



PUBLIC DISCLOSURE

December 31, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citibank, N.A.
Charter Number 1461

701 East 60th Street North
Sioux Falls, SD 57104

Office of the Comptroller of the Currency

Large Bank Supervision
Constitution Center
400 7th Street, S.W.
Washington, DC 20219

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the Community Reinvestment Act (CRA) tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

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

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

Rated Area: A rated area is a state or multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and

typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Description of Institution

Citibank, N.A. ("CBNA" or "the bank") is a full-service interstate bank with its main office in Sioux Falls, South Dakota and headquarters in New York, New York. CBNA is the lead bank subsidiary of Citicorp, which is a direct subsidiary of Citigroup Inc. (Citi). Citi is a global financial services company with approximately 200 million customer accounts and does business in more than 160 countries. Citi's total assets of \$1.9 trillion as of December 31, 2011 made it the nation's third largest bank holding company. Citi provides consumers, corporations, governments, and institutions with a broad range of financial products and services, including consumer banking and credit, corporate and investment banking, securities brokerage, transaction services and wealth management. CBNA operates more than 1,000 branches and over 3,000 ATMs in 17 states and territories.

As of December 31, 2011, CBNA reported assets of \$1.3 trillion, total deposits of \$882.5 billion, and Tier One Capital of \$121.8 billion. The bank's loans comprise 44 percent of total assets and are distributed as follows: 25 percent credit card, 24 percent foreign office, 22 percent residential real estate, 17 percent other, 6 percent consumer, and 6 percent commercial and commercial real estate. For analysis purposes, we considered only domestic deposits, which were 36.5 percent of total deposits. We applied this percentage to Tier One Capital and used \$44.5 billion as the capital figure in our analyses of CD loans and investments.

On July 1, 2011, Citibank (South Dakota), N.A. (CBSD), an affiliated credit card issuing bank, merged into CBNA. The merger resulted in a significant increase to CBNA's Tier One Capital in the last half of 2011. As the Sioux Falls Assessment Area was only in existence for six months of the evaluation period, we did not evaluate performance in the State of South Dakota. However, we considered CBSD's volume of CD loans and investments in the overall rating of CBNA. In South Dakota, CBSD originated CD loans totaling \$37 million. CBSD also had five current and one prior period investment, totaling \$40 million and \$5 million, respectively.

At the bank's request, we considered loans, investments, and grants from several affiliates and subsidiaries. Refer to Appendix A for a complete list. The bank and its affiliates were not constrained by any legal or financial impediments that would hinder the ability to meet the credit, investment, and service needs of its communities.

CBNA, along with 13 other mortgage servicers, entered into a Consent Order (Order) with the OCC and Federal Reserve Board on April 13, 2011. The Order related to allegations of unsafe and unsound banking practices concerning certain servicing and foreclosure practices with residential mortgage loans from 2008 through 2010. 2010 was the first year of the analysis for this evaluation. Under the Order, the institutions agreed to submit to an independent foreclosure review to identify borrowers potentially harmed through the foreclosure practices. On January 7, 2013, CBNA agreed to settle the independent foreclosure review requirement by providing \$306.5 million for cash relief to eligible homeowners around the country and \$486.9 million in mortgage relief in the form of loan modifications and other loss mitigation activities. The other requirements of the Order remain in effect.

CBNA was rated Outstanding at its last CRA evaluation dated July 26, 2010.

Description of Evaluation Process

Evaluation Period/Products Evaluated

This evaluation considered CBNA's HMDA-reportable loans (home purchase, home improvement, and home refinance) and small loans to businesses for calendar years 2010 and 2011. CD lending, investments, and services were evaluated for the period beginning April 1, 2010 and ending December 31, 2011. Retail services were evaluated for calendar years 2010 and 2011.

At the bank's request, we considered home mortgage loans originated by CitiMortgage and credit card loans made by CBSD prior to its merger into CBNA. Additionally, grants originated by CitiFoundation were considered under the Investment Test. Appendix A provides information on the subsidiaries, affiliates, and products reviewed during this evaluation.

Selection of Areas for Full-Scope Review

In each state and MMA where the bank has an office, one AA within that state/MMA was selected for a full-scope review. The area selected was typically the MSA or MD that contained the largest percentage of bank deposits within the rating area. Refer to the "Scope" section under each State and MMA Rating section (as applicable) for details regarding how the areas were selected.

Ratings

The bank's overall rating is a blend of the MMA and state ratings. Four primary rating areas that represent the most significant deposit markets to the bank carried the greatest emphasis in our overall conclusions. These rating areas account for 84 percent of the bank's domestic deposits and allocated Tier One Capital. By order of significance, they are:

- New York-Northern New Jersey-Long Island, NY-NJ MMA: The New York-White Plains-Wayne, NY-NJ MD has the greatest influence over the rating for the MMA;
- State of California: The Los Angeles-Long Beach-Glendale, CA (Los Angeles) MD has the greatest influence over the rating for the state;
- State of Florida: The Miami MD has the greatest influence over the rating for the state; and
- State of Illinois: The Chicago-Joliet-Naperville (Chicago) MD has the greatest influence over the rating for the state.

The MMA ratings and state ratings are based primarily on conclusions drawn on areas that received full-scope reviews, but the bank's performance in areas receiving limited-scope reviews is also considered. Refer to the "Description of Institution's Operations" or "Scope of Evaluation" section under each State and MMA Rating section for details regarding how the areas were emphasized in arriving at the respective ratings.

Lending Test

For the various loan products considered under the Lending Test, small loans to businesses received greater emphasis than home mortgages in developing the conclusions. Overall, within the mortgage loan category, home refinance lending was generally given more emphasis based on the proportion of loans originated or purchased during the evaluation period. No bank markets had a sufficient number of multifamily or small farm loans to analyze. Appendix D provides information on the markets where the bank originated these types of loans.

We gave equal consideration to the geographic and borrower distribution components of the Lending Test. The volume of CD loans and the degree of responsiveness of those loans to the needs in the community were considered in the lending evaluation. The lack of CD lending in any area had a neutral impact on the Lending Test ratings. In situations where the bank's CD lending positively impacted the rating, it is described in the conclusions for the rating area. We compared the dollar amount of CD loans to the Tier One Capital allocated to the AAs to gain a common perspective regarding the volume of CD lending activity. Tier One Capital was allocated to the rating areas and AAs based on the percentage of bank deposits in those AAs. We considered those loans within the context of the shortened 21 month evaluation period for those loans.

In our analysis of the distribution of loans in geographies with different income levels, we gave greater consideration to the bank's performance in moderate-income tracts if there were a limited number of owner-occupied housing units or businesses in the low-income tracts. For borrower distribution, we considered the impact that poverty levels had on the demand for mortgages from low-income individuals and the affordability or high cost of housing in some markets.

We did not draw conclusions on a particular loan product if the bank made less than 50 loans in an AA during the evaluation period as the analysis on fewer than 50 loans did not provide meaningful conclusions.

Investment Test

We considered both the volume of qualified investments made during the current evaluation period and those made prior to the evaluation period that are still outstanding. The amount of consideration given to the current and prior period investments is based on the responsiveness of the investments to the needs in the AAs.

We compared the dollar amount of qualified investments made in the current evaluation period and prior evaluation periods to the Tier One Capital allocated to each AA, to gain a common perspective regarding the volume of the activity. Tier One Capital was allocated to the rating areas and AAs based on the percentage of bank deposits in each AA. Consideration was also given to investments made in the bank's broader statewide and regional areas. The bank's CD function does not geographically restrict investments and will provide qualifying investments that are outside of the bank's AAs, with many in the broader regional areas.

Service Test

Primary consideration is given to CBNA's performance delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in low- and moderate-income (LMI) geographies, but also considered branches in middle- and upper-income areas that are less than one mile in proximity to LMI areas. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the AAs, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch.

Where CBNA opened or closed branches within an AA, the overall impact of the changes was evaluated. If no branches were opened or closed in an AA, we did not include that performance element in our analysis.

We also considered data provided on usage and adoption of alternative delivery systems to assess the effectiveness of those systems in serving the needs of all segments of the bank's communities. CBNA has multiple alternative delivery systems which have proven effective in helping to provide retail banking services in the AAs and to LMI individuals. Alternative delivery systems include ATMs, 24-hour online banking, and bank-by-phone. The bank tracked the level of usage of these alternative delivery systems by the income level of the geography where the customer resides. We gave positive consideration to these systems where the access to banking services for LMI individuals was enhanced.

We evaluated the range of services and products offered by all of the bank's branches. Services and products offered at branches are consistent throughout the branch network. We specifically focused on differences in branch hours and services in low- or moderate-income geographies compared to those in middle- or upper-income geographies.

The bank's record of providing CD services was evaluated in AAs that received full-scope reviews. Our primary consideration was the responsiveness of CBNA to the needs of the community. Services that reflected ongoing relationships and where CBNA served in leadership roles received the most consideration in our analysis. We also considered the degree to which those services were offered and the volume of individuals impacted relative to the bank's resources in specific AAs.

The bank offers several CD services that benefit multiple AAs or in some cases provide nationwide benefit. These services target LMI individuals and families and demonstrate innovation and/or leadership in providing CD services.

Data Integrity

Prior to the start of this evaluation, we tested the accuracy of the bank's CRA lending data. We also reviewed the appropriateness of CD activities provided for consideration in our evaluation. This included the testing of CD loans, investments, and services for compliance with the CRA regulation.

Community Contacts

OCC Community Affairs Officers updated or completed contacts in full-scope AAs for this evaluation. Interviews were conducted with a variety of community organizations including low-income housing agencies, small business development centers, and social service and community action organizations. We also reviewed existing contacts made during the evaluation period with community groups, local government representatives, realtors, and business leaders within the various AAs, as well as public comments received by the bank or the OCC. Information from these community contacts for the Primary Rating Areas is summarized, as needed, in the Market Profiles found in Appendix C.

Other Information

Assessment Areas (AAs) – We determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that the bank's branches could service and did not arbitrarily exclude any low- or moderate-income areas.

Lending Gap Analysis – We reviewed summary reports and maps and analyzed CBNA's home mortgage and small business lending activity over the evaluation period. We did not identify any unexplained conspicuous gaps in any of the areas under review.

Inside/Outside Ratio – We considered the volume of loans made inside CBNA's AAs a positive factor in our evaluation of lending performance. At the state/multistate level, we analyzed the volume of bank loan originations and purchases within the AAs versus those made outside the AAs. Our conclusions in this area were based solely on bank originations and purchases and did not include any affiliate data. Conclusions are discussed in each rated area.

Flexible Loan Programs – The bank participated in or offered several flexible loan products that addressed the needs of LMI borrowers and geographies. The programs are offered on a national, regional, or local basis. Examples are: Fannie Mae MyCommunityMortgage; FHA and VA loans; and the Citi Closing Assistance Program. Also, the bank continues to partner with the Neighborhood Assistance Corporation of America (NACA). Borrowers who have received homebuyer education and counseling by NACA are eligible. Nationally, the NACA program provided approximately 1,700 loans to borrowers within the bank's assessment areas. Where flexible loan programs were given positive consideration, it is noted within the Lending Test of the respective AA.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 12 CFR 195.28(c), respectively, in determining a national bank's or Federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau (CFPB). We also considered other material practices CBNA engaged in during the evaluation period involving home mortgage lending practices and foreclosure issues that provide relevant context for the bank's activities during the period of the CRA evaluation.

The OCC identified the following public information regarding noncompliance with the statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution:

- Evidence of unfair billing practices in connection with identity protection products and unfair marketing and sales practices for debt cancellation products. The practices affected customers of CBNA and its affiliate, Department Stores National Bank (DSNB) from 2000 through February 2013. The banks entered into a Consent Order with the OCC and paid \$35 million in civil money penalties (CMP). The banks no longer offer identity protection products and are not currently selling debt cancellation products. For further information on the practices and settlement, see OCC enforcement actions #2015-078 and #2015-079, dated July 20, 2015. In a related action, CFPB found evidence of unfair or deceptive acts or practices by CBNA and DSNB for the marketing, sale, billing, and retention of credit card add-on products and certain debt collection practices. The CFPB imposed an additional \$35 million in CMPs. For further information on the practices and settlement, see CFPB Consent Order #2015-CFPB-0015, dated July 21, 2015. The banks anticipate making payments of almost \$750 million to over 9.5 million customers as a combined outcome of the OCC and CFPB Consent Orders.
- Evidence of unfair acts or practices involving overstated APRs, and failure to remit, or delayed remittance of, post-sale payments made by borrowers, on credit card accounts CBNA sold to debt buyers between February 2010 and June 2013. CBNA entered into a Consent Order with the CFPB in which, among other things, it agreed to reserve \$4.89 million for redress of consumer injury in accordance with an approved redress plan and pay a civil money penalty of \$3 million. For further information on the practices and settlement, see CFPB Consent Order #2016-CFPB-0003, dated February 23, 2016.
- Evidence of noncompliance with the Servicemembers Civil Relief Act (SCRA). In 2012, CBNA entered into the National Mortgage Settlement (NMS) with the U.S. Department of Justice. Under NMS, the bank conducted a full review to determine whether any servicemembers were foreclosed on in violation of the SCRA from January 2006 through April 2012. Nonjudicial foreclosure-related payments were made to 126 servicemembers and co-borrowers and totaled \$13.4 million and judicial foreclosure-

related payments were made to 135 servicemembers and co-borrowers and totaled \$15.6 million. For more information about the mortgage servicing settlement, go to www.NationalMortgageSettlement.com.

The OCC also found, in 2012, 14 instances in which CBNA violated the SCRA provision limiting interest to 6 percent and one instance in which the bank did not obtain a court order prior to foreclosing on a servicemember in violation of SCRA. The bank subsequently refunded impacted customers for the excess interest payments.

The OCC does not have additional public information regarding noncompliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The OCC will consider any evidence of discriminatory or other illegal credit practices relative to this institution that other regulators may provide to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information provided concerns activities that occurred during the evaluation period addressed in this performance evaluation.

The evidence of discriminatory and other illegal credit practices discussed in this section warranted a reduction in the overall CRA rating from "Outstanding" to "Satisfactory". CBNA's performance under the Lending, Investment, and Service Tests would otherwise have resulted in an "Outstanding" rating.

General Information and Overall CRA Rating

General Information

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

This document is an evaluation of the CRA performance of CBNA, N.A. issued by the OCC, the institution’s supervisory agency, for the evaluation period starting January 1, 2010 through December 31, 2011. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

Overall CRA Rating

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

The following table indicates the performance level of CBNA with respect to the Lending, Investment, and Service Tests:

Performance Levels	Citibank, 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 emphasized more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- CBNA’s overall Lending Test performance is excellent.
- CBNA’s overall Investment Test performance is excellent.
- CBNA’s overall Service Test performance is good.
- The evidence of discriminatory and other illegal credit practices discussed in the Fair Lending and Other Illegal Credit Practices section of this document warranted a reduction in the overall CRA rating from “Outstanding” to “Satisfactory”. CBNA’s

performance under the Lending, Investment, and Service Tests would otherwise have resulted in an “Outstanding” rating.

Refer to Tables 1-15 in the Appendix D for the facts and data that support all Test conclusions under the individual rating areas, for both full-scope and limited-scope.

Executive Summary

This section provides narrative support for CBNA’s overall performance rating. The Primary Rating Areas and Other Rating Areas sections of this evaluation provide additional comments regarding performance for each multistate MSA and state. Supporting numerical tables, found in Appendix D, reflect data considered during the analysis of the bank’s CRA performance.

LENDING TEST

- Overall lending performance during the evaluation period is excellent.

Economic conditions remained challenging during the evaluation period. These include high unemployment along with borrowers and communities impacted by the housing crisis. The bank has also faced its own financial issues, but has remained committed to responsive efforts to meet the credit needs of the communities it serves. These context issues were considered in evaluating the bank’s CRA performance, and in the determination of conclusions about, and in assigning ratings to the bank’s performance.

Overall lending performance in the four primary rating areas ranged from good to excellent, with excellent performance in the New York-Northern New Jersey-Long Island MMA as well as the states of California and Illinois, three of the four largest rating areas. Together the four areas represent 84 percent of the bank’s domestic deposits.

Areas of stronger geographic distribution include the New York-Northern New Jersey-Long Island MMA, the State of California, and the State of Illinois. Areas of stronger borrower distribution include the State of Illinois. Performance for small loans to businesses was stronger than performance for home mortgage loans in most rating areas.

CD lending was strong in some communities, which had a positive or significantly positive impact on lending performance in those communities. CD lending had a positive impact in three of the fourteen full-scope AAs, and a significantly positive impact in eight other full-scope AAs.

CBNA originated more than \$2.9 billion in CD loans, with 91 percent providing nearly 18,000 units of needed affordable housing, one percent helping to revitalize LMI geographies, and eight percent funding social services targeted to LMI individuals. Another \$337 million in letters of credit, primarily in New York, were issued to support CD projects. Letters of credit provide a valuable credit enhancement necessary for many CD projects to be viable. Without these letters of credit, many needed CD projects would not have been completed.

Excellent lending activity levels exist in a majority of the full scope AAs, with home mortgage and small loans to businesses market shares and rankings exceeding deposit market share and rankings.

INVESTMENT TEST

- CBNA's overall investment performance is excellent and responsive to the needs of the communities.
- Rating areas where investment performance is excellent represent over 95 percent of bank deposits.
- In many of the bank's AAs, the bank took a leadership role in developing and participating in investments that were large, complex and involved multiple partners with both public and private funding.

The bank has remained a stable, long-term provider of capital, which positively affected LMI communities and residents. Performance is evident in the more than 1,500 investments or grants totaling over \$2.2 billion made during the evaluation period in its AAs. Another \$2.3 billion of CD investments from prior periods remain outstanding and continue to support identified needs. As a national investor and leader in CD investments, the bank also makes numerous CD investments that benefit areas outside of the bank's AAs. This includes broad statewide areas or regional areas that total \$1.3 billion in current and prior period investments. These broader regional area investments further support the overall excellent investment performance of the bank, but did not impact any of the individual AA investment ratings.

SERVICE TEST

- CBNA's overall service performance is good.

Delivery systems are accessible to essentially all portions of the bank's AAs, when considering the additional accessibility provided by branches in middle-and upper-income geographies in close proximity to LMI geographies, and as demonstrated by high rates of adoption and use of CitiPhone by customers in LMI areas. The distribution is good in the majority of rating areas. Because branches in Puerto Rico do not provide retail banking services and operate more like wholesale banking offices, an analysis of the branch distribution was not meaningful. The bank also operated too few branches in Guam and New Jersey to effectively assess the level of performance through branch locations.

CBNA's record of opening and closing branch offices has improved the accessibility of its delivery systems. On a net basis, the bank opened 14 branches during the evaluation period.

Overall hours do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies. Branch hours are reasonably consistent across the AAs and any differences were reasonably explained.

CD services were good to excellent in many communities which had an impact on the Service Test performance in those communities. CD services were good in four of the fourteen full-

scope AAs and excellent in four other full-scope AAs. CBNA provided financial literacy and first-time homebuyer education services to LMI persons throughout its AAs. The bank maintains a significant number of ongoing relationships with organizations that work on affordable housing, education initiatives, small business development, and other CD goals.

Primary Rating Areas

- New York-Northern New Jersey-Long Island MMA
- State of California
- State of Florida
- State of Illinois

New York-Northern New Jersey-Long Island MMA

CRA rating for the MMA¹: 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 AA.
- Good geographic distribution of loans and good distribution of loans by borrower income.
- Positive impact of CD lending on the Lending Test elevated the overall good lending performance to excellent, resulting in an Outstanding Lending Test rating.
- Excellent level of CD investments.
- Branches are accessible to geographies and individuals of different income levels after considering branches in middle- and upper-income geographies that are in close proximity to LMI geographies.
- Good level of CD services.

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

CBNA's operations in the New York-Northern New Jersey-Long Island MMA are in four MDs: New York-White Plains-Wayne (excluding Putnam County); Edison-New Brunswick; Nassau-Suffolk; and Newark-Union (Essex, Morris, and Union Counties). As of June 30, 2011, CBNA's deposits in the MMA totaled \$66.2 billion and represented nearly 45 percent of the bank's domestic deposits. In terms of deposit market share, CBNA ranks 4th with a 6.2 percent share compared to 33.4 percent for JPMorgan Chase N.A., the largest financial institution in the MMA. There are 229 FDIC-insured depository institutions in the geographic area providing strong competition for the bank. Within the MMA, CBNA operates 277 branches.

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

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

Scope of Evaluation in New York-Northern New Jersey-Long Island MMA

We conducted a full-scope analysis of the New York-Wayne-White Plains MD as this area accounted for 82 percent of the deposits and 60 percent of the loans within the MMA. Limited-scope analyses were conducted for the Edison-New Brunswick, Nassau-Suffolk, and Newark-Union MDs. During the evaluation period, 63 percent of the loans by number were small loans to businesses and 37 percent were home mortgage loans. Within home mortgages, 41 percent were for home purchase, 2 percent were for home improvement, and 57 percent were for home refinance.

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 MMA is rated Outstanding. Based on a full-scope review, the bank's performance in the New York-White Plains-Wayne MD is excellent. Performance in the limited-scope areas did not impact the overall Lending Test rating in the MMA.

Lending Activity

Lending activity in the AA is excellent, given the strong competition for all types of loans. The bank ranks 4th in deposits with a 6.3 percent market share. In overall HMDA lending, the bank ranks 3rd with nearly a 10 percent market share. For home purchase lending, the bank ranked 2nd with a 10 percent market share; for home improvement, the bank ranked 4th with a 5.9 percent market share; and for home refinancing, the bank ranked 3rd with a 9.6 percent market share. The lending market shares are particularly strong considering the number of competing lenders vs. the number of depository institutions. There are 172 depository institutions in the AA. In this AA, there is strong competition for home mortgage lending with over 600 lenders, many without a depository presence. For small loans to businesses, the bank ranked 3rd with a 6.7 percent market share.

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The geographic distribution of home mortgage loans is good. The geographic distributions of home purchase loans and home improvement loans are excellent and home refinance loans is good. The bank's portion of home purchase loans in both LMI geographies exceeds the percent of owner-occupied units there. Its market share of such loans in both LMI geographies substantially meets its overall market share. The bank's portion of home improvement loans in both LMI geographies exceeds the percent of owner-occupied units there. The market share

of such loans in low-income geographies substantially meets and in moderate-income geographies exceeds its overall market share. The bank's portion of home refinance loans in both LMI geographies is below the percent of owner-occupied units there. The market share of such loans in low-income geographies is near to, and in moderate-income geographies exceeds, its overall market share.

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

Small Loans to Businesses

The geographic distribution of small loans to businesses is good. The portion of small loans to businesses in low-income geographies is below, and in moderate-income geographies approximates, the percentage of businesses within these geographies. The bank's market share in both LMI geographies exceeds its overall market share.

Refer to Table 6 in the New York-Northern New Jersey-Long Island MMA 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.

Inside/Outside Ratio

The bank originated or purchased a substantial majority of its home mortgage loans and small loans to businesses within the MMA. Overall, the bank originated or purchased 98.2 percent of the number of loans inside its AAs. The bank originated or purchased the following percentages of loans by product type: home purchase (97.6 percent); home improvement (98 percent); home refinance (96.8 percent); and small business (99.7 percent).

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The overall distribution of home mortgage loans by borrower income is good, given the following economic factors: competition, the high cost of housing, high poverty level, and unemployment in the New York-White Plains-Wayne MD during the evaluation period. Despite the real estate and economic downturn affecting the U.S. during the evaluation period, economic data shows that the median sales price of existing single-family homes in this AA remained strong and averaged \$443,000. Coupled with a poverty level of 17 percent (and significantly higher in the 25 to 40 percent range in some of the counties/geographies within the AA) of the households in the AA and a higher than average unemployment rate, homeownership remains very difficult for most LMI borrowers. The updated median family income for the AA indicates that a low-income individual earns no more than \$34,000 a year and a moderate-income borrower earns no more than \$54,000 a year. Additionally, the low

interest rate environment led to an increase in refinance lending which was concentrated in the middle- and upper-income markets.

While the distribution of home purchase loans is adequate, taking the economic factors described above the bank's performance is considered good. The percentage of home purchase loans to LMI borrowers was well below the percentage of such families. The bank's market share to both LMI borrowers exceeded the bank's overall market share.

The distribution of home improvement loans is adequate. The percentage of home improvement loans to low-income borrowers was significantly below and to moderate-income borrowers was below the percentage of such families. The bank's market share to low-income borrowers was well below and to moderate-income borrowers exceeded the bank's overall market share.

While the distribution of home refinance loans is adequate, taking the economic factors described above the bank's performance is considered good. The percentage of home refinance loans to both LMI borrowers was significantly below the percentage of such families. The bank's market share to both LMI borrowers exceeded the bank's overall market share.

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

Small Loans to Businesses

The distribution of small loans to businesses is good. The percentage of small loans to small businesses was near to the percentage of small businesses. The bank's market share of loans to small businesses exceeded the bank's overall market share.

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

Community Development Lending

CD lending had a positive impact on the Lending Test, which elevated the overall good performance in the New York-White Plains-Wayne MD to excellent. The bank originated 125 loans totaling \$1.3 billion or 8 percent of allocated Tier One Capital and which were responsive to area needs. A substantial majority of the loans addressed the need for creating or preserving affordable housing, including rental housing, for LMI persons.

One example is a \$282 million loan to purchase 32 subordinate construction loans from the New York City Housing Development Corporation and assume responsibility for funding all future draws on these loans. The 32 loans originally financed 28 properties and 2,218 units with tenants earning no more than 80 percent of the median family income.

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

This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

Product Innovation and Flexibility

CBNA's use of flexible lending programs was given positive consideration for its Lending Test performance. During the evaluation period, the bank originated 1,136 loans in the AA totaling \$197.9 million under various programs. Details of the flexible lending programs that the bank participates in can be found under Other Information in the Description of Evaluation Process section of this evaluation.

Other Loan Data

CBNA issued 18 standby letters of credit totaling \$302.6 million that have a qualified CD purpose. The letters of credit were given positive consideration and supported the creation or preservation of affordable housing within New York City.

Refer to Table 1 Other Products in the New York-Northern New Jersey-Long Island MMA section of Appendix D for facts and data on these letters of credit.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Nassau-Suffolk AA is consistent with the bank's overall Outstanding performance under the Lending Test in the New York-Northern New Jersey-Long Island MMA. In the Edison-New Brunswick and Newark-Union AAs, performance is weaker than the bank's overall performance in the MMA and considered good. The weaker performance is due to weaker home mortgage lending geographic distribution and limited CD lending in those AAs. Refer to the Tables 1 through 13 in the New York-Northern New Jersey-Long Island 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 MMA is rated Outstanding. Based on a full-scope review, the performance in the New York-White Plains-Wayne MD is excellent. Performance in the limited-scope areas did not impact the overall Investment Test rating in the MMA.

CBNA originated 362 investments in the AA totaling \$816.2 million. Additionally, the bank had 137 investments totaling \$741 million that were originated in prior periods and which remain outstanding and responsive to identified needs. The combined current and prior period investment dollar volume represent 9.5 percent of Tier One Capital allocated to the AA.

The bank's responsiveness to the identified CD needs in the AA is excellent, especially in the area of affordable housing. A significant amount of grants and contributions were also made to address other community needs such as financial education, job training, and assistance to small businesses.

An example that demonstrates the bank's responsiveness is the New York Affordable Housing Preservation Fund LLC (NYAH) investment. In July 2010, Citi Community Capital partnered with a private developer to form the fund. NYAH seeks to preserve LMI housing projects which are in danger of rolling out of subsidy programs or converting into market rate housing by acquiring, refinancing or rehabilitating these properties. Citi committed \$47.5 million to the fund during the evaluation period. As of December 31, 2011, the fund had made equity investments in eight developments preserving 1,487 housing units in upper Manhattan, the Bronx, and Queens. The majority of these projects are located within LMI census tracts and are set aside for individuals and families earning at or below 80 percent of the area median income.

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

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Edison-New Brunswick, Nassau-Suffolk, and Newark-Union MDs is consistent with the bank's overall Outstanding performance under the Investment Test in the New York-Northern New Jersey-Long Island MMA. Refer to Table 14 in the New York-Northern New Jersey-Long Island 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 MMA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the New York-White Plains-Wayne MD is good. Performance in the limited-scope areas did not impact the overall Service Test rating in the MMA.

Retail Banking Services

Delivery systems are accessible to essentially all geographies and individuals of different income levels, after considering the close proximity of branches in middle- and upper-income geographies that are near LMI geographies. There are 182 branches within the New York-White Plains-Wayne MD. Two branches are located in geographies with no income designation. The distribution of branches in low-income geographies is well below the population residing in those geographies. The distribution of branches in moderate-income geographies is near to the population residing in those geographies. There are 18 branches in middle- and upper-income geographies that are within one-half mile of low-income geographies and 30 branches in middle- and upper-income geographies that are within one-

half mile of moderate-income geographies. Our evaluation of the effectiveness of these branches included consideration of available and affordable public transportation within the AA, as well as the absence of any physical barriers, such as water or highways, that could obstruct access to the branch.

CBNA's alternative delivery systems, including ATMs, CBNA Online, and CitiPhone Banking, provide additional delivery system availability and access to retail banking services. The percentage of full-service ATMs in low-income geographies is well below the percentage of the population residing in those geographies. The percentage of full-service ATMs in moderate-income geographies is near to the percentage of the population residing in those geographies. The percentage of CitiPhone users located in low-income geographies is equal to the percentage of households residing in low-income geographies. The percentage of CitiPhone users located in moderate-income geographies exceeds the percentage of households residing in moderate-income geographies. The percentage of CBNA Online users located in LMI geographies is near to the percentage of households residing in those geographies.

CBNA's record of opening and closing branch offices has improved the accessibility of its delivery systems in the AA. During the evaluation period, one branch opened in a middle-income geography, eight branches opened in upper-income geographies, and one branch opened in a geography that has not been assigned an income level. Seven of the ten branches are located within one-half mile of a low- or moderate-income geography and provided some additional access to persons living in LMI geographies. No branches were closed. Office hours throughout the AA do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and individuals. Branch hours are convenient, with evening and Saturday banking hours offered at various locations, including branches located in LMI geographies.

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

Community Development Services

CBNA provided a good level of CD services. Twenty-seven employees served as board or committee members for 33 CD organizations that focused on economic development, affordable housing, and community services to primarily LMI individuals. The services were responsive to the critical needs of the AA and numerous employees served in leadership roles. Additionally, CBNA employees participated in 101 CD services for a total of 409 hours, which benefited 41 organizations and over 4,000 LMI individuals. A majority of these services were presentations and seminars on teaching children to save, homeownership and homebuyer counseling, and financial literacy.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Nassau-Suffolk MD is consistent with the bank's overall High Satisfactory performance under the Service Test in the New York-Northern New Jersey-Long Island MMA. In the Edison-New Brunswick and the Newark-Union MDs, the bank's performance is weaker than the bank's

overall performance in the MMA and considered adequate. The weaker performance is due to a weaker distribution of branches in LMI geographies.

Refer to Table 15 in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data that support these conclusions.

State of California

CRA Rating for California: 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 AA.
- Good geographic distribution of loans and good distribution of loans by borrower income.
- Significantly positive CD lending enhances the bank's overall good lending performance.
- Excellent level of CD investments.
- Branches are accessible to geographies and individuals of different income levels after considering branches in middle- and upper-income geographies that are in close proximity to LMI geographies.
- Adequate level of CD services.

Description of Institution's Operations in California

CBNA has delineated 24 AAs within the state of California. As of June 30, 2011, the bank had \$45.3 billion deposits within the state, however approximately \$8.1 billion were attributed to escrow accounts of the bank's affiliate, CitiMortgage. The remaining \$37.2 billion represent 25 percent of the bank's deposits. CBNA ranked 5th with a 5.3 percent deposit market share. Primary competitors include Bank of America, N.A, Wells Fargo Bank N.A., JP Morgan Chase Bank N.A., and Union Bank, N.A. As of December 31, 2011, CBNA operated 380 branches and 713 ATMs in the state.

Refer to Appendix C Market Profiles for detailed demographics and other performance context information on the AA within the state of California that received a full-scope review.

Scope of Evaluation in California

We conducted a full-scope review of the Los Angeles MD as this area accounted for nearly 33 percent of the deposits and 30 percent of the lending within the state. The remaining AAs received limited-scope reviews. During the evaluation period, 52 percent of the loans by number were small loans to businesses and 48 percent were home mortgage loans. Within home mortgages, 17 percent were for home purchase, 2 percent were for home improvement, and 81 percent were for home refinance.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of California is rated Outstanding. Based on a full-scope review, the bank's performance in the Los Angeles MD is excellent. Performance in the limited-scope areas did not impact the overall Lending Test rating in the state.

