



PUBLIC DISCLOSURE

July 13, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

MUFG Union Bank, N.A.
Charter Number: 21541

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New York, NY 10020

Office of the Comptroller of the Currency

Large Bank Supervision
Constitution Center
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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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General Information and Overall CRA Rating

General Information

The Community Reinvestment Act (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 meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of MUFG Union Bank, N.A. (MUB or bank) issued by the Office of the Comptroller of the Currency (OCC), the institution's supervisory agency, as of July 13, 2015. 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 **Outstanding**.

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

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

*The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- A good geographic distribution of loans for small businesses and home mortgages.
- A borrower distribution of loans that was good for home mortgages and adequate for small loans to businesses.

- Lending levels reflect good responsiveness to the credit needs of the assessment areas (AAs).
- A high volume of community development loans, which were responsive to identified needs in the Bank's AAs had a significantly positive influence on the Lending Test particularly in the state of California.
- Excellent levels of qualified investments that are focused on affordable housing and small business development needs.
- An excellent distribution of branch offices for retail markets that makes MUB's products and services readily accessible to geographies and individuals of different income levels.
- Highly responsive and employs innovative community development services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, and are 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) – 2000 Census: 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.

Census Tract (CT) – 2010 Census: Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

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.

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 metropolitan area/assessment area.

Median Family Income (MFI) – 2000 Census: 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.

Median Family Income (MFI) – 2010 Census: The median income derived from the United States Census Bureau’s American Community Survey data every 5 years and used to determine the income level category of geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography, the median is the point at which half of the families have income above it and half below it.

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

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

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The MSA 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.

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) 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

MUFG Union Bank, N.A. (MUB) is an interstate full service commercial bank that operates in the states of California, Georgia, Illinois, New York, Oregon, Texas, and Washington. Headquartered in New York, New York, with the main banking office in San Francisco, California, MUB is the primary subsidiary of MUFG Americas Holdings Corporation (MUAH). MUAH is direct subsidiary of The Bank of Tokyo-Mitsubishi UFJ, Ltd. (BTMU), a bank organized under the laws of Japan, and a direct subsidiary of Mitsubishi UFJ Financial Group (NYSE: MTU). MTU is one of the world's largest financial organizations with total assets of approximately \$2.3 trillion, as of December 31, 2014. MUB's total assets for years ending 2014, 2013, and 2012 were \$113 billion, \$105 billion and \$96 billion respectively. MUB's Tier One Capital levels for years ending 2014, 2013, 2012 were \$12.1 billion, \$11.3 billion, and \$9.2 billion, respectively.

Effective July 1, 2014, the U.S branch banking operations of BTMU and MUB were reorganized under a new holding company renamed MUFG Americas Holding Company (MUAH). Concurrently, Union Bank, N.A., a wholly owned subsidiary of MUAH, was renamed MUFG Union Bank, N.A. (MUB) and its headquarters relocated from San Francisco to New York. The integration did not involve a legal entity combination, but rather an integration of personnel and certain business and support activities. As a result of this initiative, all of BTMU's banking activities in the Americas are managed by employees of MUB, which included the addition of approximately 2,300 U.S employees formerly employed by BTMU.

As of December 31, 2014, MUB operated 401 full-service branches throughout its seven-state AAs and has defined 40 separate AAs.

- MUB has its most significant presence in California where MUB gathers a predominance of deposits from 350 branches. Lending activity and branch offices are likewise most prevalent in California. Competition in California is intense and comprised of a myriad of financial institution types.
- MUB has one branch in Georgia located in the Atlanta-Sandy Springs-Roswell MSA that opened December 12, 2013.
- MUB has one branch in Illinois located in the Chicago-Naperville-Arlington Heights MD that opened April 16, 2012.
- MUB has one branch in New York, in the New York-White Plains-Wayne, NY-NJ MD.
- MUB has three branches in Oregon, two in the Portland portion of that multistate MSA and one in the Salem MSA. Portland is a multistate area, however, MUB only has one office in the Portland side of the MSA and therefore only includes that portion of the MSA in the AA.
- MUB has two branches in Texas, one in the Dallas-Plano-Irving, TX MD and one in the Houston-Woodlands-Sugar Land MSA that opened on July 11, 2012.
- MUB has 43 branches in Washington.

MUB provides a comprehensive array of financial services to individuals, small businesses, middle-market companies, major corporations, government agencies, not-for-profit organizations, corporate and multi-national companies headquartered in the United States, and the real estate development and real estate investment community. Also included are clients with large or unique cash management requirements, such as government entities and not-for-profits, national clients in communications, media, entertainment, energy, public

utilities, retailing, and other specialty industries. Consumer, consumer real estate, and agricultural lending represent smaller lines of business for the bank.

Under the CRA, MUB's primary lending products are residential lending and lending to small businesses. MUB's loan distribution for the evaluation period were 60 percent home mortgage loans, 39 percent small loans to businesses, and one percent small farm loans. Since the prior CRA Performance Evaluation, the bank increased its mortgage product offering to include Federal Housing Authority (FHA) loans. MUB also offers various special loan programs designed to accommodate small business needs and to foster their development. One of MUB's prominent programs is its Business Diversity Lending program, which focuses on making credit available to credit-worthy small businesses that are at least 51 percent owned and managed by women, minorities and service-disabled veterans. The flexible underwriting standards and intended market of this program make it unique, and under the Equal Credit Opportunity Act, it is considered a Special Purpose Credit Program. Under Fair Lending laws, this exclusive designation allows MUB to track various borrower profile items normally prohibited.

Another of MUB's programs is its Community Based Financing Program where the bank partners with community based financing organizations to provide non-traditional business financing for small businesses. Other small business programs offered by the bank include retail loans and lines of credit, including a cash reserve line tied to business checking, and various loan products guaranteed by the Small Business Administration. While MUB's lending niche emphasizes lending to small businesses, it also emphasizes an active jumbo mortgage loan program. The bank responds to other community credit needs, such as affordable housing to low- and moderate-income (LMI) geographies and borrowers, through extensive transactions associated with low-income housing and other community development (CD) loans, investments and services. We assessed limited CD service affiliate activity in the New York AA from BTMU prior to the merger. This activity was not considered in other CRA performance evaluations.

There are no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs. The prior evaluation by the OCC of MUB's CRA performance was in March 31, 2012 when the Union Bank, N.A. bank received a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation considered MUB's HMDA-reportable loans (home purchase, home improvement and home refinance), small loans to businesses, and small loans to farms for the calendar years 2012, 2013, and 2014. CD lending, qualified investments, retail and CD services and branch distribution were evaluated for the period beginning April 1, 2012 through December 31, 2014. The evaluation dates for the Chicago, Atlanta and Houston-Woodlands-Sugarlands branches coincide with the branch opening dates noted in the Description of Institution section.

Data Integrity

We tested the accuracy of MUB's reported data utilized in this evaluation during a CRA Data Integrity examination conducted in October 2014. We also validated the accuracy of community development loans, investments, and services. For 2014 HMDA data, we relied on the Consumer Financial Protection Bureau (CFPB) evaluation of MUB's data collection systems and internal controls for ensuring the accuracy of the data.

The Office of Management and Budget (OMB) revised the MA and census tract geographic definitions and boundaries in February 2013. Those revisions became effective for CRA purposes on January 1, 2014. While the bank did not alter its assessment area (AA) during the evaluation period, demographic data and loan data for 2014 are presented separately in this evaluation because the OMB MA changes may have affected the bank's AA delineation and/or HMDA reportable data geocoding. Therefore we relied on tables from January 1, 2012 through December 31, 2013 and the second set of tables January 1, 2014 to December 31, 2014.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed MUB's home mortgage and small loans to businesses activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. The Bank's AAs consists of whole geographies, meets the requirements of the CRA regulation, and do not arbitrarily exclude any LMI areas.

Inside/Outside Ratio

We performed an analysis of the inside/outside loan ratio at the bank level. Our analysis does not consider affiliate lending under this performance criteria. For the combined three-year evaluation period, MUB originated a substantial majority of its reportable loan products in its AAs. The Bank originated or purchased 99 percent of its home mortgage loans and 99 percent of its small loans to businesses in its AAs during the evaluation period. This performance was a positive factor in the conclusions for MUB's geographic distribution of home mortgage loans and small loans to businesses.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, we selected a sample of AAs within that state for full-scope reviews. We chose full-scope AA using various factors including those AAs having the highest representation of deposits and, where lending activity and number of branches are significant. Refer to the “Scope” section under each State Rating section for details regarding how the areas were selected.

Ratings

We rated the Bank’s overall CRA performance based upon the state ratings. We placed considerably greater emphasis on the performance in California since MUB generates 91 percent of the deposits from the California markets, and MUB’s lending volume and branch locations are most heavily concentrated in California.

The individual state ratings are derived primarily from those AAs receiving full-scope reviews. The aggregate deposits represented by these full-scope AAs provided a significant majority of their state’s deposit gatherings. For the state of California, full-scope review AAs receiving the greatest emphasis are the Los Angeles-Long Beach-Glendale MD, San Francisco-Redwood City-South San Francisco MD, San Diego-Carlsbad MSA, Oakland-Hayward-Berkeley MD, and the Fresno MSA. For the states of Oregon and Washington the ratings were influenced most by the respective full-scope AAs reviewed there. For the commercial branch states of New York, Georgia, Illinois, and Texas, the ratings were influenced most by the respective full-scope AAs with the performance context consideration that these branches do not solicit retail deposits.

Refer to the “Scope” section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

MUB’s overall CRA rating is driven primarily by its Lending Test performance (50 percent), followed by the Investment Test (25 percent) and Service Test (25 percent). Lending Test conclusions were influenced most by MUB’s performance with home mortgage purchase lending followed by small loans to businesses. This weighting considers the respective volume in these lending categories, AA credit needs, and MUB’s increase in home mortgage purchase lending. Home improvement loans represented only 2% of mortgage loans reported, multifamily loans represented less than 1% of loans reported, and small loans to farms represented less than 1% of loan volumes overall and are not a primary product lines for the bank. While we analyzed loan products in AAs with loan volumes over 50 loans, these loan categories did not have significant weight under the Lending Test conclusions, and, as a result, may not have received a write-up in the narrative. Community development loan activity affected Lending Test conclusions for each full-scope AA. Positive community development loan activity may or may not elevate an overall Lending Test rating and would depend upon Lending Test component performance and various other factors including loan volume, AA credit needs, and performance context. Positive community development had a neutral impact on AAs with outstanding lending performance based on primary lending products.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices.

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

State Rating

State of California

CRA Rating for California:	<u>Outstanding</u>
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>Outstanding</u>
The service test is rated:	<u>Outstanding</u>

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to the credit needs of the AAs.
- MUB's distribution of loans among geographies is good. Performance for home mortgage loans is good and small loans to businesses is good.
- MUB's distribution of loans to individuals and businesses of different income levels is good with good performance for home mortgage loans by income level of the borrower and good performance of small loans to businesses of different sizes.
- An excellent level of community development and flexible lending that had a positive impact on MUB's lending test rating considering the affordability issues in California.
- An excellent level of qualified investments focused on affordable housing and small business development needs.
- MUB's distribution of branch offices is readily accessible to geographies and individuals of different income levels and the level of community development services are excellent.

Description of Institution's Operations in California

MUB's most significant banking presence is in the state of California where it is the fourth largest deposit-taking financial institution with over seven percent of the state's deposits, based on the June 2014 Summary of Deposit Report. Other large institutions include Bank of America, N.A. with 24 percent, Wells Fargo Bank, N.A. with 20 percent, and JP Morgan Chase, N.A. with nine percent. MUB operates 350 branches in 27 AAs within the state. As well, 91 percent of its deposits and 94 percent of its reportable loans are in California. As a contextual matter, we considered the Bank's actual deposit gatherings, particularly from the Los Angeles-Long Beach-Glendale MD. A significant number of deposit relationships are corporate or municipal entities with multiple accounts centrally booked in one of the Los Angeles-area offices, but MUB manages these relationships out of these locations. The OCC considered the primary addresses of the customers associated with these accounts that are located elsewhere. In 2014, the bank reported \$36.1 billion in deposits for the MSA of which \$12.7 billion represented accounts located outside of the Los Angeles-Long Beach-Glendale MD. MUB allocated these deposits, many from states where MUB does not have operations on

a pro-rata share across the bank's footprint. After MUB fully allocated deposits based upon their physical location and the pro-rata share, the Los Angeles-Long Beach-Glendale MD reflected \$24.3 billion in total deposits – roughly two thirds of the level reported by the FDIC Summary of Deposits. This contextual matter also applies to other AAs, but to a lesser extent. We considered in our analysis the primary address locations and its effect on each of the bank's AAs in California.

We also considered the significant affordability barriers that exist in the California housing market. According to the housing affordability index used by the California Association of Realtors (CAR)¹, as of Q3 2014, only 30 percent of California households were able to afford a home based on traditional underwriting criteria and household income levels. According to the data from the CAR website, the median sales price for existing homes throughout the entire state of California as of December 2014 was \$453,780. Over the course of the exam period, median housing values have increased from \$271,490, representing a 67 percent increase in housing values throughout California², while the housing affordability index declined for the state by 25 points.

In each of the bank's full-scope AAs, CAR reports median housing value ranged between \$204,430 and \$1,010,412 as of year-end 2014 as compared to the national average in the \$217,000 range (source: National Association of Realtors³). The minimum household income needed to afford a home in California based on a traditional 30-year loan term, with 10 percent down, was nearly \$94,000 annually, whereas the median family income in California was \$66,894. This affordability issue has a significant effect on a lender's ability to originate home purchase, home improvement, and home refinance loans to both low- and moderate-income borrowers. Poverty levels, which range from nine to 19 percent in the bank's full scope AAs, disproportionately add to the challenges of credit qualification for homeownership for both low- and moderate-income families. These factors bring significant challenges to lenders in their ability to reach demographic parity. In our evaluation of MUB's home mortgage lending performance, we considered these factors throughout our analysis to reflect this significant performance context.

We took public comments and information from community groups into consideration. Refer to the Market Profiles for the state of California in Appendix C for detailed demographics and other contextual information for the full-scope AAs.

Scope of Evaluation in California

We performed full-scope reviews of the Fresno MSA, the Los Angeles-Long Beach-Glendale MD, the Oakland-Hayward-Berkeley MD, the San Diego-Carlsbad MSA, and the San Francisco-Redwood City-South San Francisco MD. We performed limited-scope reviews of the remaining AAs in the state of California which include the following: Bakersfield MSA, El Centro MSA, the Hanford-Corcoran MSA, the Madera MSA, the Modesto MSA, the Oxnard-Thousand Oaks-Ventura MSA, the Redding MSA, the Riverside-San Bernardino-Ontario MD, the Sacramento-Roseville-Arden-Arcade MSA, the Salinas MSA, the San Jose-Sunnyvale-Santa Clara MSA, the San Luis Obispo-Paso Robles-Arroyo Grande MSA, the San Rafael

¹ <http://www.car.org/marketdata/data/haitraditional/>

² <http://www.car.org/marketdata/data/housingdata/>

³ <http://www.realtor.org/topics/housing-affordability-index>

MSA, the Anaheim-Santa Ana-Irvine MD, the Santa Maria-Santa Barbara MSA, the Santa Cruz-Watsonville MSA, the Santa Rosa-Petaluma MSA, the Stockton-Lodi MSA, the Vallejo-Fairfield MSA, the Visalia-Porterville MSA, the Yuba City MSA, and the non-MSA. In evaluating MUB's lending record, the ratings were influenced primarily by those areas that received full scope reviews. Note that we weighted the full scope AAs based on their relative weight using deposit and loan activity within the state. For example, Los Angeles-Long Beach-Glendale MD and San Diego-Carlsbad MSA account for over 50% of the California weighting and therefore had more influence than the other full-scope AAs.

Total reportable loans during the review period consist of the following: sixty percent home mortgage loans, 39 percent small loans to businesses, and one percent small farm loans. MUB is not an agricultural lender and therefore does not attempt to compete with banks that specialize in agricultural lending. Therefore due to the small number of small farm loans, we did not perform an analysis of these loans. Within home mortgage loans, 33 percent is home purchase, 62 percent is home refinance, three percent is home improvement and two percent is multifamily. We only analyzed home improvement and multifamily loans for the Los Angeles-Long Beach-Glendale MD since home improvement lending is not a major product line for the bank and therefore does not provide meaningful analysis. In our evaluation of the bank's lending test, we placed greater weight on home mortgage lending; within home mortgage lending, we placed the most weight on home refinance lending since this represents the majority of the bank's home mortgage lending. In addition, proportionally, we placed greater weight on the Los Angeles-Long Beach-Glendale MD, since 30 percent of MUB's loans and 33 percent of the bank's deposits are centered in this AA. As noted above, we considered the allocated deposits into the performance context. In assessing the bank's lending performance, we considered the housing affordability and the relatively low median family income in the Los Angeles-Long Beach-Glendale MD as well as the high cost of homes in all AAs within the state of California.

