 2009 TO DECEMBER 31, 2010									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Charlottesville AA	45.52	1	33.33	0	0	0	100	5	38.46	0	0	20.00	80.00	2.49	16.68	48.55	32.28
Limited Review:																	
Richmond AA	25.43	1	33.33	0	0	0	100	5	38.46	0	0	0	100	0.00	0.00	45.35	54.65
VA Non MA AA	29.05	1	33.33	0	0	100	0	3	23.08	0	0	100	0	0.00	0.00	23.85	76.15