We considered the significant affordability barriers that exist in the California housing market. Although housing prices have declined dramatically, Los Angeles remains one of the most expensive housing markets in the country. As of December 2011, the median home sale price was \$308,000, which is down from \$540,000 in 2007. This decline can be seen from two perspectives. For some, homes are marginally more affordable. For others who bought during the years experiencing the run-up in values (2002 to 2006), many homeowners are "underwater," owing more than their home is worth. According to data provided by CoreLogic, as of first quarter 2011, 23.8 percent of homeowners with mortgages in the Los Angeles MSA had negative equity in their homes, making refinancing challenging. Additionally, the updated median family income for the AA indicates a low-income person earns less than \$32,000 per year and a moderate-income person earns less than \$51,000 per year. These income levels make homeownership very difficult for most LMI borrowers. In the first half of 2010, California had the nation's third highest state foreclosure rate, with nearly 2 percent of its housing units receiving a foreclosure filing. By the first half of 2011, California moved up and had the nation's highest total foreclosure filings.

Lending Activity

Lending activity in the AA is excellent, considering strong competition in this market for all types of loans. The bank ranks 6th in deposits with a 4.8 percent market share. In overall HMDA lending, the bank ranks 2nd with an 11 percent market share. For home purchase lending, the bank ranked 4th with a 6.2 percent market share, for home improvement, the bank ranked 3rd with an 8.9 percent market share, and for home refinancing the bank ranked 2nd with a 13.4 percent market share. The lending market shares are particularly strong considering the number of competing lenders vs. the number of depository institutions. There are 126 depository institutions in the AA. There is strong competition for home mortgage lending with over 700 lenders, many without a depository presence. For small loans to businesses, the bank ranked 4th with an 8.4 percent market share.

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The geographic distribution of home mortgage loans is good. The geographic distribution of home purchase loans is excellent, home improvement loans is good, and home refinance loans is adequate. The bank's portion of home purchase loans in both LMI geographies exceeds the percent of owner-occupied units there and its market share of such loans in both LMI census tracts substantially meets its overall market share.

The bank's portion of home improvement loans in low-income geographies is below the percent of owner-occupied units there and well below in moderate-income tracts. The market share of such loans in both LMI census tracts exceeds its overall market share.

The bank's portion of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied units there and in moderate-income geographies is well below. The bank's market share of such loans in both LMI census tracts substantially meets its overall market share. However, the refinance market was adversely impacted by declining property values during the period.

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

Small Loans to Businesses

The geographic distribution of small loans to businesses is good. The portion of small loans to businesses in low-income geographies is below and in moderate-income geographies exceeds the percentage of businesses within these geographies. The bank's market share in low-income geographies was near to and in moderate-income geographies exceeded its overall market share.

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

Inside/Outside Ratio

The bank originated or purchased a substantial majority of its home mortgage loans and small loans to business inside its AAs. Overall, the bank originated or purchased 98.1 percent of the number of its loans inside its AAs. The bank originated or purchased the following percentages of loans by product type: Home Purchase (96 percent); Home Improvement (99 percent); Home Refinance (98 percent); and Small Business (99 percent).

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The overall distribution of home mortgage loans by borrower income is good, given the very high cost of housing coupled with falling home prices, high poverty level, high foreclosure rate, and above average unemployment rate in the Los Angeles MD during the evaluation period.

The distribution of home purchase loans is good, considering housing costs and market share. The percentage of home purchase loans to low-income borrowers was significantly below the percentage of such families. The percentage of loans to moderate-income borrowers was near to the percentage of such families. The bank's market share to both LMI borrowers substantially meets the bank's overall market share.

The distribution of home improvement loans is adequate. The percentage of home improvement loans to low-income borrowers was well below the percentage of such families. The percentage of loans to moderate-income borrowers was below the percentage of such families. The bank's market share to low-income borrowers was below and the bank's market share to moderate-income borrowers exceeded the bank's overall market share.

The distribution of home refinance loans is good, considering declining property values and good market share. The percentage of home refinance loans to low-income borrowers was significantly below the percentage of such families. The percentage of loans to moderate-income borrowers was well below the percentage of such families. This poor performance was offset by excellent market share performance. The bank's market share to low-income borrowers substantially meets and the bank's market share to moderate-income borrowers exceeded the bank's overall market share.

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

Small Loans to Businesses

The distribution of small loans to businesses is adequate. The percentage of small loans to small businesses was below the percentage of small businesses. The bank's market share of loans to small businesses exceeded the bank's overall market share. Additionally, there was no revenue information on 43 percent of the loans, as the bank did not rely on this information in its credit decisions.

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

Community Development Lending

CD lending had a significantly positive impact on the Lending Test, considering the short evaluation period for CD activities. The bank originated 11 loans in the Los Angeles MD totaling \$273.6 million, or 7.4 percent of allocated Tier One Capital. The most significant loan was for \$200 million to finance Los Angeles County's healthcare services to LMI persons. The County was facing increased costs through its other financing sources. CBNA was able to structure the loan with flexible pricing and terms, which allowed the County to save millions of dollars.

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

Product Innovation and Flexibility

CBNA's use of flexible lending programs was given significantly positive consideration on its Lending Test performance. During the evaluation period, the bank originated 620 loans in the AA totaling \$119.9 million under various programs. Details of the flexible lending programs that the bank participates in can be found under Other Information in the Description of Evaluation Process section of this evaluation.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Oakland, Salinas, San Diego, San Francisco, San Luis Obispo, Santa Cruz, and Santa Rosa AAs is consistent with the bank's overall Outstanding performance under the Lending Test in the State of California. In the Fresno, Hanford, Modesto, Napa, Oxnard, Riverside, San Diego, San Jose, Santa Ana, Santa Barbara, and Visalia AAs, the bank's performance is weaker than the bank's overall performance in the state, and considered good. In the Bakersfield, Madera, Merced, Sacramento, Stockton, and Vallejo AAs, the bank's performance is weaker than the bank's overall High Satisfactory performance and considered adequate. Weaker performance was generally the result of weaker home mortgage geographic distribution of loans.

Refer to the Tables 1 through 13 in the State of California 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 California is rated Outstanding. Based on a full-scope review, the bank's performance in the Los Angeles MD is excellent. Performance in limited-scope AAs did not impact the overall Investment Test rating in the State of California.

CBNA originated 103 investments in the AA totaling \$330.6 million. Additionally, 30 investments originated in prior periods were still outstanding totaled \$162.8 million and continue to provide ongoing benefit and responsiveness to identified needs. The combined current and prior period investment dollar volume represents over 13 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified CD needs in the AA is excellent, especially in the area of affordable housing. A significant amount of grants and contributions were also made to address other community needs such as financial education, asset building, and assistance to small businesses.

Examples that demonstrate the bank's responsiveness are the investments in two multifamily housing projects. CBNA provided \$5.4 million of Low-Income Housing Tax Credit (LIHTC) equity to finance development of a new complex designed to house and serve at-risk transition-age young adults. All of the units are income restricted to 30 percent or less of the area median income level. The project financing was innovative as it created a work-around solution to the state's temporary suspension of the Multifamily Housing Program permanent financing funds and allowed the project to continue.

In 2011, CBNA purchased \$23 million of multifamily housing revenue bonds issued by the California Statewide Communities Development Authority. The proceeds of these bonds financed the new construction of a 145-unit multifamily apartment property located in the northwest area of the city of Inglewood. The project qualified for LIHTCs and all of the units are restricted to families earning 60 percent or less of the area median income.

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

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bakersfield, Fresno, Merced, Modesto, Oakland, Oxnard, Riverside, Sacramento, Salinas, San Diego, San Francisco, San Jose, San Luis Obispo, Santa Barbara, Santa Cruz, Santa Rosa, Vallejo and Visalia AAs is consistent with the overall Outstanding performance under the Investment Test in the State of California. The bank's performance in the Hanford, Madera, Napa, Santa Ana, and Stockton AAs is weaker than the bank's overall performance in the state. Performance in the Napa AA is good, Santa Ana AA is considered adequate, performance in the Madera and Hanford AAs is considered poor and very poor in Stockton due to lower level of investments.

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

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the State of California is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Los Angeles MD is good. Performance in the limited-scope areas did not impact the overall Service Test rating in the state.

Retail Banking Services

Delivery systems are accessible to essentially all geographies and individuals of different income levels, after consideration to the close proximity of branches in several middle- and upper-income geographies that are near to LMI geographies. There are 112 branches within the Los Angeles MD. The distribution of branches in low-income geographies is below the percentage of the population residing in those geographies. The distribution of branches in moderate-income geographies is near to the percentage of the population residing there. CBNA also has four branches in middle- and upper-income geographies that are within one mile of low-income geographies and 32 branches in middle- and upper-income geographies that are within one mile of moderate-income geographies. Our evaluation of the effectiveness of these branches included consideration of available and affordable public transportation within the AA, as well as the absence of any physical barriers, such as water or highways, that could obstruct access to the branch.

CBNA's alternative delivery systems, including ATMs, CBNA Online, and CitiPhone Banking, provide additional delivery system availability and access to retail banking services. The percentage of full-service ATMs in low-income geographies is below the percentage of the population residing in those geographies. The percentage of full-service ATMs in moderate-income geographies is near to the percentage of the population residing in those geographies. The percentage of CBNA Online users located in low-income geographies is below the percentage of households residing in low-income geographies, and near to the percentage of households residing in moderate-income geographies. The percentage of CitiPhone users located in LMI geographies is near to the percentage of households residing in those geographies. CBNA's record of opening and closing branches in the AA has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. During the evaluation period, two branches were opened in upper-income geographies. Office hours throughout the AA do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and individuals. Many branches offer extended hours and some offer Saturday hours, including branches in low- and moderate-income geographies.

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

Community Development Services

CBNA provided an adequate level of CD services. Eight employees served as board or committee members for ten organizations that focused on community services to primarily LMI individuals, affordable housing, and economic development. Additionally, employees provided 486 hours for 32 activities that benefited 12 organizations and 876 LMI individuals. A majority of these services were presentations and seminars on foreclosure prevention, teaching children to save, and financial education and literacy.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Fresno, San Diego, San Francisco, Santa Ana, and Stockton AAs is consistent with the bank's overall High Satisfactory performance under the Service Test in the State of California. In the Bakersfield, Modesto, Napa, Oxnard, Sacramento, Salinas, San Jose, Santa Barbara, and Vallejo AAs, the bank's performance is weaker than the bank's overall performance in the State of California. Weaker performance is the result of weaker distributions of branches among low- and/or moderate-income geographies. In the Hanford, Madera, Merced, Oakland, Riverside, San Luis Obispo, Santa Cruz, Santa Rosa, and Visalia AAs, the bank's performance is stronger than the bank's overall performance in the State of California. Stronger performance is the result of stronger distribution of branches among LMI geographies. Performance in the limited-scope areas did not impact the overall state rating.

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

State of Florida

CRA Rating for Florida: 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 in the Miami AA.
- Good geographic distribution of loans and adequate distribution of loans by borrower income.
- CD lending supports the bank's overall good lending performance.
- Excellent level of CD investments.
- Branches are accessible to geographies and individuals of different income levels after considering branches in middle- and upper-income geographies that are in close proximity to LMI geographies.
- Adequate level of CD services.

Description of Institution's Operations in Florida

CBNA has delineated four AAs within the state of Florida. These are the Miami-Dade MD, Fort Lauderdale MD, West Palm Beach MD, and Jacksonville MSA. Competition is strong with 70 FDIC-insured depository institutions operating 660 offices within Miami-Dade County. As of June 30, 2011, the bank reported \$11.1 billion in deposits or 7.5 percent of total deposits within the state. CBNA ranked 5th in deposit market share at 5.5 percent. Primary competitors include Bank of America, N.A., Wells Fargo N.A., Sun Trust Bank, and JPMorgan Chase, N.A. As of December 31, 2011, CBNA operated 53 branches and 148 ATMs in the state.

Refer to Appendix C Market Profiles for detailed demographics and other performance context information on the AA within the state of Florida that received a full-scope review.

Scope of Evaluation in Florida

The Miami AA was selected for a full-scope review, accounting for nearly 72 percent of deposits and 50 percent of lending. The remaining AAs received limited-scope reviews. In Miami, the high cost of housing and high poverty levels makes affordability an issue for LMI individuals. The Miami real estate market was impacted by the recent housing crisis more than the limited-scope AAs. The limited-scope AAs positively impacted the Lending Test rating for the State of Florida. The geographic distribution of loans and distribution of loans to

borrowers of different income levels is based on home purchase and home refinance lending. The low volume of home improvement loans in all of the Florida AAs made an analysis of this product not meaningful.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Florida is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Miami AA is adequate. Performance in the limited-scope AAs had a positive impact on the overall Lending Test rating in the state, supporting the High Satisfactory rating.

Lending Activity

Lending activity in the AA is good after considering strong competition within the AA. During the evaluation period, small loans to businesses accounted for 90 percent of lending and home mortgage lending accounted for 10 percent. The bank ranked 3rd in deposits with a 9.6 percent market share. In overall HMDA lending, the bank ranked 7th with 3.2 percent market share. For home purchase lending, the bank ranked 9th with a 2.4 percent market share. For home refinancing the bank ranked 4th with a 4.5 percent market share. The lending market shares are good considering the number of competing lenders vs. the number of depository institutions. In this AA, there is strong competition for home mortgage lending. There are 388 home mortgage lenders in the market compared to 70 depository institutions. The bank ranked 2nd in small loans to businesses with a 10.9 percent market share.

Distribution of Loans by Income Level of the Geography

The distribution of loans to geographies of different income levels is good. We noted good distribution of home purchase loans, poor distribution of home refinance loans, and excellent distribution of small loans to businesses.

Home Mortgage Loans

The geographic distribution of home mortgage loans is adequate. The geographic distribution of home purchase loans is good and the distribution of home refinance loans is poor. The bank's portion of home purchase loans in low-income geographies exceeds and in moderate-income geographies is below the percentage of owner-occupied units for the AA, respectively. The market share in low-income geographies is well below and in moderate-income geographies exceeds its overall market share.

The bank's portion of home refinance loans in LMI geographies is significantly below the percent of owner-occupied units. The market share in low-income geographies is significantly below and in moderate-income geographies is below its overall market share. As a result of the economic downturn in 2008, homeowners in Miami-Dade County, along with many other communities throughout the U.S., have negative equity in their homes, meaning they owe more on their mortgage than the home is worth. Negative equity makes refinancing difficult to achieve. While the geographic distribution of home refinance loans is very poor, considering

homeowners unable to refinance their homes, overall geographic distribution of refinance loans performance is poor.

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

Small Loans to Businesses

The geographic distribution of small loans to businesses is excellent. The portion of small loans to businesses in low-income geographies is near to and in moderate-income geographies approximates the percentage of businesses within these geographies. The bank's market share in low-income geographies substantially meets and in moderate-income geographies exceeds its overall market share.

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

Inside/Outside Ratio

Overall, the bank originated or purchased 45 percent of the number of its loans inside its AAs. Although the bank originated or purchased an adequate percentage of its home mortgage loans within its State of Florida AAs, it originated a substantial majority of its small loans to businesses in those AAs. The bank originated or purchased the following percentages of loans by product type within its AAs: home purchase (35 percent), home improvement (50 percent), home refinance (36 percent), and small loans to businesses (97 percent). CBNA originated a large percentage of its mortgage loans in the Tampa MSA, where it has a large corporate facility with over 3,000 employees, but no branch/deposit-taking ATM presence.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level of borrower is adequate based on adequate distribution of home mortgages and good distribution of small loans to businesses. Consideration was given to declining home prices resulting in negative equity for many borrowers, high unemployment rate, high rate of foreclosures, and high poverty level within the AA. In addition, many special lending programs in place limit borrowers from refinancing for a given period of time.

Home Mortgage Loans

The overall distribution of home mortgage loans by borrower income is adequate. The distribution of home purchase loans and home refinance loans is poor. The updated median family income for the AA indicates a low-income family earns less than \$20,000 a year and a moderate-income family earns less than \$32,000 a year. These income levels make homeownership difficult for most LMI borrowers given the median housing cost is \$181,000. The poverty level is also very high at 18 percent. Considering the income barrier and affordability of housing, performance is adequate. The percentages of home purchase loans

to low-income and moderate-income borrowers were significantly below and below the percentages of low-income and moderate-income families, respectively. The bank's market share to low-income borrowers was well below and the market share to moderate-income borrowers was also below the overall market share.

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

Small Loans to Businesses

The distribution of small loans to businesses is good. The percentage of small loans to small businesses was near to the percentage of small businesses. The market share of loans to small businesses exceeded the bank's overall market share.

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

Community Development Lending

CD lending had a positive impact on the Lending Test rating and provides support for the bank's overall good lending performance. CBNA originated 13 loans in the Miami AA totaling \$106.7 million. The volume represents 4.4 percent of allocated Tier One Capital. The loans were responsive to the critical need of affordable housing for LMI people.

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

Product Innovation and Flexibility

CBNA's use of flexible loan programs was given positive consideration for its Lending Test performance. During the evaluation period, CBNA originated 33 loans totaling \$3.6 million. Details of the flexible lending programs that the bank participates in can be found under Other Information in the Description of Evaluation Process section of this evaluation.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Fort Lauderdale, Jacksonville, and West Palm Beach AAs is consistent with the bank's overall High Satisfactory performance under the Lending Test in the State of Florida.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the State of Florida is rated Outstanding. Based on a full-scope review, the bank's performance in the Miami MD is excellent. Performance in the limited-scope areas did not impact the overall Investment Test rating in the state.

CBNA originated 38 investments in the AA totaling \$105.8 million. Additionally, 16 investments totaling \$59 million made in prior periods remain outstanding and continue to provide ongoing benefit to address identified needs. The combined current and prior period investment dollar volume represents 6.8 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified CD needs in the AA is good, especially in the area of affordable housing. A significant amount of grants and contributions was also made to address other community needs such as financial education, assistance to small businesses, and homeownership counseling.

An example that demonstrates the bank's responsiveness was CBNA becoming a single investor and limited partner in two proprietary funds formed to invest in residential projects that qualified for LIHTCs. CBNA made an equity investment of \$24 million in the development of a 102-unit apartment complex in a low-income census tract within Miami. Eleven units are restricted to families earning no more than 33 percent of the median income and the remaining units restricted to 60 percent or less of the median income. CBNA made an equity investment of \$23.3 million in another complex of 103 units restricted to seniors with annual incomes up to 60 percent of the median income.

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

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Fort Lauderdale and Jacksonville AAs is consistent with the overall Outstanding performance under the Investment Test in the State of Florida. In the West Palm Beach AA, the bank's performance is weaker than the bank's overall performance in the state due to a lower level of investments and is considered adequate.

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

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the State of Florida is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Miami MD is good.

Performance in the limited-scope AAs did not impact the overall Service Test rating for the State of Florida.

Retail Banking Services

Delivery systems are accessible to essentially all geographies and individuals of different income levels, after considering the close proximity of branches in middle- and upper-income geographies to LMI geographies. There are 24 branches within the Miami AA. The distribution of branches in low-income geographies is near to the population residing in those geographies. The distribution of branches in moderate-income geographies is below the population residing in those geographies. CBNA has 10 branches in a middle- or upper-income geography that are within one mile of a low- or moderate-income geography. After giving consideration to these middle- and upper-income branches, accessibility for LMI individuals improves and is considered good. Our evaluation of the effectiveness of these branches included consideration of available and affordable public transportation within the AA, as well as the absence of any physical barriers, such as water or highways, that could obstruct access to the branch.

CBNA's alternative delivery systems, including ATMs, CBNA Online, and CitiPhone Banking, provide additional delivery system availability and access to retail banking services. The percentage of full-service ATMs in low-income geographies approximates the percentage of the population residing in those geographies. The percentage of full-service ATMs in moderate-income geographies is below the percentage of the population residing in those geographies. The percentage of CitiPhone users located in LMI geographies is near to the percentage of households residing in those geographies. The percentage of CBNA online users located in LMI geographies is below the percentage of households residing in those geographies.

CBNA's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the AA, particularly in LMI geographies and to LMI individuals. During the evaluation period, one branch was opened in a middle-income geography and no branches were closed. CBNA's office hours throughout the AA do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and LMI individuals. Branches located in LMI geographies have similar weekday hours as the branches located in middle- and upper-income geographies. However, the branch located in a low-income geography does not offer Saturday hours because it is in a commercial business district and does not have a significant customer presence during the weekend.

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

Community Development Services

CBNA provided an adequate level of CD services. Four employees serve as board or committee members for eight organizations. The services are responsive to the needs of the AA and three employees serve in a leadership role. Additionally, one of the employees

provided 22 first-time homebuyer education presentations for a total of 35 hours of service, which benefited 998 LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Fort Lauderdale AA is consistent with the bank's overall High Satisfactory performance under the Service Test in the State of Florida. In the Jacksonville AA and the West Palm Beach AA, the bank's performance is weaker than the bank's overall performance in the State of Florida. The weaker performance is due to a weaker distribution of branches in LMI geographies. The bank's performance in these AAs is poor and adequate, respectively.

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

State of Illinois

CRA Rating for Illinois: 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:

- Excellent lending activity in the AA.
- Good geographic distribution of loans and good distribution of loans by borrower income.
- Significantly positive CD lending enhances the bank's overall good lending performance.
- Excellent level of CD investments.
- Branches are accessible to geographies and individuals of different income levels after considering branches in middle- and upper-income geographies that are in close proximity to LMI geographies.
- Adequate level of CD services.

Description of Institution's Operations in Illinois

CBNA has delineated two AAs within Illinois. They are a portion of the Chicago MD (Cook, DuPage, Kane, Kendall, McHenry, and Will counties) and the Illinois portion of the Lake County MD. As of June 30, 2011, CBNA held \$9.4 billion in deposits and ranked 7th in the state with a 2.6 percent market share. This rating area contains 6.4 percent of the bank's deposits. Primary competitors include JP Morgan Chase, N.A., Harris Bank N.A., and Bank of America N.A. As of December 31, 2011, the bank operated 73 branches and 281 ATMs within the state.

Refer to Appendix C Market Profiles for detailed demographics and other performance context information on the AA within the State of Illinois that received a full-scope review.

Scope of the Evaluation in Illinois

The Chicago AA was selected for a full-scope review with 97 percent of the deposits, 90 percent of the loans, and nearly all of the branches in the state located in this AA. A limited-scope review of the Lake County MD was performed.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Illinois is rated Outstanding. Based on a full-scope review, the bank's performance in the Chicago AA is excellent. Performance in the limited-scope area did not impact the overall Lending Test rating in the state.

Lending Activity

Lending activity in the AA is excellent, given strong competition in the AA for all types of loans. The bank ranks 6th in deposits with a 3.5 percent market share. In overall HMDA lending, the bank ranks 5th with a 6.2 percent market share. For home purchase lending, the bank ranked 6th with a 3.4 percent market share, for home improvement, the bank ranked 4th with a 5.6 percent market share, and for home refinancing the bank ranked 4th with a 7.2 percent market share. The lending market shares are particularly strong considering the number of competing lenders vs. the number of depository institutions. In this AA, there is strong competition for home mortgage lending. There are over 800 home mortgage lenders in the market and 218 depository institutions. For small loans to businesses, the bank ranks 3rd with a 9.3 percent market share.

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The geographic distribution of home mortgage loans is good. The geographic distribution of home purchase loans is excellent, the distribution of home improvement loans is poor, and the distribution of home refinance loans is good. The bank's portion of home purchase loans in both LMI geographies exceeds the percent of owner-occupied units there. Its market share of such loans in both geographies exceeds its overall market share.

The bank's portion of home improvement loans in both LMI geographies is well below the percent of owner-occupied units there. The market share of such loans in both LMI geographies is significantly below its overall market share.

The bank's portion of home refinance loans in both LMI geographies is below the percent of owner-occupied units there. Its market share of such loans in both LMI geographies exceeds its overall market share.

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

Small Loans to Businesses

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

Refer to Table 6 in the State of Illinois 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.

Inside/Outside Ratio

The bank originated or purchased a substantial majority of its home mortgage loans and small loans to businesses inside its AAs. Overall, the bank originated or purchased 94 percent of the number of its loans inside its AAs. The bank originated or purchased the following percentages of loans by product type: Home Purchase (94 percent), Home Improvement (92 percent), Home Refinance (93.5 percent), and Small Business (99 percent).

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level is good based on good distribution of home mortgage lending and good distribution of small loans to businesses. The high cost of housing and relatively high poverty level of households (10 percent) in the AA was considered.

Home Mortgage Loans

The overall distribution of home mortgage loans by borrower income is good. The distribution of both home purchase and home refinance loans is good and of home improvement loans is adequate. The percentage of home purchase loans to low-income borrowers is below and the percentage to moderate-income borrowers exceeds the percentage of such families. The bank's market share to low-income borrowers is below and to moderate-income borrowers substantially meets the bank's overall market share.

The percentage of home improvement loans to low-income borrowers is well below and the percentage to moderate-income borrowers is near to the percentage of such families. The bank's market share to low-income borrowers is significantly below and to moderate-income borrowers is below the bank's overall market share.

The percentage of home refinance loans to low-income borrowers is well below and the percentage to moderate-income borrowers is below the percentage of such families. This adequate distribution of loans is enhanced by excellent market share performance. The bank's market share to low-income borrowers exceeds and to moderate-income borrowers substantially meets the bank's overall market share.

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

Small Loans to Businesses

The distribution of small loans to businesses is good. The percentage of small loans to small businesses is near to the percentage of small businesses. The bank's market share of loans to small businesses exceeds the bank's overall market share.

Refer to Table 11 in the State of Illinois 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.

Community Development Lending

CD lending had a significantly positive impact on the Lending Test rating, considering the short evaluation period for CD activities. CBNA originated nine CD loans totaling \$193.2 million. This volume represented 7 percent of allocated Tier One Capital. In terms of dollars, 66 percent were for affordable housing and 34 percent were for economic development/revitalization efforts. One example of the responsiveness and complexity is a \$78 million loan to rehabilitate a vacant building into mixed-use affordable housing and retail/office space. Including the loan, the project required multiple funding sources including grants from the city and state and both historic tax credits and LIHTCs.

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

Other Loan Data

CBNA provided for consideration one standby letter of credit totaling \$300,000 that has a qualified CD purpose. The letter of credit facilitated the creation of affordable housing and was given positive consideration. Refer to Table 1 Other Products in the State of Illinois section of Appendix D for facts and data on this letter of credit.

Product Innovation and Flexibility

CBNA's use of flexible lending programs was given significantly positive consideration on its Lending Test performance. During the evaluation period, the bank originated 1,683 loans totaling \$234.5 million under various programs. Details of the flexible lending programs that the bank participates in can be found under Other Information in the Description of Evaluation Process section of this evaluation.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Lake County AA is weaker than the bank's overall Outstanding performance in the State of Illinois and considered good. Weaker performance was due to weaker geographic distribution of loans.

Refer to the Tables 1 through 13 in the State of Illinois 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 Illinois is rated Outstanding. Based on a full-scope review, the bank's performance in the Chicago AA is excellent. Performance in the limited-scope area did not impact the overall Investment Test rating in the state.

CBNA originated 105 investments in the AA totaling \$193.1 million. Additionally, 32 investments totaling \$109.3 million made in prior periods were still outstanding and remain responsive to identified needs. The combined current and prior period investment dollar volume represents almost 11 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified CD needs in the AA is good, especially in the area of affordable housing. A significant amount of grants and contributions were also made to address other community needs such as financial education, assistance to small businesses, and homeownership preservation.

One example is a mixed-income/mixed-use development that addresses public housing needs. CBNA provided \$24.5 million of LIHTC equity to finance the first phase consisting of 137 apartments within 19 buildings. Twenty-eight units will be unrestricted and 109 units set aside for those earning 60 percent or less of the median income.

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

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Lake County AA is consistent with the bank's overall Outstanding performance under the Investment Test in the State of Illinois. Refer to the Table 14 in the Illinois section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the State of Illinois is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Chicago AA is good. Performance in the limited-scope area did not impact the overall Service Test rating in the state.

Retail Banking Services

Delivery systems are accessible to essentially all geographies and individuals of different income levels, after considering the close proximity of branches in several middle- and upper-income geographies to LMI geographies. There are 71 branches in the Chicago AA. The distribution of branches in low-income geographies is below the population residing in those geographies. The distribution of branches in moderate-income geographies is near to the population residing in those geographies. CBNA also has three branches located in upper-income geographies that are within one mile of low-income geographies and 18 branches located in middle- and upper-income geographies that are within one mile of moderate-income geographies. After giving consideration to these middle- and upper-income branches, accessibility for LMI geographies and LMI individuals improves and is considered good. Our evaluation of the effectiveness of these branches included consideration of available and affordable public transportation within the AA, as well as the absence of any physical barriers, such as water or highways, that could obstruct access to the branch. There were no branch openings or closings during the evaluation period.

CBNA's alternative delivery systems, including ATMs, CBNA Online, and CitiPhone Banking, provide additional delivery system availability and access to retail banking services. The percentage of full-service ATMs in low-income geographies is well below the percentage of the population residing in those geographies. The percentage of full-service ATMs in moderate-income geographies is below the percentage of the population residing in those geographies. The percentage of CitiPhone users located in LMI geographies exceeds the percentage of households residing in those geographies. The percentage of CBNA Online users located in low-income geographies approximates the percentage of households residing in low-income geographies. The percentage of CBNA Online users located in moderate-income geographies is equal to the percentage of households residing in moderate-income geographies. Office hours throughout the AA do not vary in a way that inconveniences certain portions of the AA, particularly LMI geographies and LMI individuals. Many branches offer extended evening hours and some offer Saturday hours, including branches in LMI geographies.

Community Development Services

CBNA provided an adequate level of CD services. Ten employees served as board or committee members for 12 organizations that focused on economic development, affordable housing, and community services to primarily LMI individuals. CD services were responsive to the needs of the AA and several employees served in a leadership role. Additionally, employees provided 24 first-time homebuyer/homeownership presentations and financial

education workshops for a total of 96 hours of CD services, which benefited 10 organizations and 684 LMI individuals.

Refer to Table 15 in the State of Illinois 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.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Lake County AA is weaker than the bank's overall High Satisfactory performance under the Service Test in the State of Illinois. The weaker performance is due to a weaker distribution of branches in LMI geographies.

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

OTHER RATING AREAS

- State of Connecticut
- Territory of Guam
- State of Maryland
- State of Massachusetts
- State of Nevada
- State of New Jersey
- Commonwealth of Puerto Rico
- State of Texas
- Philadelphia-Camden-Wilmington (PA-NJ-DE) MMA
- Washington-Arlington-Alexandria (DC-VA-MD) MMA

State of Connecticut

CRA Rating for Connecticut: 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:

- Excellent lending activity in the AA.
- Good geographic distribution of loans and good distribution of loans by borrower income.
- Significantly positive CD lending enhances the bank's overall good lending performance.
- Excellent level of CD investments.
- Branches are accessible to geographies and individuals of different income levels after considering branches in middle- and upper-income geographies that are in close proximity to moderate-income geographies.
- Good level of CD services.

Description of Institution's Operations in Connecticut

CBNA has delineated two AAs within the state of Connecticut. They are the Bridgeport and New Haven MSAs in their entirety. As of June 30, 2011, CBNA held \$2.8 billion of deposits in the state and ranked 6th with a 5.5 percent market share. Primary competitors include Peoples United Bank N.A. and Wells Fargo Bank, N.A., with deposit market shares of 14.3 and 13.5 percent, respectively. The rating area deposits represented approximately 2 percent of the bank's deposits. The bank operates 20 branches and 60 ATMs within the state. The Bridgeport MSA was selected for a full-scope review with nearly all of the bank's deposits within the state concentrated here. The New Haven MSA was evaluated using limited-scope procedures. The bank's performance in this state had a limited impact on its overall CRA rating due to the bank's relatively small presence.

LENDING TEST

The bank's performance under the Lending Test in the State of Connecticut is rated Outstanding. Based on a full-scope review, the bank's performance in the Bridgeport MSA is excellent. CD lending contributed significantly to the rating. Performance in the limited-scope area did not impact the overall Lending Test rating in the state.

Lending activity in the AA is excellent after considering strong competition within the AA for all types of loans. The bank ranks 5th in deposits with an 8.7 percent market share. In overall HMDA lending, the bank ranks 4th with a 7.1 percent market share. For home purchase lending, the bank ranked 4th with a 5.2 percent market share, for home improvement, the bank ranked 7th with a 4.7 percent market share, and for home refinancing the bank ranked 3rd with an 8 percent market share. The lending market shares are particularly strong considering the number of competing lenders vs. the number of depository institutions. In this AA, there is strong competition for home mortgage lending. There are 410 home mortgage lenders in the market compared to 32 depository institutions. The bank ranks 4th in small loans to businesses with an 8.7 percent market share, equaling its deposit market share.

The distribution of loans to geographies of different income levels is good. We noted adequate distribution of home purchase and home refinance loans, poor distribution of home improvement loans, and excellent distribution of small loans to businesses. The bank originated or purchased a high percentage of its home mortgage loans and small loans to businesses within its AAs. Overall, the bank originated or purchased 61.8 percent of the number of its loans inside its AAs. The bank originated or purchased the following percentages of loans inside the AAs, by product type: home purchase (62 percent), home improvement (63 percent), home refinance (59 percent), and small loans to businesses (96 percent).