In our analyses, we considered the Office of Management and Budget (OMB) MA geographic boundary revisions, which became effective for CRA purposes on January 1, 2014. The 2010 Census data changes that applied beginning on January 1, 2012 and the MA changes that applied beginning January 1, 2014 affect data collection requirements and CRA evaluation procedures. Since some of these changes affected the delineation of some of MUB's AAs, separate analyses of the 2012/2013 loan data and the 2014 loan data were necessary.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in California is rated "High Satisfactory". Based on full-scope reviews, the bank's performance is excellent in the Fresno MSA and good in the Los Angeles-Long Beach-Glendale MD, the Oakland-Hayward-Berkeley MD, the San Diego-Carlsbad MSA, and the San Francisco-Redwood City-South San Francisco MD.

Lending Activity

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

Overall, MUB's lending activity in the state of California is good. MUB has excellent lending activity in the Los Angeles-Long Beach-Glendale MD and the San Francisco-Redwood City-South San Francisco MD; and good activity in, the Oakland-Hayward-Berkeley MD, and the San Diego-Carlsbad MSA and adequate in the Fresno MSA. We based our lending activity comments on June 30, 2014 deposit market data and the 2013 loan market data for each AA. We placed more weight on the dollar volume of market share for small loans to businesses since some financial institutions originate a substantial number of credit cards with small dollar balances, which can substantially affect their rank and market share. We also considered that the competition, particularly for mortgage loans, is more significant than it is for deposits. Consequently, we did not expect that rank and market share for loans would match deposit rank and market share to be considered excellent. For example in some markets we considered 95 percent of market share to be excellent.

Fresno MSA

Lending activity in the Fresno MSA is adequate. MUB has 7.1 percent of the market's deposit base and ranks fourth among 25 financial institutions that compete for deposits in this AA. In comparison, the bank has a market share of 5.58 percent and ranks fifth among 64 lenders who compete for small loans to businesses. For home mortgage loans, MUB has a market share of 0.30 percent and ranks 48 among 408 financial institutions that compete for these loans.

Los Angeles-Long Beach-Glendale MD

Lending Activity in the Los Angeles-Long Beach-Glendale MD is excellent. MUB has 11.40 percent of the market's deposit base and ranks third in deposit market share among 111 financial institutions that compete for deposits in this AA. In comparison, the bank has a 3.96 percent market share and ranks fifth among 165 financial institutions that compete for small loans to businesses. For home mortgage loans, MUB has a market share of 2.68 percent and ranks sixth among 788 institutions that compete for these loans in this AA. We considered lending activity to be excellent despite the lower market share of home mortgage loans due to the intense competition for home mortgage loans. Significant competitors include nonbank financial institutions such as Quicken Loans, Penny Mac, AmeriHome Mortgage, Stearns Lending, and PHH Mortgage. Some of these financial institutions are able to dominate the market because they are willing to make riskier loans at a time when regulated banks are pulling back from the subprime market.

Oakland-Hayward-Berkeley MD

Lending activity in the Oakland-Hayward-Berkeley MD is good. MUB has 2.79 percent of the market's deposit base and ranks ninth in deposit market share among 51 financial institutions that compete for deposits in this AA. The bank has a market share of 2.74 percent and ranks 11th among 107 financial institutions that compete for small loans to businesses. For home mortgage loans, MUB has a market share of 1.23 percent and ranks 19th among 613 institutions that compete for these loans in this AA.

San Diego-Carlsbad MSA

Lending activity in the San Diego-Carlsbad MSA is good. MUB has 17.99 percent of the market's deposit base and ranks second in deposit market share among 52 financial institutions that compete for deposits in this AA. In comparison, the bank has a market share of 8.67 percent and ranks second among 120 financial institutions that compete for small loans to

businesses. For home mortgage loans, MUB has a market share of 1.98 percent and ranks ninth among 678 financial institutions that compete for these loans in this AA. We considered lending to be good despite the lower market share of home mortgage loans because of the intense competition for home mortgage loans from nonbank financial institutions in this AA.

San Francisco-Redwood City-South San Francisco MD

Lending activity in the San Francisco-Redwood City-South San Francisco MD is excellent. MUB has 2.53 percent of the market's deposit base and ranks seventh in deposit market share among 54 financial institutions that compete for deposits in this AA. In comparison, the bank has a market share of 3.48 percent and ranks ninth among 109 financial institutions that compete for small loans to businesses. For home mortgage loans, MUB has a market share of 3.22 percent and ranks eighth among 538 financial institutions that compete for these loans in this AA.

Distribution of Loans by Income Level of the Geography

Overall, MUB's geographic distribution of home purchase and small loans to businesses in the state of California is good. It is adequate in the Los Angeles-Long Beach-Glendale MD; it is good in the Fresno MSA and the Oakland-Hayward-Berkeley MD; excellent in the San Diego-Carlsbad MSA, and good in the San Francisco-Redwood City-South San Francisco MD. We placed more weight on 2012/2013 performance, we also considered that in all the full-scope AAs, the bank's 2014 performance was consistent with its 2013/2013 performance.

Home Mortgage Loans

MUB's geographic distribution of home mortgage loans is good.

Refer to Tables 2, 3, 4, and 5 for the applicable evaluation period 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 and purchases.

Market share data for 2014 was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

Fresno MSA

MUB's combined 2012-2013 and 2014 HMDA geographic distribution in the Fresno MSA is good.

2012-2013

MUBs geographic distribution of home purchase loans in the Fresno MSA is excellent. The bank's distribution of home purchase loans in both low- and moderate-income CTs exceeded the percentage of owner-occupied units in these CTs, which is excellent. MUB's market share of loans also exceeded overall market share in both low- and moderate-income CTs, and is excellent.

MUB's geographic distribution of home refinance loans in the Fresno MSA is adequate. The bank's geographic distribution of home refinance loans in both low- and moderate-income CTs was below the percentage of owner-occupied units, but it is adequate. Market share of loans in

low-income CTs exceeded overall market share and is excellent. Market share in middle-income CTs substantially met overall market share, which is good.

2014

MUB's geographic distribution of home mortgage loans in 2014 in the Fresno MSA is consistent with 2012/2013.

MUB's geographic distribution of home purchase loans during 2014 in the Fresno AA was good. The bank's geographic distribution of home purchase loans in low-income CTs was below the percentage of owner-occupied units, but it is adequate taking into consideration that the low-income census tract provide limited lending opportunities. Geographic distribution of these loans in moderate-income CTs exceeded the percentage of owner-occupied units, which is excellent. We gave more weight to the moderate-income census tract due to the difficulties of home purchase lending in the low-income tracts in Fresno.

MUB's geographic distribution of home refinance loans during 2014 in the Fresno MSA is excellent. The bank's geographic distribution of these loans in both low- and moderate-income CTs exceeded the percentage of owner-occupied units and is excellent.

Los Angeles-Long Beach-Glendale MD

MUB's combined 2012-2013 and 2014 HMDA geographic distribution in this AA is adequate.

2012/2013

MUB's geographic distribution of home purchase loans in this AA is adequate. The bank's geographic distribution of these loans in low-income CTs was near to the percentage of owner-occupied units and is good. Market share was below overall market share, but it is adequate. The bank's geographic distribution of home purchase loans was below the percentage of owner-occupied units in moderate-income CTs and is adequate. MUB's market share was also below overall market share, and it is adequate.

MUB's geographic distribution of home improvement loans in this AA is adequate. The bank's percentage of these loans in low-income CTs was below the percentage of owner-occupied units, but it is adequate. However, market share exceeded overall market share, which is excellent. The bank's percentage of loans in moderate-income CTs was substantially below the percentage of owner-occupied units, and it is very poor. Market share is below overall market share, but it is adequate.

MUB's geographic distribution of home refinance loans in this AA is adequate. The percentage of the bank's loans is substantially below the percentage of owner-occupied units in both low- and moderate-income CTs and is very poor. Market share substantially meets market share for loans in both low- and moderate-income CTs, and it is good.

MUB's geographic distribution of multi-family loans in this AA is good. The percentage of the bank's loans is near to the percentage of multi-family units in low-income CTs and is good. The percentage of the bank's loans in moderate-income CTs exceeds the percentage of multi-family housing units and is excellent. Market share of loans in low-income CTs was substantially below overall market share and is very poor. However, market share in moderate-income CTs substantially meets overall market share, and is good.

2014

MUB's geographic distribution of home mortgage loans in 2014 in Los Angeles-Long Beach-Glendale MD is stronger than in 2012/2013.

The geographic distribution of home purchase loans in 2014 in this AA is excellent. The percentage of loans in both low- and moderate-income CTs exceeds the percentage of owner-occupied units in these CTs.

MUB's geographic distribution of home improvement loans in 2014 in the Los Angeles-Long Beach-Glendale AA is excellent. The percentage of the bank's loans exceeds owner-occupied units in both low- and moderate-income CTs, which is excellent.

The bank's geographic distribution of home refinance loans in 2014 in this AA is excellent. The percentage of the bank's loans exceeds the percentage of owner-occupied units in both low- and moderate-income CTs and is excellent.

MUB's geographic distribution of multi-family loans in 2014 in this AA is good. The percentage of these loans in low-income CTs was below the percentage of multi-family units, which is adequate. The percentage of these loans in moderate-income CTs exceeds the percentage of multi-family units, and is excellent.

Oakland-Hayward-Berkeley MD

MUB's combined 2012-2013 and 2014 HMDA geographic distribution in this AA is good.

2012/2013

MUB's geographic distribution of home purchase loans in the Oakland-Hayward-Berkeley MD is good. The geographic distribution of these loans in low-income CTs exceeded the percentage of owner-occupied units and is excellent. Market share also exceeds overall market share and is excellent. The percentage of the bank's loans in moderate-income CTs was below the percentage of owner-occupied units, but it is adequate. Market share was below overall market share, which is adequate.

The bank's geographic distribution of home refinance loans in this AA is poor. The percentage of the bank's loans was substantially below the percentage of owner-occupied units in both low- and moderate-income CTs, and is very poor. However, the bank's market share in both low- and moderate-income CTs substantially meets overall market share and is good.

2014

As noted below, geographic distribution in the Oakland-Hayward-Berkeley MD is stronger in 2014 than in 2012/2013.

MUB's geographic distribution of home purchase loans in 2014 in the Oakland-Hayward-Berkeley MD is good. The distribution of the bank's loans was near to the percentage of owner-occupied units in both low- and moderate-income CTs, which is good.

MUB's geographic distribution of home refinance loans in this AA in 2014 is excellent. The distribution of the bank's loans exceeds the percentage of owner-occupied units in both low- and moderate-income CTs.

San Diego-Carlsbad MSA

MUB's combined 2012-2013 and 2014 HMDA geographic distribution in this AA is excellent.

2012/2013

MUB's geographic distribution of home purchase loans in the San Diego-Carlsbad MSA is good. The bank's distribution of loans exceeds the percentage of owner-occupied units in low-income CTs and is excellent. The bank's market share of loans in low-income CTs exceeds overall market share, and is excellent. It was below the percentage of owner-occupied units in moderate-income CTs, but it is adequate. Market share substantially meets overall market share in moderate-income CTs, which is good.

The bank's geographic distribution of home refinance loans in this AA is excellent. The bank's percentage of home refinance loans in low-income CTs exceeds the percentage of owner-occupied units and is excellent. The percentage of these loans in moderate-income CTs was near to the percentage of owner-occupied units, which is good. The bank's market share in both low- and moderate-income CTs exceeds overall market share, and is excellent.

2014

As noted below, geographic distribution in the San Diego-Carlsbad MSA is stronger in 2014 than in 2012/2013.

MUB's geographic distribution of home purchase loans in 2014 in the San Diego-Carlsbad MSA is excellent. The percentage of the bank's loans exceeds the percentage of owner-occupied units in both low- and moderate-income CTs.

The bank's geographic distribution of home refinance loans in this AA is excellent. The percentage of the bank's loans exceeds the percentage of owner-occupied units in both low- and moderate-income CTs.

San Francisco-Redwood City-South San Francisco MD

MUB's combined 2012-2013 and 2014 HMDA geographic distribution in this AA is excellent.

2012/2013

MUB's geographic distribution of home purchase loans in this AA is good. The percentage of the bank's loans exceeds the percentage of owner-occupied units in low-income CTs and is excellent. Market share in low-income CTs also exceeds overall market share, which is excellent. Distribution of loans in moderate-income CTs was substantially below the percentage of owner-occupied units and is very poor. However, the bank's market share in moderate-income CTs substantially meets overall market share and is good.

MUB's geographic distribution of home refinance loans in this AA is excellent. The bank's distribution of these loans in low-income CTs exceeds the percentage of owner-occupied units and is excellent. The percentage of home refinance loans was below the percentage of owner-occupied units in moderate-income CTs, but it is adequate. The bank's market share in both low- and moderate-income CTs exceeds overall market share and is excellent.

2014

As noted below, geographic distribution in the San Francisco-Redwood City-South San Francisco MD is stronger in 2014 than in 2012/2013.

The bank's geographic distribution of home purchase loans in 2014 in the San Francisco-San Mateo-Redwood City MD is excellent. MUB's percentage of loans exceeds the percentage of owner-occupied units in both low- and moderate-income CTs and is excellent.

MUB's geographic distribution of home refinance loans in 2014 in this AA is excellent. The bank's percentage of home refinance loans exceeds the percentage of owner-occupied units in both low- and moderate-income CTs and is excellent.

Small Loans to Businesses

MUB's combined 2012-2013 and 2014 small loans to businesses geographic distribution in California is good.

Refer to Table 6 for the applicable evaluation period 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.

MUB's combined 2012-2013 and 2014 geographic distribution of small loans to businesses performance in California is good.

Fresno MSA

MUB's combined 2012-2013 and 2014 small loans to businesses geographic distribution in this AA is excellent.

2012/2013

MUB's geographic distribution of small loans to businesses in this AA is excellent. The percentage of the bank's loans exceeds the percentage of businesses in low-income CTs, which is excellent. In moderate-income CTs, the percentage of the bank's loans was near to the comparator, and it is good. MUB's market share exceeds overall market share in both low- and moderate-income CTs and is excellent.

2014

MUB's geographic distribution of small loans to businesses in the Fresno MSA in 2014 is consistent with the 2012/2013 performance.

MUB's geographic distribution of small loans to businesses in this AA is excellent. The percentage of the bank's loans exceeds the percentage of businesses in low-income CTs, which is excellent. In moderate-income CTs, the percentage of the bank's loans was near to the comparator, and it is good.

Los Angeles-Long Beach-Glendale MD

MUB's combined 2012-2013 and 2014 small loans to businesses geographic distribution in this AA is good.

2012/2013

MUB's geographic distribution of small loans to businesses in this AA is good. In low-income CTs, the percentage of the bank's loans is near to the percentage of businesses and is good; market share exceeds overall market share and is excellent. In moderate-income CTs, the

percentage of the bank's loans was below the percentage of businesses, but it is adequate. Market share substantially meets overall market share, and it is good.

2014

MUB's geographic distribution of small loans to businesses in the Los Angeles-Long Beach-Glendale MD in 2014 is consistent with the 2012/2013 performance.

The bank's geographic distribution of small loans to businesses in 2014 in this AA is good. In both low- and moderate-income CTs, the percentage of the bank's loans was near to the percentage of businesses, which is good.

Oakland-Hayward-Berkeley MD

MUB's combined 2012-2013 and 2014 small loans to businesses geographic distribution in this AA is excellent.

2012/2013

MUB's geographic distribution of small loans to businesses in this AA is excellent. In both low- and moderate-income CTs, the percentage of the bank's loans exceeds the percentage of businesses in those CTs and is excellent. Market share in both low- and moderate-income CTs exceeds overall market share, which is excellent.

2014

MUB's geographic distribution of small loans to businesses in the Oakland-Hayward-Berkeley MD in 2014 is weaker than 2012/2013 performance.

The bank's geographic distribution of small loans to businesses in 2014 in this AA is good. The percentage of the bank's loans substantially meets the percentage of businesses in both low- and moderate-income CTs.

San Diego-Carlsbad MSA

MUB's combined 2012-2013 and 2014 small loans to businesses geographic distribution in this AA is excellent.

2012/2013

MUB's geographic distribution of small loans to businesses in this AA is excellent. The percentage of the bank's loans was near to the percentage of businesses in low-income CTs and is good. It exceeds the percentage in moderate-income CTs, which is excellent. The bank's market share exceeds overall market share in both low- and moderate-income CTs, which is excellent.

2014

MUB's geographic distribution of small loans to businesses in the San Diego-Carlsbad MSA in 2014 is consistent with 2012/2013 performance.