The distribution of loans by income level of borrower is good. We noted good distribution of home purchase and home refinance loans, poor distribution of home improvement loans, and good distribution of small loans to businesses.

CD lending had a significantly positive impact on the bank's Lending Test, considering the short evaluation period for CD activities. CBNA originated three loans in the Bridgeport MSA for \$53.4 million, which represented 6.3 percent of allocated Tier One Capital. Nearly all of the dollars helped address the critical need of affordable housing for LMI persons. CBNA's use of flexible loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated 70 loans totaling \$12.4 million under various programs.

Based on a limited-scope review, the bank's performance under the Lending Test in the New Haven AA is weaker than the bank's overall Outstanding performance under the Lending Test in the State of Connecticut and is considered good. Weaker performance was due to weaker geographic distribution of loans.

INVESTMENT TEST

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 Bridgeport AA is excellent. Performance in the limited-scope area did not impact the overall Investment Test rating in the state.

CBNA originated 28 investments in the AA totaling \$25 million. Additionally, six investments totaling \$25.4 million that originated in prior periods are still outstanding and continue to address identified needs. The combined current and prior period investment dollar volume represents almost six percent of Tier One Capital allocated to the AA. The bank's

responsiveness to the identified CD needs in the AA is good, especially in the area of affordable housing. A significant amount of grants and contributions was also made to address other community needs such as financial education, assistance to small businesses, and homeownership counseling. One example is \$16 million LIHTC equity to support construction of a 50-unit affordable multifamily apartment complex located in Stamford. The project is part of Stamford's South End Redevelopment Plan, a larger mixed-use development. All of the units will be affordable to families earning up to 60 percent of the median family income.

Based on a limited-scope review, the bank's performance under the Investment Test in the New Haven AA is consistent with the bank's overall Outstanding performance under the Investment Test in the State of Connecticut.

SERVICE TEST

The bank's performance under the Service Test in the State of Connecticut is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Bridgeport AA is good.

Delivery systems are accessible to essentially all geographies and individuals of different income levels, after considering the proximity of branches in several middle- and upper-income geographies to moderate-income geographies. There are 19 branches within the Bridgeport AA. The distribution of branches in LMI geographies is below the percentage of the population residing in those geographies. However, there are four branches located in middle- or upper-income geographies that are within one mile of moderate-income geographies. Our evaluation of the effectiveness of these branches included consideration of available and affordable public transportation within the AA, as well as the absence of any physical barriers, such as water or highways, that could obstruct access to the branch. No branches were opened or closed during the evaluation period.

CBNA provided a good level of CD services. During the evaluation period, five employees served as board members for four organizations that focused on affordable housing and community services to primarily LMI individuals. Additionally, employees provided 69 hours for 22 service activities that benefited 10 organizations and 409 LMI individuals. A majority of these services were presentations and seminars on teaching children to save and financial education and literacy.

Based on a limited-scope review, the bank's performance under the Service Test in the New Haven AA is consistent with the bank's overall High Satisfactory performance under the Service Test in the State of Connecticut. Performance in the limited-scope area did not impact the overall state rating.

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

Territory of Guam

CRA Rating for Guam: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Good lending activity in the AA.
- Poor geographic distribution of loans and adequate distribution of loans by borrower income.
- Positive impact of CD lending on the Lending Test, which elevated the overall adequate lending performance to good, resulting in a High Satisfactory Lending Test rating.
- Adequate level of CD investments, given limited opportunities in the AA.
- The bank operated too few branches in Guam to effectively assess the level of performance through branch locations and services. Delivery systems are reasonably accessible to geographies and individuals of different income levels after considering the small size of the island and the limited opportunities for a branch network in Guam. The bank provided an excellent level of CD services considering limited bank resources in the AA.

Description of Institution's Operations in Guam

CBNA has delineated the entire island as its AA. As of June 30, 2011, CBNA held \$271 million of deposits within the territory and ranked 5th with a 14.1 percent market share. Primary competitors include First Hawaiian Bank, Bank of Hawaii, and Bank of Guam and have a combined market share of 74 percent. The bank operates one branch and 13 ATMs on Guam. The bank's performance in this rating area had minimal impact on its overall CRA rating.

LENDING TEST

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

The geographic distribution of loans and distribution of loans to borrowers of different income levels are based on home purchase and home refinance lending. Home improvement loans are not offered in the Guam AA. A geographic distribution analysis for small loans to businesses was not performed because no demographic data was available for business loans. A significant majority (88 percent) of small loans to businesses had no revenue information because CBNA does not collect revenue as part of its underwriting process,

particularly for business credit cards. This manner of reporting is allowed under the regulation, however, an analysis of making loans to businesses of different sizes was not conducted because we could not draw a reliable conclusion. The bank demonstrated good performance and ranks 3rd in the small business loans in a market in which the top two lenders account for nearly 85 percent of the market. Home lending market share data for Guam is not applicable as lenders in Guam are not required to report HMDA lending data.

The geographic distribution of home mortgage loans is poor. The geographic distribution of home purchase loans in low-income geographies is very poor and the distribution in moderate-income geographies is poor. The geographic distribution of home refinance loans in low-income geographies is excellent and the distribution in moderate-income geographies is very poor. Given there is a very low level (0.04 percent) of owner-occupied housing in low-income geographies, we placed more emphasis on performance in moderate-income geographies. Given that the Guam rating area and Guam AA are one in the same, an inside/outside ratio is not meaningful.

The distribution of home mortgage loans to borrowers of different income levels is adequate. The distribution for home purchase loans is very poor and poor for low-income and moderate-income families, respectively. The distribution for home refinance is very poor and excellent for low-income and moderate-income borrowers, respectively. Distribution is considered adequate due to the high cost of housing and very high household poverty level of 22 percent.

CD lending had a significantly positive impact on lending performance in the Guam AA, which elevated the overall adequate performance to good. The bank originated one CD loan for \$14.3 million which represents 17.4 percent of allocated Tier One Capital. The loan helped address the critical need of affordable housing and represented nearly 37 percent of total lending in Guam by dollar volume. Product Innovation and Flexibility had a neutral impact on lending performance in the Guam AA. There were no loans with flexible terms originated during the evaluation period.

INVESTMENT TEST

The bank's performance under the Investment Test in Guam is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Guam AA is adequate, considering limited investment opportunities in the AA.

CBNA originated four investments in the AA totaling \$40,000 consisting of grants and contributions. Additionally, there is one prior period investment totaling \$434,000 that remains outstanding and has ongoing impact. The combined current and prior period investment dollar volume represent 0.6 percent of Tier One Capital allocated to the AA. Although the bank's responsiveness to the identified CD needs in the AA is poor as the investments are not commensurate with the bank's overall capacity, , opportunities are limited. This was given consideration in arriving at the overall investment performance for this AA.

SERVICE TEST

The bank's performance under the Service Test in Guam is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Guam AA is good.

The bank operated too few branches in Guam to effectively assess the level of performance through branch locations. Other delivery systems are reasonably accessible to essentially all geographies and individuals of different income levels, after considering the small size of the island and the limited opportunities for a branch network in Guam. There is one branch in the Guam AA, and it is located in a middle-income geography. CBNA's ATM network enhances accessibility in moderate-income geographies. The percentage of the bank's full-service ATMs in moderate-income geographies exceeds the percentage of the population residing in these geographies. All CBNA ATMs in Guam are bilingual (English and Japanese) to cater to both the local market as well as Japanese tourists. There were no branch openings or closings.

CBNA provided an excellent level of CD services that were responsive to the needs of the AA, considering the bank operates one branch. One employee served on the board of directors for an organization that provides affordable housing to LMI people. Additionally, employees participated in four CD services for a total of 366 hours, which benefited two organizations and 237 LMI individuals.

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

State of Maryland

CRA Rating for Maryland²: 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:

- Excellent lending activity in the AA.
- Adequate geographic distribution of loans and good distribution of loans by borrower income.
- Excellent level of CD investments.
- Branches are reasonably accessible to geographies and individuals of different income levels.
- Excellent level of CD services.

Description of Institution's Operations in the State of Maryland

CBNA has delineated one AA consisting of a portion of the Baltimore MSA (Anne Arundel and Baltimore counties, and Baltimore City). As of June 30, 2011, CBNA held \$255 million of deposits within the state, representing 0.17 percent of CBNA's total deposits. CBNA ranked 22nd in market share for deposits with 0.5 percent. Primary competitors include Bank of America, N.A., Manufactures and Traders Trust Company, PNC Bank, N.A., and Wells Fargo Bank, N.A. The bank operates four branches and ten ATMs within the state. The bank's performance in this rating area had minimal impact on its overall CRA rating.

LENDING TEST

The bank's performance under the Lending Test in the State of Maryland is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Baltimore AA is good.

Lending activity in the AA is excellent, given the bank's level of deposits and the strong competition within the AA. The bank ranks 22nd in deposits with a 0.5 percent market share. In overall HMDA lending, the bank ranks 7th with a 3 percent market share. For home

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

purchase lending, the bank ranked 12th with a 1.4 percent market share, for home improvement, the bank ranked 20th with a 1.4 percent market share, and for home refinancing, the bank ranked 5th with a 4 percent market share. The lending market shares are particularly strong considering the number of competing lenders vs. the number of depository institutions. In this AA, there is strong competition for home mortgage lending. There are 497 home mortgage lenders in the market compared to 65 depository institutions. The bank ranks 6th in small loans to businesses with a 6.7 percent market share.

The distribution of loans to geographies of different income levels is adequate. We noted good distribution of small loans to businesses and poor distribution of all home mortgage loans. The bank originated or purchased a majority of its home mortgage loans and small loans to businesses within its AA. Overall, the bank originated or purchased 52.1 percent of the number of its loans inside the AA. The bank originated or purchased the following percentages of loans by product type: Home Purchase (56.8 percent), Home Improvement (60 percent), Home Refinance (50.7 percent), and Small Business (65.2 percent).

The distribution of loans by income level of borrower is good. We noted good distribution of small loans to businesses and good distribution of all home mortgage loans.

CBNA did not originate any CD loans in the AA during the evaluation period. CBNA's use of flexible lending programs was given positive consideration on its Lending Test performance. During the evaluation period, the bank originated 70 loans totaling \$12.2 million under various programs. Details of the flexible lending programs that the bank participates in can be found under Other Information in the Description of Evaluation Process section of this evaluation.

INVESTMENT TEST

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.

CBNA originated 31 investments in the AA totaling \$3.3 million. Additionally, 11 prior period investments totaling \$24.2 are still outstanding and continue to address identified needs. The combined current and prior period investment dollar volume represents almost 36 percent of Tier One Capital allocated to the AA. The majority of dollars addressed the needs of affordable housing.

SERVICE TEST

The bank's performance under the Service Test in the State of Maryland is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Baltimore AA is adequate.

Delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank has a limited presence in the AA with only four offices. It has no branches in low-income geographies. The distribution of branches in moderate-income geographies approximates the population residing in those geographies. CBNA has one branch located in a middle-income geography that is within one mile of a moderate-income geography. Our

evaluation of the effectiveness of these branches included consideration of available and affordable public transportation within the AA, as well as the absence of any physical barriers, such as water or highways, that could obstruct access to the branch. There were no branch openings or closing during the evaluation period.

CBNA provided an excellent level of CD services, considering the limited number of branches. Nine employees served as board or committee members for 13 organizations that focused on affordable housing and community services to primarily LMI individuals. Additionally, employees provided nine presentations on financial literacy and teaching children to save for a total of 76 hours, which benefited four organizations and 395 LMI individuals.

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

State of Massachusetts

CRA Rating for Massachusetts: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent lending activity in the AA.
- Good geographic distribution of loans and good distribution of loans by borrower income in the full scope AA.
- CD lending supports the bank's overall adequate lending performance.
- Performance in the limited scope AAs negatively impacted the overall lending performance in the state.
- Good level of CD investments, although performance in the full-scope Boston AA was considered excellent. Performance in the limited-scope AAs negatively impacted the overall investment performance in the state.
- Branches are accessible to geographies and individuals of different income levels.
- Good level of CD services.

Description of Institution's Operations in the State of Massachusetts

CBNA has delineated three AAs in Massachusetts. They are the Boston, Cambridge, and Peabody MDs in their entirety. As of June 30, 2011, CBNA held \$1.5 billion of deposits within the state, representing one percent of CBNA's total deposits. CBNA ranked 17th with a 0.5 percent deposit market share. Primary competitors include Bank of America, N.A., State Street Bank and Trust Company, and RBS Citizens N.A. The bank operates 31 branches and 65 ATMs within Massachusetts.

LENDING TEST

The bank's performance under the Lending Test in the State of Massachusetts is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Boston MSA is good. Performance in the limited-scope areas negatively impacted the overall Lending Test rating in the State of Massachusetts. The limited-scope AAs represent 55 percent of deposits and nearly 50 percent of loans for Massachusetts.

Lending activity in the AA is excellent, given the bank's level of deposits and strong competition within the AA. The bank ranks 17th in deposits with a 0.5 percent market share. In overall HMDA lending, the bank ranks 5th with a 5.5 percent market share. For home purchase lending, the bank ranked 4th with a 4.0 percent market share, for home improvement, the bank ranked 14th with a 1.7 percent market share, and for home refinancing the bank ranked 5th with a 6.3 percent market share. The lending market shares are particularly strong considering the number of competing lenders vs. the number of depository institutions. In this AA, there is strong competition for home mortgage lending. There are 538 home mortgage lenders in the market compared to 78 depository institutions. The bank ranks 2nd in small loans to businesses with a 9.3 percent market share.

The distribution of loans to geographies of different income levels is good. We noted good distribution of small loans to businesses and home refinance loans, excellent distribution of home purchase loans, and adequate distribution of home improvement loans. The bank originated or purchased a high percentage of its home mortgage loans and small loans to businesses within its AAs. Overall, the bank originated or purchased 80.6 percent of the number of its loans inside its AAs. The bank originated or purchased the following percentages of loans by product type: home purchase (78.5 percent); home improvement (76.1 percent); home refinance (80.7 percent); and small loans to businesses (96.9 percent).

The distribution of loans by income level of borrower is good. We noted good distributions of small loans to businesses, home purchase loans, and home refinance loans, and adequate distribution of home improvement loans. Consideration was given to the high cost of housing and poverty level (11 percent) within the AA.

CD lending had a positive impact on lending performance in the AA but provides support for the bank's overall good lending performance in the AA. During the evaluation period, CBNA originated two loans totaling \$12.5 million, or 5.6 percent of allocated Tier One Capital. By dollar volume, 58 percent targeted affordable housing for LMI people and 42 percent targeted economic development. CBNA's use of flexible lending programs was given positive consideration on its Lending Test performance. During the evaluation period, the bank originated 27 loans/ totaling \$4.7 million under various programs. Details of the flexible lending programs that the bank participates in can be found under Other Information in the Description of Evaluation Process section of this evaluation.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Cambridge and Peabody AAs is consistent with the bank's overall Low Satisfactory performance under the Lending Test in the State of Massachusetts.

INVESTMENT TEST

The bank's performance under the Investment Test in the State of Massachusetts is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Boston AA is excellent. However, poor performance in the Cambridge AA and very poor performance in the Peabody AA negatively impacted the overall Investment Test rating in the State of Massachusetts. The limited-scope areas collectively carried about 50 percent of the performance in the State of Massachusetts.

CBNA originated 35 investments in the AA totaling \$14.2 million. Additionally, 16 prior period investments totaling \$32 million remain outstanding and responsive to identified needs. The combined current and prior period investment dollar volume represents almost 21 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified CD needs in the AA is good, especially in the area of community services. A significant amount of grants and contributions were also made to address other community needs such as affordable housing, foreclosure prevention, and financial education.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Cambridge and Peabody AAs was significantly below the bank's overall High Satisfactory performance under the Investment Test in the State of Massachusetts. Performance in the Cambridge and Peabody AAs is considered poor and very poor, respectively, due to lower levels of investments and resulted in the High Satisfactory rating.

SERVICE TEST

The bank's performance under the Service Test in the State of Massachusetts is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Boston AA is good. Performance in the limited-scope areas did not impact the overall Service Test rating in the State of Massachusetts.

Delivery systems are accessible to essentially all geographies and individuals of different income levels. There are 16 branches in the Boston AA. The distribution of branches in low-income geographies exceeds the population residing in those geographies. The distribution of branches in moderate-income geographies is below the population residing in those geographies. There are six branches located in middle- or upper-income geographies that are within one-half mile of low- or moderate-income geographies. These middle- and upper-income branches were considered and further support the overall good accessibility to retail banking services for LMI geographies and individuals. Our evaluation of the effectiveness of these branches included consideration of available and affordable public transportation within the AA, as well as the absence of any physical barriers, such as water or highways, that could obstruct access to the branch. There were no branch openings or closings during the evaluation period.

The bank provided a good level of CD services. Ten employees served on a board or committee for 13 organizations. Employees provided leadership/innovation for nine organizations. Additionally, employees participated in seven CD services for a total of 23 hours, which benefitted five organizations and 236 LMI persons.

Based on limited-scope reviews, the bank's performance under the Service Test in the Cambridge AA was consistent with the bank's overall High Satisfactory performance under the Service Test in the State of Massachusetts. In the Peabody AA, the bank's performance is weaker than the bank's overall performance and considered adequate. The weaker performance is due to a lack of branches in low- or moderate-income geographies.

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

State of Nevada

CRA Rating for Nevada: 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 in the AA.
- Adequate geographic distribution of loans and adequate distribution of loans by borrower income.
- Positive CD lending enhances the bank's overall adequate lending performance.
- Excellent level of CD investments.
- Branches are accessible to geographies and individuals of different income levels after considering branches located in middle- and upper-income geographies that are near low- and moderate-income geographies.
- Good level of CD services.

Description of Institution's Operations in the State of Nevada

CBNA has delineated one AA within the state of Nevada consisting of the Las Vegas MSA. As of June 30, 2011, deposits in the Las Vegas AA were nearly \$166 billion. Approximately \$165 billion are nonbranch or "main office" deposits. "Main office" deposits do not reflect traditional retail customer relationships, rather they are wholesale funds. The "main office" deposits do not reflect where any of CBNA's customers are located, where they work or where they conduct business. The adjusted domestic deposits of the Las Vegas AA are \$4.2 billion. This represents 2.8 percent of total domestic deposits. CBNA ranks 1st in market deposit share when based on all deposits. However, based on retail deposits alone, CBNA ranked eighth. Primary competitors include Bank of America, N.A and Wells Fargo Bank, N.A. The bank operates 15 branches and 39 ATMs within the state.

LENDING TEST

The bank's performance under the Lending Test in the State of Nevada is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Las Vegas AA is adequate.

The geographic distribution of loans and distribution of loans to borrowers of different income levels is based on home purchase and home refinance lending. The low volume of home improvement loans originated made an analysis of this product not meaningful. Lending activity is good considering the substantial majority of the bank's deposits are not from the local community, along with strong competition within AA. In overall home mortgage lending, the bank ranks 5th with a 2.9 percent market share. For home purchase lending, the bank ranked 5th with a 2.5 percent market share, for home improvement, the bank ranked 7th with a 4.0 percent market share, and for home refinancing the bank ranked 6th with a 4.0 percent market share. The lending market shares are strong considering the number of competing lenders vs. the number of depository institutions. In this AA, there is strong competition for home mortgage lending. There are 368 home mortgage lenders in the market compared to 41 depository institutions. The bank ranks 4th in small loans to businesses with a 7.9 percent market share.

The distribution of loans to geographies of different income levels is adequate. We noted adequate distribution of small loans to businesses and home purchase loans and poor distribution of home refinance loans. The bank originated or purchased a high percentage of its home mortgage loans and small loans to businesses within its AA. Overall, the bank originated or purchased 78 percent of the number of its loans inside its AA. The bank originated or purchased the following percentages of loans by product type: home purchase (79.8 percent), home improvement (93.8 percent), home refinance (67.2 percent), and small loans to businesses (99 percent).

The distribution of loans by income level of borrower is adequate. We noted adequate distribution of small loans to businesses and good distribution of home purchase and home refinance loans.

CD lending had a positive impact on lending performance in the AA, considering the short evaluation period for CD activities. During the evaluation period, CBNA originated five loans totaling \$42.2 million, or 3.3 percent of allocated Tier One Capital. All of the loans targeted affordable housing for LMI persons. CBNA provided for consideration one standby letter of credit totaling \$5.6 million that has a qualified CD purpose. The letter of credit facilitated the creation of affordable housing and was given positive consideration. Total CD lending activity represents 3.8 percent of allocated Tier One Capital. Refer to Table 1 Other Products in the State of Nevada section of Appendix D for data on this letter of credit.

CBNA's use of flexible lending programs was given positive consideration on its Lending Test performance. During the evaluation period, the bank originated 266 loans totaling \$34.3 million under various programs. Details of the flexible lending programs that the bank participates in can be found under Other Information in the Description of Evaluation Process section of this evaluation.

INVESTMENT TEST

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

CBNA originated 21 investments in the AA totaling \$45.4 million. Additionally, four prior period investments totaling \$22.4 million are still outstanding and continue to address identified needs of the AA. The combined current and prior period investment dollar volume represent almost 5.4 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified CD needs in the AA is good, especially in the area of affordable housing.

SERVICE TEST

The bank's performance under the Service Test in the State of Nevada is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Las Vegas AA is good.

Delivery systems are accessible to essentially all geographies and individuals of different income levels, after considering the close proximity of branches in middle-income geographies. There are 15 branches within the Las Vegas AA. We placed slightly more emphasis on branches in moderate-income geographies. The bank does not have any branches in low-income geographies; however, only two percent of the area's population live in those geographies. The distribution of branches in moderate-income geographies approximates the percentage of the population residing there. CBNA has four branches in middle-income geographies that are within one mile of moderate-income geographies. Our evaluation of the effectiveness of these branches included consideration of available and affordable public transportation within the AA, as well as the absence of any physical barriers, such as water or highways, that could obstruct access to the branch. There were no branch openings or closings during the evaluation period.

CBNA provided a good level of CD services. Five employees served as board or committee members for six organizations that focused on affordable housing and community services to primarily LMI. In addition, employees provided 137 hours for 11 activities that benefited three organizations and 1,207 LMI individuals. A majority of these activities were presentations and seminars on teaching children to save and financial education and literacy.

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

State of New Jersey

CRA Rating for New Jersey³: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Excellent lending activity in the AA.
- Adequate geographic distribution of loans and adequate distribution of loans by borrower income.
- Good level of CD investments.
- The bank operated too few branches in New Jersey to effectively assess the level of performance through branch locations. The bank also provided a poor level of CD services.

Description of Institution's Operations in the State of New Jersey

Within New Jersey, CBNA has delineated one AA outside of the multistate areas consisting of the Trenton-Ewing MSA in its entirety. As of June 30, 2011, deposits totaled \$46 million with the state, representing 0.03 percent of CBNA's total deposits. CBNA ranked 24 out of 25 depository institutions in deposit market share. The bank operates one branch and three ATMs in the AA. Performance in this rating area had minimal impact on the bank's overall rating.

LENDING TEST

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

The geographic distribution of loans and distribution of loans to borrowers of different income levels is based on home purchase and home refinance lending. The low volume of home improvement loans did not provide for a meaningful analysis. Lending activity is excellent, given the bank's limited presence (one branch) and strong competition for all types of loans. CBNA has minimal deposit market share in this AA. In overall HMDA lending, the bank ranks

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

6th with a 4.0 percent market share. For home purchase lending, the bank ranked 7th with a 2.2 percent market share and for home refinance, the bank ranked 5th with a 4.8 percent market share. The lending market shares are particularly strong considering the number of competing lenders vs. the number of depository institutions. In this AA, there is strong competition for home mortgage lending. There are 323 mortgage lenders in the market and 25 depository institutions. The bank ranks 5th in small loans to businesses with a 6.8 percent market share.

The distribution of loans to geographies of different income levels is adequate. We noted good distribution of small loans to businesses and very poor distribution of home purchase and home refinance loans. The bank originated or purchased a majority of its home mortgage loans and small loans to businesses within its AA. Overall, the bank originated or purchased 53.1 percent of the number of its loans inside its AA. The bank originated or purchased the following percentages of loans by product type: home purchase (54.2 percent), home improvement (66.7 percent), home refinance (51.7 percent), and small loans to businesses (100 percent).

The distribution of loans by income level of borrower is adequate. We noted good distribution of small loans to businesses and poor distribution of home purchase and home refinance loans.

No CD loans were originated in the Trenton AA during the evaluation period. CBNA's use of flexible lending programs was given positive consideration on its Lending Test performance. During the evaluation period, the bank originated eight loans totaling \$1.4 million under various programs. Details of the flexible lending programs that the bank participates in can be found under Other Information in the Description of Evaluation Process section of this evaluation.

INVESTMENT TEST

The bank's performance under the Investment Test in the State of New Jersey is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Trenton MSA is good.

CBNA originated six grants and contributions in the AA totaling \$69,000. Additionally, one prior period investment totaling \$458,000 remains outstanding and continues to provide benefit to identified needs of the AA. The combined current and prior period investment dollar volume represent almost four percent of Tier One Capital allocated to the AA.

The bank's responsiveness to the identified CD needs in the AA is adequate. While CD needs have been identified in this AA, CD opportunities are somewhat limited by the area's modest size and the bank's limited presence compared to other large inter-state banking companies. This was taken into consideration in arriving at the overall investment performance for this AA.

SERVICE TEST

The bank's performance under the Service Test in the State of New Jersey is rated Needs to Improve. Based on a full-scope review, the bank's performance in the Trenton AA is poor.

The bank operated too few branches in New Jersey to effectively assess the level of performance through branch locations and services. The bank operates only one branch in the Trenton AA. There were no branch openings or closings during the evaluation period.

CBNA provided a poor level of CD services in this AA, considering the bank operates one branch. One employee served as a committee member for two CD organizations that provided financial education and community services to LMI individuals.

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

Commonwealth of Puerto Rico

CRA Rating for Puerto Rico: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Good lending activity in the AA targeting CD lending.
- Adequate geographic distribution of loans and very poor distribution of loans by borrower income.
- CD lending had a significantly positive impact on the Lending Test elevating overall adequate lending performance to good, resulting in the High Satisfactory Lending Test rating.
- Excellent level of CD investments.
- Excellent level of CD services.

Description of Institution's Operations in the Commonwealth of Puerto Rico

CBNA has delineated one AA within Puerto Rico consisting of the San Juan MSA in its entirety. As of June 30, 2011, CBNA held \$3.1 billion of deposits in Puerto Rico with \$2 billion of these deposits being International Banking Entity (IBE) deposits. IBE deposits can only come from nonresidents of Puerto Rico and whose primary location is located outside of the commonwealth. Adjusting deposits for IBE, results in total deposits of \$1.1 billion representing 0.77 percent of CBNA's total deposits. CBNA ranked 6th in market share for deposits or 6.3 percent, when including IBE deposits. Primary competitors are Banco Popular de Puerto Rico and FirstBank of Puerto Rico with combined market share of 58 percent. The bank operates four branches and no ATMs within the commonwealth. The bank's performance in Puerto Rico had minimal impact on the bank's overall CRA rating.

CBNA does not offer retail services within Puerto Rico. The four branches operate similar to a wholesale bank and management focused its efforts on CD lending. The bank did not originate any mortgage loans in this AA. Small loans to businesses consist of credit card loans and totaled \$2.6 million during the evaluation period.

LENDING TEST

The bank's performance under the Lending Test in Puerto Rico is rated High Satisfactory. Based on a full-scope review, the bank's performance in the San Juan AA is good.

Lending activity in the AA is good. The substantial majority of total lending of \$75.8 million consisted of CD loans. The distribution of loans to geographies of different income levels is adequate based on adequate distribution of small loans to business. The bank originated all of its small loans to businesses within the AA. The distribution of loans based on loans to small businesses is very poor. Market conditions resulting from the severe recession in the AA was considered in evaluating performance.

CD lending had a significantly positive impact on the Lending Test. The bank originated four loans totaling \$73.2 million or 21.2 percent of allocated Tier One Capital and 97 percent of total lending in Puerto Rico. The majority of the dollar volume targeted affordable housing for LMI people. The bank does not offer retail loan products (i.e., consumer, home mortgage, or commercial) in Puerto Rico.

INVESTMENT TEST

The bank's performance under the Investment Test in Puerto Rico is rated Outstanding. Based on a full-scope review, the bank's performance in the San Juan AA is excellent. CBNA originated 14 investments in the AA totaling \$17.7 million. Additionally, three prior period investments totaling \$16.2 million remain outstanding and continue to address identified needs in the AA. The combined current and prior period investment dollar volume represent almost 10 percent of Tier One Capital allocated to the AA.

The bank's responsiveness to the identified CD needs in the AA is good, including two investments addressing affordable housing. Additionally, a number of grants and contributions were made to address other community needs such as economic development and foreclosure prevention.

SERVICE TEST

The bank's performance under the Service Test in Puerto Rico is rated Outstanding. Based on a full-scope review, the bank's performance in the San Juan AA is excellent. Because branches in Puerto Rico do not provide retail banking services and operate more like wholesale banking offices, an analysis of the branch distribution was not meaningful. We gave primary consideration to the bank's CD services because the bank's business model is consistent with the provision of CD services.

CBNA provided an excellent level of CD services that are responsive to the needs of the AA, after considering the bank's limited presence and its primary strategic focus of serving large corporate and wholesale bank customers. One employee holds a leadership position as a member of the Board of Directors for an organization that provides community services to primarily LMI individuals. Additionally, 15 employees provided 26 financial education classes for a total of 355 CD service hours, which benefited 721 LMI individuals.

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

State of Texas

CRA Rating for Texas: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent lending activity in the AA.
- Adequate geographic distribution of loans and good distribution of loans by borrower income.
- Significantly positive CD lending enhances the bank's overall good lending performance..
- Limited scope AAs negatively impacted the Investment Test rating for the State of Texas when compared to performance in the full-scope area of Dallas.
- Overall a good level of CD investments and excellent level of CD services.
- Branches are accessible to geographies and individuals of different income levels after considering branches located in middle and upper-income geographies that are near LMI geographies.

Description of Institution's Operations in the State of Texas

CBNA has delineated thirteen AAs within Texas. These AAs are two MDs, 10 MSAs, and one nonmetropolitan area. As of June 30, 2011, CBNA had \$3.8 billion deposits within the state and ranked 15th with a 0.9 percent market share. Primary competitors include JP Morgan Chase, N.A., Bank of America, N.A., USAA Federal Savings Bank, and Wells Fargo Bank, N.A. The bank operates 100 branches and 143 ATMs within the state.

LENDING TEST

The bank's performance under the Lending Test in the State of Texas is rated Outstanding. Based on a full-scope review, the bank's performance in the Dallas AA is excellent. The Dallas AA represents 25.4 percent of the deposits in the state. CBNA has a minimal deposit market share (0.70 percent) and ranks 20th in this AA. In overall home mortgage lending, the bank ranks 4th with a 6.2 percent market share. For home purchase lending, the bank ranked 6th with a 2.9 percent market share, for home improvement, the bank ranked 9th with 2.8 percent market share, and for home refinance, the bank ranked 3rd with a 9.4 percent market share. The lending market shares are particularly strong considering the number of competing lenders vs. the number of depository institutions. In this AA, there is strong competition for

home mortgage lending. There are 734 mortgage lenders in the market compared to 134 depository institutions. The bank ranks 3rd in small loans to businesses with an 11.5 percent market share.

The geographic distribution of loans is adequate. We noted excellent distribution of small loans to businesses and home improvement loans and poor distribution of home purchase and home refinance loans. The bank originated or purchased a high percentage of its home mortgage loans and small loans to businesses within its AAs. Overall, the bank originated or purchased 83.4 percent of the number of its loans inside its AAs. The bank originated or purchased the following percentages of loans by product type: home purchase (79.8 percent); home improvement (84.7 percent); home refinance (85.4 percent); and small loans to businesses (70.3 percent).

The distribution of loans by income level of borrower is good. We noted excellent distribution of small loans to businesses and home improvement loans, good distribution of home purchase loans, and poor distribution of home refinance loans. We gave consideration to the moderately high cost of housing and 10 percent poverty level in the AA.

CD lending had a significantly positive impact on the Lending Test, considering the short evaluation period for CD activities. CBNA originated two loans totaling \$31 million or 10 percent of allocated Tier One Capital. CBNA's use of flexible lending programs was given positive consideration in its Lending Test performance. During the evaluation period, the bank originated 219 loans totaling \$24.8 million under various programs. Details of the flexible lending programs that the bank participates in can be found under Other Information in the Description of Evaluation Process section of this evaluation.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Fort Worth and Wichita Falls AAs is consistent with the bank's overall Outstanding performance in the State of Texas. CD lending had a positive impact on the Lending Test in the Fort Worth and Wichita Falls AAs and elevated the overall good lending performance to excellent. In the Abilene, Austin, College Station, Houston, Killeen, Midland, Texas Non-MSA, Odessa, San Antonio, and San Angelo AAs, the bank performance is weaker than the overall Outstanding for the state and lending performance is considered good.

INVESTMENT TEST

The bank's performance under the Investment Test in the State of Texas is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Dallas AA is excellent. Performance in the limited-scope areas negatively impacted the overall Investment Test rating in the state.

CBNA originated 56 investments in the AA totaling \$6.9 million. Additionally, 12 prior period investments totaling \$76.1 million remain outstanding and continue to address identified needs of the AA. The combined current and prior period investment dollar volume represents almost 29 percent of Tier One Capital allocated to the AA.

The bank's responsiveness to the identified CD needs in the AA is good, especially in the area of affordable housing. A significant amount of grants and contributions were also made to

address other community needs such as financial education, assistance to small businesses, and capacity building.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Austin, Fort Worth, Houston, Midland, Texas Non-MSA, San Antonio and Wichita Falls AAs is excellent and stronger than the bank's overall High Satisfactory performance in the State of Texas. The bank's performance in the Abilene, College Station, Killeen, Odessa, and San Angelo AAs was significantly weaker than the overall performance in the state and is considered very poor. This performance is due to lower levels of investments benefitting those areas and negatively impacted the overall Investment Test rating for the State of Texas.

SERVICE TEST

The bank's performance under the Service Test in the State of Texas is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Dallas AA is good.

Delivery systems are accessible to essentially all geographies and individuals of different income levels, after considering the proximity of branches in middle- and upper-income geographies to LMI geographies. There are 23 branches within the Dallas AA. The distribution of branches in low-income geographies is below the population residing in those geographies. The distribution of branches in moderate-income geographies is well below the population residing in those geographies. There are, however, 10 branches in middle- and upper-income geographies that are within one mile of moderate-income geographies. After giving consideration to these branches, accessibility improves and is considered good. Our evaluation of the effectiveness of these branches included consideration of available and affordable public transportation within the AA, as well as the absence of any physical barriers, such as water or highways, that could obstruct access to the branch.

CBNA's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems. During the evaluation period, there was one branch opening in a middle-income geography and two branch closings in a middle-income geography.

The bank provided an excellent level of CD services. Nineteen employees served as a board or committee member for 21 organizations. Additionally, employees participated in 27 CD services for a total of 1,355 hours of service, which benefited 10 organizations and 1,624 LMI individuals. The majority of these services targeted financial education.

Based on the limited-scope reviews, the bank's performance under the Service Test in the Odessa AA and San Antonio AA is consistent with the bank's High Satisfactory performance in the state. In the Abilene, College Station, Killeen, and Texas Non-MSA AAs, performance is stronger than the bank's overall performance in the state. The stronger performance is due to a stronger distribution of branches in LMI geographies. In the Austin, Fort Worth, Houston, Midland, San Angelo, and Wichita Falls AAs, the bank's performance is weaker than the bank's overall performance in the state. The weaker performance is due to a weaker distribution of branches in LMI geographies. Performance in the limited-scope areas did not impact the Service Test rating in the State of Texas.

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

Philadelphia-Camden-Wilmington (PA-NJ-DE) MMA

CRA rating for the MMA⁴: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity in the AA.
- Adequate geographic distribution of loans and good distribution of loans by borrower income.
- Excellent level of CD investments.
- Branches are reasonably accessible to geographies and individuals of different income levels after considering branches located in middle- and upper-income geographies that are near LMI geographies.
- Adequate level of CD services.

Description of Institution's Operations in Philadelphia-Camden-Wilmington MMA

CBNA's operations in the Philadelphia-Camden-Wilmington PA-NJ-DE MMA are in three MDs: Philadelphia MD in its entirety, Camden (Camden County, New Jersey), and Wilmington (New Castle County, Delaware). As of June 30, 2011, deposits in the MMA totaled \$2.8 billion, representing 2 percent of the bank's total deposits. Within the MMA, the bank ranks 14th with a market share of 0.7 percent. Primary competitors include FIA Card Services N.A., ING Bank, FSB, TD Bank, N.A., and Wells Fargo Bank, N.A. CBNA operates 23 branches and 50 ATMs within the MMA. The Philadelphia MD was selected for a full-scope review as this AA contained 48 percent of the deposits and 79 percent of the lending within the MMA. Limited-scope reviews were conducted in the Camden and Wilmington MDs.

LENDING TEST

The bank's performance under the Lending Test in the Philadelphia-Camden-Wilmington MMA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Philadelphia MD is good. Performance in the limited-scope areas did not impact the overall rating in the MMA.

⁴ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

The bank ranks 14th in deposits with a 0.7 percent market share for the MMA. In overall HMDA lending, the bank ranks 5th with a 3.1 percent market share. For home purchase lending, the bank ranked 13th with a 1.1 percent market share, for home improvement, the bank ranked 22nd with a 0.9 percent market share, and for home refinancing the bank ranked 5th with a 4.2 percent market share. The lending market shares are particularly strong considering the number of competing lenders vs. the number of depository institutions. In this AA, there is strong competition for home mortgage lending. There are 641 home mortgage lenders in the market compared to 97 depository institutions. The bank ranks 5th in small loans to businesses with a 5.6 percent market share.

The distribution of loans to geographies of different income levels is adequate. We noted good distribution of home improvement loans and small loans to businesses, adequate distribution of home purchase loans, and poor distribution of home refinance loans. The bank originated or purchased a high percentage of its home mortgage loans and small loans to businesses within the MMA. Overall, the bank originated or purchased 86.3 percent of the number of its loans inside its AAs. The bank originated or purchased the following percentages of loans by product type: home purchase (87 percent); home improvement (88 percent); home refinance (86 percent); and small loans to businesses (97 percent). The distribution of loans by income level of borrower is good. We noted good distribution of home purchase and small loans to businesses and adequate distribution of home improvement and home refinancing loans.

No CD loans were originated in the Philadelphia MD during the evaluation period. CBNA's use of flexible products was given positive consideration in its Lending Test performance. During the evaluation period, the bank originated 55 loans totaling \$8.4 million under various programs. Details of the flexible lending programs that the bank participates in can be found under Other Information in the Description of Evaluation Process section of this evaluation.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Camden NJ MD is consistent with the overall High Satisfactory performance under the Lending Test in the MMA. Performance in the Wilmington DE MD is stronger than the bank's overall performance in the MMA. Stronger performance was the result of the positive impact of CD lending.

INVESTMENT TEST

The bank's performance under the Investment Test in the Philadelphia-Camden-Wilmington MMA is rated Outstanding. Based on a full-scope review, the bank's performance in the Philadelphia MD is excellent. Performance in the limited-scope areas did not impact the overall Investment Test rating in the MMA.

CBNA originated 44 investments in the AA totaling \$8.9 million. Additionally, eight prior period investments totaling \$18.1 million remain outstanding and continue to address identified needs of the AA. The combined current and prior period investment dollar volume represents almost seven percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified CD needs in the AA is adequate and includes a significant amount of grants and contributions made to address community needs such as foreclosure prevention, neighborhood revitalization, and assistance to small businesses.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Wilmington DE MD is consistent with the bank's overall Outstanding performance under the Investment Test in the Philadelphia-Camden-Wilmington MMA. In the Camden NJ MD, performance was significantly weaker than the bank's overall performance in the MMA and is considered very poor. This performance is due to a significantly lower level of investments in this AA.

SERVICE TEST

The bank's performance under the Service Test in the Philadelphia-Camden-Wilmington MMA is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Philadelphia MD is adequate.

Delivery systems are reasonably accessible to geographies and individuals of different income levels, after considering the proximity of branches in middle- and upper-income geographies to LMI geographies. There are 21 branches within the Philadelphia MD. The distribution of branches in LMI geographies is well below the population residing in those geographies. There are five branches located in middle- or upper-income geographies that are within one mile of low- or moderate-income geographies. Our evaluation of the effectiveness of these branches included consideration of available and affordable public transportation within the AA, as well as the absence of any physical barriers, such as water or highways, that could obstruct access to the branch. There were no branch openings or closings during the evaluation period.

CBNA provided an adequate level of CD services. Six employees served as board or committee members for seven CD organizations that focused on community services to primarily LMI individuals. Additionally, employees participated in five CD services for a total of 33 hours, which benefited three organizations and 98 LMI individuals. A majority of these services were financial education classes.

Based on a limited-scope review, the bank's performance under the Service Test in the Camden and Wilmington MDs is weaker than the bank's overall Low Satisfactory performance under the Service Test in the Philadelphia-Camden-Wilmington MMA and it is considered poor. The weaker performance is due to a weaker distribution of branches in LMI geographies. Performance in the limited-scope areas did not impact the Service Test rating for the MMA.

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

Washington-Arlington-Alexandria MMA

CRA rating for the MMA⁵: 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:

- Excellent lending activity in the AA.
- Good geographic distribution of loans and good distribution of loans by borrower income.
- Excellent level of CD investments.
- Delivery systems are accessible to essentially all geographies and individuals of different income levels.
- Adequate level of CD services.

Description of Institution's Operations in Washington-Arlington-Alexandria MMA

The bank has delineated two AAs within the Washington-Arlington-Alexandria MMA. The Washington DC MD contains the District of Columbia, Charles and Prince George counties in Maryland, and Arlington, Fairfax, Loudoun, Prince William, Alexandria City, Fairfax City, and Falls Church City counties in Virginia. The Bethesda MD consists of Montgomery County in Maryland. As of June 30, 2011, the bank had \$5.2 billion in deposits in the MMA, representing 3.5 percent of the bank's deposits. CBNA ranked 8th in the MMA with a 3.2 percent market share. The bank's primary competitors in the MMA include E*TRADE Bank, Wells Fargo Bank, N.A., Capital One, N.A., and Bank of America, N.A. Within the MMA, the bank operates 40 branches and 105 ATMs. The Washington DC MD was selected for a full-scope review as it accounted for 77 percent of the deposits and nearly 75 percent of the lending within the MMA. A limited-scope review of the Bethesda MD was performed.

LENDING TEST

The bank's performance under the Lending Test in the Washington-Arlington-Alexandria MMA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Washington DC MD is good. Performance in the limited-scope area did not impact the overall Lending Test rating in the MMA.

⁵ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Lending activity in the AA is excellent, given strong competition within the AA. The bank ranks 8th in deposits with a 3.0 percent market share. In overall home mortgage lending, the bank ranks 6th with a 3.2 percent market share. For home purchase lending, the bank ranked 14th with a 1.4 percent market share, for home improvement, the bank ranked 13th with a 4.3 percent market share, and for home refinancing the bank ranked 5th with a 4.3 percent market share. The lending market shares are particularly strong considering the number of competing lenders vs. the number of depository institutions. In this AA, there is strong competition for home mortgage lending. There are 653 home mortgage lenders in the market compared to 73 depository institutions. The bank ranks 6th in small loans to businesses with a 7.1 percent market share.

The distribution of loans to geographies of different income levels is good. We noted excellent distribution of home purchase and small loans to businesses, good distribution of home refinance loans, and poor distribution of home improvement loans. The bank originated or purchased a significant majority of its home mortgage loans and small loans to businesses within its AAs. Overall, the bank originated or purchased 90.5 percent of the number of its loans inside its AAs. The bank originated or purchased the following percentages of loans by product type: home purchase (94 percent); home improvement (86 percent); home refinance (89 percent); and small loans to businesses (99 percent). The distribution of loans by income level of borrower is good. We noted excellent distribution of home purchase loans, good distribution of home refinance and small loans to businesses, and adequate distribution of home improvement loans. The high cost of housing and the poverty level of the AA, especially within the District of Columbia, were considered in the analysis.

CD lending had a positive impact on the Lending Test, considering the short evaluation period for CD activities. The bank originated five CD loans for \$43.3 million, which represented 3.6 percent of allocated Tier One Capital. By dollars, 98 percent were for affordable housing to LMI people and 2 percent were for economic development. The loans were responsive to AA needs with the creation of over 250 units of affordable housing. CBNA's use of flexible products was given positive consideration in its Lending Test performance. During the evaluation period, the bank originated 370 loans totaling \$108.9 million under various programs. Details of the flexible lending programs that the bank participates in can be found under Other Information in the Description of Evaluation Process section of this evaluation.

Based on a limited-scope review, the bank's performance under the Lending Test in the Bethesda MD is consistent with the bank's overall High Satisfactory performance under the Lending Test in the Washington-Arlington-Alexandria MMA.

INVESTMENT TEST

The bank's performance under the Investment Test in the Washington-Arlington-Alexandria MMA is rated Outstanding. Based on a full-scope review, the bank's performance in the Washington DC MD is excellent. Performance in the limited-scope areas did not impact the overall Investment Test rating in the MMA.

CBNA originated 97 investments in the AA totaling \$31.8 million. Additionally, 21 prior period investments totaling \$33.8 million remain outstanding and continue to address identified needs

of the AA. The combined current and prior period investment dollar volume represent 5.4 percent of Tier One Capital allocated to the AA. The bank's responsiveness to the identified CD needs in the AA is adequate, especially in the area of affordable housing. A significant amount of grants and contributions were also made to address other community needs such as financial education, capacity building, and assistance to small businesses.

Based on a limited-scope review, the bank's performance under the Investment Test in the Bethesda MD is consistent with the bank's overall Outstanding performance under the Investment Test in the Washington-Alexandria-Arlington MMA.

SERVICE TEST

The bank's performance under the Service Test in the Washington-Alexandria-Arlington MMA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Washington DC MD is good.

Delivery systems are accessible to essentially all geographies and individuals of different income levels. There are 31 branches within the Washington DC MD. One branch is located in a geography with no income designation. The distribution of branches in low-income geographies exceeds the population residing in those geographies. The distribution of branches in moderate-income geographies is below the population residing in those geographies. There are also seven branches located in middle- or upper-income geographies that are within one mile of low- or moderate-income geographies. These middle- and upper-income branches were considered and further support the overall good accessibility to retail banking services. Our evaluation of the effectiveness of these branches included consideration of available and affordable public transportation within the AA, as well as the absence of any physical barriers, such as water or highways, that could obstruct access to the branch. CBNA's record of opening and closing branch offices has improved the accessibility of delivery systems in the AA, particularly in LMI geographies and to LMI individuals. During the evaluation period, one branch opened in a low-income geography. There were no branch closings during the evaluation period.

CBNA provided an adequate level of CD services. Eight employees served as board or committee members for 13 CD organizations that focused on affordable housing and community services to primarily LMI individuals. Additionally, employees participated in 10 CD services for a total of 86 hours, which benefited seven organizations and 107 LMI individuals. A majority of these services were financial education presentations.

Based on a limited-scope review, the bank's performance under the Service Test in the Bethesda AA is consistent with the bank's overall High Satisfactory performance under the Service Test in the Washington-Alexandria-Arlington MMA.

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

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): 1/1/2010 to 12/31/2011 CD Loans, Investment Test, and Service Test: 4/1/2010 to 12/31/2011 Retail Services: 1/1/2010 to 12/31/2011	
Financial Institution		Products Reviewed
Citibank, N.A. (CBNA) Main Office: Sioux Falls, South Dakota Headquarters: New York City, New York		Home Mortgage Disclosure Act: Home Purchase, Home Refinance, and Home Improvement Loans. Small Business Loans. CD Loans, Investments, and Services. Retail Services.
Subsidiary or Affiliate	Relationship	Products Reviewed
Citibank (South Dakota), N.A.	Affiliate	Small Business Loans
CitiFinancial Company (dba CitiFinancial Company(DE), a Delaware corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (an Oklahoma corporation, in Florida dba CitiFinancial Equity Services, Inc.)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a California corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a Delaware corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a Pennsylvania corporation)	Affiliate	Home Mortgage Loans
CitiFinancial, Inc. (a Maryland corporation)	Affiliate	Home Mortgage Loans
CitiFinancial, Inc. (a Texas corporation)	Affiliate	Home Mortgage Loans
OneMain Financial, Inc., a Hawaii corporation	Affiliate	Home Mortgage Loans
OneMain Financial, Inc., a Delaware corporation	Affiliate	Home Mortgage Loans
Citi Mortgage, Inc.	Affiliate	Home Mortgage Loans
Citicorp North America, Inc. (CNAI)	Affiliate	Home Mortgage Loans, CD Loans and Investments
Citicorp USA, Inc. (CUSA)	Subsidiary	Home Mortgage Loans, CD Loans and Investments
Citigroup Global Markets, Inc.	Affiliate	CD Loans
Citi Foundation	Affiliate	CD Investment Grants
Citi Community Development	Affiliate	CD Investment Grants

List of Assessment Areas and Type of Examination

Assessment Area and MSA # (Some AAs include portions of counties)		Type of Exam	Other Information (Reflects counties within aggregated AAs)
Multistate MSAs			
New York-Northern New Jersey-Long Island, NY-NJ			
New York-White Plains-Wayne, NY/NJ	35644	Full-Scope	All Counties except Putnam County
Edison-New Brunswick, NJ	20764	Limited-Scope	
Nassau-Suffolk, NY	35004	Limited-Scope	
Newark-Union, NJ	35084	Limited-Scope	All Counties except Hunterdon, Sussex NJ Counties, and Pike County, PA
Philadelphia-Camden-Wilmington, PA/NJ/DE			
Philadelphia, PA	37964	Full-Scope	
Camden, NJ	15804	Limited-Scope	Camden County only
Wilmington, DE	48864	Limited-Scope	New Castle County only
Washington-Arlington-Alexandria DC/VA/MD			
Washington-Arlington-Alexandria DC/VA/MD	47894	Full-Scope	All Counties except Calvert County in MD, Clarke, Fauquier, Spotsylvania, Stafford, Warren, Fredericksburg City, Manassas City, Manassas Park City in VA and Jefferson County, WV
Bethesda-Rockville-Frederick, MD	13644	Limited-Scope	All Counties except Frederick County
States			
CALIFORNIA			
Los Angeles-Long Beach-Glendale, CA	31084	Full-Scope	
Bakersfield, CA	12540	Limited-Scope	
Fresno, CA	23420	Limited-Scope	
Hanford-Corcoran, CA	25260	Limited-Scope	
Madera-Chowchilla, CA	31460	Limited-Scope	
Merced, CA	32900	Limited-Scope	
Modesto, CA	33700	Limited-Scope	
Napa, CA	34900	Limited-Scope	
Oakland-Fremont-Hayward, CA	36084	Limited-Scope	
Oxnard-Thousand Oaks-Ventura, CA	37100	Limited-Scope	
Riverside-San Bernardino-Ontario, CA	40140	Limited-Scope	
Sacramento-Arden-Arcade-Roseville, CA	40900	Limited-Scope	All Counties except El Dorado County
San Diego-Carlsbad-San Marcos, CA	41740	Limited-Scope	
San Francisco-San Mateo-Redwood City, CA	41884	Limited-Scope	
San Jose-Sunnyvale-Santa Clara, CA	41940	Limited-Scope	All Counties except San Benito County
San Luis Obispo-Paso Robles, CA	42020	Limited-Scope	

CALIFORNIA (cont.)			
Santa Ana-Anaheim-Irvine, CA	42044	Limited-Scope	
Santa Barbara-Santa Maria-Goleta, CA	42060	Limited-Scope	
Santa Cruz-Watsonville, CA	42100	Limited-Scope	
Santa Rosa-Petaluma, CA	42220	Limited-Scope	
Stockton, CA	44700	Limited-Scope	
Vallejo-Fairfield, CA	46700	Limited-Scope	
Visalia-Porterville, CA	47300	Limited-Scope	
CONNECTICUT			
Bridgeport-Stamford-Norwalk, CT	14860	Full-Scope	
New Haven-Milford, CT	35300	Limited-Scope	
FLORIDA			
Miami-Miami Beach-Kendall, FL	33124	Full-Scope	
Ft Lauderdale-Pompano Beach-Deerfield Beach, FL	22744	Limited-Scope	
Jacksonville, FL	27260	Limited-Scope	Duval County Only
West Palm Beach-Boca Raton-Boynton Beach, FL	48424	Limited-Scope	
Guam, Territory of			
Guam – Non MSA		Full-Scope	
ILLINOIS			
Chicago-Joliet-Naperville, IL	16974	Full-Scope	All Counties except DeKalb and Grundy Counties
Lake County-Kenosha County, IL	29404	Limited-Scope	Lake County (IL) only
MARYLAND			
Baltimore-Towson, MD	12580	Full-Scope	All Counties except Carroll, Harford, Howard, and Queen Anne
MASSACHUSETTS			
Boston-Quincy, MA	14484	Full-Scope	
Cambridge-Newton-Framingham, MA	15764	Limited-Scope	
Peabody, MA	37764	Limited-Scope	
NEVADA			
Las Vegas-Paradise, NV	29820	Full-Scope	
NEW JERSEY			
Trenton-Ewing, NJ	45940	Full-Scope	
Puerto Rico, Commonwealth of			
San Juan-Caguas-Guaynabo, PR	41980	Full-Scope	
TEXAS			
Dallas-Plano-Irving, TX	19124	Full-Scope	All Counties except Delta, Ellis, and Kaufman
Abilene, TX	10180	Limited-Scope	All Counties except Callahan
Austin-Round Rock-San Marcos, TX	12420	Limited-Scope	All Counties except Bastrop and Caldwell

TEXAS (cont.)			
College Station-Bryan, TX	17780	Limited-Scope	All Counties except Robertson
Ft Worth-Arlington, TX	23104	Limited-Scope	All Counties except Johnson
Houston-Sugar Land-Baytown, TX	26420	Limited-Scope	All Counties except Austin, Chambers, Galveston, Liberty, San Jacinto, and Waller
Killeen-Temple Fort Hood, TX	28660	Limited-Scope	All Counties except Bell and Coryell
Midland, TX	33260	Limited-Scope	
Odessa, TX	36220	Limited-Scope	
San Angelo, TX	41660	Limited-Scope	All Counties except Irion
San Antonio-New Braunfels, TX	41700	Limited-Scope	Bexar County only
Wichita Falls, TX	48660	Limited-Scope	
Texas Non-MSA		Limited-Scope	

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

CITIBANK, N.A. CRA RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Citibank, N.A.	Outstanding	Outstanding	High Satisfactory	Outstanding
Multistate Metropolitan Area or State:				
NY-Northern NJ-Long Island MMA	Outstanding	Outstanding	High Satisfactory	Outstanding
California	Outstanding	Outstanding	High Satisfactory	Outstanding
Florida	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Illinois	Outstanding	Outstanding	High Satisfactory	Outstanding
Connecticut	Outstanding	Outstanding	High Satisfactory	Outstanding
Guam	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Maryland	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Massachusetts	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Nevada	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
New Jersey	Low Satisfactory	High Satisfactory	Needs to Improve	Satisfactory
Puerto Rico	High Satisfactory	Outstanding	Outstanding	Outstanding
Texas	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Philadelphia-Camden-Wilmington MMA	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Washington-Arlington-Alexandria MMA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

(*) The Lending Test is emphasized more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

New York-Northern New Jersey-Long Island Multistate Metropolitan Area New York-White Plains-Wayne Multistate MD

Demographic Information for Full-Scope Area: NY-White Plains-Wayne Multistate MD						
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
Businesses by Geography	1,079,218	6.71	18.51	22.35	51.41	1.02
Farms by Geography	7,235	2.61	8.58	18.89	69.62	0.29
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 2011	= \$49,461	Median Housing Value (4Q2011)		= \$442,600		
Households Below the Poverty Level	= \$67,400 = 17%	Unemployment Rate (Dec 2011)		= 8.2%		

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI, National Association of Realtors, and Bureau of Labor Statistics

The New York-Northern New Jersey-Long Island MMA has four AAs. The New York-White Plains-Wayne MD was selected for a full-scope review and consists of Bergen, Hudson, and Passaic counties in northeast New Jersey. In southeast NY, the MD consists of Bronx, Kings, New York, Queens, Richmond, Rockland and Westchester counties. The MD consists of the five boroughs of New York City (NYC). The 2011 HUD adjusted median family income for this AA is approximately \$67,000, increasing slightly from the 2009 level of approximately \$65,000. However, there are significant disparities in the income levels of the five counties or boroughs. New York County (Manhattan) is among the richest counties in the U.S., and the other boroughs, especially Queens and Staten Island, have large middle-income populations. However, the poverty level of the MD (17 percent) is high, with the highest rates found within Bronx (28.5 percent) and Kings (22.1 percent) counties.

Banking competition is very strong with 172 FDIC-insured depository institutions in the New York MD. CBNA has approximately \$54 billion in deposits within this AA, representing 36.8 percent of the bank's total domestic deposits. As of June 30, 2011, CBNA ranked fourth with a deposit market share of 6.3 percent and it operated 182 offices. Major banking competitors include JP Morgan Chase Bank, Bank of New York Mellon, Bank of America, and HSBC, with deposit market shares of 39.1, 10.8, 9.1 and 6.0

percent, respectively. CBNA offers full-scale retail services, loans and deposits, and a range of banking services to businesses, including small businesses.

NYC is the most significant economic contributor to the MD. NYC is home to a diversified mix of businesses, with many national and international corporations headquartered there. Historically, the financial services industry has dominated the downtown area. 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 the Bronx. Some of the AA's largest employers are New York Presbyterian Healthcare Systems, Citigroup, JPMorgan Chase, Verizon, and Federated Department Stores.

The MD economy has struggled following the recession that began in late 2008. The unemployment rate for the greater MD has more than doubled since 2006 and as of December 2011 was 8.2 percent, with even greater levels within NYC, at 9.5 percent. In the Bronx, the AA's poorest county, the unemployment rate was 12.4 percent in December 2011.

Housing prices have continued to decline. The median single-family housing value for the AA in 2011 was approximately \$443,000, a decline from \$450,000 in 2010 and \$494,000 in 2008. Despite the significant drop in housing values, the high cost of living associated with this area continues to make home ownership difficult. Consequently, housing in the New York metropolitan area is characterized by high costs, low homeownership rates, and a critical reliance on rental housing, including federally subsidized rental housing. Because of the disparity between incomes and area housing costs, LMI families face significant challenges to purchase or rent affordable homes in the AA.

The opportunities for CD participation within the AA are quite broad. There are numerous CD and governmental organizations representing affordable housing, economic development, and services to LMI families. During discussions with community contacts and bank management, they identified the following needs for this assessment area:

- Affordable housing for purchase or rent;
- Targeted financial education, including: 1) housing/home purchase counseling with special outreach to high-poverty neighborhoods; and, 2) small business development and financial education/technical assistance related to starting a new business and the role of creditworthiness in gaining access to capital;
- Promoting access to mainstream financial products and services to the unbanked and underbanked;
- Foreclosure prevention efforts and loss mitigation strategies;
- Neighborhood revitalization strategies that impact LMI communities;
- Support for entrepreneurship, small business, and microfinance;
- Savings strategies and preparation for college success; and
- Nonprofit capacity building, particularly as government funding is being reduced at a time when demand for their services is increasing.

State of California Los Angeles MD

Demographic Information for Full-Scope Area: Los Angeles MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,054	8.71	28.29	27.99	34.23	0.78
Population by Geography	9,519,338	8.00	29.44	30.88	31.58	0.10
Owner-Occupied Housing by Geography	1,499,694	1.91	15.46	31.30	51.33	0.00
Businesses by Geography	1,035,293	6.47	18.72	26.40	47.64	0.78
Farms by Geography	8,187	3.09	15.57	30.85	49.93	0.55
Family Distribution by Income Level	2,154,311	23.87	16.49	17.40	42.24	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	869,463	13.65	41.46	28.95	15.94	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below the Poverty Level	= \$46,509 = \$64,000 = 15%	Median Housing Value (4Q2011) Unemployment Rate (December 2011)		= \$308,000 =10.6%		

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

Source: 2000 U.S. Census and 2011 HUD updated MFI, National Association of Realtors, and Bureau of Labor Statistics.

The State of California has 24 AAs. The Los Angeles-Long Beach-Glendale MD was selected for a full-scope review and is comprised of Los Angeles County, a diverse urban area that consists of more than 80 cities and a number of unincorporated areas. It is the most populous county in the state with more than 9.9 million residents. Reductions in aerospace manufacturing and weak employment growth are delaying Los Angeles' transition from recovery to expansion. The housing market is cooling, with house prices and sales falling following the end of federal and state housing supports. While a reduction in defense and civilian contracts has resulted in the loss of jobs in the area, planned aerospace sales to foreign countries will help to offset the impact. Public infrastructure construction has a more positive outlook with construction plans for more than 15 miles of light rail and other transportation infrastructure projects scheduled over the next 10 years. The outlook for commercial construction will be slower to improve; however, a \$1 billion hotel and office complex and a National Football League stadium are projects being considered in downtown.

Banking competition is strong with 126 FDIC-insured depository institutions operating 1,765 offices in the county. CBNA has about \$12.2 billion in deposits in the Los Angeles AA, representing 8.3 percent of the bank's total domestic deposits. As of June 30, 2011, CBNA ranked sixth with a market share of 4.8 percent and operated 110 offices. Major competitors include Bank of America, Wells Fargo, Union Bank, and JPMorgan Chase Bank, with deposit market shares of 20.0, 14.7, 11.0, and 8.8 percent, respectively. CBNA offers full-scale retail services, loans and deposits, and a range of banking services to businesses, including small businesses.

Los Angeles and Long Beach are home to the two busiest shipping ports in the country, and are considered a gateway to Pacific Rim business interests. In addition to the trade sectors, leading business sectors include government, the motion picture and video industries, restaurants, and other tourism-related businesses. Major employers include the University of California - Los Angeles, Kaiser Permanente, Northrop Grumman, and Boeing. The AA has several federal and state designations aimed at stimulating economic development including an Empowerment Zone, and Enterprise Zones. Over \$17 billion in tax incentives are tied to the designations.

According to the U.S. Bureau of Labor Statistics, the unemployment rate declined slightly from 11.5 percent in December 2010 to 10.7 percent in December 2011. The local unemployment rate is similar to the 12.2 percent (Dec. 2010) and 11.2 percent (Dec. 2011) unemployment rates for the state of California, but higher than the national unemployment rates of 9.1 percent and 8.3 percent for the same periods.

Although affordability continues to be a significant issue, housing values in the region continue to decline. According to the National Association of Realtors, the median housing price in the Los Angeles MSA was \$334,000 in 2009 and \$308,000 in 2011, thus increasing affordability. According to the California Association of Realtors, the Housing Affordability Index for December 2011 indicates that 48 percent of the households in the AA can afford to purchase a median priced home. However, the AA has been heavily impacted by foreclosures, especially in the northwestern area of the county in the Palmdale and Lancaster communities, where high amounts of new housing development took place in the early years of the decade. The foreclosures have exacerbated the need for residential rental units, resulting in long waiting lists for affordable rentals. The Los Angeles Housing Authority reports waiting lists for subsidized properties with more than 1,000 names.

The opportunities for CD participation within the AA are quite broad. There are numerous CD and governmental organizations representing affordable housing, economic development, and services to LMI families. During discussions with community contacts and bank management, they identified the following needs for this assessment area:

- Affordable housing – homeownership and rental;
- Multi-family housing that can accommodate large families;
- Asset building initiatives – economic self- sufficiency;
- Financial education and counseling for LMI first-time homeowners and for small business owners to start or grow a small business;
- Foreclosure prevention efforts and loss mitigation strategies;
- Higher education for LMI individuals and access to renovated and modernized county public schools;
- Access to healthcare services for medically indigent individuals;
- Strengthen CD financial institutions;
- Capacity building for CD nonprofit organizations serving LMI communities;
- Small business financing including micro loans;
- Financial services, particularly branches in the unbanked and under-banked communities;
- Foreclosure prevention counseling; and,
- Job training/work force development.

State of Florida Miami AA

Demographic Information for Full Scope Area: Miami-Miami Beach-Kendall MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	347	7.78	28.53	32.85	29.97	0.86
Population by Geography	2,253,362	4.89	28.61	35.68	30.79	0.02
Owner-Occupied Housing by Geography	449,333	1.69	19.82	36.99	41.51	0.00
Business by Geography	454,418	3.98	19.56	32.37	43.51	0.59
Farms by Geography	5,069	2.39	18.13	35.10	44.19	0.20
Family Distribution by Income Level	552,484	23.00	16.98	18.53	41.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	220,856	8.31	40.20	35.41	16.08	0.00
Median Family Income	= \$40,266		Median Housing Value	= \$181,100		
HUD Adjusted Median Family Income for 2011	= \$51,900		(4Q2011)			
Households Below Poverty Level	= 18%		Unemployment Rate	= 10.2%		
			(Dec. 2011)			

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

Source: 2000 U.S. Census and 2011 HUD updated MFI, National Association of Realtors, and Bureau of Labor Statistics

The State of Florida has four AAs. The Miami MD was selected for a full-scope review and consists of Miami-Dade County. Incorporated municipalities include Miami, Miami-Beach, North Miami Beach, Coral Gables, Homestead, South Miami, and Kendall. Miami-Dade County is a densely populated urban center with the greatest concentration of LMI geographies found in Miami. Miami is a very high cost area in which to live compared to most other areas of Florida. Housing is very difficult to afford for LMI individuals without large subsidies. Miami-Dade County, particularly the city of Miami, has been severely impacted by the housing crisis. The state of Florida consistently ranks among the top five states in the nation for the number of home foreclosures. The high foreclosure rate puts additional stress on the affordable rental market and the stability of communities. The area includes a federally designated Enterprise Zone that targets economic development with the goal of stimulating and retaining jobs. There are 20 areas designated as Targeted Urban Areas that are the focus for the Urban Economic Revitalization Plan for Miami-Dade County.