The percentage of the bank's loans is near to the percentage of businesses in low- income CTs and is good. It exceeds the percentage in moderate-income CTs, which is excellent.

San Francisco-Redwood City-South San Francisco MD

MUB's combined 2012-2013 and 2014 small loans to businesses geographic distribution in this AA is good.

2012/2013

MUB's geographic distribution of small loans to businesses in this AA is good. The distribution of the bank's loans exceeds the percentage of businesses in low-income CTs and is excellent. Market share also exceeds overall market share, which is excellent. The percentage of the bank's loans in moderate-income CTs was below the percentage of businesses in these CTs, but it is adequate. Market share in moderate-income CTs was also below overall market share and is adequate.

2014

MUB's geographic distribution of small loans to businesses in the San Francisco-Redwood City-South San Francisco MD in 2014 is stronger than 2012/2013 performance.

MUB's geographic distribution of small loans to businesses in 2014 in this AA is excellent. The distribution of the bank's loans exceeds the percentage of businesses in both low- and moderate-income CTs.

Distribution of Loans by Income Level of the Borrower

Overall, MUB's distribution of home mortgage and small loans to businesses in the state of California reflects good penetration among retail customers of different income levels and businesses of different sizes. Distribution is good in the Fresno MSA, it is adequate in the Los Angeles-Long Beach-Glendale MD, Oakland-Hayward-Berkeley MD, and good in the San Diego-Carlsbad MSA; and it is adequate in the San Francisco-Redwood City-South San Francisco MD. In concluding on the bank's performance in its full-scope AAs, we considered performance context factors, such as the high cost of housing in all of the AAs in the state of California, and the relatively low median family income in the Los Angeles-Long Beach-Glendale MD. We also considered the nature and impact of competition on lending opportunities across market segments, particularly low- and moderate-income borrowers, given the bank's product offerings, including efforts to improve performance through flexible lending products.

Home Mortgage Loans

MUB's distribution of home mortgage loans reflects good penetration among retail customers of different income levels

Refer to Tables 8, 9 and 10 for the applicable evaluation period 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.

Fresno MSA

MUB's borrower distribution of HMDA loans is good in this AA.

2012/2013

MUB's distribution of home purchase loans to borrowers in the Fresno MSA reflects good penetration among retail customers of different income levels. The bank's percentage of loans to low-income borrowers was below the percentage of low-income families, but it is adequate, given the high cost of housing. The bank's percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families, which is excellent. The bank's market share of loans to low and moderate-income borrowers exceeds overall market share and is excellent.

MUB's distribution of home refinance loans to borrowers in the Fresno MSA reflects good penetration among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was below the percentage of low-income families and is poor. While the comparator is poor, considering the difficulties lending to low-income families and economic conditions in this AA we considered MUB's performance adequate. The bank's market share of home refinance loans to low-income borrowers meets overall market share and is excellent. In addition, the bank's percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent. The bank's market share of loans to moderate-income families exceeds overall market share, which is excellent.

2014

MUB's distribution of home mortgage loans to borrowers in the Fresno MSA in 2014 weaker than the 2012/2013 performance as noted below.

The bank's distribution of home purchase loans to borrowers in the Fresno MSA reflects adequate penetration among retail customers of different income levels. MUB's percentage of loans to low-income borrowers was substantially below the percentage of low-income families, and it is very poor. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families, which is excellent.

MUB's distribution of home refinance loans reflects adequate penetration among retail customers of different income levels. The bank's percentage of loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. However, the percentage of loans to moderate-income families was near to the percentage of moderate-income families, which is good.

Los Angeles-Long Beach-Glendale MD

MUB's borrower distribution of HMDA loans is adequate in this AA.

2012/2013

MUB's distribution of home purchase loans to borrowers in the Los Angeles-Long Beach-Glendale MD reflects poor penetration among retail customers of different income levels. The percentage of home purchase loans made to low-income borrowers was substantially below the percentage of low-income families and is very poor considering the performance context in the market. Market share of these loans was below overall market share, but it is adequate. The percentage of the bank's loans to moderate-income borrowers is below the percentage of moderate-income families and is adequate given the performance context. Market share approximates overall market share and is excellent. In assessing the bank's performance, we considered the high cost of housing in Los Angeles County, which combined with a low medium family income, makes it difficult for LMI individuals and families to qualify for a home

purchase loan in this AA. This is supported by the fact that Los Angeles has the highest percentage of renters of any U.S. city, at more than half the population. See *Appendix B: Market Profiles for Full Scope Areas* for additional comments.

The distribution of home improvement loans to borrowers in this AA reflects good penetration among retail customers of different income levels. The percentage of the bank's home improvement loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. However, the bank's market share of these loans to low-income borrowers exceeds overall market share and is excellent. In addition, both the distribution of home improvement loans to moderate-income borrowers and market share exceed the comparators, which is excellent.

MUB's distribution of home refinance loans to borrowers in this AA reflects adequate penetration among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. Market share was below overall market share, but it is adequate. The percentage of loans to moderate-income borrowers was near to the percentage of moderate-income families and is good. Market share exceeds overall market share and is excellent. In concluding on the bank's performance, we considered economic conditions during the review period as well as the relatively low medium family income in this AA.

2014

MUB's distribution of home mortgage loans to borrowers in the Los Angeles-Long Beach-Glendale MD in 2014 is consistent with the 2012/2013 performance as noted below.

The distribution of home purchase loans to borrowers in the Los Angeles-Long Beach-Glendale MD in 2014 reflects poor penetration among retail customers of different income levels considering performance context. The percentage of the bank's home purchase loans to both low- and moderate-income borrowers was substantially below the percentage of families that are low- and moderate-income and is very poor, even after considering performance context factors.

The distribution of home improvement loans to borrowers in this AA reflects adequate penetration among retail customers of different income levels. The percentage of the bank's home improvement loans to low-income borrowers was substantially below the percentage of low-income families, and is very poor. The percentage of these loans to moderate-income borrowers was near to the percentage of moderate-income families, which is good.

The distribution of home refinance loans to borrowers in the Los Angeles-Long Beach-Glendale MD reflects good penetration among retail customers of different income levels. The percentage of the bank's home refinance loans to low-income borrowers was substantially below the percentage of low-income families, and is very poor. However, the percentage of the bank's loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent. Considering the affordability in this AA, we weighted MUB's loans to moderate-income borrowers higher than loans to low-income borrowers.

Oakland-Hayward-Berkeley MD

MUB's borrower distribution of HMDA loans is adequate in this AA.

2012/2013

The distribution of home purchase loans to borrowers in the Oakland-Hayward-Berkeley MD reflects adequate penetration among retail customers of different income levels. The percentage of the bank's home purchase loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. The bank's market share to low-income borrowers was also substantially below overall market share, which is very poor. However, the percentage of these loans to moderate-income borrowers approximates the percentage of moderate-income families and is excellent. In addition, the bank's market share to moderate-income borrowers substantially meets overall market share, which is good.

The distribution of home refinance loans to borrowers in this AA reflects good penetration among retail customers of different income levels. The percentage of the bank's home refinance loans to low-income borrowers was well below the percentage of low-income families. While the comparator is poor, it is considered adequate considering the lack of affordability in this AA. Market share of these loans substantially meets overall market share and is good. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent. Market share of home refinance loans to moderate-income borrowers exceeds overall market share, which is excellent.

2014

MUB's distribution of home mortgage loans to borrowers in the Oakland-Hayward-Berkeley MD is weaker in 2014 than in 2012/2013 as noted below.

The 2014 distribution of home purchase loans to borrowers in the Oakland-Hayward-Berkeley MD reflects poor penetration among retail customers of different income levels. The percentage of the bank's home purchase loans to low- and moderate-income borrowers was significantly below the families that are low- and moderate-income, reflecting very poor distribution. However, we considered performance context factors in concluding on the bank's performance.

The distribution of home refinance loans to borrowers in this AA reflects adequate penetration among retail customers of different income levels. The percentage of the bank's home refinance loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. However, the percentage of these loans to moderate-income borrowers nearly meets the percentage of moderate-income families and is good.

San Diego-Carlsbad MSA

MUB's borrower distribution of HMDA loans is good in this AA.

2012/2013

MUB's distribution of home purchase loans to borrowers in this AA reflects good penetration among retail customers of different income levels. The percentage of the bank's home purchase loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. We considered the lack of affordability particularly for low-income families and weighted more towards MUB moderate-income performance. Market share of loans to low-income borrowers exceeds overall market share and is excellent. The percentage of loans to moderate-income borrowers was below the percentage of moderate-income families, but it is adequate. The bank's market share exceeds overall market share and is excellent.

MUB's distribution of home refinance loans to borrowers in this AA reflects good penetration of loans among retail customers of different income levels. The percentage of the bank's home purchase loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. However, market share exceeds overall market share and is excellent. In addition, the percentage of the bank's loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent. Market share of loans to moderate-income borrowers exceeds overall market share and is excellent.

2014

MUB's distribution of home mortgage loans to borrowers in the San Diego-Carlsbad MSA is weaker in 2014 than in 2012/2013 as noted below.

The bank's distribution of home purchase loans to borrowers in this AA reflects very poor penetration of loans among retail customers of different income levels. The percentage of the bank's loans to both low- and moderate-income borrowers was substantially below the percentage of low- and moderate-income families reflecting very poor penetration to these income groups in 2014.

MUB's distribution of home refinance loans to borrowers in this AA reflects good penetration of loans among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. However, the percentage of the bank's loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent.

San Francisco-Redwood City-South San Francisco MD

MUB's borrower distribution of HMDA loans is adequate considering the lack of affordability in this AA.

2012/2013

MUB's distribution of home purchase loans to borrowers in this AA reflects poor penetration of loans among retail customers of different income levels. The distribution of the bank's loans to both low- and moderate-income borrowers was substantially below the percentage of low- and moderate-income families in this AA and is very poor. The bank's market share of loans to both low- and moderate-income borrowers was also substantially below overall market share and is very poor. In concluding on the bank's performance, we considered the high cost of housing, limited availability of affordable homes and competition from other lenders.

MUB's distribution of home refinance loans to borrowers in this AA reflects poor distribution of these loans among retail customers of different income levels. The distribution of the bank's loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. Market share was also substantially below overall market share and is very poor. The distribution of home refinance loans to moderate-income borrowers was below the percentage of moderate-income families, but it is adequate. Market share of loans to moderate-income borrowers exceeds overall market share and is excellent. In concluding on the bank's performance, we considered the high cost of housing and limited availability of affordable homes and assigned an adequate distribution rating, overall.

2014

MUB's distribution of home mortgage loans to borrowers in the San Francisco-Redwood City-South San Francisco MD in 2014 is consistent with 2012/2013 as noted below.

MUB's distribution of home purchase loans to borrowers in this AA reflects poor penetration among retail customers of different income levels, which is consistent with borrower distribution in 2012-2013. The distribution of the bank's loans to both low- and moderate-income borrowers was substantially below the percentage of low- and moderate-income families, indicating very poor performance. In concluding on the bank's performance, we considered contextual factors, specifically the extremely high cost of housing.

MUB's distribution of home refinance loans to borrowers in this AA reflects adequate penetration of loans among retail customers of different income levels. The distribution of the bank's loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. However, the percentage of loans to moderate-income borrowers approximates the percentage of moderate-income families and is excellent.

Small Loans to Businesses

MUB's borrower distribution of small loans to businesses in California is adequate.

Refer to Table 11 for the applicable evaluation period 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.

Fresno MSA

MUB's borrower distribution of small loans to businesses in this AA is good.

2012/2013

The distribution of the MUB's small loans to businesses is good in the Fresno MSA. The percentage of the bank's small loans to businesses in the Fresno MSA was below the demographic comparator and is adequate. The bank's market share of small loans to businesses exceeds market share for all lenders and is excellent. The majority of the bank's small loans to businesses (79 percent) are in amounts of \$100 thousand or less and is good.

2014

The distribution of MUB's small loans to businesses in 2014 is weaker than in 2012/2013 as noted below.

The distribution of MUB's small loans to businesses is adequate. The percentage of the bank's small loans to businesses in the Fresno MSA was below the demographic comparator, but it is adequate. The majority of the bank's small loans to businesses (83 percent) are in amounts of \$100 thousand or less and is excellent.

Los Angeles-Long Beach-Glendale MD

MUB's borrower distribution of small loans to businesses in this AA is adequate. While MUB's percentage of small loans to businesses is poor the examiner considered the impact of the loans in the market under the performance context and considered the overall performance adequate.

2012/2013

The distribution of MUB's small loans to businesses is adequate. The percentage of the bank's small loans to businesses in the Los Angeles-Long Beach-Glendale MD was substantially below the percentage of small businesses and is very poor. The bank's market share compared to market share for all lenders was near to overall market share, and it is good. The majority of the bank's small loans to businesses (78 percent) are in amounts of \$100 thousand or less and is good

2014

The distribution of MUB's small loans to businesses in the Los Angeles-Long Beach-Glendale MD is consistent with 2014 than in 2012/2013.

The distribution of MUB's small loans to businesses is poor. The percentage of the bank's small loans to businesses in the Los Angeles-Long Beach-Glendale MD was substantially below the percentage of small businesses and is very poor. The majority of the bank's small loans to businesses (79 percent) are in amounts of \$100 thousand or less and is good

Oakland-Hayward-Berkeley MD

MUB's borrower distribution of small loans to businesses in this AA is poor.

2012/2013

The distribution of MUB's small loans to businesses in the Oakland-Hayward-Berkeley MD is poor. The percentage of the bank's small loans to businesses is well below the percentage of small businesses in the AA and is poor. Market share is well below market share for all lenders, which is also poor. The majority of the bank's small loans to businesses (68 percent) are in amounts of \$100 thousand or less and is adequate.

2014

The distribution of MUB's small loans to businesses in the Oakland-Hayward-Berkeley MD in 2014 is consistent with the 2012/2013 performance.

The distribution of MUB's small loans to businesses in 2014 is poor. The percentage of the bank's small loans to businesses is substantially below the percentage of businesses that are small and is very poor. The majority of the bank's small loans to businesses (67 percent) are in amounts of \$100 thousand or less which is adequate.

San Diego-Carlsbad MSA

MUB's borrower distribution of small loans to businesses in this AA is excellent.

2012/2013

MUB's distribution of small loans to businesses in this AA is excellent. The percentage of the bank's loans is near to the percentage of businesses in low-income CTs and is good. It exceeds the percentage in moderate-income CTs, which is excellent. The majority of the bank's small loans to businesses (67 percent) are in amounts of \$100 thousand or less and is adequate.

2014

The distribution of MUB's small loans to businesses in the San Diego-Carlsbad MSA in 2014 is consistent with the 2012/2013 performance as noted below.

The distribution of MUB's small loans to businesses in 2014 is good. The percentage of the bank's small loans to businesses is substantially below the percentage of businesses that are small and is very poor. The majority of the bank's small loans to businesses (84 percent) are in amounts of \$100 thousand of less and is excellent.

San Francisco-Redwood City-South San Francisco MD

MUB's borrower distribution of small loans to businesses in this AA is poor.

2012/2013

The distribution of MUB's small loans to businesses in the San Francisco-Redwood City-South San Francisco MD is poor. The percentage of the bank's small loans to businesses was substantially below the percentage of small businesses in the AA, and it is very poor. Market share was below market share for all lenders, but it is adequate. The majority of the bank's small loans to businesses (64 percent) are in amounts of \$100 thousand of less and is adequate.

2014

The distribution of MUB's small loans to businesses in the San Francisco-Redwood City-South San Francisco MD in 2014 is consistent with 2012/2013 performance as noted below.

The distribution of MUB's small loans to businesses is poor. The percentage of the bank's small loans to businesses was substantially below the percentage of small businesses in the AA, which is very poor. The majority of the bank's small loans to businesses (69 percent) are in amounts of \$100 thousand of less and is adequate.

Community Development Lending

MUB's CD lending had a significantly positive impact on the lending test in California. The level and nature of CD lending is excellent. We evaluated CD lending from the effective date of the prior examination through December 31, 2014. This period encompassed 33 months of activity versus the 36 months evaluated during the prior examination. During the current period, MUB reported 535 loans totaling \$1.4 billion in the California full scope areas. MUB is a leader in CD lending in California.

Refer to Table 1 Lending Volume in the 2014 state of California section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This Table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. However, Table 5 does not separately list CD loans.

MUB's CD lending in the full-scope AAs totaled \$1.4 billion (which compared well to tier one capital of \$12.1 billion year end 2014). This was an increase of over 10 percent over the number and dollar volume of CD lending noted in the prior evaluation. The bank's CD loans focus primarily on affordable housing and community services, which are both identified as CD needs in all the full-scope AAs in the state of California. The high and increasing cost of

residential real estate in much of the state continues to give significant weight to the bank's CD lending activities that provide and support affordable housing in LMI geographies and for LMI individuals. MUB's level and nature of CD lending positively influenced the overall Lending Test rating.