Competition is strong with 70 FDIC-insured depository institutions operating 660 offices within Miami-Dade County. CBNA has approximately \$8 billion in deposits in the Miami AA representing 5.4 percent of the bank's total domestic deposits. As of June 30, 2011, CBNA ranked third with a market share of 9.6 percent and it operated 24 offices. Major banking competitors include Wells Fargo, Bank of America, SunTrust Bank, and Mercantile Commerce Bank, with deposit market shares of 12.8, 11.5, 7.0, and 5.2 percent, respectively.

CBNA offers retail services, loans and deposits and a range of banking services to businesses, including small businesses. The Miami AA relies largely on the tourism and leisure industries. Many of the available jobs are hourly, lower-paying positions because of

this service-based economy. However, the Miami AA's economy has become more diversified and a growing center of international trade, transportation, utilities, education, health services, government, retail trade, professional and business services, finance and commerce. The largest employers in Miami-Dade County are public entities, which include the Miami-Dade Public School System, Miami-Dade County, the U.S. Federal Government, and the Florida State Government. Other large employers include the University of Miami, Publix Supermarkets, Baptist Health Systems of South Florida, American Airlines, Winn Dixie Stores, and Bell South.

Local economic conditions were weak during the evaluation period. In Miami-Dade County, housing starts declined to the lowest level in a decade. Construction and construction-related jobs drove the local economy's decline and led to high unemployment rates and the closing of many small businesses. According to Moody's Analytics, at the peak in 2005, 9,922 single-family housing permits were issued. In 2009, the number was 624, rising to 1,027 in 2010 and approximately 1,900 in 2011. The decline in jobs, particularly construction and construction-related jobs, drove the county's unemployment rate to 12.4 percent as of December 31, 2010. As of December 31, 2011, the rate was 10.2 percent. These rates are higher than the state of Florida overall, which reported unemployment rates of 10.9 percent and 9.7 percent, respectively, for the same periods. This indicates a need for activities that support job creation, job placement, and job training programs, and CD services for LMI persons and families.

The National Association of Realtors reports significant decline in housing prices; the median sales price of existing single-family homes in the Miami-Ft. Lauderdale-Miami Beach MSA, which encompasses the AA, was \$211,200 in 2009 and \$181,100 in 2011.

Opportunities for CD lending, investments, and services in Miami-Dade County are good. Opportunities exist to finance the purchase and/or rehabilitation of multi-family housing units that provide affordable rental housing in LMI geographies, but they have declined from previous levels because of the volume of condominium conversions during the height of the housing boom. Statewide affordable housing entities are continuing to construct affordable rental housing, as are some local developers. Either they are financed directly or through loan funds that rely on the participation of a group of local banks. There is a federally designated Empowerment Zone that targets economic development with the goal of revitalizing the area by stimulating and retaining jobs, and there are areas designated as Enterprise Zones that share the same goal.

The impact of the mortgage crisis caused some CD organizations to change their focus from new construction to acquiring foreclosed properties, rehabilitating them, and then making them available for rent or for sale to LMI persons or families. Some of these activities are being funded through grants from the Neighborhood Stabilization Program (NSP) offered by the Department of Housing and Urban Development, which were awarded to Miami-Dade County and the city of Miami. Banking activities related to the NSP are given positive consideration under CD.

CD investment options are available. Mortgage-backed securities backed by mortgages to LMI borrowers are an option either directly or through loan funds that make investments in mortgage-backed securities. LIHTCs remain available. Miami-Dade County, the State and the Region have CD financial institutions and private equity organizations that need support for their CD activities. Opportunities exist to contribute to qualified nonprofit organizations whose

missions are focused on providing affordable housing and community services for LMI persons, particularly in the areas of job training and job placement. However, the extent of these activities has been impacted by the financial condition of some area banks.

Opportunities exist to provide financial literacy training in schools and in cooperation with local community organizations. This training could include homeownership, credit, foreclosure counseling, and information on general banking services to assist the unbanked population. During discussions with community contacts and bank management, they identified the following needs for this assessment area:

- Affordable rental housing;
- Foreclosure prevention programs;
- Stabilizing neighborhoods impacted by high vacancies due to foreclosure (including encouragement of new homeowners to purchase homes in those neighborhoods);
- Financial education for first-time LMI homeowners, small business owners and LMI children, youth and adults to make informed financial choices;
- College access for LMI individuals;
- Strengthening CDFIs to encourage economic growth and provide microloans to small businesses; and,
- Revitalization of an aging school infrastructure.

State of Illinois Chicago MD

Demographic Information for Full-Scope Area: Chicago MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,694	13.75	25.15	34.83	25.27	1.00
Population by Geography	7,501,908	7.98	23.66	38.77	29.58	0.01
Owner-Occupied Housing by Geography	1,722,786	2.62	15.23	44.44	37.70	0.00
Businesses by Geography	540,089	3.89	14.50	37.12	44.19	0.30
Farms by Geography	7,723	1.48	8.97	46.54	43.01	0.00
Family Distribution by Income Level	1,833,366	20.92	17.56	22.00	39.52	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	705,492	14.52	33.83	37.45	14.20	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below the Poverty Level	= \$60,166 = \$76,200 = 10%	Median Housing Value (4Q2011) Unemployment Rate (Dec. 2011)		= \$176,500 = 9.1%		

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

Source: 2000 U.S. Census and 2011 HUD updated MFI, National Association of Realtors, and Bureau of Labor Statistics

The State of Illinois has two AAs. The Chicago-Joliet-Naperville, IL MD was selected for full-scope review and is comprised of Cook, DuPage, Kane, Kendall, McHenry, and Will counties. The Chicago AA is located in northeastern Illinois, with Cook County located in the easternmost part of the MD and bordering Lake Michigan. Cook County is split between Chicago and the Chicago suburbs. Large concentrations of LMI families can be found in the south and west sides of Chicago and in South Suburban Cook County. Cook County contains 79 percent of the AA's total census tracts and 96 percent of its LMI-designated census tracts. The level of poverty varied throughout the AA, with Cook County the highest at 15.8 percent followed by Kane County at 10.1 percent. The 2011 HUD adjusted median income is approximately \$76,000 and the median family income from 2000 was approximately \$60,000.

Bank competition is strong with 218 FDIC-insured depository institutions within the Chicago AA. CBNA had approximately \$9.7 billion in deposits in the Chicago AA, representing 6.4 percent of the bank's total domestic deposits. As of June 30, 2011, CBNA ranked seventh with a market share of 2.6 percent and it operated 71 offices. Major banking competitors include JPMorgan Chase, Harris National Bank, Bank of America, and Northern Trust Company, with deposit market shares of 20.5, 12.0, 9.4, and 6.8 percent, respectively.

CBNA offers full-scale retail services, loans and deposits, and a range of banking services to businesses, including small businesses.

Chicago is a significant business center in the Midwest and has a diversified economy. The largest and strongest sectors of this diverse economic base include finance and business services, wholesale and retail, manufacturing, health care and transportation. The largest employers in the Chicago AA are public entities, which include the U.S. Federal Government, Chicago Public Schools, the city of Chicago, the state of Illinois, and Cook County. Other large employers include Wal-Mart, Advocate Healthcare, JP Morgan Chase, Walgreens, United Continental Holdings, Allstate Corp., AT&T and the University of Illinois, Chicago.

A number of key events have had an adverse impact on the economy. These include a rise in consumer prices (particularly rent, food, gasoline and clothing), high unemployment, a rise in foreclosures, a decline in home values, a decline in the stock market, and an increase in poverty. In addition, the U.S. Census Bureau's Gini Index, used to measure income inequality, lists Cook County as the second most disparate of the 25 most populous counties in the United States. Job losses in construction and manufacturing contributed significantly to the AA's unemployment rate. However, according to the Bureau of Labor Statistics, the unemployment rate overall decreased slightly from 10.9 percent in December 2009 to 9.2 percent in December 2010, and to 9.1 percent in December 2011. Home prices decreased from \$199,200 in 2009, to \$191,400 in 2010 and to \$176,500 in 2011. Still, Cook County had the lowest home ownership rate (58.9 percent) among the six counties comprising the AA and was well below the state ownership rate of 68.7 percent and the national average of 66.1 percent.

A review of community contacts and discussions with CBNA management indicated that the following are identified financial needs within the community:

- Outreach to address housing and foreclosure issues;
- Stabilization of communities, particularly as it pertains to vacant and abandoned properties;
- Re-starting credit for consumers and small businesses;
- Creation of new and preservation of existing affordable housing, particularly rental units for LMI families and vulnerable populations, such as seniors and veterans;
- Programs and funds to support small business creation and growth;
- Financial education and counseling for homeownership readiness and personal finance;
- Foreclosure prevention strategies and loss mitigation efforts;
- Programs to promote asset-building and credit building;
- Savings strategies and preparation for college; and
- Providing access to mainstream financial products and services, particularly to the unbanked and the under-banked.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state and multistate metropolitan area. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 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 Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 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.

Tables of Performance Data

- New York- Northern New Jersey-Long Island NY-NJ MMA
- State of California
- State of Florida
- State of Illinois
- State of Connecticut
- Territory of Guam
- State of Maryland
- State of Massachusetts
- State of Nevada
- State of New Jersey
- Commonwealth of Puerto Rico
- State of Texas
- Philadelphia-Camden-Wilmington PA-NJ-DE MMA
- Washington-Arlington-Alexandria, DC-VA-MD MMA

Table 1. Lending Volume

LENDING VOLUME		Geography: NY MULTI						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
New York-Wayne-White Plains	59.60	20,810	7,685,708	34,700	446,144	0	0	125	1,304,355	55,635	9,436,207	81.58
Limited Review:												
Edison-New Brunswick	14.71	5,824	1,524,080	7,904	51,692	0	0	1	288	13,729	1,576,060	0.39
Nassau-Suffolk	16.84	4,064	1,368,065	11,646	169,377	0	0	8	37,252	15,718	1,574,694	17.36
Newark-Union	8.85	3,729	1,165,250	4,529	27,225	0	0	0	0	8,258	1,192,475	0.68

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: NY MULTI						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letters of Credit**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:														
New York-Wayne-White Plains	100.00	18	302,588	0	0	0	0	0	0	0	0	18	302,588	81.58
Limited Review:														
Edison-New Brunswick	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.39
Nassau-Suffolk	0.00	0	0	0	0	0	0	0	0	0	0	0	0	17.36
Newark-Union	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.68

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NY MULTI				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
New York-Wayne-White Plains	8,383	71.36	2.03	3.36	11.98	14.83	26.93	23.38	59.06	58.43	9.99	9.66	9.48	8.65	10.77
Limited Review:															
Edison-New Brunswick	886	7.54	3.50	2.60	14.87	14.79	51.71	43.34	29.93	39.28	2.78	2.00	2.49	2.47	3.45
Nassau-Suffolk	1,766	15.03	0.22	0.45	12.21	12.80	66.17	63.42	21.40	23.33	5.76	9.09	5.53	5.55	6.54
Newark-Union	712	6.06	3.82	2.95	13.82	10.11	32.75	25.70	49.61	61.24	3.64	1.38	2.36	3.02	4.76

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: NY MULTI		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-Wayne-White Plains	392	59.76	2.03	2.55	11.98	12.24	26.93	21.68	59.06	63.52	5.90	5.00	7.69	6.72	5.39
Limited Review:															
Edison-New Brunswick	77	11.74	3.50	0.00	14.87	2.60	51.71	64.94	29.93	32.47	1.66	0.00	0.58	2.10	1.45
Nassau-Suffolk	127	19.36	0.22	0.00	12.21	6.30	66.17	65.35	21.40	28.35	2.96	0.00	3.33	2.67	3.72
Newark-Union	60	9.15	3.82	0.00	13.82	8.33	32.75	26.67	49.61	65.00	2.93	0.00	4.19	1.47	3.80

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NY MULTI				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
New York-Wayne-White Plains	11,913	54.40	2.03	1.43	11.98	8.77	26.93	15.97	59.06	73.83	9.59	9.23	10.72	8.71	9.69	
Limited Review:																
Edison-New Brunswick	4,861	22.20	3.50	0.66	14.87	9.36	51.71	45.01	29.93	44.97	5.21	3.77	4.24	4.68	6.13	
Nassau-Suffolk	2,170	9.91	0.22	0.23	12.21	11.06	66.17	64.70	21.40	24.01	5.12	8.51	5.66	5.20	4.64	
Newark-Union	2,955	13.49	3.82	1.22	13.82	5.01	32.75	26.02	49.61	67.75	5.43	5.11	4.73	5.55	5.44	

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NY MULTI				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-Wayne-White Plains	17	85.00	17.74	5.88	29.37	47.06	21.21	41.18	31.69	5.88	0.27	0.00	0.69	0.17	0.00
Limited Review:															
Edison-New Brunswick	0	0.00	7.81	0.00	24.08	0.00	53.46	0.00	14.66	0.00	0.00	0.00	0.00	0.00	0.00
Nassau-Suffolk	1	5.00	3.51	0.00	27.94	0.00	58.07	100.00	10.49	0.00	1.23	0.00	0.00	1.96	0.00
Newark-Union	2	10.00	26.54	50.00	34.26	0.00	24.43	50.00	14.77	0.00	0.35	1.39	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: NY MULTI		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-Wayne-White Plains	34,390	58.83	6.71	5.32	18.51	17.74	22.35	24.64	51.41	52.29	6.65	7.84	7.67	7.56	6.02
Limited Review:															
Edison-New Brunswick	7,893	13.50	3.04	3.81	13.68	14.80	51.01	52.92	32.17	28.47	6.76	8.22	8.50	7.50	5.27
Nassau-Suffolk	11,641	19.92	0.58	0.45	12.84	12.85	62.87	60.16	23.70	26.54	6.74	9.69	7.69	6.61	6.79
Newark-Union	4,529	7.75	10.36	7.53	17.80	16.76	30.06	33.08	41.79	42.64	5.26	7.26	7.36	6.02	4.16

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NY MULTI						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families**	% BANK Loans***	% Families**	% BANK Loans**	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-Wayne-White Plains	8,419	71.45	25.94	1.13	15.46	8.57	16.78	20.17	41.82	70.13	11.14	13.15	11.90	9.27	11.64
Limited Review:															
Edison-New Brunswick	886	7.52	19.11	9.26	18.58	21.56	22.73	23.02	39.58	46.16	3.10	2.42	2.52	3.13	3.62
Nassau-Suffolk	1,766	14.99	18.03	8.11	18.61	27.11	24.19	22.63	39.18	42.14	6.40	7.47	6.99	4.88	7.13
Newark-Union	712	6.04	23.67	4.07	16.72	19.24	19.69	21.49	39.92	55.20	4.15	4.50	3.55	3.34	4.87

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: NY MULTI				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ⁶	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-Wayne-White Plains	394	59.88	25.94	3.81	15.46	12.69	16.78	18.27	41.82	65.23	6.41	2.44	9.37	5.12	6.52
Limited Review:															
Edison-New Brunswick	77	11.70	19.11	12.99	18.58	22.08	22.73	24.68	39.58	40.26	1.75	1.97	1.51	1.44	2.03
Nassau-Suffolk	127	19.30	18.03	10.24	18.61	22.05	24.19	27.56	39.18	40.16	3.12	3.41	3.09	3.04	3.10
Newark-Union	60	9.12	23.67	5.00	16.72	11.67	19.69	21.67	39.92	61.67	3.10	2.02	1.90	3.01	3.62

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

⁶ 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: NY MULTI		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Families ⁷	% BANK Loans****	%Families***	% BANK Loans****	%Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-Wayne-White Plains	11,980	54.54	25.94	1.57	15.46	5.93	16.78	14.84	41.82	77.66	11.17	11.99	11.69	10.97	11.15
Limited Review:															
Edison-New Brunswick	4,861	22.13	19.11	5.09	18.58	15.92	22.73	26.84	39.58	52.15	6.18	5.49	5.29	5.89	6.71
Nassau-Suffolk	2,170	9.88	18.03	7.26	18.61	23.57	24.19	28.00	39.18	41.17	5.82	7.18	7.35	5.81	4.94
Newark-Union	2,955	13.45	23.67	3.10	16.72	11.06	19.69	20.97	39.92	64.87	6.40	7.34	6.09	6.42	6.41

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by bank.

⁷ 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: NY MULTI			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
New York-Wayne-White Plains	34,700	59.03	65.99	58.24	98.34	1.00	0.66	6.65	11.63
Limited Review:									
Edison-New Brunswick	7,904	13.45	68.77	53.87	99.66	0.11	0.23	6.76	8.84
Nassau-Suffolk	11,646	19.81	70.83	60.16	98.09	0.93	0.98	6.74	13.54
Newark-Union	4,529	7.71	67.58	54.76	99.67	0.13	0.20	5.26	7.84

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 26.85% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NY MULTI				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
New York-Wayne-White Plains	137	741,032	362	816,163	499	1,557,195	88.70	0	0
Limited Review:									
Edison-New Brunswick	3	2,389	10	5,275	13	7,664	0.44	0	0
Nassau-Suffolk	16	69,160	55	101,299	71	170,459	9.71	0	0
Newark-Union	5	5,977	30	14,271	35	20,248	1.15	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NY MULTI																	
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches *	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings **	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
New York-Wayne-White Plains	81.58	180	65.45	6.11	18.33	19.44	56.11	9	0	0	0	1	8	12.50	26.28	26.38	34.68
Limited Review:																	
Edison-New Brunswick	0.39	6	2.18	0.00	33.33	50.00	16.67	0	0	0	0	0	0	3.91	17.20	51.81	26.93
Nassau-Suffolk	17.36	76	27.64	0.00	14.47	64.47	21.05	0	1	0	0	- 1	0	0.76	16.02	64.36	18.86
Newark-Union	0.68	13	4.73	15.38	0.00	30.77	53.85	0	0	0	0	0	0	12.85	24.47	28.20	34.48

*Bank operates 182 branches – 2 are located in NA geographies**There were 10 branch openings – 1 was located in a NA Geography

Table 1. Lending Volume

LENDING VOLUME		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Los Angeles MD	30.37	37,823	12,663,566	41,443	356,499	0	0	11	273,601	79,277	13,293,666	32.81
Limited Review:												
Bakersfield	1.16	924	156,579	2,092	12,657	0	0	0	0	3,016	169,236	0.46
Fresno	1.52	1,406	268,197	2,551	19,318	2	461	4	13,226	3,963	301,202	1.59
Hanford	0.14	144	23,491	229	1,423	1	296	0	0	374	25,210	0.11
Madera	0.26	236	46,427	447	5,112	1	212	1	99	685	51,850	0.18
Merced	0.40	297	44,952	742	5,018	0	0	0	0	1,039	49,970	0.34
Modesto	1.06	642	110,753	2,131	12,661	0	0	1	7,580	2,774	130,994	0.66
Napa	0.31	307	98,393	510	3,469	0	0	0	0	817	101,862	0.26
Oakland	7.48	12,315	4,317,039	7,200	65,714	0	0	10	169,358	19,525	4,552,111	9.84
Oxnard	3.15	5,070	1,569,688	3,140	25,694	0	0	2	19,968	8,212	1,615,350	2.39
Riverside	8.06	10,115	2,245,584	10,914	74,968	0	0	6	41,690	21,035	2,362,242	4.72
Sacramento	4.94	6,069	1,386,892	6,836	47,302	0	0	3	17,687	12,908	1,451,881	3.85
Salinas	0.51	520	178,998	804	5,724	0	0	1	9,879	1,325	194,601	0.13

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Lending Volume

LENDING VOLUME		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Limited Review:												
San Diego	9.32	11,825	3,829,800	12,492	97,547	0	0	5	61,826	24,322	3,989,173	4.05
San Francisco	6.05	9,425	4,215,641	6,353	63,504	0	0	6	136,975	15,784	4,416,120	17.14
San Jose	7.01	11,746	4,804,880	6,551	62,802	0	0	6	42,945	18,303	4,910,627	11.13
San Luis Obispo	0.83	1,022	293,927	1,131	7,778	0	0	1	10,755	2,154	312,460	0.25
Santa Ana	12.66	18,800	6,356,239	14,255	129,315	0	0	1	36,808	33,056	6,522,362	8.25
Santa Barbara	0.83	788	368,191	1,371	8,662	0	0	0	0	2,159	376,853	0.29
Santa Cruz	0.64	629	212,334	1,046	7,329	0	0	0	0	1,675	219,663	0.27
Santa Rosa	1.04	1,379	405,314	1,347	7,678	0	0	1	8,224	2,727	421,216	0.55
Stockton	1.15	927	178,504	2,068	12,490	0	0	0	0	2,995	190,994	0.22
Vallejo	0.63	781	176,354	874	6,267	0	0	0	0	1,655	182,621	0.07
Visalia	0.48	456	70,628	799	5,119	0	0	0	0	1,255	75,747	0.42

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letters of Credit**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:														
Los Angeles MD	0.00	0	0	0	0	0	0	0	0	0	0	0	0	32.81
Limited Review:														
Bakersfield	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.46
Fresno	0.00	0	0	0	0	0	0	0	0	0	0	0	0	1.59
Hanford	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.11
Madera	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.18
Merced	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.34
Modesto	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.66
Napa	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.26
Oakland	0.00	0	0	0	0	0	0	0	0	0	0	0	0	9.84
Oxnard	0.00	0	0	0	0	0	0	0	0	0	0	0	0	2.39
Riverside	0.00	0	0	0	0	0	0	0	0	0	0	0	0	4.72
Sacramento	0.00	0	0	0	0	0	0	0	0	0	0	0	0	3.85
Salinas	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.13

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letters of Credit**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Limited Review:														
San Diego	100.00	1	20,736	0	0	0	0	0	0	0	0	1	20,736	4.05
San Francisco	0.00	0	0	0	0	0	0	0	0	0	0	0	0	17.14
San Jose	0.00	0	0	0	0	0	0	0	0	0	0	0	0	11.13
San Luis Obispo	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.25
Santa Ana	0.00	0	0	0	0	0	0	0	0	0	0	0	0	8.25
Santa Barbara	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.29
Santa Cruz	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.27
Santa Rosa	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.55
Stockton	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.22
Vallejo	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.07
Visalia	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.42

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Los Angeles MD	6,210	27.04	1.91	3.25	15.46	17.31	31.30	30.19	51.33	49.24	6.21	5.95	5.54	5.55	6.98
Limited Review:															
Bakersfield	405	1.76	2.10	0.25	23.06	4.94	33.51	29.14	41.33	65.68	2.85	0.00	0.92	3.04	3.18
Fresno	335	1.46	1.60	0.60	21.71	11.34	35.87	28.96	40.82	59.10	2.03	0.00	2.05	1.79	2.21
Hanford	31	0.13	0.00	0.00	22.35	22.58	39.08	29.03	38.57	48.39	2.05	0.00	5.47	1.75	1.50
Madera	81	0.35	0.00	0.00	11.37	7.41	52.17	49.38	36.46	43.21	3.98	0.00	2.62	2.78	6.43
Merced	91	0.40	0.00	0.00	17.13	10.99	50.94	34.07	31.94	54.95	1.81	0.00	1.88	1.46	2.14
Modesto	185	0.81	1.12	0.54	14.63	9.19	53.88	58.92	30.36	31.35	1.78	2.04	1.51	1.74	1.94
Napa	41	0.18	0.00	0.00	13.85	12.20	60.87	68.29	25.28	19.51	2.17	0.00	1.10	2.31	2.90
Oakland	2,060	8.97	3.49	4.08	13.07	14.85	43.58	43.25	39.86	37.82	5.24	5.46	4.61	5.11	5.62
Oxnard	841	3.66	1.20	0.83	15.46	12.37	46.06	47.09	37.29	39.71	8.36	4.96	5.55	8.34	10.13
Riverside	2,683	11.68	1.49	0.56	21.74	13.72	43.33	42.53	33.44	43.20	3.03	1.71	2.11	2.53	4.30
Sacramento	1,490	6.49	3.71	2.48	19.49	11.95	40.60	39.26	36.20	46.31	3.31	2.46	2.87	3.06	3.74
Salinas	139	0.61	0.00	0.00	13.83	10.79	45.09	44.60	41.08	44.60	2.52	0.00	2.15	1.90	3.58

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CALIFORNIA										Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Limited Review:																
San Diego	2,014	8.77	2.30	2.58	14.03	10.87	41.01	36.49	42.66	50.05	4.95	3.56	4.01	4.53	5.74	
San Francisco	1,026	4.47	1.54	6.04	12.79	15.30	45.12	43.47	40.55	35.19	4.79	3.61	4.78	5.74	3.86	
San Jose	1,274	5.55	1.17	2.67	14.81	23.86	48.40	45.60	35.63	27.86	5.24	4.55	5.30	5.36	5.06	
San Luis Obispo	221	0.96	0.00	0.00	10.27	8.14	75.43	84.16	14.31	7.69	5.11	0.00	3.45	5.38	5.03	
Santa Ana	2,759	12.01	1.25	1.67	19.56	26.35	33.56	32.84	45.63	39.14	8.09	9.48	9.91	8.54	6.89	
Santa Barbara	126	0.55	0.97	1.59	17.42	20.63	39.94	46.83	41.68	30.95	3.00	3.70	2.98	2.94	3.09	
Santa Cruz	83	0.36	0.00	0.00	20.21	27.71	40.44	39.76	39.35	32.53	3.10	0.00	2.74	2.75	3.71	
Santa Rosa	193	0.84	0.00	0.00	9.17	9.33	71.27	71.50	19.56	19.17	3.06	0.00	2.51	3.03	3.45	
Stockton	337	1.47	1.80	0.89	19.48	4.45	39.28	26.11	39.43	68.55	2.27	1.01	1.04	1.85	2.73	
Vallejo	246	1.07	0.52	0.00	15.69	10.16	50.32	46.75	33.48	43.09	2.59	0.00	2.46	2.38	2.95	
Visalia	97	0.42	0.00	0.00	22.02	12.37	38.85	42.27	39.13	45.36	1.52	0.00	1.57	1.41	1.61	

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles MD	908	33.09	1.91	1.32	15.46	9.80	31.30	29.74	51.33	59.14	8.96	10.38	9.33	9.59	8.53
Limited Review:															
Bakersfield	17	0.62	2.10	0.00	23.06	0.00	33.51	35.29	41.33	64.71	4.14	0.00	0.00	8.08	2.03
Fresno	28	1.02	1.60	0.00	21.71	10.71	35.87	17.86	40.82	71.43	4.29	0.00	7.89	3.88	5.58
Hanford	5	0.18	0.00	0.00	22.35	40.00	39.08	20.00	38.57	40.00	3.75	0.00	0.00	0.00	8.82
Madera	5	0.18	0.00	0.00	11.37	0.00	52.17	40.00	36.46	60.00	9.09	0.00	0.00	8.00	11.54
Merced	11	0.40	0.00	0.00	17.13	9.09	50.94	54.55	31.94	36.36	6.35	0.00	0.00	6.25	8.70
Modesto	12	0.44	1.12	0.00	14.63	25.00	53.88	58.33	30.36	16.67	5.23	0.00	11.11	3.95	5.08
Napa	5	0.18	0.00	0.00	13.85	20.00	60.87	40.00	25.28	40.00	2.42	0.00	0.00	3.33	0.00
Oakland	243	8.86	3.49	1.23	13.07	7.41	43.58	27.57	39.86	63.79	7.93	0.93	7.96	6.87	9.19
Oxnard	114	4.15	1.20	0.00	15.46	7.89	46.06	41.23	37.29	50.88	9.96	0.00	8.06	9.28	11.08
Riverside	192	7.00	1.49	0.52	21.74	6.25	43.33	35.94	33.44	57.29	6.97	0.00	5.21	7.15	7.49
Sacramento	117	4.26	3.71	1.71	19.49	6.84	40.60	25.64	36.20	65.81	5.85	4.76	4.62	3.80	7.97
Salinas	13	0.47	0.00	0.00	13.83	7.69	45.09	30.77	41.08	61.54	5.26	0.00	0.00	5.56	5.88

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Limited Review:															
San Diego	242	8.82	2.30	0.83	14.03	7.44	41.01	38.43	42.66	53.31	7.91	6.82	7.85	9.07	7.18
San Francisco	159	5.79	1.54	0.00	12.79	15.09	45.12	42.14	40.55	42.77	5.91	0.00	9.00	5.41	5.74
San Jose	184	6.71	1.17	0.00	14.81	10.87	48.40	44.57	35.63	44.57	10.74	0.00	8.33	10.47	11.91
San Luis Obispo	19	0.69	0.00	0.00	10.27	5.26	75.43	78.95	14.31	15.79	4.42	0.00	0.00	4.84	5.00
Santa Ana	374	13.63	1.25	0.00	19.56	13.64	33.56	32.09	45.63	54.28	10.49	0.00	9.84	9.57	11.36
Santa Barbara	21	0.77	0.97	0.00	17.42	4.76	39.94	28.57	41.68	66.67	4.50	0.00	0.00	1.78	6.65
Santa Cruz	13	0.47	0.00	0.00	20.21	7.69	40.44	53.85	39.35	38.46	0.00	0.00	0.00	0.00	0.00
Santa Rosa	31	1.13	0.00	0.00	9.17	0.00	71.27	83.87	19.56	16.13	4.47	0.00	0.00	4.58	4.96
Stockton	9	0.33	1.80	0.00	19.48	0.00	39.28	33.33	39.43	66.67	2.07	0.00	0.00	2.27	2.65
Vallejo	7	0.26	0.52	0.00	15.69	0.00	50.32	42.86	33.48	57.14	4.12	0.00	0.00	4.26	5.97
Visalia	15	0.55	0.00	0.00	22.02	6.67	38.85	53.33	39.13	40.00	5.49	0.00	0.00	9.52	3.45

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Los Angeles MD	30,638	28.41	1.91	0.86	15.46	8.83	31.30	23.76	51.33	66.54	13.40	11.95	12.58	13.57	13.48
Limited Review:															
Bakersfield	502	0.47	2.10	0.20	23.06	3.19	33.51	21.71	41.33	74.90	6.12	0.00	2.78	5.91	6.55
Fresno	1,040	0.96	1.60	0.29	21.71	8.65	35.87	21.54	40.82	69.52	8.16	8.57	10.71	8.66	7.72
Hanford	108	0.10	0.00	0.00	22.35	5.56	39.08	26.85	38.57	67.59	5.84	0.00	4.63	5.39	6.24
Madera	149	0.14	0.00	0.00	11.37	1.34	52.17	57.05	36.46	41.61	8.90	0.00	4.76	9.33	8.74
Merced	194	0.18	0.00	0.00	17.13	3.61	50.94	37.63	31.94	58.76	8.52	0.00	7.20	6.74	10.06
Modesto	444	0.41	1.12	0.23	14.63	4.28	53.88	56.98	30.36	38.51	5.67	6.25	3.72	5.90	5.75
Napa	261	0.24	0.00	0.00	13.85	9.58	60.87	61.69	25.28	28.74	6.40	0.00	5.44	7.47	4.79
Oakland	10,007	9.28	3.49	1.15	13.07	6.80	43.58	32.27	39.86	59.79	9.83	9.61	8.85	9.66	10.03
Oxnard	4,114	3.81	1.20	0.29	15.46	7.34	46.06	37.82	37.29	54.55	13.13	10.23	11.68	12.12	14.17
Riverside	7,238	6.71	1.49	0.12	21.74	6.44	43.33	31.13	33.44	62.31	10.44	4.15	6.72	8.86	12.27
Sacramento	4,462	4.14	3.71	1.61	19.49	6.05	40.60	30.30	36.20	62.03	8.04	8.04	6.41	6.50	9.16
Salinas	368	0.34	0.00	0.00	13.83	4.35	45.09	38.59	41.08	57.07	5.13	0.00	3.26	5.55	5.02

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Limited Review:																
San Diego	9,564	8.87	2.30	1.20	14.03	6.50	41.01	30.77	42.66	61.52	9.84	9.04	8.46	9.53	10.23	
San Francisco	8,236	7.64	1.54	2.05	12.79	11.97	45.12	43.13	40.55	42.85	10.06	9.12	11.05	11.09	9.03	
San Jose	10,287	9.54	1.17	0.72	14.81	10.34	48.40	44.12	35.63	44.81	11.32	12.35	11.50	11.53	11.05	
San Luis Obispo	781	0.72	0.00	0.00	10.27	10.37	75.43	74.01	14.31	15.62	7.49	0.00	9.85	7.34	6.84	
Santa Ana	15,667	14.53	1.25	0.52	19.56	14.09	33.56	28.64	45.63	56.76	13.75	14.78	15.39	13.94	13.30	
Santa Barbara	641	0.59	0.97	0.16	17.42	7.49	39.94	37.44	41.68	54.91	5.98	0.00	4.48	5.94	6.40	
Santa Cruz	533	0.49	0.00	0.00	20.21	15.95	40.44	39.96	39.35	44.09	6.21	0.00	6.11	5.73	6.70	
Santa Rosa	1,153	1.07	0.00	0.00	9.17	6.42	71.27	70.42	19.56	23.16	6.72	0.00	6.09	6.89	6.38	
Stockton	581	0.54	1.80	0.52	19.48	4.30	39.28	27.54	39.43	67.64	6.43	3.28	3.66	5.15	7.29	
Vallejo	527	0.49	0.52	0.57	15.69	3.98	50.32	40.42	33.48	55.03	5.96	23.08	4.03	5.78	6.41	
Visalia	344	0.32	0.00	0.00	22.02	10.47	38.85	32.56	39.13	56.98	7.59	0.00	9.92	6.93	7.74	

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles MD	11	28.21	12.96	27.27	31.74	27.27	28.34	36.36	26.96	9.09	0.06	0.00	0.08	0.00	0.13
Limited Review:															
Bakersfield	0	0.00	5.58	0.00	33.58	0.00	31.60	0.00	29.24	0.00	0.00	0.00	0.00	0.00	0.00
Fresno	3	7.69	6.51	0.00	38.38	66.67	39.03	33.33	16.08	0.00	5.41	0.00	8.33	9.09	0.00
Hanford	0	0.00	0.00	0.00	30.00	0.00	38.19	0.00	31.80	0.00	0.00	0.00	0.00	0.00	0.00
Madera	1	2.56	0.00	0.00	47.62	0.00	39.87	100.00	12.50	0.00	0.00	0.00	0.00	0.00	0.00
Merced	1	2.56	0.00	0.00	39.39	100.00	42.53	0.00	18.09	0.00	7.14	0.00	8.33	0.00	0.00
Modesto	1	2.56	3.38	0.00	26.24	0.00	49.18	100.00	21.20	0.00	0.00	0.00	0.00	0.00	0.00
Napa	0	0.00	0.00	0.00	24.02	0.00	72.18	0.00	3.80	0.00	0.00	0.00	0.00	0.00	0.00
Oakland	5	12.82	13.31	20.00	27.95	20.00	45.36	40.00	13.38	20.00	1.03	1.49	0.49	1.23	1.96
Oxnard	1	2.56	3.57	0.00	34.60	100.00	47.43	0.00	14.41	0.00	0.00	0.00	0.00	0.00	0.00
Riverside	2	5.13	7.73	0.00	38.68	50.00	37.84	50.00	15.76	0.00	1.10	0.00	1.25	1.41	0.00
Sacramento	0	0.00	10.93	0.00	35.93	0.00	35.50	0.00	17.64	0.00	0.00	0.00	0.00	0.00	0.00
Salinas	0	0.00	0.00	0.00	28.29	0.00	58.50	0.00	13.21	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Limited Review:															
San Diego	5	12.82	11.77	20.00	32.61	20.00	37.33	40.00	18.29	20.00	0.67	0.98	0.41	0.95	0.00
San Francisco	4	10.26	19.98	25.00	23.42	25.00	31.54	25.00	25.05	25.00	0.11	0.00	0.00	0.31	0.00
San Jose	1	2.56	6.98	0.00	25.75	100.00	53.88	0.00	13.39	0.00	0.35	0.00	1.15	0.00	0.00
San Luis Obispo	1	2.56	0.00	0.00	34.31	0.00	64.12	100.00	1.56	0.00	0.00	0.00	0.00	0.00	0.00
Santa Ana	0	0.00	6.27	0.00	41.07	0.00	33.61	0.00	19.05	0.00	0.00	0.00	0.00	0.00	0.00
Santa Barbara	0	0.00	12.99	0.00	41.94	0.00	28.08	0.00	16.99	0.00	0.00	0.00	0.00	0.00	0.00
Santa Cruz	0	0.00	0.00	0.00	43.78	0.00	44.77	0.00	11.45	0.00	0.00	0.00	0.00	0.00	0.00
Santa Rosa	2	5.13	0.00	0.00	29.86	100.00	65.54	0.00	4.60	0.00	4.08	0.00	10.53	0.00	0.00
Stockton	0	0.00	22.11	0.00	26.33	0.00	37.30	0.00	14.27	0.00	0.00	0.00	0.00	0.00	0.00
Vallejo	1	2.56	6.21	0.00	35.41	0.00	37.98	100.00	20.40	0.00	0.00	0.00	0.00	0.00	0.00
Visalia	0	0.00	0.00	0.00	40.02	0.00	30.92	0.00	29.06	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles MD	41,195	32.43	6.47	4.82	18.72	19.06	26.40	28.50	47.64	47.62	8.36	8.15	9.55	9.27	7.60
Limited Review:															
Bakersfield	2,092	1.65	2.24	2.15	24.49	24.19	28.59	27.68	44.67	45.98	8.59	9.30	8.69	9.64	8.06
Fresno	2,549	2.01	5.43	3.33	23.64	28.13	32.26	35.78	38.56	32.76	9.41	7.31	13.57	10.54	6.87
Hanford	229	0.18	0.00	0.00	35.40	28.38	31.28	41.48	33.20	30.13	7.73	0.00	6.88	8.83	7.16
Madera	447	0.35	0.00	0.00	12.98	11.41	54.52	62.19	32.49	26.40	10.22	0.00	14.01	11.34	7.72
Merced	742	0.58	0.00	0.00	25.08	18.46	47.61	57.55	27.31	23.99	16.34	0.00	14.64	18.85	13.89
Modesto	2,131	1.68	6.49	3.57	14.64	16.19	51.23	54.58	27.64	25.67	17.24	12.31	22.86	18.46	14.36
Napa	510	0.40	0.00	0.00	23.35	15.29	56.42	57.06	20.24	27.65	6.92	0.00	5.51	6.56	9.29
Oakland	7,199	5.67	8.80	6.89	15.45	13.46	38.68	39.32	36.96	40.33	6.38	6.40	7.17	6.96	5.71
Oxnard	3,140	2.47	2.90	2.10	16.34	14.39	48.21	46.11	32.55	37.39	7.13	5.81	6.81	7.18	7.20
Riverside	10,910	8.59	2.64	2.06	23.99	23.93	41.13	41.15	32.18	32.85	9.38	10.11	10.38	9.88	8.34
Sacramento	6,836	5.38	6.45	5.65	20.06	20.25	37.59	38.22	35.90	35.88	9.48	9.73	10.50	10.21	8.46
Salinas	804	0.63	0.00	0.00	19.30	20.65	44.15	42.04	36.55	37.31	7.23	0.00	9.27	7.49	6.31

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Limited Review:															
San Diego	12,492	9.83	4.29	3.40	18.44	16.75	36.62	37.02	40.60	42.83	8.19	8.76	8.56	8.51	7.75
San Francisco	6,351	5.00	13.61	9.27	17.37	16.96	34.98	40.48	33.97	33.29	4.62	3.97	4.21	4.96	4.63
San Jose	6,551	5.16	2.69	2.11	19.82	18.35	44.20	44.77	33.29	34.77	7.14	7.16	7.08	7.42	6.85
San Luis Obispo	1,131	0.89	0.00	0.00	18.67	11.85	67.54	71.88	13.80	16.27	9.33	0.00	7.50	9.92	8.47
Santa Ana	14,204	11.18	2.38	2.44	25.49	24.31	33.63	33.50	37.70	39.75	7.75	8.97	7.88	8.15	7.41
Santa Barbara	1,371	1.08	2.22	1.68	32.24	29.10	32.93	36.98	32.61	32.24	8.10	12.07	8.27	8.93	7.05
Santa Cruz	1,046	0.82	0.00	0.00	20.73	22.85	45.71	41.20	33.56	35.95	8.45	0.00	10.62	7.65	8.40
Santa Rosa	1,347	1.06	0.00	0.00	13.94	10.17	69.95	70.60	16.10	19.23	5.73	0.00	5.58	5.67	6.43
Stockton	2,068	1.63	6.95	3.72	19.14	19.73	34.91	38.88	39.00	37.67	13.65	10.19	14.28	15.87	12.23
Vallejo	874	0.69	2.16	0.57	21.22	17.96	46.30	48.63	30.29	32.84	8.31	6.56	8.35	9.40	7.21
Visalia	799	0.63	0.00	0.00	25.81	27.16	35.56	36.42	38.60	36.42	7.30	0.00	7.71	7.23	7.31

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles MD	0	0.00	3.09	0.00	15.57	0.00	30.85	0.00	49.93	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Bakersfield	0	0.00	1.42	0.00	31.37	0.00	33.82	0.00	33.38	0.00	0.00	0.00	0.00	0.00	0.00
Fresno	2	50.00	1.29	0.00	24.51	0.00	44.11	100.00	30.06	0.00	0.00	0.00	0.00	0.00	0.00
Hanford	1	25.00	0.00	0.00	21.85	0.00	59.57	0.00	18.45	100.00	0.00	0.00	0.00	0.00	0.00
Madera	1	25.00	0.00	0.00	2.75	0.00	80.77	100.00	16.48	0.00	0.61	0.00	0.00	0.74	0.00
Merced	0	0.00	0.00	0.00	12.71	0.00	73.28	0.00	14.01	0.00	0.00	0.00	0.00	0.00	0.00
Modesto	0	0.00	1.83	0.00	12.09	0.00	62.56	0.00	23.52	0.00	0.00	0.00	0.00	0.00	0.00
Napa	0	0.00	0.00	0.00	13.62	0.00	46.22	0.00	40.16	0.00	0.00	0.00	0.00	0.00	0.00
Oakland	0	0.00	5.70	0.00	16.05	0.00	38.08	0.00	40.17	0.00	0.00	0.00	0.00	0.00	0.00
Oxnard	0	0.00	4.08	0.00	20.68	0.00	54.25	0.00	20.99	0.00	0.00	0.00	0.00	0.00	0.00
Riverside	0	0.00	1.81	0.00	24.07	0.00	41.84	0.00	32.26	0.00	0.00	0.00	0.00	0.00	0.00
Sacramento	0	0.00	3.86	0.00	18.25	0.00	45.15	0.00	32.73	0.00	0.00	0.00	0.00	0.00	0.00
Salinas	0	0.00	0.00	0.00	17.87	0.00	49.40	0.00	32.72	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Limited Review:															
San Diego	0	0.00	3.47	0.00	16.73	0.00	40.79	0.00	38.99	0.00	0.00	0.00	0.00	0.00	0.00
San Francisco	0	0.00	6.21	0.00	14.85	0.00	42.91	0.00	36.03	0.00	0.00	0.00	0.00	0.00	0.00
San Jose	0	0.00	2.45	0.00	23.86	0.00	44.45	0.00	29.24	0.00	0.00	0.00	0.00	0.00	0.00
San Luis Obispo	0	0.00	0.00	0.00	12.97	0.00	72.75	0.00	14.28	0.00	0.00	0.00	0.00	0.00	0.00
Santa Ana	0	0.00	2.48	0.00	26.03	0.00	32.87	0.00	38.36	0.00	0.00	0.00	0.00	0.00	0.00
Santa Barbara	0	0.00	1.72	0.00	22.43	0.00	33.31	0.00	42.55	0.00	0.00	0.00	0.00	0.00	0.00
Santa Cruz	0	0.00	0.00	0.00	21.99	0.00	39.46	0.00	38.55	0.00	0.00	0.00	0.00	0.00	0.00
Santa Rosa	0	0.00	0.00	0.00	5.95	0.00	80.70	0.00	13.35	0.00	0.00	0.00	0.00	0.00	0.00
Stockton	0	0.00	1.37	0.00	10.20	0.00	52.06	0.00	36.38	0.00	0.00	0.00	0.00	0.00	0.00
Vallejo	0	0.00	0.73	0.00	11.23	0.00	57.26	0.00	30.77	0.00	0.00	0.00	0.00	0.00	0.00
Visalia	0	0.00	0.00	0.00	23.48	0.00	42.08	0.00	34.44	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ₈	% BANK Loans**	% Families**	% BANK Loans**	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles MD	6,223	27.08	23.87	2.70	16.49	14.06	17.40	24.72	42.24	58.52	6.87	6.14	5.86	5.92	7.69
Limited Review:															
Bakersfield	405	1.76	23.46	4.44	16.67	12.10	18.13	20.00	41.75	63.46	3.08	1.85	2.00	1.95	4.75
Fresno	335	1.46	22.80	5.97	17.05	20.90	18.53	23.58	41.63	49.55	2.18	1.40	1.69	1.82	2.84
Hanford	31	0.13	20.55	0.00	18.31	22.58	19.92	45.16	41.22	32.26	2.20	0.00	2.77	2.62	1.92
Madera	81	0.35	22.09	4.94	16.65	12.35	21.11	25.93	40.14	56.79	4.28	1.00	0.97	4.17	7.88
Merced	91	0.40	20.72	9.89	18.32	17.58	19.88	23.08	41.08	49.45	1.94	1.94	0.91	1.71	2.74
Modesto	185	0.81	21.74	5.95	17.27	24.32	20.71	23.24	40.28	46.49	1.93	0.65	1.87	1.42	3.01
Napa	41	0.18	18.55	2.44	19.66	14.63	22.34	34.15	39.45	48.78	2.39	1.00	1.21	3.71	2.38
Oakland	2,060	8.96	20.97	10.88	17.47	21.33	21.18	22.74	40.38	45.04	5.75	5.62	5.79	5.29	6.03
Oxnard	841	3.66	19.55	5.13	18.43	20.26	22.09	28.01	39.92	46.60	9.11	7.45	7.59	8.87	10.35
Riverside	2,683	11.67	21.73	6.01	17.48	18.99	20.23	23.39	40.56	51.62	3.33	2.11	2.63	2.53	4.56
Sacramento	1,490	6.48	21.09	9.68	18.46	23.99	20.94	22.78	39.51	43.55	3.61	2.46	2.59	3.29	5.04
Salinas	139	0.60	19.70	2.17	18.38	16.67	21.52	28.99	40.40	52.17	2.70	0.68	2.21	2.49	3.46

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by bank.

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ₉	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Limited Review:															
San Diego	2,014	8.76	21.02	3.28	17.91	13.71	20.09	25.93	40.98	57.08	5.41	3.43	4.93	5.04	5.88
San Francisco	1,026	4.46	21.33	6.05	17.59	17.27	19.98	19.71	41.11	56.98	5.25	8.13	6.71	5.64	4.61
San Jose	1,274	5.54	20.21	7.15	17.95	19.26	21.63	24.37	40.21	49.21	5.72	7.66	6.38	5.59	5.36
San Luis Obispo	221	0.96	18.57	0.90	18.88	14.03	22.65	25.34	39.90	59.73	5.58	2.50	4.96	3.93	6.77
Santa Ana	2,759	12.01	20.69	5.95	17.97	21.36	20.68	27.53	40.65	45.16	8.80	11.63	11.53	8.70	7.66
Santa Barbara	126	0.55	20.00	4.80	18.61	16.80	20.45	19.20	40.95	59.20	3.28	3.46	2.29	3.24	3.71
Santa Cruz	83	0.36	19.96	1.20	17.98	14.46	21.23	33.73	40.83	50.60	3.44	1.52	2.48	5.10	3.22
Santa Rosa	193	0.84	17.73	6.74	18.87	16.58	24.32	31.61	39.08	45.08	3.34	2.84	2.89	3.41	3.66
Stockton	337	1.47	22.77	4.76	16.48	20.24	19.80	24.40	40.95	50.60	2.45	1.20	1.81	2.11	3.56
Vallejo	246	1.07	19.26	7.35	18.51	29.39	23.45	26.53	38.79	36.73	2.85	1.69	3.08	2.61	3.28
Visalia	97	0.42	22.23	6.19	17.27	12.37	19.30	26.80	41.20	54.64	1.63	2.20	1.07	1.62	1.82

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by bank.

9 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: CALIFORNIA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ¹⁰	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles MD	909	33.11	23.87	4.18	16.49	13.42	17.40	20.46	42.24	61.94	9.73	6.91	12.30	10.07	9.37
Limited Review:															
Bakersfield	17	0.62	23.46	0.00	16.67	11.76	18.13	17.65	41.75	70.59	4.38	0.00	0.00	3.64	6.12
Fresno	28	1.02	22.80	14.29	17.05	3.57	18.53	17.86	41.63	64.29	4.52	25.81	1.72	4.88	2.41
Hanford	5	0.18	20.55	20.00	18.31	20.00	19.92	0.00	41.22	60.00	3.85	0.00	0.00	0.00	6.25
Madera	5	0.18	22.09	20.00	16.65	20.00	21.11	20.00	40.14	40.00	9.62	0.00	0.00	13.33	10.00
Merced	11	0.40	20.72	9.09	18.32	18.18	19.88	36.36	41.08	36.36	7.02	0.00	11.11	6.67	6.90
Modesto	12	0.44	21.74	8.33	17.27	8.33	20.71	8.33	40.28	75.00	5.67	5.88	0.00	7.41	6.94
Napa	5	0.18	18.55	0.00	19.66	20.00	22.34	20.00	39.45	60.00	2.48	0.00	0.00	0.00	6.52
Oakland	243	8.85	20.97	9.47	17.47	13.99	21.18	21.40	40.38	55.14	8.68	9.48	6.85	7.88	9.52
Oxnard	114	4.15	19.55	7.89	18.43	14.91	22.09	35.09	39.92	42.11	10.60	13.79	7.84	12.31	10.35
Riverside	192	6.99	21.73	4.69	17.48	12.50	20.23	24.48	40.56	58.33	7.59	3.36	8.37	6.93	8.15
Sacramento	117	4.26	21.09	10.26	18.46	11.97	20.94	20.51	39.51	57.26	6.28	9.52	5.09	5.35	6.53
Salinas	13	0.47	19.70	0.00	18.38	23.08	21.52	0.00	40.40	76.92	5.38	0.00	3.85	0.00	5.93

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

¹⁰ 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: CALIFORNIA										Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families*	% BANK Loans****	% Families ¹¹	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Limited Review:																
San Diego	242	8.82	21.02	2.90	17.91	9.96	20.09	18.26	40.98	68.88	8.35	0.79	7.25	5.61	10.47	
San Francisco	159	5.79	21.33	7.55	17.59	22.01	19.98	28.93	41.11	41.51	6.25	4.07	6.69	7.94	5.68	
San Jose	184	6.70	20.21	5.43	17.95	12.50	21.63	24.46	40.21	57.61	11.42	8.26	8.53	10.12	13.16	
San Luis Obispo	19	0.69	18.57	10.53	18.88	5.26	22.65	10.53	39.90	73.68	4.72	9.09	2.38	3.45	5.74	
Santa Ana	374	13.62	20.69	4.55	17.97	17.11	20.68	24.87	40.65	53.48	11.19	9.38	12.50	9.24	11.93	
Santa Barbara	21	0.77	20.00	9.52	18.61	19.05	20.45	33.33	40.95	38.10	4.62	22.22	13.21	6.86	1.90	
Santa Cruz	13	0.47	19.96	0.00	17.98	46.15	21.23	15.38	40.83	38.46	0.00	0.00	0.00	0.00	0.00	
Santa Rosa	31	1.13	17.73	3.23	18.87	29.03	24.32	22.58	39.08	45.16	4.77	3.70	13.13	4.20	1.39	
Stockton	9	0.33	22.77	0.00	16.48	33.33	19.80	33.33	40.95	33.33	2.18	0.00	3.77	5.17	0.00	
Vallejo	7	0.26	19.26	0.00	18.51	0.00	23.45	28.57	38.79	71.43	4.37	0.00	2.38	3.92	7.14	
Visalia	15	0.55	22.23	6.67	17.27	20.00	19.30	13.33	41.20	60.00	5.84	0.00	8.33	6.90	5.75	

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

¹¹ 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: CALIFORNIA				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families ¹²	% BANK Loans****	%Families***	% BANK Loans****	%Families***	% BANK Loans****						
Full Review:																
Los Angeles MD	30,680	28.44	23.87	2.89	16.49	8.99	17.40	17.33	42.24	70.79	15.51	13.45	16.26	16.60	15.20	
Limited Review:																
Bakersfield	502	0.47	23.46	2.84	16.67	7.10	18.13	14.40	41.75	75.66	8.23	8.11	4.63	8.15	8.73	
Fresno	1,040	0.96	22.80	4.93	17.05	10.35	18.53	19.83	41.63	64.89	10.13	17.75	11.10	10.48	9.34	
Hanford	108	0.10	20.55	4.00	18.31	9.00	19.92	17.00	41.22	70.00	7.73	10.34	4.04	8.07	8.17	
Madera	149	0.14	22.09	4.76	16.65	12.24	21.11	24.49	40.14	58.50	11.04	12.07	13.51	14.16	9.24	
Merced	194	0.18	20.72	3.13	18.32	11.98	19.88	20.83	41.08	64.06	11.38	11.94	12.41	11.50	11.1	
Modesto	444	0.41	21.74	7.31	17.27	16.89	20.71	23.97	40.28	51.83	7.36	5.70	7.05	9.04	7.04	
Napa	261	0.24	18.55	6.59	19.66	12.79	22.34	26.74	39.45	53.88	7.59	10.67	5.93	9.34	6.93	
Oakland	10,007	9.28	20.97	5.21	17.47	12.58	21.18	20.93	40.38	61.28	11.10	10.23	11.38	10.53	11.3	
Oxnard	4,114	3.81	19.55	5.40	18.43	14.17	22.09	26.32	39.92	54.11	15.28	11.68	14.53	16.37	15.3	
Riverside	7,238	6.71	21.73	3.54	17.48	9.97	20.23	20.43	40.56	66.06	13.47	8.67	11.75	12.82	14.3	
Sacramento	4,462	4.14	21.09	5.02	18.46	13.65	20.94	24.32	39.51	57.01	9.76	8.33	7.77	9.25	10.6	
Salinas	368	0.34	19.70	3.31	18.38	9.37	21.52	19.56	40.40	67.77	6.04	1.99	4.95	6.29	6.37	

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

12 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: CALIFORNIA				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families ¹³	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Limited Review:																
San Diego	9,564	8.87	21.02	3.49	17.91	9.50	20.09	20.54	40.98	66.47	11.58	9.17	10.63	11.65	11.8	
San Francisco	8,236	7.63	21.33	5.50	17.59	14.53	19.98	22.55	41.11	57.42	11.15	13.39	13.26	12.58	10.1	
San Jose	10,287	9.54	20.21	3.89	17.95	11.30	21.63	22.19	40.21	62.61	12.36	11.63	12.43	12.43	12.3	
San Luis Obispo	781	0.72	18.57	4.50	18.88	13.00	22.65	26.00	39.90	56.50	8.75	6.61	8.81	9.02	8.83	
Santa Ana	15,667	14.52	20.69	4.63	17.97	12.78	20.68	25.64	40.65	56.95	15.59	15.56	16.64	17.20	14.7	
Santa Barbara	641	0.59	20.00	4.89	18.61	7.73	20.45	18.93	40.95	68.45	7.08	6.53	7.51	6.02	7.33	
Santa Cruz	533	0.49	19.96	5.83	17.98	11.47	21.23	23.12	40.83	59.59	7.03	7.16	6.80	6.95	7.09	
Santa Rosa	1,153	1.07	17.73	6.90	18.87	16.51	24.32	22.27	39.08	54.32	7.76	9.39	7.15	7.10	8.01	
Stockton	581	0.54	22.77	5.63	16.48	13.03	19.80	19.01	40.95	62.32	8.29	6.57	7.04	7.01	9.34	
Vallejo	527	0.49	19.26	6.73	18.51	17.50	23.45	26.92	38.79	48.85	7.87	5.51	8.01	8.83	7.71	
Visalia	344	0.32	22.23	3.87	17.27	14.58	19.30	17.56	41.20	63.99	9.71	6.84	11.19	8.24	10.0	

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

¹³ 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: CALIFORNIA			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Los Angeles MD	41,443	32.55	67.79	44.95	99.40	0.39	0.22	8.36	8.49	
Limited Review:										
Bakersfield	2,092	1.64	70.62	33.41	99.76	0.14	0.10	8.59	7.97	
Fresno	2,551	2.00	68.03	38.10	99.41	0.27	0.31	9.41	8.67	
Hanford	229	0.18	69.30	45.85	100.00	0.00	0.00	7.73	7.00	
Madera	447	0.35	71.05	37.81	99.55	0.00	0.45	10.22	10.09	
Merced	742	0.58	68.11	29.11	99.73	0.27	0.00	16.34	12.76	
Modesto	2,131	1.67	69.91	32.80	99.95	0.05	0.00	17.24	12.34	
Napa	510	0.40	70.32	51.37	100.00	0.00	0.00	6.92	8.28	
Oakland	7,200	5.65	68.46	48.49	99.40	0.40	0.19	6.38	6.17	
Oxnard	3,140	2.47	70.39	49.14	99.49	0.35	0.16	7.13	7.56	
Riverside	10,914	8.57	69.30	40.94	99.69	0.14	0.17	9.38	8.04	
Sacramento	6,836	5.37	69.14	38.97	99.74	0.18	0.09	9.48	7.29	
Salinas	804	0.63	69.55	47.64	99.88	0.00	0.12	7.23	7.17	

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 42.59% of small loans to businesses originated and purchased by the bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CALIFORNIA			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Limited Review:										
San Diego	12,492	9.81	66.93	47.88	99.63	0.22	0.14	8.19	8.59	
San Francisco	6,353	4.99	66.90	55.52	99.23	0.57	0.20	4.62	5.31	
San Jose	6,551	5.15	66.80	50.86	99.48	0.38	0.14	7.14	7.30	
San Luis Obispo	1,131	0.89	70.96	54.64	100.00	0.00	0.00	9.33	10.99	
Santa Ana	14,255	11.20	68.30	48.12	99.23	0.48	0.29	7.75	7.78	
Santa Barbara	1,371	1.08	69.43	52.66	100.00	0.00	0.00	8.10	9.46	
Santa Cruz	1,046	0.82	72.32	58.03	100.00	0.00	0.00	8.45	9.06	
Santa Rosa	1,347	1.06	69.43	49.52	100.00	0.00	0.00	5.73	5.83	
Stockton	2,068	1.62	68.69	28.34	99.90	0.10	0.00	13.65	7.30	
Vallejo	874	0.69	71.00	44.16	99.77	0.00	0.23	8.31	7.76	
Visalia	799	0.63	70.32	40.80	100.00	0.00	0.00	7.30	7.76	

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 42.59% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Los Angeles MD	0	0.00	95.03	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Bakersfield	0	0.00	88.58	0.00	0.00	0.00	0.00	0.00	0.00
Fresno	2	50.00	90.59	100.00	0.00	50.00	50.00	0.00	0.00
Hanford	1	25.00	88.87	0.00	0.00	0.00	100.00	0.00	0.00
Madera	1	25.00	92.01	100.00	0.00	100.00	0.00	0.61	0.99
Merced	0	0.00	91.31	0.00	0.00	0.00	0.00	0.00	0.00
Modesto	0	0.00	92.95	0.00	0.00	0.00	0.00	0.00	0.00
Napa	0	0.00	92.91	0.00	0.00	0.00	0.00	0.00	0.00
Oakland	0	0.00	94.67	0.00	0.00	0.00	0.00	0.00	0.00
Oxnard	0	0.00	90.79	0.00	0.00	0.00	0.00	0.00	0.00
Riverside	0	0.00	93.95	0.00	0.00	0.00	0.00	0.00	0.00
Sacramento	0	0.00	94.98	0.00	0.00	0.00	0.00	0.00	0.00
Salinas	0	0.00	84.19	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: CALIFORNIA			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Limited Review:									
San Diego	0	0.00	94.81	0.00	0.00	0.00	0.00	0.00	0.00
San Francisco	0	0.00	94.37	0.00	0.00	0.00	0.00	0.00	0.00
San Jose	0	0.00	93.71	0.00	0.00	0.00	0.00	0.00	0.00
San Luis Obispo	0	0.00	96.16	0.00	0.00	0.00	0.00	0.00	0.00
Santa Ana	0	0.00	93.72	0.00	0.00	0.00	0.00	0.00	0.00
Santa Barbara	0	0.00	91.16	0.00	0.00	0.00	0.00	0.00	0.00
Santa Cruz	0	0.00	92.77	0.00	0.00	0.00	0.00	0.00	0.00
Santa Rosa	0	0.00	94.66	0.00	0.00	0.00	0.00	0.00	0.00
Stockton	0	0.00	92.07	0.00	0.00	0.00	0.00	0.00	0.00
Vallejo	0	0.00	96.09	0.00	0.00	0.00	0.00	0.00	0.00
Visalia	0	0.00	89.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CALIFORNIA				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Los Angeles MD	30	162,821	103	330,615	133	493,436	34.61	0	0
Limited Review:									
Bakersfield	3	4,534	2	25,174	5	29,708	2.08	0	0
Fresno	7	18,289	10	16,215	17	34,504	2.42	0	0
Hanford	1	124	1	2	2	126	0.01	0	0
Madera	0	0	1	2	1	2	0.00	0	0
Merced	0	0	2	9,849	2	9,849	0.69	0	0
Modesto	4	2,986	1	2	5	2,988	0.21	0	0
Napa	2	1,038	1	3	3	1,041	0.07	0	0
Oakland	19	82,251	49	75,424	68	157,675	11.06	0	0
Oxnard	5	39,143	14	13,068	19	52,211	3.66	0	0
Riverside	17	71,007	27	34,628	44	105,635	7.41	0	0
Sacramento	10	59,519	8	15,876	18	75,395	5.29	0	0
Salinas	2	17,067	1	1,081	3	18,148	1.27	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CALIFORNIA				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Limited Review:									
San Diego	10	60,060	30	55,679	40	115,739	8.12	0	0
San Francisco	16	71,897	96	26,084	112	97,981	6.87	0	0
San Jose	18	113,140	36	62,546	54	175,686	12.32	0	0
San Luis Obispo	1	764	2	1,873	3	2,637	0.18	0	0
Santa Ana	7	17,897	14	1,702	21	19,599	1.37	0	0
Santa Barbara	2	6,342	0	0	2	6,342	0.44	0	0
Santa Cruz	2	1,307	0	0	2	1,307	0.09	0	0
Santa Rosa	3	5,429	2	19	5	5,448	0.38	0	0
Stockton	0	0	5	67	5	67	0.00	0	0
Vallejo	1	7,973	1	1,886	2	9,859	0.69	0	0
Visalia	3	7,962	2	2,479	5	10,441	0.73	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Geography: CALIFORNIA			
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Los Angeles MD	32.81	112	29.47	4.46	23.21	23.21	49.11	2	0	0	0	0	2	8.00	29.44	30.88	31.58
Limited Review:																	
Bakersfield	0.46	2	0.53	0.00	0.00	0.00	100.0	0	0	0	0	0	0	4.40	32.14	31.74	30.06
Fresno	1.59	14	3.68	7.14	14.29	42.86	35.71	0	1	0	0	- 1	0	4.73	32.88	35.66	26.63
Hanford	0.11	1	0.26	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	35.42	35.84	23.81
Madera	0.18	2	0.53	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	21.87	54.77	23.36
Merced	0.34	3	0.79	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	26.44	50.04	23.52
Modesto	0.66	4	1.05	0.00	0.00	25.00	75.00	0	0	0	0	0	0	2.66	21.22	52.77	23.35
Napa	0.26	2	0.53	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	16.66	63.01	20.33
Oakland	9.84	42	11.05	9.52	19.05	47.62	23.81	1	0	0	0	0	1	8.54	20.25	41.14	30.04
Oxnard	2.39	10	2.63	0.00	20.00	50.00	30.00	0	0	0	0	0	0	3.86	23.98	44.41	27.75
Riverside	4.72	26	6.84	7.69	38.46	34.62	19.23	0	1	0	- 1	0	0	3.53	28.54	41.16	26.73
Sacramento	3.85	12	3.16	0.00	8.33	66.67	25.00	0	0	0	0	0	0	7.22	26.25	37.59	28.94
Salinas	0.13	1	0.26	0.00	0.00	0.00	100.0	0	0	0	0	0	0	0.00	26.32	48.43	25.25