In addition to the bank's CD lending in the various AAs, we also considered MUB's additional \$85 million in CD lending made throughout California that benefited broader statewide or regional areas that include the bank's AAs.

Below are highlights of MUB's CD lending in each of the full-scope AAs.

Fresno MSA

MUB's CD lending in the Fresno is excellent and provided a significantly positive impact to this AA's lending performance.

MUB originated seven CD loans totaling \$60.5 million over the evaluation period in this AA. All of these loans supported community services targeted to LMI individuals. The loans include the following:

A \$28.8 million loan originated in 2012 and renewed for \$31.3 million in 2014 provided financing to an organization that provides services to the developmentally disabled and persons at risk of having developmental disabilities. The vast majority of individuals served by this organization were LMI, living on federal social security income disability benefits.

\$400 thousand provided funding to three organizations. One organization primarily serves LMI elderly and disabled individuals. Another provides relief and assistance to LMI disabled American Veterans and their dependents. The third provides needed services to at-risk youth ages 12 to 17 and non-minor dependents.

To provide perspective regarding the relative level of community development lending, we allocated a portion of the bank's tier one capital to each AA based on its pro rata share of deposits as a means of comparative analysis. MUB's volume of CD lending in Fresno represents 42 percent of tier one capital allocated to this AA.

Los Angeles – Long Beach – Glendale MD

MUB's CD lending in the Los Angeles – Long Beach – Glendale MD is excellent and provided a significantly positive impact to this AA's lending performance.

MUB originated 269 CD loans totaling \$524 million over the evaluation period. Approximately 53 percent of these loans were targeted to affordable housing needs, ten percent to organizations providing community services, six percent for economic development needs, 22 percent small business development, and nine percent for revitalization and stabilization needs. CD loans include the following:

\$297 million provided 4,071 units of affordable housing for LMI individuals and families.

\$109 million consists of SBA 504 loans. Two SBA 504 loans used to finance a wholesaler of school and office supply products, which in turn provides jobs to LMI individuals.

\$17 million represents a loan to an organization that provides assistance to eligible low-income families with subsidized childcare and training to childcare providers.

Oakland – Hayward – Berkley – MD

MUB's CD lending in the Oakland – Hayward – Berkley – MD is excellent and provided a significantly positive impact to this AA's lending performance.

MUB originated 70 CD loans totaling \$276 million over the evaluation period in this AA. Approximately 56 percent of these loans were targeted to organizations that provide affordable housing, 39 percent to organizations that provide services to LMI, three percent for revitalization and stabilization, and two percent for economic development. These loans include the following:

\$160 million provided funding for 1,703 units of affordable housing for LMI individuals and families.

\$50 million provided funds to a facility that provides assessments to parents of the developmentally disabled and persons at risk of having developmental disabilities. This organization also helps individuals integrate into their communities. The majority of the recipients are LMI.

San Diego – Carlsbad MSA

MUB's CD lending in the San Diego – Carlsbad MSA is excellent and provided a significantly positive impact to this AA's lending performance.

MUB originated 128 CD loans totaling \$302 million over the evaluation period. Approximately 27 percent of these loans were targeted to affordable housing needs, 48 percent for community services to LMI individuals, eight percent for economic development, and 17 percent for revitalization and stabilization. These loans include the following:

\$134 million provided funds for 1,386 units of affordable housing for LMI individuals and families.

\$42.4 million provided funds to an organization that provides social services to disabled adults, children, and families. All of the recipients were low-income and public-benefit recipients and relied on supplemental social security income to cover living expenses.

\$83.3 million consisted of five construction and permanent loans that were used to rehabilitate and build new apartments for low-income seniors, LMI families, and transition age youth.

San Francisco–Redwood City–South San Francisco MD

MUB's CD lending in the San Francisco–Redwood City–South San Francisco MD is excellent and provided a significantly positive impact to this AA's lending performance.

MUB originated 61 CD loans totaling \$165 million over the evaluation period. Approximately 55 percent of these loans were for affordable housing, 35 percent were for community services, nine percent were for economic development initiatives, and one percent for revitalization and stabilization needs. These loans include the following:

\$110 million provided funds for 839 units of affordable housing for LMI individuals and families.

\$32 million represents a renewal of a loan to an organization that provides social services to LMI disabled adults, children, and families.

Product Innovation and Flexibility

MUB's innovative and flexible lending programs had a positive impact on the lending test conclusion. The bank's Economic Opportunity Mortgage (EOM) program is available for borrowers meeting income limits, or residing in targeted LMI CTs. Underwriting standards for the program are flexible, allowing higher loan-to-value, higher debt-to-income ratios, and limited credit history. MUB's flexible mortgage loan products include the EOM whereby MUB extended 4,239 loans totaling \$984 million in California during the evaluation period. This represents an 80 percent increase in the number of loans and more than 120 percent increase in loan dollars from the prior evaluation (2,346 loans totaling \$443 million). These direct-loan programs were developed to meet the needs of LMI families.

MUB originated several innovative loans and investments, using the same staff to initiate loans (debt) and investments (equity). This includes the following that meet CD loan qualifications:

Long Beach, CA – MUB provided a \$6.1 million construction loan for affordable low-income senior housing and a \$6.9 million equity investment.

Los Angeles, CA – The bank provided a \$16.1 million affordable housing loan with ten units reserved for transitional aged youth who aged out of foster care and a \$16.5 million equity investment.

Orinda, CA – The bank provided a \$15 million construction loan that provided affordable housing for LMI seniors and a \$10.8 million equity investment.

San Francisco, CA – The bank provided a \$21.1 million construction loan that provided affordable housing for LMI families and a \$15.4 million equity investment.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Bakersfield MSA, the Oxnard-Thousand Oaks-Ventura MSA, the Riverside-San Bernardino-Ontario MD, the Sacramento-Roseville-Arden-Arcade MSA, the Anaheim-Santa Ana-Irvine MD, and the Visalia-Porterville MSA is consistent with the bank's overall "High Satisfactory" performance under the lending test in the state of California. In the El Centro MSA, the Hanford-Corcoran MSA, the Madera MSA, the Modesto MSA, the Redding MSA, the Salinas MSA, the San Jose-Sunnyvale-Santa Clara MSA, the San Luis Obispo-Paso Robles-Arroyo Grande MSA, the San Rafael MSA, the Santa Barbara-Santa Maria MSA, the Santa Cruz-Watsonville MSA, the Santa Rosa-Petaluma MSA, the Stockton-Lodi MSA, the Vallejo-Fairfield MSA, the Yuba City MSA, and the non-MSA, MUB's performance is weaker than the bank's overall performance in the state. Weaker performance was partially due to a low volume of loans in a number of limited-scope AAs as well as weaker penetration of home mortgage loans among retail customers of different income levels. Refer to the Tables 1 through 13 for the

applicable evaluation period 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

Refer to Table 14 in the 2014 state of California section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test in California is rated "Outstanding." The bank's performance is excellent based on full-scope reviews in the Los Angeles-Long Beach-Glendale MD, Oakland-Hayward-Berkeley MD, and San Francisco-Redwood City-South San Francisco MD. The bank's performance is Good in the San Diego-Carlsbad MSA, and poor in the Fresno MSA AA.

MUB is responsive in addressing the community's needs in the California AAs by providing a combination of qualified investments, Low Income Housing Tax Credits (LIHTC), donations, and grants through the Bank Enterprise Award (BEA) program. These investments promote affordable housing, help to revitalize neighborhoods, stimulate job creation or retention, and provide economic development opportunities for low and moderate-income individuals and families.

MUB began an innovative program of packaging its investments in LIHTCs into MUB Guaranteed Tax Credit Funds and then selling participations in these funds to other financial institutions. In this program, MUB sells participations in amounts as low as \$250 thousand, which enables much smaller financial institutions to participate in LIHTC investments. By using its in-house legal and investment expertise, the bank is able to reduce the overhead expense to create the funds, which provides a better return to downstream investors. The bank continues to use this investment packaging strategy and has carried it forward into the current evaluation period. By expanding the accessibility of the LIHTC program and combining other tax credits (new market tax credits and historic tax credit), MUB has effectively increased the capacity of the marketplace to invest in the creation of affordable housing and assisting in the stabilization and revitalization of low- and moderate-income geographies. The packaging of these tax credits remains a complex transaction and is responsive to community needs.

During the current evaluation period over 95 percent of the dollar amount in bank's investment portfolio for AAs within MUB's footprint is contributed to LIHTCs that finance affordable housing for low-income families. An additional \$81 million of unfunded investment commitments will also go toward financing economic development activities in the AA. Nearly 32 thousand affordable housing units are the result of these investments. MUB also has made some state and regional investments in areas outside of the MUB AAs; investments during the current period total of \$4.9 million and had \$22.4 million outstanding from prior period investments. These additional investments further enhance the bank's overall performance under the Investment Test.

Donations

MUB donated more than \$16.8 million or 82 percent (of all donations) in the California AA during the current evaluation period to support affordable housing and home ownership programs; social services for low and moderate-income individuals and families; health services, counseling, education and other services to support for self-improvement.

MUB has established a commitment to donate 2 percent of their net income every year to nonprofit organization in its communities. In 2010, the bank introduced a giving “floor” of \$10 million dollars a year to ensure ongoing funding to the communities they serve. After the acquisition of Santa Barbara Bank and Trust, N.A. in 2012, the floor was elevated to \$11 million in 2013 and set at \$12 million for 2014 and 2015.

Interest on Lawyers Trust Accounts (IOLTA’s)

An IOLTA is a program that is offered in every state, as well as the District of Columbia and Virgin Islands, that allows lawyers holding funds belonging to clients, which are nominal amounts or held for such a short-term period of time that would not be feasible for an individual interest bearing account. In California, the statute mandates that lawyers, who manage these accounts for their clients, place them in pooled, interest bearing checking accounts and sets the minimum interest rate that financial institutions must pay on IOLTA account. The interest generated from the pooled funds are used to provide civil legal aid to the poor/indigent (“indigent” being defined as individuals whose income is less than 125 percent of the current poverty threshold established by the US Office of Management and Budget) and support improvements to the justice system. The IOLTA program is a unique and innovative way to increase access to legal aid/services for LMI individuals and their families.

MUB was recognized by the California State Bar Association for its leadership role for their participation in the “Peaking Your Interest” program on IOLTA accounts. The banks involved in this program currently pay at least 1 percent yield on IOLTA accounts. The Leadership Banks have voluntarily opted to demonstrate their commitment to their communities by paying the peaked interest rates over the required rate set by association, which has made an enormous difference in the IOLTA funding.

During this evaluation period, MUB has contributed interest of \$1.2 million in excess of the legally required \$69 thousand dollars for legal services to support poor and indigent individuals or families in MUB’s California AAs. The excess interest paid went to support programs like Central California Legal Services, a legal aid program that assisted in ensuring funds earmarked for economic development opportunities (shopping center) to the city of West Fresno were not redirected. Another example, Public Counsel, a Legal Aid non-profit, used the funds to assist an affordable housing developer save a crucial affordable housing development for low-income seniors.

Community Development Financial Institutions (CDFI) Bank Enterprise Awards (BEA) Program

The BEA Program provides monetary awards to banks and thrifts that have successfully demonstrated an increase in their investments in census tracts with at least 30 percent of residents having incomes less than the national poverty level and 1.5 times the national

unemployment rate. The BEA Program's goal is to generate greater economic opportunity for those individuals and families with the least access to financial products and services. The BEA program believes investing in economically distressed communities provides the key to their revitalization. The BEA Program awards FDIC-insured depository institutions for making investments in the most distressed communities throughout the nation.

FDIC-insured depository institutions that demonstrate an increase in investing in CDFIs or in their own lending, investing, or service-related activities in distressed communities can apply for a BEA Program award. Award amounts correlate with the percentage of increase in dollars associated with these activities: the greater the increase, the larger the award. Organizations that receive awards must then reinvest that money back into distressed communities.

MUB successfully submitted their first BEA Program application in 2013 and was awarded \$41,008 in grants. The bank reinvested a portion of their award in MUB's California AAs with their consortium lending program partners California Community Reinvestment Corporation (\$4,000)—LA; New America (\$1,000) a new CDFI in Oakland, and in the Fresno CDFI \$28,000 to purchase and train CDFI staff on a Microloan Management System.

Investments by Assessment Area

Fresno MSA

MUB's investment performance in the Fresno MSA is poor. MUB received consideration for 67 investments totaling \$631 thousand in this AA during the evaluation period. MUB made a stock purchase membership in an agricultural loan program in this AA. MUB made donations totaling \$506 thousand to 31 agencies that provide support services to low- and moderate-income individuals in this MSA. MUB paid \$100 thousand to a licensed small business development corporation that provides technical assistance to small businesses to stimulate economic development in disadvantage areas. MUB also paid excess interest on IOLTAs of \$52 thousand that will provide legal services that benefit low- and moderate-income individuals in this MSA. The bank provided the Fresno CDFI BEA grant of \$25,000 to help support small businesses reduce their expenses for underwriting small dollar loans.

Community development opportunities in the area are available and can help banks respond to the numerous needs in this AA. Two CDFIs certified by the CDFI Fund of the U.S. Treasury Department are headquartered in Fresno, and several regional CDFIs also serve the area, including a statewide CDFI that finances affordable housing and in which many banks have invested, and another statewide CDFI that finances underserved, low-income, immigrant and beginning farmers. A nonprofit affiliate of an international organization builds affordable housing in Fresno and a Community Action Agency administers many social services programs such as Head Start as well as a small business micro-loan fund. An active SBA Certified Development Corporation headquartered in Fresno is one of 23 such organizations authorized to make SBA 504 loans in California to small businesses in conjunction with banks. In addition, an economic development association provides job training and seeks to attract businesses, and the state university in Fresno has several economic development initiatives.

Los Angeles-Long Beach-Glendale MD

MUB's investment performance in the Los Angeles-Long Beach-Glendale MD is excellent. MUB received credit for 676 investments, totaling \$314 million in the AA with an additional 19 unfunded commitments totaling \$2.2 million. Over 98 percent of the dollar volume of MUB's

investment transactions were LIHTC that focused on affordable housing. MUB's LIHTC investments here include a December 2012 transaction where the bank purchased a \$15.5 million of tax credit equity (all of which is funded) to support the construction of 72-unit apartment complex to serve 71 LMI household and transitional foster care youths. Fifteen of the apartments will be for the foster care youth who have aged out of the system and are homeless or at risk of becoming homeless. Onsite social services for the foster youth and other residents will be provided.

MUB made donations to over 160 agencies totaling over \$4.7 million during the current period, of which \$100 thousand was paid to an agency whose mission is committed to revitalizing and providing long-term sustenance of underserved communities through education, increased access to financial capital, and credit and opportunities for home and business ownership. It has developed and implemented programs focused on connecting the minority, LMI community with mainstream, private sector resources, and empowering under-served communities. This agency also provides financial literacy classes to LMI inner-city youth, so that they will be able to improve their economic situation and feel empowered and responsible to become contributing members of their community.

MUB paid excess interest on IOLTAs of \$400 thousand that will benefit low- and moderate-income individuals in this MSA/AA. The bank also provided a BEA grant of \$4,000 BEA to one of their consortium lending partners. There are good investment opportunities and numerous investment vehicles in this AA.

Oakland-Hayward-Berkeley MD

MUB's investment performance in the Oakland-Hayward-Berkeley MD is excellent. MUB received credit for 215 investments totaling \$162 million in this AA during the evaluation period. The bank also has 7 unfunded commitments totaling another \$839 thousand. Nearly 85 percent of the dollar volume of MUB's investment transactions in this AA is focused on affordable housing, a primary credit need in this AA. MUB's LIHTC investments include a \$17.2 million investment for the construction of a new 90-unit affordable housing project serving 89 LMI households and 1 property manager. The project is part of the master-planned MacArthur Transit Village and is the first residential phase of a multi-phase development project. The project will consist of a five-story residential structure over a single level garage structure.

In addition, MUB donated \$1.5 million dollars to 68 organizations in this AA, of which a \$40 thousand was donated to an organization that provides short term and long-term hunger solutions for LMI individuals and families. MUB also paid \$68 thousand in excess interest on IOLTAs that will benefit low- and moderate-income individuals in this AA. The bank made one BEA grant to a new CDFI in this AA.

The level of opportunity for community development activities in the Oakland AA area is very good. Numerous nonprofit community development organizations provide financial education, develop affordable housing and commercial real estate and provide assistance to small businesses. Five CDFIs certified to participate in the programs of the CDFI Fund of the U.S. Treasury Department serve the area directly, and three more regional CDFIs designate Oakland as part of the area they serve.