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Geography: CALIFORNIA			
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Limited Review:																	
San Diego	4.05	25	6.58	4.00	24.00	40.00	32.00	0	0	0	0	0	0	7.78	24.46	37.46	30.01
San Francisco	17.14	47	12.37	17.02	10.64	40.43	31.91	1	1	0	0	0	0	7.21	21.80	42.21	28.77
San Jose	11.13	24	6.32	0.00	16.67	50.00	33.33	1	0	0	0	1	0	4.03	22.79	47.69	25.49
San Luis Obispo	0.25	2	0.53	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	16.72	69.48	13.79
Santa Ana	8.25	37	9.74	2.70	27.03	45.95	24.32	2	0	0	0	1	1	4.95	30.96	31.84	32.26
Santa Barbara	0.29	2	0.53	0.00	0.00	50.00	50.00	0	0	0	0	0	0	6.08	31.57	33.18	29.18
Santa Cruz	0.27	2	0.53	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	31.25	39.43	29.32
Santa Rosa	0.55	4	1.05	0.00	25.00	75.00	0.00	0	1	0	0	0	- 1	0.00	14.38	69.79	15.83
Stockton	0.22	2	0.53	0.00	50.00	50.00	0.00	0	0	0	0	0	0	5.88	25.65	38.34	30.13
Vallejo	0.07	1	0.26	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.55	22.77	47.80	27.02
Visalia	0.42	3	0.79	0.00	66.67	0.00	33.33	0	0	0	0	0	0	0.00	32.31	38.64	28.80

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Miami	49.65	1,444	496,023	12,535	112,386	0	0	13	106,730	13,992	715,139	71.89
Limited Review:												
Fort Lauderdale	25.00	1,503	387,808	5,542	49,885	0	0	2	23,700	7,047	461,393	15.36
Jacksonville	6.34	614	104,797	1,172	5,941	0	0	1	596	1,787	111,334	0.10
West Palm Beach	19.01	1,404	390,123	3,952	27,369	0	0	2	16,800	5,358	434,292	12.65

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Miami	575	31.98	1.69	3.83	19.82	15.13	36.99	22.09	41.51	58.96	2.36	1.34	2.45	1.56	3.00
Limited Review:															
Fort Lauderdale	608	33.82	1.16	0.99	23.67	12.99	45.93	34.05	29.24	51.97	2.86	0.71	3.00	2.12	3.68
Jacksonville	182	10.12	3.02	0.00	20.84	17.58	49.70	40.66	26.44	41.76	1.36	0.00	1.18	0.98	2.06
West Palm Beach	433	24.08	1.53	1.39	24.63	13.16	36.35	30.48	37.50	54.97	2.53	3.41	1.86	1.76	3.29

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: FLORIDA								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Miami	16	20.25	1.69	0.00	19.82	12.50	36.99	18.75	41.51	68.75	1.57	0.00	2.20	0.92	2.00
Limited Review:															
Fort Lauderdale	30	37.97	1.16	0.00	23.67	3.33	45.93	23.33	29.24	73.33	3.90	0.00	2.50	3.08	4.90
Jacksonville	10	12.66	3.02	0.00	20.84	0.00	49.70	70.00	26.44	30.00	1.18	0.00	0.00	1.38	1.55
West Palm Beach	23	29.11	1.53	4.35	24.63	21.74	36.35	21.74	37.50	52.17	2.13	0.00	3.17	0.83	2.64

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Miami	837	27.30	1.69	0.36	19.82	7.41	36.99	19.24	41.51	73.00	4.52	2.13	3.69	3.63	5.03
Limited Review:															
Fort Lauderdale	863	28.15	1.16	0.81	23.67	5.68	45.93	29.55	29.24	63.96	4.52	3.96	3.96	3.72	5.07
Jacksonville	422	13.76	3.02	0.47	20.84	11.37	49.70	38.63	26.44	49.53	3.49	0.00	3.77	2.94	3.97
West Palm Beach	944	30.79	1.53	0.11	24.63	6.57	36.35	27.22	37.50	66.10	4.91	1.30	3.31	4.73	5.23

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:																	
Miami	4	44.44	6.85	50.00	35.49	25.00	30.24	25.00	27.42	0.00	0.80	0.00	0.00	3.45	0.00		
Limited Review:																	
Fort Lauderdale	2	22.22	2.27	0.00	32.48	50.00	48.64	0.00	16.61	50.00	1.23	0.00	0.00	0.00	0.00	5.26	
Jacksonville	0	0.00	6.21	0.00	24.74	0.00	53.15	0.00	15.90	0.00	0.00	0.00	0.00	0.00	0.00		
West Palm Beach	3	33.33	3.13	0.00	32.78	66.67	31.51	33.33	32.58	0.00	10.00	0.00	22.22	14.29	0.00		

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans					
Full Review:															
Miami	12,446	53.87	3.98	3.38	19.56	18.55	32.37	30.16	43.51	47.90	10.85	9.95	12.04	10.81	10.58
Limited Review:															
Fort Lauderdale	5,542	23.99	4.01	5.03	19.65	18.33	41.33	39.86	35.01	36.77	6.55	6.33	7.01	6.43	6.50
Jacksonville	1,172	5.07	5.55	4.18	23.15	24.23	44.31	40.70	26.99	30.89	5.02	4.75	4.44	5.35	5.25
West Palm Beach	3,945	17.07	2.78	2.92	19.29	18.86	34.19	30.93	43.62	47.30	5.62	6.01	5.97	5.62	5.49

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families*	% BANK Loans****	% Families ¹⁴	% BANK Loans* ^{***}	% Families ^{***}	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Miami	584	32.32	23.00	1.20	16.98	12.03	18.53	15.64	41.50	71.13	2.88	1.30	1.99	1.64	3.84	
Limited Review:																
Fort Lauderdale	608	33.65	20.85	2.80	18.17	16.45	20.48	18.75	40.50	62.01	3.27	1.07	2.08	2.55	4.48	
Jacksonville	182	10.07	21.18	11.54	18.97	30.22	23.25	23.63	36.60	34.62	1.71	0.96	1.45	1.63	2.44	
West Palm Beach	433	23.96	19.86	6.24	18.56	15.24	20.60	17.32	40.98	61.20	2.85	2.14	2.20	2.47	3.37	

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by bank.

14 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: FLORIDA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹⁵	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Miami	16	20.25	23.00	12.50	16.98	18.75	18.53	0.00	41.50	68.75	1.72	1.79	5.06	0.00	1.40
Limited Review:															
Fort Lauderdale	30	37.97	20.85	3.33	18.17	6.67	20.48	20.00	40.50	70.00	4.14	2.13	0.99	4.65	5.49
Jacksonville	10	12.66	21.18	10.00	18.97	20.00	23.25	20.00	36.60	50.00	1.25	1.52	0.74	0.68	1.89
West Palm Beach	23	29.11	19.86	13.04	18.56	13.04	20.60	8.70	40.98	65.22	2.23	0.00	2.53	1.09	3.08

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

¹⁵ 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: FLORIDA				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families ¹⁶	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Miami	840	27.36	23.00	1.68	16.98	6.86	18.53	11.79	41.50	79.66	6.14	2.74	4.25	5.45	6.70	
Limited Review:																
Fort Lauderdale	863	28.11	20.85	4.79	18.17	10.51	20.48	15.77	40.50	68.93	6.12	7.19	5.59	4.32	6.63	
Jacksonville	422	13.75	21.18	8.18	18.97	16.37	23.25	22.76	36.60	52.69	4.76	6.10	4.28	4.05	5.02	
West Palm Beach	945	30.78	19.86	4.16	18.56	13.45	20.60	16.12	40.98	66.28	6.43	4.55	7.69	6.11	6.44	

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by bank.

16 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: FLORIDA			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Miami	12,535	54.03	69.18	59.43	99.27	0.45	0.29	10.85	15.65	
Limited Review:										
Fort Lauderdale	5,542	23.89	70.49	61.17	99.08	0.65	0.27	6.55	9.47	
Jacksonville	1,172	5.05	69.09	57.59	100.00	0.00	0.00	5.02	7.20	
West Palm Beach	3,952	17.03	70.34	62.12	99.75	0.15	0.10	5.62	8.03	

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 24.27% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Miami	16	58,980	38	105,845	54	164,825	78.26	0	0
Limited Review:									
Fort Lauderdale	5	10,669	21	24,275	26	34,944	16.59	0	0
Jacksonville	1	181	13	435	14	616	0.29	0	0
West Palm Beach	5	9,923	12	312	17	10,235	4.86	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Geography: FLORIDA			
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Miami	71.89	24	45.28	4.17	16.67	33.33	45.83	1	0	0	0	1	0	4.89	28.61	35.68	30.79
Limited Review:																	
Fort Lauderdale	15.36	15	28.30	6.67	13.33	46.67	33.33	1	0	0	0	0	1	3.57	26.43	43.13	26.88
Jacksonville	0.10	1	1.89	0.00	0.00	0.00	100.0	0	0	0	0	0	0	4.65	25.08	48.49	21.78
West Palm Beach	12.65	13	24.53	0.00	7.69	30.77	61.54	0	0	0	0	0	0	4.21	29.32	33.88	32.37

Table 1. Lending Volume

LENDING VOLUME		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Chicago	89.98	23,925	5,539,257	25,113	221,058	0	0	9	193,174	49,047	5,953,489	96.85
Limited Review:												
Lake County	10.02	2,666	724,014	2,789	23,222	0	0	4	40,661	5,459	787,897	3.15

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letter of Credit**		% of Rated Area Deposits in AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full Review:															
Chicago	100.00	1	300	0	0	0	0	0	0	0	0	0	1	300	96.85
Limited Review:															
Lake County	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0	3.15

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Chicago	2,900	92.62	2.62	3.38	15.23	15.93	44.44	34.03	37.70	46.66	3.42	3.56	4.43	2.86	3.65
Limited Review:															
Lake County	231	7.38	1.19	0.43	16.35	3.46	36.62	34.63	45.84	61.47	2.98	1.92	0.69	2.49	4.07

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: ILLINOIS								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago	482	91.98	2.62	1.45	15.23	8.30	44.44	32.99	37.70	57.26	5.56	1.12	2.64	3.90	8.09
Limited Review:															
Lake County	42	8.02	1.19	0.00	16.35	7.14	36.62	30.95	45.84	61.90	5.16	0.00	4.69	2.63	7.39

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago	20,519	89.56	2.62	1.92	15.23	10.21	44.44	30.40	37.70	57.47	7.23	8.90	8.52	6.32	7.53
Limited Review:															
Lake County	2,391	10.44	1.19	0.04	16.35	3.18	36.62	25.68	45.84	71.10	7.32	1.92	4.38	5.51	8.51

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago	8	80.00	11.65	12.50	24.27	25.00	35.55	37.50	28.53	25.00	0.12	0.00	0.20	0.16	0.00
Limited Review:															
Lake County	2	20.00	6.09	0.00	34.70	0.00	36.12	50.00	23.10	50.00	4.88	0.00	0.00	6.67	14.29

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses*	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago	25,088	90.00	3.47	2.71	13.74	13.11	37.52	37.57	45.05	46.61	9.29	12.46	10.79	9.54	8.79
Limited Review:															
Lake County	2,789	10.00	0.86	0.75	12.94	10.18	32.41	29.37	53.80	59.70	9.11	7.59	10.71	9.70	8.80

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families [†]	% BANK Loans ^{****}	% Families ¹⁷	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago	2,903	92.63	20.92	10.26	17.56	25.36	22.00	20.11	39.52	44.26	3.92	3.10	3.77	3.46	4.54
Limited Review:															
Lake County	231	7.37	17.00	5.63	17.25	11.26	22.01	20.35	43.75	62.77	3.48	0.82	1.68	3.54	5.40

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by bank.

17 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: ILLINOIS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹⁸	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago	482	91.98	20.92	6.65	17.56	16.22	22.00	28.07	39.52	49.06	6.09	2.68	4.93	6.31	7.31
Limited Review:															
Lake County	42	8.02	17.00	7.14	17.25	14.29	22.01	30.95	43.75	47.62	5.67	4.11	5.48	6.98	5.51

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.2% of loans originated and purchased by bank.

¹⁸ 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: ILLINOIS		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹⁹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago	20,532	89.57	20.92	6.50	17.56	14.11	22.00	21.92	39.52	57.46	8.88	9.33	8.55	8.12	9.21
Limited Review:															
Lake County	2,391	10.43	17.00	4.07	17.25	11.28	22.01	22.60	43.75	62.05	9.06	6.40	8.30	9.18	9.41

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by bank.

¹⁹ 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: ILLINOIS			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Chicago	25,113	90.00	65.07	55.33	99.29	0.43	0.29	9.29	14.84	
Limited Review:										
Lake County	2,789	10.00	66.77	62.71	99.61	0.14	0.25	9.11	15.06	

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 28.83% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ILLINOIS				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago	32	109,297	105	193,065	137	302,362	93.86	0	0
Limited Review:									
Lake County	2	19,761	6	25	8	19,786	6.14	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: ILLINOIS																	
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches *	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings **	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Chicago	96.85	71	97.26	4.23	16.9	22.54	56.34	0	0	0	0	0	0	7.98	23.66	38.77	29.58
Limited Review:																	
Lake County	3.15	2	2.74	0	0	0	100.0	0	0	0	0	0	0	2.76	24.34	33.68	39.23

Table 1. Lending Volume

LENDING VOLUME		Geography: CONNECTICUT						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Bridgeport	63.10	3,574	1,511,377	4,289	29,335	0	0	3	53,372	7,866	1,594,084	98.62
Limited Review:												
New Haven	36.90	1,485	323,514	3,114	17,435	0	0	0	0	4,599	340,949	1.38

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CONNECTICUT					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		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:																
Bridgeport	739	74.95	3.34	2.44	16.53	14.21	39.53	32.61	40.60	50.74	5.20	3.08	4.32	4.94	5.98	
Limited Review:																
New Haven	247	25.05	3.04	2.02	12.33	8.50	52.39	45.75	32.24	43.72	2.59	0.00	1.16	2.26	3.88	

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: CONNECTICUT										Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Bridgeport	59	65.56	3.34	0.00	16.53	6.78	39.53	40.68	40.60	52.54	4.68	0.00	4.63	6.45	3.55	
Limited Review:																
New Haven	31	34.44	3.04	3.23	12.33	6.45	52.39	45.16	32.24	45.16	1.72	0.00	0.91	1.73	2.02	

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: CONNECTICUT						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Bridgeport	2,776	69.70	3.34	0.79	16.53	9.44	39.53	36.38	40.60	53.39	8.00	6.94	10.58	8.08	7.53
Limited Review:															
New Haven	1,207	30.30	3.04	0.66	12.33	5.63	52.39	42.42	32.24	51.28	5.29	3.85	3.62	5.29	5.58

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: CONNECTICUT						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Bridgeport	4,289	57.94	7.56	7.41	19.04	19.07	33.66	36.54	39.74	36.98	8.71	10.36	9.54	9.38	7.67
Limited Review:															
New Haven	3,114	42.06	7.47	4.98	17.54	15.57	43.19	46.15	31.78	33.30	10.20	9.83	10.54	10.62	9.84

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CONNECTICUT								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ²⁰	% BANK Loans****	% Families*	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Bridgeport	739	74.95	21.61	8.13	17.25	21.41	19.58	17.48	41.56	52.98	5.82	4.91	6.43	4.64	6.26
Limited Review:															
New Haven	247	25.05	20.85	6.07	17.34	30.36	22.55	23.89	39.26	39.68	2.95	1.62	2.45	2.46	4.29

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by bank.

²⁰ 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: CONNECTICUT								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ²¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Bridgeport	59	65.56	21.61	3.39	17.25	13.56	19.58	10.17	41.56	72.88	4.98	1.75	3.14	1.87	8.25
Limited Review:															
New Haven	31	34.44	20.85	9.68	17.34	22.58	22.55	29.03	39.26	38.71	1.77	2.65	0.37	1.69	2.44

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

²¹ 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: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ²²	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Bridgeport	2,776	69.70	21.61	4.72	17.25	14.86	19.58	21.10	41.56	59.32	9.10	8.80	10.14	9.77	8.66
Limited Review:															
New Haven	1,207	30.30	20.85	5.11	17.34	15.75	22.55	26.30	39.26	52.85	6.15	6.64	6.26	5.92	6.19

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by bank.

²² 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: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Bridgeport	4,289	57.94	68.81	58.66	99.58	0.33	0.09	8.71	13.59
Limited Review:									
New Haven	3,114	42.06	68.18	54.24	99.81	0.16	0.03	10.20	14.59

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 30.50% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CONNECTICUT				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Bridgeport	6	25,371	28	25,009	34	50,380	91.55	0	0
Limited Review:									
New Haven	3	3,584	4	1,069	7	4,653	8.45	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: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Bridgeport	98.62	19	95.00	5.26	15.79	36.84	42.11	0	0	0	0	0	0	10.24	22.80	33.16	33.80
Limited Review:																	
New Haven	1.38	1	5.00	0.00	100.0	0.00	0.00	0	0	0	0	0	0	9.45	19.46	45.77	25.31

Table 1. Lending Volume

LENDING VOLUME		Geography: GUAM						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Guam	100.00	142	22,337	55	1,477	0	0	1	14,300	198	38,114	100.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: GUAM				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Guam	50	100.00	0.04	0.00	6.44	2.00	73.20	86.00	20.32	12.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: GUAM		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Guam	88	100.0	0.04	1.14	6.44	0.00	73.20	77.27	20.32	21.59	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: GUAM				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of 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:															
Guam	54	100.0	0.00	0.00	0.00	0.00	0.00	50.00	0.00	50.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: GUAM						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ²³	% BANK Loans****	% Families*	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Guam	50	100.0	27.45	2.00	16.89	6.00	18.75	28.00	36.92	64.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

²³ 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: GUAM		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Families ²⁴	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Guam	92	100.0	27.45	1.09	16.89	16.30	18.75	17.39	36.92	65.22	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

²⁴ 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: GUAM			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Guam	55	100.00	0.00	12.73	94.55	0.00	5.45	0.00	0.00

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 78.18% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: GUAM				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Guam	1	434	4	40	5	474	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: GUAM																	
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Guam	100.00	1	100.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.04	7.32	76.60	16.04

Table 1. Lending Volume

LENDING VOLUME		Geography: MARYLAND						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Baltimore	100.00	2,902	661,939	3,554	16,170	0	0	0	0	6,456	678,109	100.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MARYLAND				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Baltimore	453	100.00	6.27	1.77	20.59	17.88	41.37	34.44	31.77	45.92	1.44	0.48	1.04	0.94	2.42

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: MARYLAND				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Baltimore	58	100.0	6.27	0.00	20.59	8.62	41.37	44.83	31.77	46.55	1.35	0.00	1.23	1.04	1.87	

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: MARYLAND						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore	2,391	100.0	6.27	1.51	20.59	8.99	41.37	37.60	31.77	51.90	4.00	3.60	3.38	3.56	4.50

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MARYLAND				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses**	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore	3,551	100.0	6.52	5.10	19.49	17.12	40.30	45.06	33.64	32.72	6.67	8.42	7.50	7.23	5.65

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MARYLAND						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ²⁵	% BANK Loans****	% Families*	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore	453	100.0	23.81	12.44	18.84	24.67	22.09	25.33	35.26	37.56	1.63	1.02	1.31	1.53	2.29

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by bank.

²⁵ 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: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ²⁶	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore	58	100.0	23.81	8.62	18.84	24.14	22.09	27.59	35.26	39.66	1.48	0.54	2.45	0.90	1.66

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

²⁶ 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: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	%Families ²⁷	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore	2,391	100.0	23.81	8.35	18.84	18.10	22.09	26.02	35.26	47.53	5.16	5.82	5.25	5.39	4.90

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by bank.

²⁷ 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: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Baltimore	3,554	100.00	65.24	62.66	99.80	0.20	0.00	6.67	9.86

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 18.32% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MARYLAND				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Baltimore	11	24,156	31	3,280	42	27,436	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: MARYLAND																	
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Baltimore	100.00	4	100.00	0.00	25.00	50.00	25.00	0	0	0	0	0	0	11.90	24.63	38.08	24.85

Table 1. Lending Volume

LENDING VOLUME		Geography: MASSACHUSETTS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Boston	43.72	6,215	1,775,368	6,620	39,636	0	0	2	12,467	12,837	1,827,471	50.07
Limited Review:												
Cambridge	39.34	5,790	1,715,414	5,760	37,824	0	0	0	0	11,550	1,753,238	45.89
Peabody	16.94	2,287	607,616	2,687	14,458	0	0	0	0	4,974	622,074	4.05

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MASSACHUSETTS					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		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:																
Boston	931	48.92	1.97	3.01	14.35	17.29	46.50	40.49	37.18	39.21	3.98	2.96	3.52	3.80	4.48	
Limited Review:																
Cambridge	676	35.52	0.94	0.59	14.92	12.13	53.92	50.15	30.23	37.13	3.43	1.24	2.29	3.44	4.11	
Peabody	296	15.55	1.66	2.36	11.05	9.12	55.92	53.38	31.37	35.14	3.16	1.61	1.75	3.16	3.96	

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MASSACHUSETTS										Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Boston	83	38.97	1.97	0.00	14.35	8.43	46.50	40.96	37.18	50.60	1.73	0.00	2.62	1.56	1.65	
Limited Review:																
Cambridge	98	46.01	0.94	0.00	14.92	10.20	53.92	64.29	30.23	25.51	2.13	0.00	0.86	2.94	1.34	
Peabody	32	15.02	1.66	0.00	11.05	0.00	55.92	59.38	31.37	40.63	1.92	0.00	0.00	2.10	1.61	

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: MASSACHUSETTS Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Boston	5,199	42.71	1.97	2.27	14.35	10.79	46.50	37.80	37.18	49.14	6.32	6.82	6.99	6.08	6.37
Limited Review:															
Cambridge	5,015	41.20	0.94	0.32	14.92	9.39	53.92	51.98	30.23	38.31	6.02	3.81	5.67	6.38	5.67
Peabody	1,959	16.09	1.66	0.61	11.05	5.31	55.92	50.54	31.37	43.54	6.32	10.42	7.33	6.35	6.08

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MASSACHUSETTS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Boston	2	66.67	13.39	50.00	29.57	0.00	31.06	50.00	25.97	0.00	0.30	3.03	0.00	0.00	0.00
Limited Review:															
Cambridge	1	33.33	7.40	0.00	30.67	0.00	48.78	0.00	13.16	100.00	0.49	0.00	0.00	0.00	7.14
Peabody	0	0.00	14.41	0.00	28.40	0.00	46.94	0.00	10.24	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: MASSACHUSETTS Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses*	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Boston	6,620	43.94	9.17	6.33	14.83	17.39	35.58	41.54	40.40	34.74	9.34	8.42	12.28	9.82	8.14
Limited Review:															
Cambridge	5,760	38.23	2.86	1.79	16.58	17.34	50.74	53.13	29.82	27.74	9.20	5.76	10.00	9.52	8.62
Peabody	2,687	17.83	5.36	4.65	13.89	11.95	50.29	52.25	30.46	31.15	9.70	9.45	8.80	10.11	9.49

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MASSACHUSETTS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ²⁸	% BANK Loans****	% Families*	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Boston	931	48.92	21.69	6.23	17.14	23.85	21.61	24.92	39.56	45.01	4.65	3.78	4.51	4.63	4.87
Limited Review:															
Cambridge	676	35.52	19.32	5.47	18.26	17.75	22.74	30.92	39.69	45.86	3.94	2.15	2.97	5.15	4.15
Peabody	296	15.55	20.76	9.80	17.43	16.89	21.99	26.35	39.82	46.96	3.63	3.01	2.31	3.34	4.89

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

²⁸ 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: MASSACHUSETTS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ²⁹	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Boston	83	38.97	21.69	4.82	17.14	13.25	21.61	33.73	39.56	48.19	1.85	1.44	1.40	1.82	2.08
Limited Review:															
Cambridge	98	46.01	19.32	11.22	18.26	17.35	22.74	33.67	39.69	37.76	2.27	1.96	2.07	3.26	1.69
Peabody	32	15.02	20.76	0.00	17.43	18.75	21.99	28.13	39.82	53.13	2.04	0.00	2.75	1.94	1.81

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

²⁹ 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: MASSACHUSETTS															Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011														
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*																																	
	#	% of Total**	% Families***	% BANK Loans****	% Families ³⁰	% BANK Loans* ^{***}	% Families**	% BANK Loans****	% Families*	% BANK Loans***	% Families**	% BANK Loans*	Overall	Low	Mod	Mid	Upp																											
Full Review:																																												
Boston	5,199	42.71	21.69	3.99	17.14	14.96	21.61	25.20	39.56	55.85	7.64	8.32	7.92	7.43	7.62																													
Limited Review:																																												
Cambridge	5,015	41.20	19.32	5.17	18.26	15.28	22.74	31.39	39.69	48.15	7.18	7.63	6.73	7.80	6.91																													
Peabody	1,959	16.09	20.76	4.46	17.43	14.10	21.99	25.49	39.82	55.95	7.65	7.96	8.01	8.02	7.37																													

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by bank.

³⁰ 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: MASSACHUSETTS			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Boston	6,620	43.94	65.85	51.77	99.77	0.14	0.09	9.34	13.57
Limited Review:									
Cambridge	5,760	38.23	66.76	57.86	99.65	0.24	0.10	9.20	13.32
Peabody	2,687	17.83	69.24	54.11	99.85	0.07	0.07	9.70	13.78

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 32.26% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MASSACHUSETTS				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Boston	16	31,996	35	14,221	51	46,217	95.36	0	0
Limited Review:									
Cambridge	1	1,044	8	1,190	9	2,234	4.61	0	0
Peabody	0	0	3	17	3	17	0.04	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		
Geography: MASSACHUSETTS																		
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																		
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																		
Boston	50.07	16	51.61	18.75	12.50	18.75	50.00	0	0	0	0	0	0	0	7.06	23.54	40.00	29.24
Limited Review:																		
Cambridge	45.89	12	38.71	8.33	16.67	33.33	41.67	0	0	0	0	0	0	0	3.46	22.32	49.69	24.54
Peabody	4.05	3	9.68	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0	6.49	18.99	49.28	25.25

Table 1. Lending Volume

LENDING VOLUME		Geography: NEVADA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Las Vegas	100.00	2,291	396,792	5,506	27,230	0	0	5	42,163	7,802	466,185	100.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: NEVADA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letter of Credit**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Las Vegas	100.00	1	5,598	0	0	0	0	0	0	0	0	1	5,598	100.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEVADA					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Las Vegas	1,208	100.00	0.39	0.41	16.32	2.98	44.57	39.57	38.72	57.04	2.53	9.09	1.26	2.06	2.98

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: NEVADA				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Las Vegas	30	100.0	0.39	0.00	16.32	10.00	44.57	46.67	38.72	43.33	3.96	0.00	6.45	2.87	4.48	

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: NEVADA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Las Vegas	1,050	100.0	0.39	0.00	16.32	3.71	44.57	33.81	38.72	62.48	3.98	0.00	4.00	3.09	4.55

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NEVADA								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Las Vegas	3	100.00	5.44	0.00	45.33	0.00	37.71	100.00	11.53	0.00	5.41	0.00	0.00	12.50	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: NEVADA				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Las Vegas	5,500	100.0	2.24	0.96	17.24	12.73	37.56	39.91	42.56	46.40	7.88	4.37	8.01	9.02	7.17

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEVADA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ³¹	% BANK Loans****	% Families*	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Las Vegas	1,208	100.0	18.69	12.10	18.74	23.36	23.47	20.38	39.10	44.16	2.94	2.01	2.47	2.58	3.88

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by bank.

³¹ 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: NEVADA						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ³²	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Las Vegas	30	100.0	18.69	6.67	18.74	26.67	23.47	30.00	39.10	36.67	4.36	0.00	7.46	4.59	4.12

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

³² 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: NEVADA		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	%Families ³³	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Las Vegas	1,050	100.0	18.69	7.43	18.74	19.25	23.47	21.13	39.10	52.20	6.00	6.50	6.40	6.02	5.79

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 9.0% of loans originated and purchased by bank.

³³ 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: NEVADA			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Las Vegas	5,506	100.00	67.00	41.57	99.91	0.09	0.00	7.88	7.24

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 49.64% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEVADA				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Las Vegas	4	22,355	21	45,358	25	67,713	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: NEVADA			
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Las Vegas	100.00	15	100.00	0.00	26.67	60.00	13.33	0	0	0	0	0	0	2.05	27.84	41.73	28.38

Table 1. Lending Volume

LENDING VOLUME		Geography: NEW JERSEY						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Trenton	100.00	666	175,818	924	6,204	0	0	0	0	1,590	182,022	100.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEW JERSEY						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Trenton	86	100.00	6.07	1.16	12.82	1.16	38.98	16.28	42.12	81.40	2.22	0.00	0.97	0.81	3.71

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: NEW JERSEY								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Trenton	12	100.0	6.07	0.00	12.82	8.33	38.98	25.00	42.12	66.67	1.52	0.00	2.94	0.49	2.37

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: NEW JERSEY						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Trenton	568	100.0	6.07	1.06	12.82	3.35	38.98	24.65	42.12	70.95	4.82	1.74	2.83	3.58	5.61

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: NEW JERSEY								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Trenton	924	100.0	10.69	6.93	10.70	12.23	32.32	34.96	46.30	45.89	6.78	9.78	11.22	7.18	5.68

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEW JERSEY						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ³⁴	% BANK Loans****	% Families*	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Trenton	86	100.0	20.71	2.33	17.30	10.47	21.40	22.09	40.58	65.12	2.55	0.72	1.23	3.48	3.61

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

³⁴ 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: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ³⁵	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Trenton	12	100.0	20.71	8.33	17.30	16.67	21.40	8.33	40.58	66.67	1.57	1.89	2.02	0.00	2.25

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

³⁵ 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: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families ³⁶	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Trenton	568	100.0	20.71	3.53	17.30	11.66	21.40	22.08	40.58	62.72	5.80	3.77	3.60	4.79	7.05									

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchased by bank.

³⁶ 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, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Trenton	924	100.00	65.33	53.68	99.46	0.32	0.22	6.78	9.34

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 33.44% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW JERSEY				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Trenton	1	458	6	69	7	527	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: NEW JERSEY																	
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Trenton	100.00	1	100.00	0.00	0.00	0.00	100.0	0	0	0	0	0	0	11.94	14.87	35.29	37.37

Table 1. Lending Volume

LENDING VOLUME		Geography: PUERTO RICO						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
San Juan PR	100.00	0	0	518	2,634	0	0	4	73,205	522	75,839	100.00

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: PUERTO RICO					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses*	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
San Juan PR	518	100.0	1.81	2.70	11.07	10.62	21.05	19.50	66.07	67.18	4.29	5.33	4.09	2.95	3.77									

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: PUERTO RICO			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
San Juan PR	518	100.00	56.40	31.08	100.00	0.00	0.00	4.29	1.56

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 51.93% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: PUERTO RICO				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
San Juan PR	3	16,209	14	17,674	17	33,883	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: PUERTO RICO			
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
San Juan PR	100.00	4	100.00	0.00	0.00	25.00	75.00	0	0	0	0	0	0	4.67	16.27	33.30	45.75

Table 1. Lending Volume

LENDING VOLUME		Geography: TEXAS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Dallas	33.80	9,600	1,918,654	17,316	139,164	0	0	2	15,963	26,918	2,073,781	25.37
Limited Review:												
Abilene	0.65	129	12,410	388	3,251	0	0	0	0	517	15,661	3.32
Austin	13.20	5,738	1,196,599	4,771	33,943	0	0	1	367	10,510	1,230,909	6.73
College Station	1.01	473	88,913	330	6,232	3	423	0	0	806	95,568	16.53
Fort Worth	13.12	3,530	649,359	6,916	48,013	0	0	3	28,057	10,449	725,429	4.91
Houston	26.22	10,198	2,072,524	10,679	54,761	0	0	1	12,500	20,878	2,139,785	15.23
Killeen	0.11	42	6,596	46	188	0	0	0	0	88	6,784	0.43
Midland	0.81	166	24,090	476	12,767	0	0	0	0	642	36,857	8.00
Texas Non-MSA	0.96	184	22,375	578	3,316	1	34	0	0	763	25,725	7.49
Odessa	0.45	135	22,884	227	3,853	0	0	0	0	362	26,737	4.61
San Angelo	0.41	118	13,586	211	2,374	0	0	0	0	329	15,960	0.98
San Antonio	8.82	3,135	529,352	3,885	19,672	0	0	1	436	7,021	549,460	2.94
Wichita Falls	0.45	91	10,422	266	1,888	0	0	1	3,300	358	15,610	3.45

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: TEXAS										Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Dallas	1,998	23.55	2.76	0.85	20.38	7.31	34.15	28.03	42.71	63.81	2.85	2.84	2.29	2.28	3.30	
Limited Review:																
Abilene	18	0.21	0.00	0.00	19.65	16.67	49.16	33.33	31.18	50.00	0.83	0.00	3.52	0.87	0.52	
Austin	1,474	17.37	3.05	1.70	17.05	12.62	40.85	37.52	39.04	48.17	3.58	4.39	3.88	2.72	4.46	
College Station	128	1.51	0.07	0.00	18.06	13.28	48.23	31.25	33.64	55.47	3.01	0.00	3.25	2.20	3.49	
Fort Worth	693	8.17	3.44	0.43	18.69	5.19	40.71	35.64	37.16	58.73	1.96	2.27	1.51	1.65	2.27	
Houston	2,616	30.83	3.01	1.76	21.98	9.48	31.91	24.24	43.10	64.53	2.75	3.01	2.42	2.26	3.05	
Killeen	14	0.17	0.00	0.00	15.98	14.29	84.02	85.71	0.00	0.00	2.68	0.00	2.33	2.73	0.00	
Midland	58	0.68	4.50	1.72	18.42	13.79	44.68	31.03	32.40	53.45	1.26	3.33	3.27	0.95	1.18	
Texas Non-MSA	34	0.40	0.00	0.00	9.73	2.94	74.91	82.35	15.36	14.71	1.49	0.00	1.50	1.72	0.67	
Odessa	20	0.24	2.25	0.00	15.94	0.00	43.46	5.00	38.35	95.00	1.44	0.00	0.00	0.76	1.84	
San Angelo	13	0.15	0.95	0.00	16.19	0.00	53.10	46.15	29.77	53.85	0.81	0.00	0.00	0.84	0.90	
San Antonio	1,414	16.67	1.94	0.07	34.52	9.05	26.83	23.83	36.71	67.04	3.91	2.60	3.01	3.58	4.21	
Wichita Falls	4	0.05	1.52	0.00	16.68	25.00	51.23	0.00	30.57	75.00	0.37	0.00	2.27	0.00	0.49	

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: TEXAS								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Dallas	101	16.32	2.76	2.97	20.38	19.80	34.15	24.75	42.71	52.48	2.76	3.85	3.72	2.67	2.64
Limited Review:															
Abilene	21	3.39	0.00	0.00	19.65	28.57	49.16	47.62	31.18	23.81	3.99	0.00	8.89	4.93	1.44
Austin	66	10.66	3.05	4.55	17.05	22.73	40.85	33.33	39.04	39.39	1.87	2.78	3.83	1.21	1.75
College Station	10	1.62	0.07	0.00	18.06	10.00	48.23	30.00	33.64	60.00	2.66	0.00	4.35	2.22	2.67
Fort Worth	61	9.85	3.44	1.64	18.69	22.95	40.71	22.95	37.16	52.46	2.45	4.76	4.26	1.08	3.06
Houston	218	35.22	3.01	3.21	21.98	27.06	31.91	22.48	43.10	47.25	3.25	6.90	6.21	2.92	2.68
Killeen	1	0.16	0.00	0.00	15.98	0.00	84.02	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Midland	6	0.97	4.50	0.00	18.42	16.67	44.68	83.33	32.40	0.00	1.22	0.00	0.00	2.56	0.00
Texas Non-MSA	12	1.94	0.00	0.00	9.73	8.33	74.91	75.00	15.36	16.67	3.37	0.00	9.09	2.48	5.56
Odessa	24	3.88	2.25	0.00	15.94	37.50	43.46	37.50	38.35	25.00	12.16	0.00	33.33	20.00	4.88
San Angelo	12	1.94	0.95	0.00	16.19	58.33	53.10	33.33	29.77	8.33	1.63	0.00	8.33	1.14	0.00
San Antonio	76	12.28	1.94	2.63	34.52	53.95	26.83	17.11	36.71	26.32	2.48	5.56	4.33	2.53	1.56
Wichita Falls	11	1.78	1.52	0.00	16.68	27.27	51.23	54.55	30.57	18.18	2.47	0.00	8.33	1.25	1.72

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: TEXAS				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		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:																
Dallas	7,499	30.72	2.76	0.52	20.38	3.79	34.15	20.08	42.71	75.61	9.42	5.25	6.05	7.22	10.49	
Limited Review:																
Abilene	90	0.37	0.00	0.00	19.65	11.11	49.16	30.00	31.18	58.89	4.72	0.00	8.06	5.27	4.03	
Austin	4,198	17.20	3.05	1.26	17.05	7.77	40.85	29.32	39.04	61.65	9.05	6.97	7.92	6.77	10.92	
College Station	334	1.37	0.07	0.00	18.06	4.79	48.23	36.23	33.64	58.98	9.42	0.00	6.32	10.66	9.13	
Fort Worth	2,775	11.37	3.44	0.29	18.69	4.36	40.71	29.48	37.16	65.87	7.36	4.63	6.03	6.14	8.18	
Houston	7,343	30.08	3.01	1.18	21.98	6.40	31.91	17.49	43.10	74.93	7.84	7.40	6.75	6.32	8.44	
Killeen	27	0.11	0.00	0.00	15.98	18.52	84.02	81.48	0.00	0.00	6.52	0.00	9.09	6.30	0.00	
Midland	102	0.42	4.50	0.98	18.42	7.84	44.68	37.25	32.40	53.92	4.21	7.14	3.96	3.69	4.58	
Texas Non-MSA	138	0.57	0.00	0.00	9.73	7.25	74.91	73.19	15.36	19.57	6.26	0.00	12.50	6.61	4.93	
Odessa	90	0.37	2.25	2.22	15.94	8.89	43.46	25.56	38.35	63.33	7.97	0.00	14.81	8.10	7.58	
San Angelo	93	0.38	0.95	0.00	16.19	9.68	53.10	38.71	29.77	51.61	4.50	0.00	10.91	4.52	3.93	
San Antonio	1,644	6.74	1.94	0.24	34.52	7.60	26.83	16.55	36.71	75.61	6.35	10.26	4.76	5.22	6.85	
Wichita Falls	75	0.31	1.52	0.00	16.68	10.67	51.23	52.00	30.57	37.33	3.82	0.00	6.78	3.95	3.18	

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: TEXAS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Dallas	0	0.00	14.44	0.00	30.40	0.00	33.22	0.00	21.94	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Abilene	0	0.00	0.00	0.00	11.94	0.00	74.60	0.00	13.46	0.00	0.00	0.00	0.00	0.00	0.00
Austin	0	0.00	19.00	0.00	30.73	0.00	35.25	0.00	15.02	0.00	0.00	0.00	0.00	0.00	0.00
College Station	1	12.50	7.33	0.00	31.08	0.00	52.42	100.00	9.17	0.00	0.00	0.00	0.00	0.00	0.00
Fort Worth	1	12.50	7.11	0.00	28.45	0.00	45.48	0.00	18.97	100.00	1.41	0.00	0.00	0.00	8.33
Houston	3	37.50	9.98	33.33	34.80	33.33	31.01	33.33	24.21	0.00	1.14	5.00	1.75	0.00	0.00
Killeen	0	0.00	0.00	0.00	64.72	0.00	35.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Midland	0	0.00	2.26	0.00	4.69	0.00	42.21	0.00	50.85	0.00	0.00	0.00	0.00	0.00	0.00
Texas Non-MSA	0	0.00	0.00	0.00	12.48	0.00	76.32	0.00	11.20	0.00	0.00	0.00	0.00	0.00	0.00
Odessa	1	12.50	0.72	0.00	15.47	100.00	29.62	0.00	54.19	0.00	0.00	0.00	0.00	0.00	0.00
San Angelo	0	0.00	1.95	0.00	22.15	0.00	37.89	0.00	38.01	0.00	0.00	0.00	0.00	0.00	0.00
San Antonio	1	12.50	1.89	0.00	36.43	0.00	38.94	100.00	22.74	0.00	1.47	0.00	0.00	4.17	0.00
Wichita Falls	1	12.50	1.83	0.00	23.79	0.00	25.70	100.00	48.67	0.00	16.67	0.00	0.00	20.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: TEXAS		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses**	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Dallas	17,198	37.47	3.40	2.89	19.01	18.41	31.41	29.07	45.04	49.63	11.46	11.04	12.04	11.23	11.47
Limited Review:															
Abilene	388	0.85	0.00	0.00	22.37	26.55	46.41	41.75	30.50	31.70	9.61	0.00	12.17	7.92	10.60
Austin	4,767	10.39	3.93	3.38	14.82	15.29	37.54	38.81	43.64	42.52	6.68	6.68	7.82	7.04	6.01
College Station	330	0.72	1.07	3.03	19.65	20.00	40.56	37.58	38.37	39.39	5.50	13.16	5.27	6.19	4.84
Fort Worth	6,916	15.07	2.64	2.83	18.62	19.46	38.35	35.43	40.39	42.28	10.45	11.79	10.17	10.06	10.80
Houston	10,623	23.14	3.77	4.35	20.05	26.57	27.62	29.69	47.97	39.39	5.33	5.88	7.37	6.20	4.13
Killeen	46	0.10	0.00	0.00	28.95	41.30	71.05	58.70	0.00	0.00	9.59	0.00	20.31	7.83	0.00
Midland	476	1.04	4.80	6.93	25.92	21.85	35.52	39.29	33.77	31.93	8.70	9.38	6.74	10.31	9.13
Texas Non-MSA	578	1.26	0.00	0.00	12.09	11.07	71.41	64.19	16.50	24.74	9.33	0.00	5.68	9.16	14.04
Odessa	227	0.49	1.24	3.52	16.49	20.26	39.30	43.17	42.97	33.04	5.68	15.79	7.26	6.72	4.02
San Angelo	211	0.46	1.59	0.95	12.81	15.17	52.66	46.45	32.95	37.44	9.48	8.33	9.33	8.31	10.94
San Antonio	3,872	8.44	1.66	1.94	27.08	29.70	26.68	24.28	44.34	44.09	8.12	7.71	9.08	8.34	7.54
Wichita Falls	266	0.58	0.74	0.75	25.57	25.94	38.22	33.08	35.47	40.23	9.08	16.67	9.67	8.49	9.91

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: TEXAS					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans						
Full Review:																
Dallas	0	0.00	2.35	0.00	16.99	0.00	39.73	0.00	40.54	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Abilene	0	0.00	0.00	0.00	16.01	0.00	46.86	0.00	37.13	0.00	0.00	0.00	0.00	0.00	0.00	
Austin	0	0.00	2.15	0.00	14.19	0.00	45.33	0.00	38.34	0.00	0.00	0.00	0.00	0.00	0.00	
College Station	3	75.00	0.11	0.00	8.87	0.00	45.13	100.00	45.89	0.00	1.72	0.00	0.00	2.94	0.00	
Fort Worth	0	0.00	1.44	0.00	14.23	0.00	49.59	0.00	34.73	0.00	0.00	0.00	0.00	0.00	0.00	
Houston	0	0.00	2.76	0.00	15.95	0.00	36.30	0.00	44.77	0.00	0.00	0.00	0.00	0.00	0.00	
Killeen	0	0.00	0.00	0.00	28.07	0.00	71.93	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Midland	0	0.00	2.38	0.00	23.38	0.00	42.42	0.00	31.82	0.00	0.00	0.00	0.00	0.00	0.00	
Texas Non-MSA	1	25.00	0.00	0.00	5.36	0.00	75.87	100.00	18.77	0.00	0.00	0.00	0.00	0.00	0.00	
Odessa	0	0.00	0.00	0.00	5.14	0.00	46.26	0.00	48.60	0.00	0.00	0.00	0.00	0.00	0.00	
San Angelo	0	0.00	0.51	0.00	3.74	0.00	64.46	0.00	31.29	0.00	0.00	0.00	0.00	0.00	0.00	
San Antonio	0	0.00	1.02	0.00	23.83	0.00	24.62	0.00	50.22	0.00	0.00	0.00	0.00	0.00	0.00	
Wichita Falls	0	0.00	0.00	0.00	12.22	0.00	52.72	0.00	35.05	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: TEXAS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ³⁷	% BANK Loans* ^{***}	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Dallas	1,998	23.53	21.36	5.71	17.86	20.77	20.11	16.27	40.67	57.26	3.24	2.87	3.32	2.50	3.57
Limited Review:															
Abilene	18	0.21	19.10	0.00	18.13	5.56	23.51	44.44	39.27	50.00	0.95	0.00	0.65	1.68	0.68
Austin	1,474	17.36	19.10	6.45	17.86	19.43	22.60	19.63	40.44	54.48	3.95	2.50	3.13	2.94	5.07
College Station	128	1.51	23.04	2.34	16.29	14.06	17.97	14.06	42.70	69.53	3.34	2.20	3.77	2.09	3.73
Fort Worth	693	8.16	19.56	7.66	18.54	16.18	21.67	19.51	40.24	56.65	2.24	1.71	1.38	1.82	3.07
Houston	2,625	30.91	22.45	4.08	17.28	15.60	18.81	17.85	41.46	62.47	3.08	2.30	2.26	2.49	3.72
Killeen	14	0.16	18.82	7.14	18.18	0.00	22.13	14.29	40.87	78.57	3.00	0.00	0.00	2.30	4.35
Midland	58	0.68	20.88	6.90	18.60	15.52	19.33	10.34	41.20	67.24	1.42	3.31	1.26	1.29	1.36
Texas Non-MSA	34	0.40	19.51	5.88	17.55	5.88	21.98	26.47	40.95	61.76	1.60	3.13	1.40	0.84	1.88
Odessa	20	0.24	21.22	0.00	17.50	25.00	21.98	25.00	39.30	50.00	1.56	0.00	2.02	0.86	1.93
San Angelo	13	0.15	19.43	0.00	18.37	15.38	22.83	15.38	39.38	69.23	0.84	0.00	0.00	0.45	1.52
San Antonio	1,414	16.65	22.01	3.32	18.14	16.69	20.22	30.83	39.63	49.15	4.45	2.92	3.79	4.89	4.65
Wichita Falls	4	0.05	18.22	0.00	19.08	25.00	23.92	75.00	38.78	0.00	0.47	0.74	0.29	1.14	0.13

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by bank.

37 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, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ³⁸	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Dallas	101	16.32	21.36	11.88	17.86	17.82	20.11	20.79	40.67	49.50	2.89	5.48	3.75	2.46	2.61
Limited Review:															
Abilene	21	3.39	19.10	9.52	18.13	38.10	23.51	28.57	39.27	23.81	4.13	0.00	11.32	5.80	1.79
Austin	66	10.66	19.10	12.12	17.86	21.21	22.60	19.70	40.44	46.97	1.93	2.01	1.87	1.01	2.34
College Station	10	1.62	23.04	10.00	16.29	30.00	17.97	10.00	42.70	50.00	2.94	0.00	8.70	0.00	2.75
Fort Worth	61	9.85	19.56	16.39	18.54	16.39	21.67	21.31	40.24	45.90	2.55	4.88	2.35	2.20	2.42
Houston	218	35.22	22.45	16.06	17.28	22.94	18.81	15.14	41.46	45.87	3.44	6.80	6.41	4.77	2.20
Killeen	1	0.16	18.82	0.00	18.18	0.00	22.13	0.00	40.87	100.00	0.00	0.00	0.00	0.00	0.00
Midland	6	0.97	20.88	0.00	18.60	16.67	19.33	50.00	41.20	33.33	1.32	0.00	3.45	0.00	1.37
Texas Non-MSA	12	1.94	19.51	16.67	17.55	8.33	21.98	33.33	40.95	41.67	3.54	16.67	3.57	4.88	1.71
Odessa	24	3.88	21.22	4.17	17.50	16.67	21.98	33.33	39.30	45.83	12.33	0.00	28.57	0.00	14.58
San Angelo	12	1.94	19.43	25.00	18.37	33.33	22.83	16.67	39.38	25.00	1.69	0.00	2.70	2.22	1.22
San Antonio	76	12.28	22.01	19.74	18.14	31.58	20.22	22.37	39.63	26.32	2.55	5.23	5.04	1.65	1.72
Wichita Falls	11	1.78	18.22	9.09	19.08	27.27	23.92	36.36	38.78	27.27	2.68	11.11	7.69	3.13	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

38 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, 2010 TO DECEMBER 31, 2011					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families**	% BANK Loans****	% Families ³⁹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Dallas	7,501	30.72	21.36	2.65	17.86	8.39	20.11	16.43	40.67	72.52	11.47	8.67	8.81	9.67	12.5	
Limited Review:																
Abilene	90	0.37	19.10	2.33	18.13	12.79	23.51	30.23	39.27	54.65	6.78	4.55	7.43	10.61	5.41	
Austin	4,198	17.19	19.10	3.01	17.86	10.08	22.60	18.73	40.44	68.18	10.76	7.61	8.29	8.63	12.2	
College Station	334	1.37	23.04	2.13	16.29	5.18	17.97	14.63	42.70	78.05	10.92	15.38	6.29	9.12	11.7	
Fort Worth	2,775	11.36	19.56	2.73	18.54	9.02	21.67	20.00	40.24	68.25	9.38	6.18	7.28	8.12	10.4	
Houston	7,352	30.11	22.45	1.96	17.28	7.74	18.81	14.84	41.46	75.46	9.76	6.62	7.73	8.22	10.5	
Killeen	27	0.11	18.82	0.00	18.18	4.76	22.13	23.81	40.87	71.43	9.38	0.00	0.00	5.71	12.5	
Midland	102	0.42	20.88	4.90	18.60	16.67	19.33	19.61	41.20	58.82	5.49	9.52	4.44	5.84	5.34	
Texas Non-MSA	138	0.57	19.51	4.38	17.55	12.41	21.98	24.09	40.95	59.12	7.89	13.64	20.00	8.50	6.47	
Odessa	90	0.37	21.22	2.25	17.50	20.22	21.98	23.60	39.30	53.93	10.05	8.33	12.33	12.88	8.66	
San Angelo	93	0.38	19.43	3.30	18.37	20.88	22.83	24.18	39.38	51.65	5.59	0.00	10.81	6.01	4.45	
San Antonio	1,644	6.73	22.01	3.89	18.14	10.59	20.22	19.66	39.63	65.86	8.40	7.05	6.80	7.44	9.06	
Wichita Falls	75	0.31	18.22	8.57	19.08	22.86	23.92	32.86	38.78	35.71	4.34	4.00	6.87	7.22	2.69	

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.4% of loans originated and purchased by bank.

³⁹ 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, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Dallas	17,316	37.57	66.71	69.43	99.70	0.17	0.13	11.46	19.27	
Limited Review:										
Abilene	388	0.84	67.13	67.53	99.23	0.77	0.00	9.61	12.83	
Austin	4,771	10.35	66.11	65.21	99.73	0.13	0.15	6.68	9.45	
College Station	330	0.72	68.67	63.33	96.97	1.21	1.82	5.50	6.76	
Fort Worth	6,916	15.01	67.38	68.52	99.80	0.13	0.07	10.45	16.05	
Houston	10,679	23.17	67.26	56.72	99.79	0.10	0.10	5.33	7.33	
Killeen	46	0.10	72.32	63.04	100.00	0.00	0.00	9.59	14.62	
Midland	476	1.03	64.39	54.62	95.59	1.26	3.15	8.70	13.55	
Texas Non-MSA	578	1.25	69.87	61.42	99.83	0.00	0.17	9.33	12.55	
Odessa	227	0.49	67.52	57.27	97.36	0.88	1.76	5.68	11.59	
San Angelo	211	0.46	65.88	74.88	99.05	0.47	0.47	9.48	16.82	
San Antonio	3,885	8.43	66.86	54.23	99.90	0.08	0.03	8.12	11.30	
Wichita Falls	266	0.58	70.21	60.90	100.00	0.00	0.00	9.08	13.67	

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 19.10% 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, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Dallas	0	0.00	96.75	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Abilene	0	0.00	97.98	0.00	0.00	0.00	0.00	0.00	0.00
Austin	0	0.00	97.52	0.00	0.00	0.00	0.00	0.00	0.00
College Station	3	75.00	97.62	100.00	66.67	0.00	33.33	1.72	2.30
Fort Worth	0	0.00	97.75	0.00	0.00	0.00	0.00	0.00	0.00
Houston	0	0.00	97.14	0.00	0.00	0.00	0.00	0.00	0.00
Killeen	0	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00
Midland	0	0.00	98.70	0.00	0.00	0.00	0.00	0.00	0.00
Texas Non-MSA	1	25.00	98.02	0.00	100.00	0.00	0.00	0.00	0.00
Odessa	0	0.00	97.66	0.00	0.00	0.00	0.00	0.00	0.00
San Angelo	0	0.00	97.62	0.00	0.00	0.00	0.00	0.00	0.00
San Antonio	0	0.00	97.44	0.00	0.00	0.00	0.00	0.00	0.00
Wichita Falls	0	0.00	98.53	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 25.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: TEXAS				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Dallas	12	76,062	56	6,861	68	82,923	20.22	0	0
Limited Review:									
Abilene	0	0	2	6	2	6	0.00	0	0
Austin	5	46,009	20	8,626	25	54,635	13.32	0	0
College Station	0	0	6	171	6	171	0.04	0	0
Fort Worth	4	9,543	15	1,714	19	11,257	2.74	0	0
Houston	14	95,290	21	26,921	35	122,211	29.79	0	0
Killeen	0	0	0	0	0	0	0.00	0	0
Midland	1	3,811	4	86	5	3,897	0.95	0	0
Texas Non-MSA	98	83,908	0	0	98	83,908	20.46	0	0
Odessa	0	0	4	30	4	30	0.01	0	0
San Angelo	0	0	0	0	0	0	0.00	0	0
San Antonio	9	42,857	22	1,254	31	44,111	10.75	0	0
Wichita Falls	2	3,117	3	3,919	5	7,036	1.72	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: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Dallas	25.37	23	23.00	4.35	8.70	34.78	52.17	1	2	0	0	- 1	0	8.03	27.71	32.30	31.96
Limited Review:																	
Abilene	3.32	5	5.00	0.00	40.00	20.00	40.00	0	0	0	0	0	0	0.00	21.53	52.62	24.84
Austin	6.73	7	7.00	0.00	0.00	28.57	71.43	0	0	0	0	0	0	8.95	24.44	37.89	28.51
College Station	16.53	6	6.00	16.67	33.33	50.00	0.00	0	0	0	0	0	0	2.05	26.77	41.70	23.71
Fort Worth	4.91	8	8.00	0.00	37.50	25.00	37.50	0	0	0	0	0	0	5.51	25.14	39.05	30.30
Houston	15.23	11	11.00	0.00	9.09	36.36	54.55	0	0	0	0	0	0	6.72	29.68	30.76	32.79
Killeen	0.43	1	1.00	0.00	100.0	0.00	0.00	0	0	0	0	0	0	0.00	21.94	78.06	0.00
Midland	8.00	4	4.00	25.00	0.00	25.00	50.00	0	0	0	0	0	0	5.79	19.81	43.64	30.76
Texas Non-MSA	7.49	17	17.00	0.00	17.65	76.47	5.88	0	0	0	0	0	0	0.00	11.73	72.88	15.39
Odessa	4.61	3	3.00	0.00	33.33	33.33	33.33	0	0	0	0	0	0	1.84	19.77	42.31	36.08
San Angelo	0.98	1	1.00	0.00	0.00	0.00	100.0	0	0	0	0	0	0	1.52	18.06	52.65	27.76
San Antonio	2.94	8	8.00	12.50	12.50	0.00	75.00	0	1	0	0	0	- 1	3.01	40.97	27.68	28.33
Wichita Falls	3.45	6	6.00	0.00	16.67	50.00	33.33	0	0	0	0	0	0	1.65	23.49	48.15	26.70

Table 1. Lending Volume

LENDING VOLUME		Geography: PHILADELPHIA MULTI						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Philadelphia PA	78.96	6,719	1,486,593	7,718	52,677	0	0	0	0	14,437	1,539,270	48.41
Limited Review:												
Camden NJ	10.15	636	112,488	1,220	5,194	0	0	0	0	1,856	117,682	1.32
Wilmington DE	10.88	1,036	204,061	949	4,410	0	0	5	32,160	1,990	240,631	50.27

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: PHILADELPHIA MULTI						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Philadelphia PA	680	81.44	8.68	4.41	18.44	15.74	33.17	28.38	39.71	51.47	1.14	0.93	1.00	0.97	1.34
Limited Review:															
Camden NJ	80	9.58	7.40	0.00	11.37	6.25	61.83	65.00	19.40	28.75	1.30	0.00	0.79	1.05	2.55
Wilmington DE	75	8.98	1.53	0.00	14.54	12.00	51.24	46.67	32.69	41.33	0.86	0.00	0.47	0.73	1.26

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: PHILADELPHIA MULTI								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia PA	120	73.62	8.68	7.50	18.44	12.50	33.17	22.50	39.71	57.50	0.89	1.06	0.50	0.72	1.20
Limited Review:															
Camden NJ	17	10.43	7.40	5.88	11.37	5.88	61.83	58.82	19.40	29.41	0.58	0.00	0.00	0.69	0.60
Wilmington DE	26	15.95	1.53	0.00	14.54	7.69	51.24	57.69	32.69	34.62	2.85	0.00	0.00	3.42	3.19

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: PHILADELPHIA MULTI Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia PA	5,917	80.06	8.68	1.17	18.44	7.23	33.17	25.38	39.71	66.22	4.21	2.87	3.86	3.71	4.55
Limited Review:															
Camden NJ	539	7.29	7.40	0.74	11.37	4.82	61.83	61.22	19.40	33.21	3.41	2.40	2.14	3.13	4.40
Wilmington DE	935	12.65	1.53	0.53	14.54	10.59	51.24	43.42	32.69	45.45	5.62	6.67	4.91	5.78	5.60

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: PHILADELPHIA MULTI Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses*	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia PA	7,668	78.01	7.35	6.14	15.75	13.86	29.30	33.14	46.94	46.86	5.64	8.23	6.77	6.48	4.83
Limited Review:															
Camden NJ	1,213	12.34	9.07	7.58	10.75	9.81	57.25	60.84	22.37	21.76	7.73	12.83	9.57	8.42	5.62
Wilmington DE	949	9.65	11.34	8.32	13.74	16.86	46.27	47.95	28.56	26.87	5.22	5.96	5.41	5.97	4.19

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: PHILADELPHIA MULTI						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ⁴⁰	% BANK Loans****	% Families*	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia PA	680	81.44	22.16	10.44	17.16	22.79	20.53	17.94	40.14	48.82	1.29	1.36	1.13	1.02	1.53
Limited Review:															
Camden NJ	80	9.58	23.31	17.50	19.16	25.00	23.76	21.25	33.78	36.25	1.59	0.98	1.06	1.37	2.92
Wilmington DE	75	8.98	18.53	10.81	17.33	21.62	23.55	24.32	40.59	43.24	0.99	0.39	0.58	1.29	1.72

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by bank.

⁴⁰ 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: PHILADELPHIA MULTI						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ⁴¹	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia PA	120	73.62	22.16	9.17	17.16	19.17	20.53	25.00	40.14	46.67	0.96	0.53	0.61	1.06	1.28
Limited Review:															
Camden NJ	17	10.43	23.31	5.88	19.16	11.76	23.76	47.06	33.78	35.29	0.62	1.83	0.52	0.41	0.38
Wilmington DE	26	15.95	18.53	15.38	17.33	7.69	23.55	19.23	40.59	57.69	3.06	2.33	1.40	1.60	5.88

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

⁴¹ 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: PHILADELPHIA MULTI Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Families ⁴²	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia PA	5,919	80.06	22.16	4.57	17.16	14.83	20.53	21.40	40.14	59.20	5.00	3.83	4.67	4.56	5.40
Limited Review:															
Camden NJ	539	7.29	23.31	5.62	19.16	20.97	23.76	31.27	33.78	42.13	4.29	3.15	4.08	4.84	4.23
Wilmington DE	935	12.65	18.53	6.60	17.33	20.67	23.55	29.00	40.59	43.72	7.35	5.09	7.48	8.36	7.09

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

42 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: PHILADELPHIA MULTI Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Philadelphia PA	7,718	78.06	64.12	59.30	99.43	0.22	0.35	5.64	8.11
Limited Review:									
Camden NJ	1,220	12.34	66.99	53.03	99.84	0.16	0.00	7.73	9.72
Wilmington DE	949	9.60	66.23	61.43	99.89	0.00	0.11	5.22	8.39

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 25.11% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: PHILADELPHIA MULTI				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Philadelphia PA	8	18,062	44	8,851	52	26,913	34.97	0	0
Limited Review:									
Camden NJ	0	0	1	5	1	5	0.01	0	0
Wilmington DE	3	4,274	12	45,758	15	50,032	65.02	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: PHILADELPHIA MULTI																	
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Philadelphia PA	48.41	21	91.30	4.76	9.52	23.81	61.90	0	0	0	0	0	0	12.19	20.88	31.83	34.94
Limited Review:																	
Camden NJ	1.32	1	4.35	0.00	0.00	100.0	0.00	0	0	0	0	0	0	13.86	13.93	56.36	15.81
Wilmington DE	50.27	1	4.35	0.00	0.00	0.00	100.0	0	0	0	0	0	0	4.17	17.63	50.63	27.58

Table 1. Lending Volume

LENDING VOLUME		Geography: DC MULTISTATE						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Washington DC	74.83	8,946	2,849,872	8,874	60,874	0	0	5	43,326	17,825	2,954,072	77.35
Limited Review:												
Bethesda MD	25.17	3,250	1,134,885	2,747	20,743	0	0	0	0	5,997	1,155,628	22.65

* Loan Data as of December 31, 2011. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 01, 2010 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: DC MULTISTATE						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Washington DC	1,320	75.95	2.38	5.45	15.89	17.58	39.12	34.02	42.60	42.95	1.44	2.35	1.53	1.34	1.44
Limited Review:															
Bethesda MD	418	24.05	0.38	0.48	14.09	16.03	44.17	40.19	41.36	43.30	2.34	2.04	1.67	2.01	3.04

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: DC MULTISTATE										Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Washington DC	141	71.57	2.38	0.71	15.89	12.06	39.12	26.24	42.60	60.99	1.91	0.81	1.19	1.23	2.81	
Limited Review:																
Bethesda MD	56	28.43	0.38	0.00	14.09	8.93	44.17	30.36	41.36	60.71	3.52	0.00	4.31	3.18	3.65	

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: DC MULTISTATE						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington DC	7,483	72.94	2.38	2.29	15.89	10.46	39.12	27.82	42.60	59.43	4.34	3.80	4.42	3.96	4.55
Limited Review:															
Bethesda MD	2,776	27.06	0.38	0.22	14.09	10.23	44.17	36.17	41.36	53.39	5.32	1.43	5.24	5.83	4.99

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: DC MULTISTATE						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington DC	2	100.00	12.41	50.00	37.89	50.00	28.26	0.00	21.44	0.00	0.87	2.13	1.04	0.00	0.00
Limited Review:															
Bethesda MD	0	0.00	1.33	0.00	43.88	0.00	41.97	0.00	12.82	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: DC MULTISTATE				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses*	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington DC	8,784	76.18	4.71	4.62	14.74	13.35	34.94	33.74	43.77	48.28	7.09	9.03	7.81	7.27	6.73
Limited Review:															
Bethesda MD	2,747	23.82	0.40	0.25	20.50	19.51	40.79	42.56	38.30	37.68	7.46	7.14	7.51	8.22	6.78

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: DC MULTISTATE								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families*	% BANK Loans****	% Families ⁴³	% BANK Loans****	% Families*	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington DC	1,320	75.95	20.18	12.03	17.24	25.29	21.50	24.22	41.08	38.46	1.60	1.49	1.72	1.53	1.61
Limited Review:															
Bethesda MD	418	24.05	17.70	13.46	17.89	25.00	22.34	20.19	42.07	41.35	2.63	2.63	2.68	2.24	2.86

* Based on 2011 Peer Mortgage Data (USPR)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

43 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: DC MULTISTATE						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁴⁴	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington DC	141	71.57	20.18	9.29	17.24	12.86	21.50	26.43	41.08	51.43	2.02	1.44	1.05	1.87	2.75
Limited Review:															
Bethesda MD	56	28.43	17.70	8.93	17.89	8.93	22.34	33.93	42.07	48.21	3.82	3.39	3.93	3.23	4.22

* Based on 2011 Peer Mortgage Data (USPR)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

⁴⁴ 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: DC MULTISTATE		Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011											
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	%Families ⁴⁵	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington DC	7,483	72.94	20.18	6.42	17.24	15.43	21.50	24.77	41.08	53.38	5.34	5.33	5.42	5.67	5.16
Limited Review:															
Bethesda MD	2,776	27.06	17.70	6.65	17.89	17.08	22.34	23.37	42.07	52.89	6.42	6.93	7.84	6.47	5.95

* Based on 2011 Peer Mortgage Data (USPR)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

45 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: DC MULTISTATE			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Washington DC	8,874	76.36	66.89	52.07	99.41	0.43	0.16	7.09	8.46
Limited Review:									
Bethesda MD	2,747	23.64	67.13	57.74	99.38	0.47	0.15	7.46	10.00

* Based on 2011 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 29.07% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: DC MULTISTATE				Evaluation Period: APRIL 1, 2010 TO DECEMBER 31, 2011			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Washington DC	21	33,842	97	31,835	118	65,677	80.19	0	0
Limited Review:									
Bethesda MD	4	15,428	17	794	21	16,222	19.81	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: DC MULTISTATE																	
Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Washington DC	77.35	30	76.92	20.00	13.33	20.00	46.67	1	0	1	0	0	0	6.63	23.40	35.81	33.98
Limited Review:																	
Bethesda MD	22.65	9	23.08	0.00	22.22	33.33	44.44	0	0	0	0	0	0	0.97	23.03	42.00	34.00