San Diego-Carlsbad MSA

MUB's investment performance in the San Diego-Carlsbad MSA is good. MUB received credit for 367 investments totaling \$87.9 million in this AA during the evaluation period. The bank also had two unfunded commitments for \$536 thousand. More than 98 percent of the dollar volume of MUB's investment transactions on affordable housing, a primary credit need in the AA. In 2014, MUB made a LIHTC of \$22.4 million investment for the construction of 100 percent affordable multi-housing complex consisting of 108 affordable units. MUB also made \$3.1 million to 139 organizations in donations and paid \$99.5 thousand in excess interest on IOLTAs that will benefit low- and moderate-income individuals in this MSA.

There is an abundance of good investment opportunities with a number of CDFIs that serve this AA. For example, eight community development financial institutions (CDFIs) certified by the CDFI Fund of the U.S. Treasury Department serve the area, including three that focus primarily on San Diego. An abundance of opportunities is available to banks in San Diego to meet the needs of the AA.

San Francisco-Redwood City-South San Francisco MD

MUB's investment performance in the San Francisco-Redwood City-South San Francisco MD is excellent. MUB received credit for 341 investments totaling \$120 million in this AA during the evaluation period. The bank also had two unfunded commitments of \$5.1 million. Nearly 97 percent of the dollar volume of MUB's investment transactions was focused on affordable housing, a primary credit need in the AA. In 2014, MUB made \$18.2 million LIHTC for construction of a 67-unit apartment complex, with 14 HUD and 11 units restricted to the developmentally disabled. MUB also made \$3.7 million in donations to 113 organizations, of which \$40 thousand went to an organization that wants to increase the number of affordable housing units for the AA. MUB also paid \$38.5 thousand in excess interest on IOLTA that will benefit low and moderate-income individuals in this MSA/AA. There are numerous opportunities for financial institutions to become involved in activities that benefit low- and moderate-income neighborhoods and individuals in this AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, MUB performance under the Investment Test in California for Oxnard-Thousand Oaks-Ventura, Riverside, Sacramento-Roseville-Arden-Arcade MSA, Salinas, San Rafael, Anaheim-Santa Ana-Irvine, Santa Barbara-Santa Maria, Santa Cruz, Santa Rosa-Petaluma, Stockton, Vallejo-Fairfield, Visalia-Porterville, Yuba City and California Non-MSA AA were consistent with the MUBs full scope AAs receiving "Outstanding" performance. The AAs of Bakersfield, San Jose-Sunnyvale-Santa Clara, and San Luis Obispo-Paso Robles-Arroyo Grande reviews were consistent with the bank's overall performance in California. The AAs El Centro, Hanford-Corcoran, Madera, Modesto, and Redding are weaker than MUBs performance in California. The weaker AA was primarily due to lower volume of investments in both the current and prior periods, which did not have any impact on the overall performance for the state of California.

Refer to the 2014 Table 14 for the applicable evaluation period 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 California is rated "Outstanding." Based on full-scope reviews, the bank's performance is excellent in the Fresno MSA, Los Angeles-Long Beach-Glendale MD, Oakland-Hayward-Berkeley MD, San Diego-Carlsbad MSA, and San Francisco-Redwood City-South San Francisco MD AAs.

Retail Banking Services

Refer to Table 15 in the 2014 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.

MUB's retail delivery systems including bordering branches are readily accessible and we consider this excellent in the Fresno MSA, Los Angeles-Long Beach-Glendale MD, Oakland-Hayward-Berkeley MD, San Diego-Carlsbad MSA, and San Francisco-Redwood City-South San Francisco MD AAs.

The Service Test analysis focuses heavily on MUB's distribution of branches by income level of the geography. However, there were instances in which a branch located in a middle- or upper-income CT was on the border of a LMI tract, in some cases across the street or within a city block. In those instances, the middle- or upper-income branch provides ready access to the bank's financial services to both income areas. Accordingly, our analysis considered the benefit that "bordering branches" provided to their respective communities.

In 2012, MUB acquired Santa Barbara Bank & Trust (SBBT), which resulted in a net gain of 34 acquired branches primarily located along the central California coast. In addition, the bank built-out and opened six de novo branches, two of which were student-run branches in high schools opened in partnership with the Los Angeles Unified School District. The industry has seen a trend of branch closures as customer behavior is moving more toward a self-service and mobile banking model, with fewer transactions taking place at the teller line. MUB has not been immune from that trend and recorded the closure of 36 California branches over the period, eight of which involved consolidations of branches obtained in the SBBT acquisition. The remaining 28 were closed for lack of profitability. Many of the branches MUB closed during the evaluation period were located in grocery stores. These branches, known as Cash and Save "in store" branches, were closed due to profitability and an increase in bank customer use of online and mobile banking. Care was taken to ensure that branch closures did not unduly harm LMI CTs, communities of all income levels were impacted, and the communities served were not going to be left without sufficient banking services.

MUB's standard products and services are available at all branches. The bank also offers low-cost basic checking accounts targeted to low-income individuals and students. The bank continues to offer the Electronic Transfer Account (ETA). The ETA account is designed for recipients of Federal government benefits such as Social Security. The basic checking and ETA accounts require no minimum balance, have modest monthly service fees, and allow unlimited ATM access. Over the course of the evaluation period, the bank developed a new

basic banking account the “UB Access Account”, which was specifically designed for the unbanked and under-banked. The UB Access Account is a checkless banking account that requires no minimum balance, has modest monthly service fees, which are waived with at least \$25 in direct deposits, does not allow overdrafts, and provides unlimited ATM access at MUB ATMs. MUB recognizes the need for savings and has established the “Nest Egg Savings Account” as an introductory savings account targeted for lower income households. In addition, the bank works with nine individual non-profit agencies across the AA to offer Individual Deposit Accounts (IDA) for low-income consumers saving for college, establishing a business, or purchasing a home.

The reasonableness of business hours and services offered at branch locations throughout the AAs are good and do not vary in a way that inconveniences LMI geographies or individuals. Typical branch hours are Monday through Thursday from 9:00 a.m. to 5:00 p.m., Fridays until 6:00 p.m., and 9:00 a.m. to 1:00 p.m. at branches that have Saturday hours. Branches located in downtown areas are not generally open on Saturday.

MUB offers an array of alternative delivery systems for its products and services to help reach its customers. These include online banking, telephone banking, and at least one ATM at each of its branches. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of MUB’s services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding MUB’s bank performance for each full-scope AA under the Service Test.

Fresno MSA

MUB’s branches are readily accessible to all portions of the AA. The percentage of the bank’s branches located in low-income CTs is near to the distribution of the population living in those geographies and exceeds the population in moderate-income geographies. MUB has 13 branches in the AA, of which 8 percent are located in low-income CTs and 31 percent are located in moderate-income CTs. Overall accessibility to the bank’s services in LMI CTs is further enhanced by considering bordering branches. One branch in a middle-income geography and one branch in an upper-income geographies border moderate-income geographies. MUB did not open any new branches in the AA during the evaluation period. Two branches were closed, one in a moderate-income CT and one in an upper income CT. Both were in-store branches which were closed due to lack of profitability.

Los Angeles–Long Beach–Glendale MD

MUB’s branches are readily accessible in nearly all portions of the AA. The distribution of MUB’s branches in low-income geographies exceeds the distribution of the population living in those geographies and was substantially lower than demographics in moderate-income geographies. MUB has 69 branches in the AA, of which 9 percent are located in low-income CTs and 16 percent are located in moderate-income CTs. Accessibility to the bank’s services in LMI CTs was improved with bordering branches. Four branches in middle-income geographies and two branches in upper-income geographies border moderate-income geographies. The bank opened three branches including two student-run branches supporting low-income students and families, one each in a low-income and moderate-income CT; an additional branch was opened in an upper-income CT during the evaluation period. Therefore we considered the opening of the student run branches a significant community service that improved the rating for this AA. There were ten branches closed in the AA during the

evaluation period. Four were closed for lack of profitability and declining transaction volumes. MUB took great care to evaluate closures so that there was a balance across all tract categories. One closed branch was in a middle-income CT and three branches were closed upper-income CTs. In 2013, the bank made the decision to close the Cash & Save in-store branches. Some community groups were supportive of the branches, while others saw the bank as promoting check cashing by having these branches opened. A triggering event was the bank losing its lease on several of the branches, which ultimately led to the closure of six Cash & Save branches in the AA. One was located in a low-income CT, three were in moderate-income CTs, and two were in middle-income CTs.

Oakland–Hayward–Berkeley MD

MUB's branches are readily accessible to all portions of the AA. The percentage of MUB's branches located in low-income geographies exceeds the population living in those geographies, and in moderate-income geographies it was near to the demographics. MUB has 18 branches in the AA; 22 percent are located in low-income CTs and 17 percent are located in moderate-income CTs. One branch in an upper-income geography borders a moderate-income geography and improves accessibility of bank services to LMI geographies. There was one branch opened in a middle-income CT, and there were no branch closings in the AA during the evaluation period.

San Diego–Carlsbad MSA

MUB's branches are readily accessible to all portions of the AA. The percentage of MUB's branches in low-income CTs exceeds the population living in those geographies and approximates the population in moderate-income geographies. MUB has 58 branches in the AA, of which 10 percent are located in low-income CTs and 21 percent are located in moderate-income CTs. There are four branches in middle-income geographies and two branches in upper-income geographies that border low- and moderate-income geographies and further improve accessibility. Branch opening and closings have not affected accessibility; the bank opened one branch in an upper-income CT and closed two branches, one in a low-income CT and one in a moderate-income CT during the evaluation period.

San Francisco–Redwood City–South San Francisco MD

MUB's branches are readily accessible to all portions of the AA. The percentage of MUB's branches in low-income CTs exceeds the respective population demographics. The percentage of branches in moderate-income CTs also exceeds the population residing in those tracts. MUB has 13 branches in the AA, of which 23 percent are located in a low-income CT and 23 percent are located in a moderate-income CT. Neighboring branches had a neutral impact on branch distribution within the AA. Branch opening and closings have not affected accessibility; the bank opened one branch and closed one branch in middle-income CTs during the evaluation period.

Community Development Services

MUB provides a high level of CD services to its full-scope AAs. The bank's CD services had an overall positive impact on all full-scope AAs. The bank's performance is excellent in the Fresno, Los Angeles-Long Beach-Glendale, Oakland-Hayward-Berkeley, San Diego-Carlsbad; and San Francisco-Redwood City-South San Francisco AAs.

In the prior evaluation period, the bank was cited for its innovative perspective in reaching LMI consumer segments through its Cash & Save program. While many in the communities the bank served were very supportive and complementary of MUB's efforts to reach the unbanked and under-banked consumer through its check cashing and financial education branch network, there were others who criticized that the bank did not have presence in enough communities to be truly beneficial and was continuing to promote check cashing by offering the service. As a result, the bank developed the UB Access Account which could be offered throughout their branches to promote low-cost access to banking. This new product has received national acclaim for its features and accessibility. As the bank began the process of eliminating its Cash & Save service in 2013, it launched a comprehensive education campaign to promote having a bank account as a better alternative to check cashing that reduces costs to the consumer.

Since its introduction, the bank has opened 7,100 accounts. The UB Access Account is a checkless banking account that requires no minimum balance, has modest monthly service fees, which are waived with at least \$25 in direct deposits, does not allow overdrafts, and provides unlimited ATM access at MUB ATMs.

In 2010 the bank introduced its Financial Literacy Month Campaign, which involved a competition among the branches. Since then, MUB has continued to conduct the campaign each spring. In addition, the bank has promoted financial literacy as a year-round focus in order to reach more people. Over the course of the exam period, the bank recorded nearly 26,700 hours toward the provision of financial education, of which nearly 12,350 transpired during the period of the annual campaign.

In support of its commitment to financial literacy, MUB sponsored the first printing of a limited edition children's book, "What a Bank Can Do", written by nationally recognized children's authors John and Diane Tuzee. The colorful and easy-to-read book, published in English and Spanish, explores the fun and importance of saving money through its main characters Luke and Linda, who first learn the lessons of thrift with their toy banks and later with their own bank accounts. With rhyming verse-text, the book also informs children of valuable services that a bank provides.

In 2014, the bank opened two new student-run branches at high schools in Los Angeles targeting LMI youth. This innovative program allows student interns to gain practical experience associated with business and finance. These branches support low-income students and families, which improves accessibility to bank services and products.

The award-winning high school branch program has also achieved unprecedented success with high graduation rates, college enrollment and enhanced career readiness. Students have credited the program with creating the job skills and confidence necessary to obtain better jobs to support them while attending college and a number of students have worked for the bank as part-time tellers. MUB aims to replicate the success of this program and continue its expansion where possible.

Over the course of this exam period, the bank developed a new online resource for small businesses, the Small Business Resource Center, intended to offer helpful tips, best practices, and tools. This new online resource is provided as a free service for general information purposes only and is not intended to provide legal, accounting, tax, other advice, or

recommendations for any specific individual or business. The information is available to customers and non-customers alike and provides information ranging from a weekly financial update to technical assistance articles and links for running a business, managing finances, and growing a business to name a few, and industry resources and blogs. In addition, there are links to videos to assist small businesses learn more about financing, government contracting, starting a business, navigating the SBA, etc. There are also links to the bank's products and services to benefit small business entrepreneurs.

During this evaluation period, the bank has worked with the University of San Diego (USD) to develop metrics to evaluate the impact of the bank's giving and volunteering. In addition, MUB collaborated with USD to develop a training program to offer bank employees interested in serving on a board. The training is designed to educate employees on the responsibilities of board membership, how to evaluate a non-profit for board membership, and what to expect when representing the bank in this fashion.

Fresno MSA

MUB is a leader in providing CD services in the Fresno MSA AA. During the evaluation period, bank employees were involved with 18 CD organizations serving community needs with affordable housing, community economic development, community services, technical assistance, and small business development. The 152 MUB employees contributed 2,484 hours toward these organizations through fundraising events, mentoring and providing financial education, and career development.

Los Angeles–Long Beach–Glendale MD

MUB is a leader in providing CD services in the Los Angeles-Long Beach-Glendale MD AA. During the evaluation period, bank employees were involved with 115 CD organizations serving community needs with affordable housing, community economic development, community services, and technical assistance. In these capacities, 3,577 MUB employees contributed 13,871 hours toward these organizations by serving on 49 boards of directors, providing financial education and technical assistance to LMI persons, and participating in fundraising events.

Oakland–Hayward–Berkeley MD

MUB is a leader in providing CD services in the Oakland-Hayward-Berkeley MD AA. During the evaluation period, bank employees were involved in 32 CD organizations related to community services, affordable housing, economic development, and technical assistance. The 478 MUB employees contributed 3,800 hours toward CD efforts of these organizations.

San Diego–Carlsbad MSA

MUB is a leader in providing CD services in the San Diego-Carlsbad AA. During the evaluation period, bank employees were involved in 113 CD organizations that focus on affordable housing, small business development, and essential services targeted to LMI persons. The 1,702 MUB employees contributed over 5,876 hours toward these community organizations. Their involvement consists of board membership with 36 community organizations, assisting with strategic planning, financial education, financial literacy, technical assistance, and fundraising.

San Francisco–Redwood City–South San Francisco MD

MUB is a leader in providing CD services in the San Francisco-Redwood City-South San Francisco AA. During the evaluation period, bank employees were involved in 62 CD organizations that are focused primarily on affordable housing, economic development, community services, and technical assistance targeted to LMI persons. The 1,124 MUB employees contributed more than 3,211 hours toward these CD organizations. Their involvement primarily consists of board membership with 19 organizations, assisting with strategic planning, credit counseling, and fundraising.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, MUB's performance under the Service Test in the El Centro, Hanford-Corcoran, Madera, Oxnard-Thousand Oaks-Ventura, Redding, and San Jose-Sunnyvale-Santa Clara AAs were consistent with the full-scope AAs reviewed. The AAs of Bakersfield, Modesto, Riverside-San Bernardino-Ontario, Sacramento-Roseville-Arden-Arcade, Salinas, San Luis Obispo-Paso Robles-Arroyo Grande, San Rafael, Anaheim-Santa Ana-Irvine, Santa Maria-Santa Barbara, Santa Cruz-Watsonville, Santa Rosa, Stockton-Lodi, Vallejo-Fairfield, Visalia-Porterville, Yuba City, and California non-MSA are weaker than the bank's overall performance. The weaker performances are centered in the weaker distribution of branches in either LMI geographies compared to the respective population demographics. However, none of these weaker distributions of branches lowered the bank's overall conclusion under the Service Test.

MUB offers a wide array of alternative delivery systems for delivery of products and services to customers. Alternative delivery systems include online banking, telephone banking, and ATMs. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of MUB's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding MUB's bank performance for each limited-scope AA under the Service Test.

State Rating

State of Georgia

CRA Rating for Georgia:	<u>Satisfactory</u>
The lending test is rated:	<u>Low Satisfactory</u>
The investment test is rated:	<u>High Satisfactory</u>
The service test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- An adequate level of lending activity in the Atlanta–Sandy Springs–Roswell MSA.
- An excellent geographic distribution of home mortgage loans in the bank’s AA; and a good penetration of home mortgage loans to borrowers of different income levels, but on limited lending volume.
- A lack of any community development loans in the AA, which had a neutral impact on the lending test rating for the state of Georgia due to the limited time that the branch was open during the evaluation period.
- A good level of qualified investments focused on affordable housing and small business development needs considering the limited time that the branch was open during the evaluation period.
- Delivery systems are limited to commercial activity but adequate considering the bank’s business model in Georgia.
- MUB’s performance in providing CD services in the full-scope AA is adequate.

Description of Institution’s Operations in Georgia

MUB’s presence in the Atlanta-Sandy Springs-Roswell MSA is limited, as the bank operates only one commercial branch office in this AA. As mentioned previously, the branch in Georgia is commercial in nature in that it only serves commercial customers, both for direct lending and in deposit gathering. MUB expanded their business practice to include purchasing mortgage loans for low- and moderate-income borrowers and in low- and moderate-income census tracts to improve CRA lending performance under the CRA regulation. This practice adds liquidity to the market and therefore allows lenders with the infrastructure to lend in this MSA.

Scope of Evaluation in Georgia

The evaluation included a full-scope review of the Atlanta–Sandy Springs–Roswell MSA, which is MUB’s sole AA in the state of Georgia. This AA provides 100 percent of the bank’s state of Georgia deposits and 100 percent of its loans. We focused our review on home mortgage

loans purchased from January 1, 2014 through December 31, 2014. We did not consider small loans to businesses in our analysis. We reviewed qualified investments and CD services for the period beginning December 2013 through December 31, 2014. The bank did not originate any CD loans.

The Atlanta commercial branch opened December 2013. Consequently, there is limited lending activity to analyze for 2012-2013. The bank only originated five home purchase loans and five home refinance loans during this review period. In addition, since MUB does not have a retail presence in this AA, it was necessary for the bank to purchase mortgage loans in 2014. Therefore, considering the bank's limited presence and commercial banking strategy in this market, we reviewed the bank's targeted CRA activities to address CRA relative to the activities within the AA.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Georgia is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Atlanta–Sandy Springs–Roswell MSA is adequate.

Lending Activity

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

Lending activity in the Atlanta–Sandy Springs–Roswell MSA is adequate. MUB ranks 51st among 62 financial institutions that compete for deposits and has a market share of less than one percent. In comparison, the bank ranks 383rd among 748 lenders that compete for home mortgage loans; the dollar volume of loans was too low to register a market share and therefore we did not consider market share as a measure of performance.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of home mortgage loans in the Atlanta–Sandy Springs–Roswell MSA is excellent.

Home Mortgage Loans

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

2012-2013

During this review period, MUB did not originate or purchase sufficient loans to allow for a meaningful analysis due to the branch opening timing as noted in the Scope of the Evaluation section.

2014

MUB's geographic distribution of home purchase loans in 2014 in the Atlanta–Sandy Springs–Roswell MSA is excellent. The bank's geographic distribution of these loans in both low- and moderate-income CTs exceeds the percentage of owner-occupied units in these geographies.

The bank's geographic distribution of home refinance loans in 2014 in this AA is excellent. Distribution of home refinance loans in low-income CTs was near to the percentage of owner-occupied units, which is excellent. The percentage of the bank's loans in moderate-income CTs exceeds the percentage of owner-occupied units in these tracts, which is also excellent.

Distribution of Loans by Income Level of the Borrower

Overall, MUB's distribution of home mortgage loans to borrowers in the Atlanta–Sandy Springs–Roswell MSA reflects good penetration among retail customers of different income levels.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 for the applicable evaluation period in the state of Georgia 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.

2012-2013

MUB did not originate or purchase sufficient mortgage loans to allow for a meaningful analysis during this review period due to the branch opening timing as noted in the Scope of the Evaluation section.

2014

MUB's distribution of home purchase loans to borrowers in the Atlanta–Sandy Springs–Roswell MSA reflects excellent penetration among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was near to the percentage of low-income families and is good. The percentage of the bank's loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent.

MUB's distribution of home refinance loans to borrowers in this AA reflects good penetration among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was below the percentage of low-income families, but it is adequate. The percentage of MUB's loans to moderate-income borrowers exceeds the percentage of moderate-income families, which is excellent.

Community Development Lending

Refer to Table 1 Lending Volume in the 2014 state of Georgia section of Appendix D for the facts and data used to evaluate the Bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

MUB did not originate any CD loans in the Atlanta–Sandy Springs–Roswell MSA during the evaluation period. This had a neutral impact on the lending test rating for the state of Georgia due to the limited presence in the state.

Product Innovation and Flexibility

MUB’s flexible loan products are not offered in the Atlanta–Sandy Springs–Roswell MSA. This had a neutral impact on the lending test rating for the state of Georgia.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

MUB’s performance under the Investment Test in Georgia is rated “High Satisfactory” based on a full-scope review. The bank’s performance in the Atlanta-Sandy Spring-Roswell MSA AA is good considering that the branch was only open for one of the three years of the evaluation period.

Refer to Table 14 in the 2014 state of Georgia section of Appendix D for the facts and data used to evaluate the Bank’s level of qualified investments.

MUB received consideration for nine investments totaling \$728 thousand during the evaluation period within the Atlanta-Sandy Springs-Roswell MSA/AA. Over 90 percent of the dollars invested in the Atlanta-Sandy Springs-Roswell AA are LIHTC for affordable housing. Seven of the nine investments were donations totaling \$66.5 thousand dollars that are geared toward supporting LMI youths by providing services to avoid a life on the streets, education and scholarship funds, counseling on financial preparedness, and mortgage readiness.

MUB also made additional LIHTC investments totaling \$342 thousand outside the Atlanta-Sandy Spring-Roswell AA that go toward affordable housing, to benefit low and moderate-income individuals and families. This had a positive impact on the rating for the state of Georgia.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The Bank’s overall performance within the AA under the Service Test in Georgia is rated “Low Satisfactory.” Based on a full-scope review, the bank’s performance in the Atlanta-Sandy Springs-Roswell MSA is adequate.

Retail Banking Services

Refer to Table 15 in the 2014 state of Georgia 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.

Although access to low- and moderate-income geographies and individuals of different income levels in the Atlanta AA is limited, as a commercial banking operation, MUB's delivery systems are not intended to serve consumer market segments. As a result, the performance is considered adequate.

The Bank opened one commercial branch located in an upper-income CT during the evaluation period. The Bank did not close any branches in the AA during the evaluation period.

As a commercial branch, hours are by appointment only and it is not open to the general public. Only commercial customers are banked and no retail products or services are offered to consumers.

Community Development Services

MUB's performance in providing CD services in the full-scope AA is adequate, considering limited onsite operations in the AA. During the evaluation period, bank employees provided CD services through one community organization that offers a variety of financial education support to LMI individuals and families. The 16 MUB employees contributed 123 hours toward this community organization.

The bank's West Coast President now serves as the "lead director" for the National Board of Operation HOPE, headquartered in Atlanta. In his capacity as a board member, he not only supports the organization through regular board meetings and raising awareness and funding for the organization, but he also serves on the Executive Board of Operation HOPE and participates in the annual Global Financial Dignity Summit, as well. His service also extends to regular one-on-one meetings with the Founder and President of the organization, John Hope Bryant. As a result of his exemplary leadership, he was named the "Lead Director" for the National Board in January 2015.

State Rating

State of Illinois

CRA Rating for Illinois:	<u>Satisfactory</u>
The lending test is rated:	<u>Low Satisfactory</u>
The investment test is rated:	<u>Outstanding</u>
The service test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- An adequate level of lending activity in the Chicago-Naperville-Arlington Heights MD.
- An excellent distribution of home mortgage loans in the bank's AA; and an excellent penetration of home mortgage loans among retail customers of different income levels, but on limited lending volume.
- Excellent levels of qualified investments that are focused on affordable housing and small business development needs.
- Delivery systems are limited to commercial activity but adequate considering the bank's business model in Illinois.
- MUB's performance in providing CD services in the AA is adequate.

Description of Institution's Operations in Illinois

MUB's presence in the Chicago-Naperville-Arlington Heights MD is limited, as the bank operates only one commercial branch office in this AA that opened April 16, 2012. As mentioned previously, the branch in Chicago is commercial in nature in that the bank only banks commercial customers, both for direct lending and in deposit gathering. MUB extended their business practice to include purchasing mortgage loans for low- and moderate-income borrowers and in low- and moderate-income census tracts to improve CRA lending performance under the CRA regulation. This practice adds liquidity to the market and therefore allows lenders with the infrastructure to lend in this MD. We did not consider small loans to businesses in our analysis since MUB did not extend small loans to businesses.

Within the Chicago-Naperville-Arlington Heights MD, MUB ranks 150th in deposits with a 0.03 percent market share and total deposits of \$83.7 million based upon the FDIC June 2014 Summary of Deposits. In the discussion of performance context for California, there are commercial deposits reported centrally in California, which are actually located in other states both inside and outside of our combined AAs.

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

Scope of Evaluation in Illinois

In analyzing MUB's CRA performance for the state of Illinois, we performed a full-scope review of the Chicago-Naperville-Arlington Heights MD. This AA provides 100 percent of the bank's state of Illinois deposits and 100 percent of its loans. In evaluating the bank's lending performance, we placed the most weight on mortgage lending. We focused our review on home mortgage loans from April 13, 2012 through December 31, 2014. We did not consider small loans to businesses in our analysis. We reviewed CD investments and CD services for the period beginning April 13, 2012 through December 31, 2014. The bank did not originate any CD loans during the evaluation period. The other loan products are insignificant lines of business for MUB and their associated loan volumes were nominal to result in any meaningful weight toward conclusions. The dollar volume of loans was too low to register a market share and therefore we did not consider market share as a significant measure of performance.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The Bank's performance under the lending test in Illinois is rated "Low Satisfactory." Based on full-scope review, the bank's performance in the Chicago-Naperville-Arlington Heights MD is adequate.

Lending Activity

Refer to Table 1 Lending Volume for the applicable evaluation period in the state of Illinois section of Appendix D for the facts and data used to evaluate the Bank's lending activity.

Lending activity in the Chicago-Naperville-Arlington Heights MD is adequate. MUB ranks 135th among 181 financial institutions that compete for deposits and has a market share of 0.03 percent. In comparison, the bank ranks 213th among 872 lenders that compete for home mortgage loans and a market share of 0.03 percent.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans in the Chicago-Naperville-Arlington Heights MD is excellent.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 for the applicable evaluation period 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 and purchases.

Overall, the geographic distribution of home mortgage loans in the Chicago-Naperville-Arlington Heights MD is good.

2012-2013

MUB's geographic distribution of home purchase loans in the Chicago-Naperville-Arlington Heights MD is good. The bank's geographic distribution of these loans in low-income CTs was below the the percentage of owner-occupied units, but it is adequate. MUB's percentage of loans in moderate-income CTs exceeds the percentage of owner-occupied units in these CTs and is excellent. Market share in both low- and moderate-income CTs exceeds overall market share and is excellent however since market share is so low, we didn't consider this a significant factor in our rating assessment.

MUB's geographic distribution of home refinance loans in the Chicago-Naperville-Arlington Heights MD is adequate. The bank's geographic distribution of home refinance loans in low-income CTs exceeds the percentage of owner-occupied units and is excellent. The bank's market share in low-income CTs also exceeds overall market share and is excellent. MUB's percentage of home refinance loans in moderate-income CTs was below the percentage of owner-occupied units, but it is adequate. Market share meets overall market share and is excellent however since market share is so low, we didn't consider this a significant factor in our rating assessment.

2014

MUB did not originate or purchase any home mortgage loans in this AA in 2014 and is weaker than performance in 2012 and 2013. MUB's purchase program generated above the targeted levels set by the bank and therefore did not purchase additional loans in this market in 2014.

Distribution of Loans by Income Level of the Borrower***Home Mortgage Loans***

Refer to Tables 8, 9 and 10 for the applicable evaluation period 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.

MUB's distribution of home mortgage loans to borrowers in the Chicago-Naperville-Arlington Heights MD reflects excellent penetration among retail customers of different income levels.

2012-2013

MUB's distribution of home purchase loans to borrowers reflects excellent penetration among retail customers of different income levels. The percentage of loans to low-income borrowers was near to the percentage of low-income families and is excellent. The bank's market share of loans to low-income borrowers exceeds overall market share, and is excellent. The percentage of MUB's loans to moderate-income borrowers exceeds the percentage of moderate-income families, which is excellent. Market share to moderate-income borrowers exceeds overall market share and is excellent.

MUB's distribution of home refinance loans to borrowers in the Chicago-Naperville-Arlington Heights MD reflects excellent penetration among retail customers of different income levels. The percentage of loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. However, the bank's market share to low-income borrowers exceeds overall market share and is excellent. The percentage of MUB's home

refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families, which is excellent. Market share of home refinance loans to moderate-income borrowers also exceeds overall market share and is excellent.

2014

MUB exceeded their goals for the three year performance evaluation period in 2012 and 2013 and therefore MUB did not originate or purchase any home mortgage loans in this AA during the review period.

Community Development Lending

MUB did not originate any CD loans in the Chicago-Naperville-Arlington Heights MD during the evaluation period. This had a neutral impact on the lending test rating for the state of Illinois due to the limited presence in the State.

Refer to Table 1 Lending Volume in the 2014 state of Illinois section of Appendix D for the facts and data used to evaluate the Bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Product Innovation and Flexibility

MUB's flexible loan products are not offered in the Chicago-Naperville-Arlington Heights MD. This had a neutral impact on the lending test rating for the state of Illinois.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

MUB's performance under the Investment Test in Illinois is rated "Outstanding" based on a full-scope review, the Bank's performance in the Chicago-Naperville-Arlington Heights AA is excellent.

Refer to Table 14 in the 2014 state of Illinois section of Appendix D for the facts and data used to evaluate the Bank's level of qualified investments.

MUB received consideration for 14 investment totaling \$1.7 million in the Chicago-Naperville-Arlington Heights AA during the evaluation period. The bank also had 2 unfunded investments totaling another \$1.7 million. The investment dollar distribution was nearly even with 49.3 percent of the Bank's investment in affordable housing and 50.7 percent in economic development activities (job creation). The two economic development investments have created 700 jobs for LMI individuals in Cook County. The other two investments are LIHTC that will provide over 200 housing units for senior citizens in both Cook and DuPage counties. MUB also made 8 donations totaling \$65.6 thousand that will benefit low and moderate-income individuals by providing assistance with finding a job, affordable housing, growing businesses, and seeking educational opportunities.

The Chicago area presents abundant opportunities for financial institutions to serve all of the credit and community development needs of low- and moderate-income persons and areas. Many sophisticated, accomplished and well-capitalized community development organizations operate in the region, and these organizations are supported by an extensive network of foundations, research centers and universities that provide them with funding, information and expertise.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's overall performance within the AA under the Service Test in Illinois is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Chicago-Naperville-Arlington Heights MD is adequate.

Retail Banking Services

Refer to Table 15 in the 2014 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.

Although access to low- and moderate-income geographies and individuals of different income levels in the Chicago AA is limited, as a commercial banking operation, MUB's delivery systems are not intended to serve consumer market segments. As a result, the performance is considered adequate.

The bank opened one commercial branch located in an upper-income CT during the evaluation period. The bank did not close any branches in the AA during the evaluation period.

As a commercial branch, hours are by appointment only and it is not open to the general public. Only commercial customers are banked and no retail products or services are offered to consumers.

Community Development Services

MUB's performance in providing CD services in the full-scope AA is adequate. During the evaluation period, bank employees provided CD services through two community organizations that offer a variety of financial education support to LMI individuals and families. The 29 MUB employees contributed 270 hours toward these community organizations, which included small business technical and strategic planning support.

State Rating

State of New York

CRA Rating for New York:	<u>Satisfactory</u>
The lending test is rated:	<u>Low Satisfactory</u>
The investment test is rated:	<u>Outstanding</u>
The service test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- An adequate level of lending activity in the New York-Jersey City-White Plains MD.
- An excellent geographic distribution of home mortgage loans in the bank's AA; and an good penetration of home mortgage loans among retail customers of different income levels, but on limited lending volume.
- Excellent levels of community development investment focused on affordable housing and small business development needs.
- Delivery systems are limited to commercial activity but adequate considering the bank's business model in New York.
- MUB's performance in providing CD services in the AA is adequate.

Description of Institution's Operations in New York

MUB's presence in the New York-New Jersey-White Plains MD is limited, as the bank operates only one commercial branch office in this AA. As mentioned previously, the branch in New York is commercial in nature in that it only banks commercial customers both for direct lending and in deposit gathering.

Within the New York-New Jersey-White Plains MD, MUB ranks 114th in deposits with a 0.03 percent market share and total deposits of \$398 million based upon the FDIC June 2014 Summary of Deposits .

Based upon the FDIC June 2014 Summary of Deposits, JP Morgan Chase is the market leader with a 33.7 percent deposit market share, 966 offices, and \$474 billion in deposits. The Bank of NY Mellon ranks second with an 8.9 percent market share, 172 offices and \$125 billion in deposits. On a pre- and post-allocation basis, less than one percent of MUB's total deposits and its reportable loans are in New York.

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

Scope of Evaluation in New York

In analyzing MUB's CRA performance for the state of New York, we performed a full-scope review of the New York-Jersey City-White Plains MD. This AA provides 100 percent of the bank's state of New York deposits and 100 percent of its loans. In evaluating the bank's lending performance, the most weight was placed on mortgage lending. We did not consider small loans to businesses in our analysis since MUB does not lend to this segment in this market. The other loan products are insignificant lines of business for MUB and their associated loan volumes were nominal to result in any meaningful weight toward conclusions.

LENDING TEST

The bank's performance under the lending test in New York is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the New York-Jersey City-White Plains MD is good.

Lending Activity

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

Overall, MUB's lending activity in the state of New York is adequate. MUB has 0.04 percent of the deposit market share and ranks 68th among 135 financial institutions that compete for deposits in this AA. In comparison, the bank has a market share of 0.03 percent and ranks 204th among 538 lenders that compete for home mortgage loans however due to the low market share we did consider market share as a significant measure of performance.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

Overall, geographic distribution of home mortgage loans in the New York-Jersey City-White Plains MD is excellent.

2012-2013

MUB's geographic distribution of home purchase loans in this AA is excellent. The bank's percentage of home purchase loans in both low- and moderate-income CTs exceeds the percentage of owner-occupied units in these CTs, which is excellent. MUB's market share in both low- and moderate-income CTs also exceeds overall market share and is excellent.

The bank's geographic distribution of home refinance loans in this AA is excellent. The bank's percentage of home refinance loans in both low- and moderate-income CTs exceeds the percentage of owner-occupied units in these CTs, which is excellent. MUB's market share in both low- and moderate-income CTs exceeds overall market share and is excellent.

2014

MUB's geographic distribution of home mortgage loans in 2014 consistent with the bank's performance in 2012-2013.

The bank's geographic distribution of home purchase loans in 2014 in the New York-Jersey City-White Plains MD is excellent. The bank's percentage of home purchase loans in both low- and moderate-income CTs exceeds the percentage of owner-occupied units in these CTs, which is excellent.

MUB's geographic distribution of home refinance loans in this AA is excellent. The bank's percentage of home refinance loans in both low- and moderate-income CTs exceeds the percentage of owner-occupied units in these CTs, which is excellent.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 for the applicable evaluation period in the state of New York 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.

Overall, MUB's distribution of home mortgage loans to borrowers in the New York-Jersey City-White Plains MD reflects good penetration among retail customers of different income levels. Considering the lack of affordability for middle and upper income borrowers, the low and middle-income borrowers are priced out of this market, which is one of the highest priced markets in the country.

2012-2013

MUB's distribution of home purchase loans to borrowers in the New York-Jersey City-White Plains MD reflects good penetration among retail customers of different income levels. The percentage of bank loans to low-income borrowers was substantially below the percentage of low-income families, which is very poor. However, the percentage of the bank's loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent. The Bank's market share of loans for both low- and moderate-income borrowers exceeds overall market share, and is excellent. In concluding on the bank's efforts in this AA, we considered the poverty level, which disproportionately impacts low- and moderate-income populations, of almost 18 percent and the high cost of housing, which precludes many low-income borrowers from finding affordable homes and qualifying for home loans.

The bank's distribution of home refinance loans to borrowers in this AA reflects good penetration among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was substantially below the percentage of low-income families, and is very poor. However, the percentage of the bank's loans to moderate-income borrowers exceeds the percentage of moderate-income families, which is excellent. In addition, market share of loans to both low- and moderate-income borrowers exceeds overall market share and is excellent.

2014

MUB's distribution of home mortgage loans to borrowers of different income levels is in 2014 is consistent with 2012-2013, and is good.

The bank's distribution of home purchase loans to borrowers in this AA in 2014 reflects good penetration among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was substantially below the percentage of low-income families, and is very poor. However, the percentage of the bank's loans to moderate-income borrowers exceeds the percentage of moderate-income families, which is excellent. In concluding on the bank's performance, we considered the high poverty level and the high cost of housing.

The bank's distribution of home refinance loans to borrowers in this AA reflects good penetration among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was substantially below the percentage of low-income families, and is very poor. However, the percentage of the bank's loans to moderate-income borrowers exceeds the percentage of moderate-income families, which is excellent.

Community Development Lending

Refer to Table 1 Lending Volume in the 2014 state of New York section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The Bank originated one CD loan in the New York-Jersey City-White Plains MD totaling \$46,250 million during this evaluation period. This had a neutral impact on the lending test rating for the state of New York.

Product Innovation and Flexibility

MUB did not offer its flexible loan products in the New York-Jersey City-White Plains MD during the evaluation period. This had a neutral impact on the lending test rating for the state of New York.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

MUB's performance under the Investment Test in New York is rated "Outstanding" based on a full-scope review, the bank's performance in the New York-Jersey City-White Plains AA is excellent.

Refer to Table 14 in the 2014 state of New York section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

MUB made 292 investments totaling \$26.3 million during the evaluation period in the New York-Jersey City-White Plains AA. Over 92 percent of the dollar investments in the AA were

LIHTC that will provide affordable housing to LMI individuals and families in New York's Upper East Side, Mott Haven, and Harlem neighborhood. Nearly 98 percent of the total number of investments are donations that will benefit LMI individuals and families in the New York-White Plains-Wayne AA.

The NY AA has an extremely high cost of living, which makes it often prohibitive for low- to moderate-income to qualify for a mortgage, start a business or recover from a financial setback. However, the opportunities for community development participation within the AA are quite numerous. Many community development organizations and government agencies engage in affordable housing and economic development activities and provide a variety of financial and social services targeted to low- and moderate-income persons.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's overall performance within the AA under the Service Test in New York is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the New York-Jersey City-White Plains MD is adequate.

Retail Banking Services

Refer to Table 15 in the 2014 state of New York 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.

Although access to low- and moderate-income geographies and individuals of different income levels in the New York AA is limited, as a commercial banking operation, MUB's delivery systems are not intended to serve consumer market segments. As a result, the performance is considered adequate.

The Bank operated one commercial branch located in an upper-income CT during the evaluation period. The bank did not open or close any branches in the AA during the evaluation period. As a commercial branch, hours are by appointment only and it is not open to the general public. Only commercial customers are banked and no retail products or services are offered to consumers.

Community Development Services

MUB's performance in providing CD services in the full-scope AA is adequate. During the evaluation period, MUB bank employees did not provide any CD-qualified services. However, employees from affiliate BTMU provided CD services through five community organizations that offer a variety of financial education support to LMI individuals and families. The 148 BTMU employees contributed 428 hours toward these community organizations, providing financial literacy education to LMI individuals and families.

One example of financial literacy education training provided by employees involves the New York affiliate of Operation HOPE through its “Banking on Our Future” program targeted to low-income schools. A total of 59 employees provided 325 hours to support Operation HOPE.

State Rating

State of Oregon

CRA Rating for Oregon:	<u>Satisfactory</u>
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>High Satisfactory</u>
The service test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- A good level of lending activity in Oregon.
- An good geographic distribution of home mortgage loans and a good geographic distribution of small loans to businesses in the bank's AA; an adequate penetration of home mortgage loans among retail customers of different income levels, but a poor distribution of small loans to businesses.
- An excellent level of community development loans that were responsive to the CD needs in the AA. This had a positive impact on the lending test rating for the state of Oregon.
- Good level of qualified investments focused on affordable housing and small business development needs.
- Branch office locations that are accessible to geographies and individuals of different income levels.
- MUB's performance in providing CD services in the full-scope AA is very poor.

Description of Institution's Operations in Oregon

MUB's presence in the Oregon is limited. The bank has three branch offices within the state – one is in the Salem MSA and two are located in the Oregon segment of the Portland-Vancouver-Hillsboro, OR/WA multistate MSA. MUB does not have a presence in the Vancouver portion of this multistate MSA and, as such, has not included the Washington portion within its designated AA.

MUB ranks thirteenth in the Portland-Vancouver-Hillsboro MSA with a 0.90 percent deposit market share, two offices and \$388 million in deposits based on the June 2014 Summary of Deposit Report. The four largest institutions, based on deposit market share, include U.S. Bank, which is the market leader with a 19.52 percent deposit market share, 95 offices and \$8.5 billion in deposits; Bank of America ranks second with an 18.22 percent market share, 43 offices and \$7.9 billion in deposits; and Wells Fargo ranks third with a 14.90 percent market share, 61 offices and \$6.5 billion in deposits. Coming in at fourth, OnPoint® Community Credit

Union⁴ commands 7.15 percent of market share, with \$3.1 billion in deposits coming out of one branch location. Less than one percent of MUB's total deposits and one percent of its reportable loans are in Oregon.

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

Scope of Evaluation in Oregon

The evaluation included a full-scope review of the Portland-Vancouver-Hillsboro MSA. This AA provides nearly 79 percent of the bank's state of Oregon deposits and the vast majority of its loans by number and dollar. We performed a limited-scope review of the Salem MSA. Our review focused on home mortgage loans followed by small loans to businesses for the period beginning January 1, 2012 through December 31, 2014. We reviewed CD loans, qualified investments, and CD services for the period beginning April 13, 2012 through December 31, 2014.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Oregon is rated "High Satisfactory." Based on full-scope reviews, the Bank's performance in the Portland-Vancouver-Hillsboro MSA is good.

Lending Activity

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

Overall, MUB's lending activity in the state of Oregon is good. MUB has 1.09 percent of the deposit market share and ranks ninth among 36 financial institutions that compete for deposits in this AA. In comparison, the bank has a market share of 0.12 percent and ranks 58th among 476 lenders that compete for home mortgage loans. MUB has a market share of 1.07 percent and ranks 28th among 87 lenders that compete for small loans to businesses.

Distribution of Loans by Income Level of the Geography

Overall MUB's geographic distribution of home mortgage loans in the Portland-Vancouver-Hillsboro MSA is good. Geographic distribution of small loans to businesses is good.

⁴ OnPoint Community Credit Union has only one office and gathers its loans and deposits online. Per their website, they "have grown to be the largest community-owned financial institution in Oregon with over 283,000 loyal members." They gather deposits from a wide network of counties spanning Oregon and part of Washington, which are reported on the FDIC Summary of Deposits within the Portland AA.

Home Mortgage Loans

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

2012-2013

MUB's geographic distribution of home purchase loans in the Portland-Vancouver-Hillsboro MSA is good. The percentage of the bank's loans in low-income CTs exceeds the percentage of owner-occupied units and is excellent. The bank's market share also exceeds overall market share and is excellent. The percentage of MUB's loans in moderate-income CTs was below the percentage of owner-occupied units in these CTs, and is adequate. The bank's market share of loans in moderate-income CTs exceeds overall market share and is excellent.

The bank's geographic distribution of home refinance loans in this AA is good. The percentage of the bank's loans in low-income CTs exceeds the percentage of owner-occupied units, and is excellent. The bank's market share of loans in low-income CTs also exceeds overall market share and is excellent. The percentage of MUB's home refinance loans in moderate-income CTs was below the percentage of owner-occupied units, but it is adequate. The bank's market share of loans in moderate-income CTs exceeds overall market share and is excellent.

2014

The geographic distribution of home mortgage loans in 2014 is stronger than performance in 2012-2013.

MUB's geographic distribution of home purchase loans in this AA in 2014 is excellent. The bank's geographic distribution of these loans exceeds the percentage of owner-occupied units in both low- and moderate-income CTs, which is excellent.

The bank's geographic distribution of home refinance loans is excellent. The percentage of the bank's loans in low-income CTs exceeds the percentage of owner-occupied units, which is excellent. The percentage of the Bank's loans in moderate-income CTs was above the percentage of owner-occupied units in moderate-income CTs, and is excellent.

Small Loans to Businesses

Refer to Table 6 for the applicable evaluation period in the state of Oregon 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.

2012-2013

MUB's geographic distribution of small loans to businesses in the Portland-Vancouver-Hillsboro MSA is good. The bank's distribution of these loans in low-income CTs exceeds the percentage of businesses in these CTs and is excellent. The bank's market share also exceeds overall market share. MUB's distribution of these loans in moderate-income CTs was below the percentage of businesses in moderate-income CTs, but it is adequate. The bank's market share in moderate-income CTs was substantially below overall market share, and is very poor.

2014

The geographic distribution of small loans to businesses is stronger in 2014 than in 2012-2013.

MUB's geographic distribution of small loans to businesses in 2014 is excellent. The bank's distribution of these loans in both low- and moderate-income CTs exceeds the percentage of businesses in these CTs.

Distribution of Loans by Income Level of the Borrower

Overall, MUB's distribution of home purchase loans to borrowers in the Portland-Vancouver-Hillsboro MSA reflects adequate penetration among retail customers of different income levels and poor distribution of small loans to businesses.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 for the applicable evaluation period in the state of Oregon 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.

2012-2013

MUB's distribution of home purchase loans to borrowers in the Portland-Vancouver-Hillsboro MSA reflects adequate penetration among retail customers of different income levels. The bank did not originate any home purchase loans to low-income borrowers which is very poor. However, the percentage of the bank's loans to moderate-income borrowers approximates the percentage of families that are moderate-income and is excellent. Market share exceeds overall market share and is excellent. In concluding on the bank's performance, we considered the rising cost of homes during the review period in this AA, which made it difficult for low-income families to find affordable homes to purchase.

MUB's distribution of home refinance loans to borrowers in the Portland-Vancouver-Hillsboro MSA reflects good penetration among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was substantially below the percentage of low-income families, and it is very poor. However, the bank's market share to low-income borrowers exceeds overall market share, and is excellent. The percentage of the Bank's loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent. Market share exceeds overall market share, which is excellent.

2014

MUB's distribution of home mortgage loans in 2014 is weaker than in 2012-2013.

The bank's distribution of home purchase loans to borrowers in this AA in 2014 reflects adequate penetration among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. However, the percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent.

The bank's distribution of home refinance loans to borrowers in this AA reflects adequate penetration among retail customers of different income levels. The percentage of the bank's

loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. However, the percentage of MUB's loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent.

Small Loans to Businesses

Refer to Table 11 for the applicable evaluation period in the state of Oregon 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.

Overall, MUB's distribution of small loans to businesses in the Portland-Vancouver-Hillsboro MSA is poor.

2012-2013

The distribution of the bank's small loans to businesses (businesses with gross annual revenues of \$1 million or less) is poor. The percentage of the bank's small loans to businesses was substantially below the demographic comparator and is very poor. The bank's market share was below the percentage for all lenders in the market, but it is adequate.

2014

MUB's distribution of small loans to businesses in 2014 is consistent with performance in 2012-2013.

The distribution of the bank's small loans to businesses is poor. The percentage of the bank's small loans to businesses was substantially below the percentage of small businesses in the Portland-Vancouver-Hillsboro MSA, which is very poor.

Community Development Lending

Refer to Table 1 Lending Volume in the 2014 state of Oregon section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

MUB originated 18 CD loans exceeding \$9.4 million over the evaluation period in the Portland-Vancouver-Hillsboro MSA and is excellent. This includes the following:

- \$8.3 million provided financing for 697 units of affordable housing.
- \$700 thousand helped provided community services that target LMI individuals.
- \$500 thousand promoted economic development.

Based on the dollar volume and the responsiveness to CD needs identified in this AA, CD loans had a positive impact on the lending test rating in the Portland-Vancouver-Hillsboro MSA.

Product Innovation and Flexibility

MUB offers flexible loan products in the bank's Oregon AAs. These include the Economic Opportunity Mortgage (EOM) and the newly introduced Fannie Mae "My Community Mortgage" (MCM). These direct loan programs are geared to meet the needs of both LMI families and LMI communities. The bank's EOM program is available to borrowers that meet income limits or who reside in targeted LMI census tracts. Underwriting standards for the program are flexible, allowing higher loan-to-value, higher debt-to-income ratios, and limited credit history. Within its Oregon AAs, MUB originated 16 EOM and MCM loans totaling \$2.8 million during the evaluation period. This positively influenced the lending test rating in the state of Oregon.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Salem MSA is weaker than the bank's overall "high satisfactory" performance under the lending test in Oregon. During the review period, the bank originated/purchased very few loans of any type in this AA. Nevertheless this AA only accounts for 20 percent of the overall state rating and a significant portion of the deposits are commercial in nature. Therefore we did not consider this AA to negatively affect the overall performance in Oregon.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

MUB's performance under the Investment Test in Oregon is rated "High Satisfactory" based on a full-scope review and the lack of any investments in the limited scope AA. While the bank's performance in the Portland-Vancouver-Hillsboro MSA AA is excellent, the performance in the Salem MSA is very poor.

Refer to Table 14 in the 2014 state of Oregon section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

MUB made 14 qualified investments including donations totaling \$9.7 million during the evaluation period within the Portland-Vancouver-Hillsboro MSA AA. MUB also carried over \$5.1 million of investments from the prior period. Over 96 percent of the dollars MUB invested in the Portland-Vancouver-Hillsboro MSA go towards constructing, acquiring, and rehabbing housing to provide affordable housing to LMI individuals and families in the AA. Nineteen thousand in donations in the AA, went towards preparing low-income women for new jobs, job interviews, supplying professional attire, and analyzing their skills assessments. MUB also made \$4 thousand BEA grant/awards to a nonprofit bank consortium that fosters smart development and community revitalization to increase Portland supply of affordable housing units.

A number of opportunities are available in the Portland AA for financial institutions to meet the community development needs of the area. Capable, accomplished nonprofit organizations work with financial institutions, local government, foundations and other organizations to meet these needs.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Salem MSA is weaker than the bank's overall "outstanding" performance under the investment test in Oregon. During the review period, the bank did not invest in any eligible investments in the Salem MSA. While this AA did not carry significant weight in the state of Oregon, the lack of any investments in this AA is not representative of a leader in the state and therefore affected the state rating for investments.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Low Satisfactory." Based on a full-scope review, the bank's performance is adequate in the Portland-Vancouver-Hillsboro MSA.

Retail Banking Services

Refer to Table 15 in the 2014 state of Oregon 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.

MUB's delivery systems are reasonably accessible to geographies and individuals of different income levels in the Portland AA. The percentage of the bank's branches located in low-income CTs exceeds the percentage of the AAs population residing in those CTs. The bank does not have any branches located in moderate-income tracts, which was substantially below the population residing in those CTs. During the evaluation period, MUB closed a branch located in a moderate-income CT due to poor financial performance and did not open any branches during the evaluation period.

The reasonableness of business hours and services offered at branch locations are adequate and do not vary in a way that inconveniences LMI geographies or individuals. Typical branch hours are Monday through Friday from 9:00 a.m. to 5:00 p.m. with no Saturday hours.

MUB's standard products and services are available at the branches. The bank also offers low-cost basic checking accounts targeted to low-income individuals and students. The bank continues to offer the Electronic Transfer Account (ETA). The ETA account is designed for recipients of Federal government benefits such as Social Security. The basic checking and ETA accounts require no minimum balance, have modest monthly service fees, and allow unlimited ATM access. Over the course of the evaluation period, the bank developed a new basic banking account the "UB Access Account", which was specifically designed for the unbanked and under-banked. The UB Access Account is a checkless banking account that requires no minimum balance, has modest monthly service fees, which are waived with at least \$25 in direct deposits, does not allow overdrafts, and provides unlimited ATM access at MUB ATMs. MUB recognizes the need for savings and has established the "Nest Egg Savings Account" as an introductory savings account targeted for lower income households. In addition, the bank works with one individual non-profit agency across the AA to hold Individual

Deposit Accounts (IDA) for low-income consumers saving for college, establishing a business, or purchasing a home.

MUB offers an array of alternative delivery systems for its products and services to help reach its customers. These include online banking, telephone banking, and one ATM at each of its branches. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of UB's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding MUB's performance for each full-scope AA under the Service Test.

Community Development Services

UB's performance in providing CD services in the full-scope AA is very poor. During the evaluation period, bank employees provided CD services through one community organization focusing on affordable housing for LMI first-time homebuyers. The 37 MUB employees contributed 11 hours towards this organization, which included board membership, fundraising, and assisting with strategic planning.

Conclusions for Area receiving Limited-Scope Review

Based on limited-scope reviews, the bank's performance under the Service Test in the Salem AA is weaker than the bank's overall performance in the state of Oregon. This is because the bank has no branches located in LMI CTs in the Salem AA.

State Rating

State of Texas

CRA Rating for Texas:	<u>Satisfactory</u>
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>Low Satisfactory</u>
The service test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- An adequate level of lending in the Dallas-Plano-Irving MD.
- A good geographic distribution of home mortgage loans; and an excellent penetration of these loans among retail customers of different income levels, but on limited lending volume.
- An adequate level of CD lending which had a positive impact on the bank's lending test rating for the state of Texas.
- An adequate level of qualified investments in the Dallas-Plano-Irving MD.
- Delivery systems are limited to commercial activity but adequate considering the bank's business model in Texas.
- MUB's performance in providing CD services in the full-scope AA is poor.

Description of Institution's Operations in Texas

MUB's presence in Texas is limited. The Bank has two branch offices within the state – one is in the Houston-The Woodlands-Sugar Land MSA and one is located in the in the Dallas-Plano-Irving MD. As the bank has a greater percentage of its Texas deposits in the Dallas-Plano-Irving MD AA, we have selected it for full-scope review. The branches in Texas are commercial in nature in that the bank only serves commercial customers for deposit gathering and corporate lending. MUB extended business practice to include purchasing mortgage loans for low- and moderate-income borrowers and in low- and moderate-income census tracts to improve CRA lending performance under the CRA regulation.

Within the two AAs where MUB has offices, the bank ranks 47th in deposits with a 0.17 percent market share and total deposits of \$740 million. Within the Dallas-Plano-Irving MD, MUB ranks 39th with a 0.24 percent market share and total deposits of \$426 million based upon the FDIC June 2014 Summary of Deposits.

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

Scope of Evaluation in Texas

The evaluation included a full-scope review of the Dallas-Plano-Irving MD. The Dallas-Plano-Irving MD provides 74 percent of the bank's state of Texas deposits and 50 percent of its loans. We performed a limited-scope review of the Houston-The Woodlands-Sugar Land MSA. Our review focused on home mortgage loans and small loans to businesses for the period beginning January 1, 2012 through December 31, 2014. We reviewed CD loans, qualified investments, and CD services for the period beginning July 11, 2012 through December 31, 2014.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Texas is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Dallas-Plano-Irving MD is good. MUB's geographic distribution of mortgage loans is good.

Lending Activity

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

Overall, MUB's lending activity in the state of Texas is adequate. MUB has 0.25 percent market share and ranks 34th among 139 financial institutions that compete for deposits. In comparison, the bank has a market share of 0.04 percent and ranks 214th among 864 financial institutions that compete for home mortgage loans.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

Overall, the bank's geographic distribution of home mortgage loans is good.

2012-2013

MUB's geographic distribution of home purchase loans in the Dallas-Plano-Irving MSA is good. We considered the performance context of limited purchase opportunities for mortgages in low income census tracts and therefore weighted the moderate income census tract performance higher. The percentage of loans in low-income CTs was substantially below the percentage of owner-occupied units, and is very poor. The bank's market share was near to overall market share, and is good. Geographic distribution of home purchase loans in moderate-income CTs exceeds the percentage of owner-occupied units and is excellent. Market share exceeds overall market share, which is excellent.

The bank's geographic distribution of home refinance loans in this AA is good. The percentage of the Bank's loans in low-income CTs was below the percentage of owner-occupied units, but it is adequate. Market share of loans in low-income CTs exceeds overall market share, which is excellent. The percentage of the bank's loans in moderate-income CTs exceeds the percentage of owner-occupied units and is excellent. Market share exceeds overall market share, which is excellent.

2014

The bank did not originate or purchase any home mortgage loans in this AA during 2014. The bank designed a reasonable three year plan to purchase mortgages during the evaluation period and met their three year goals in 2012 and 2013, therefore we did not consider the lack of lending in 2014 negatively.

Distribution of Loans by Income Level of the Borrower

Overall, the bank's distribution of loans by income level of borrower is excellent.

Home Mortgage Loans

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

2012-2013

MUB's distribution of home purchase loans to borrowers in the Dallas-Plano-Irving MSA reflects excellent penetration among retail customers of different income levels. The percentage of the Bank's loans to low-income borrowers approximates the percentage of families that are low-income, which is excellent. MUB's market share exceeds overall market share, which is excellent. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent. MUB's market share also exceeds overall market share and is excellent.

MUB's distribution of home refinance loans to borrowers in the Dallas-Plano-Irving MSA reflects excellent penetration among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was approximates the percentage of low-income families, which is excellent. Market share exceeds overall market share, and is excellent. The percentage of home refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families and is excellent. Market share also exceeds overall market share, and is excellent.

2014

The bank did not originate or purchase any home purchase or refinance loans in this AA during 2014.

Community Development Lending

Refer to Table 1 Lending Volume in the 2014 state of Texas section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

MUB's CD lending had a positive impact on the lending test rating for the state of Texas based on the nature, impact and the bank's limited presence in the State.

MUB originated one CD loan totaling \$9.4 million over the evaluation period in the Dallas-Plano-Irving MSA. This loan was to a security firm that meets the size standards of the SBA and helped support small business development.

The bank also originated a CD loan totaling \$18 million, which helped provide affordable housing to LMI individuals in the state Texas including the bank's AAs. The bank's CD lending in its AA and in the state had a positive impact on the lending test rating in the state of Texas.

Product Innovation and Flexibility

MUB did not offer its flexible loan products in the Dallas-Plano-Irving MSA during the evaluation period. This had a neutral impact on the lending test rating for the state of Texas.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Houston-The Woodlands-Sugar Land MSA is consistent with the bank's overall "High Satisfactory" performance under the lending test in Texas. Refer to the Tables 1 through 13 in the state of Texas section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

MUB's performance under the Investment Test in Texas is rated "Low Satisfactory" based on a full-scope review, the bank's performance in the Dallas Plano-Irving MD AA is adequate.

Refer to Table 14 in the 2014 state of Texas section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

MUB made one investment totaling \$155.8 thousand in the Dallas-Plano-Irving MD AA. MUB also made five investments supporting the broader statewide areas totaling \$16.3 million. Over 44 percent of the investments made went towards affordable housing for low and moderate-income individuals and families. MUB also made 16 donations totaling \$347.5 thousand. Some of the donations made went to support an organization that empowers teens and women to overcome abuse, addiction, poverty, and limited opportunities. The organization provided access to job training, education, financial assistance and spiritual counseling. MUB also has

another \$5.3 million in unfunded commitments that will provide equity financing to Small Business Investment Company (SBIC) fund that will provide mezzanine and structured equity capital to companies operating in the small and middle market, particularly within the healthcare and business services sectors.

Opportunities are available in the Dallas area for financial institutions to help meet community credit and community development needs. Five CDFIs certified by the CDFI Fund of the U.S. Treasury Department have an office in Dallas, and three statewide CDFIs also serve the area. In addition, a number of effective non-profit organizations develop affordable housing and prepare prospective LMI homebuyers, including an affiliate of the Neighbor Works network. A number of other organizations assist small business owners with business planning and financing.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Houston-The Woodlands-Sugar Land AA with only \$54 thousand of current period investments is weaker than the bank's overall "Low Satisfactory" performance under the investment test in Texas. Refer to the Tables 1 through 13 in the state of Texas section of Appendix D for the facts and data that support these conclusions.

While the limited scope area was weaker than the full scope area, we considered the fact that the Houston-The Woodlands-Sugar Land AA was newly opened and not operational for the full evaluation period.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's overall performance within the AA under the Service Test in Texas is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Dallas-Plano-Irving MD is adequate.

Retail Banking Services

Refer to Table 15 in the 2014 state of Texas section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Although access to low- and moderate-income geographies and individuals of different income levels in the Dallas AA is limited, as a commercial banking operation, MUB's delivery systems are not intended to serve consumer market segments. As a result, the performance is considered adequate.

The bank operated one commercial branch located in an upper-income CT during the evaluation period. The Bank did not open or close any branches in the AA during the evaluation period. As a commercial branch, hours are by appointment only and it is not open to

the general public. Only commercial customers are banked and no retail products or services are offered to consumers.

Community Development Services

MUB's performance in providing CD services in the full-scope AA is adequate, considering limited onsite operations in the AA. During the evaluation period, bank employees provided CD services through three community organizations that focus on affordable housing for LMI first-time homebuyers, financial education, and community services benefiting LMI individuals and families. The 41 MUB employees contributed 55 hours toward these community organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

The limited-scope review had a neutral impact on the state of Texas. Based on limited-scope reviews, the bank's performance under the Service Test in the Houston-The Woodlands-Sugar Land MSA consistent with the Bank's overall performance in the state of Texas.

State Rating

State of Washington

CRA Rating for Washington:	<u>Outstanding</u>
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>Outstanding</u>
The service test is rated:	<u>Outstanding</u>

The major factors that support this rating include:

- A good level of lending activity in the Seattle-Bellevue-Everett MD.
- An adequate geographic distribution of home mortgage loans and an excellent geographic distribution of small loans to businesses; a good penetration of home mortgage loans among retail customers of different income levels and an adequate distribution of small loans to businesses.
- An excellent level of CD lending which had a positive impact on the bank's lending test rating in the state of Washington.
- Excellent levels of qualified investments focused on affordable housing and small business development needs.
- Branch offices are readily accessible to geographies and individuals of different income levels.
- MUB's performance in providing CD services in the full-scope AA is good.

Description of Institution's Operations in Washington

The Bank ranks eleventh in deposits with 1.99 percent of the state's deposit base (FDIC-June 2014). The top five institutions including Bank of America with 23 percent, Boeing Employees Credit Union with 13 percent, Wells Fargo with 11 percent, JP Morgan Chase with 10 percent, and U.S. Bank with 10 percent, hold more than half of the state's deposits. MUB operates 43 branches in six AAs within the state; less than five percent of the bank's total deposits and four percent of total reportable loans are in Washington.

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

Scope of Evaluation in Washington

The evaluation included a full-scope review of the Seattle-Bellevue-Everett MD which provides over 77 percent of the bank's state of Washington deposits and a limited-scope review of the Bellingham MSA, the Bremerton-Silverdale MSA, the Mount Vernon-Anacortes MSA, the Tacoma-Lakewood MD, and the non MSA AA. Our review focused on home mortgage loans and small loans to businesses for the period beginning January 1, 2012 through December 31, 2014. We reviewed CD loans, investments, and services for the period beginning April 13, 2012 through December 31, 2014.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Washington is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Seattle-Bellevue-Everett MD is good.

Lending Activity

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

Lending activity in the Seattle-Bellevue-Everett MD is good. MUB ranks seventh among 50 financial institutions that compete for deposits and has a market share of 3.40 percent. In comparison, the Bank ranks 19th among 536 institutions that compete for home mortgage loans and has a market share of 1.02 percent. The bank ranks 19th among 102 financial institutions that compete for small loans to businesses and a market share of 1.31 percent.

Distribution of Loans by Income Level of the Geography

Overall MUB's geographic distribution of home mortgage loans and small loans to businesses in Washington State is good.

Home Mortgage Loans

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

Overall, MUB's geographic distribution of home mortgage loans is adequate. In concluding on the bank's performance, we considered the bank's stronger distribution of home mortgage loans in both low- and moderate-income geographies in 2014.

2012-2013

MUB's geographic distribution of home purchase loans in the Seattle-Bellevue-Everett MD is poor. The percentage of loans in low-income CTs was substantially below the percentage of

owner-occupied units and is very poor. Market share in low-income CTs was also substantially below overall market share and is very poor. The percentage of home mortgage loans in moderate-income CTs was below the percentage of owner-occupied units in these CTs, but it is adequate. Market share exceeds overall market share and is adequate.

MUB's geographic distribution of home refinance loans in the Seattle-Bellevue-Everett MSA is poor. The percentage of loans in both low- and moderate-income CTs was substantially below the demographic comparator and is very poor. The bank's market share in both low- and moderate-income CTs was below overall market, but it is adequate.

2014

MUB's geographic distribution of home mortgage loans is stronger in 2014 than in 2012-2013.

The Bank's geographic distribution of home purchase loans in the Seattle-Bellevue-Everett MSA is adequate. The percentage of the bank's home purchase loans in low-income CTs exceeds the percentage of owner-occupied units in these CTs and is excellent. The percentage of the bank's loans in moderate-income CTs was substantially below the percentage of units in these CTs and is very poor.

MUB's geographic distribution of home refinance loans in this AA is excellent. The percentage of the bank's home refinance loans in both low- and moderate-income CTs exceeds the percentage of owner-occupied units in these CTs.

Small Loans to Businesses

Refer to Table 6 for the applicable evaluation period in the state of Washington 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.

Overall, MUB's geographic distribution of small loans to businesses is excellent.

2012-2013

The bank's geographic distribution of small loans to businesses in the Seattle-Bellevue-Everett MSA is excellent. The geographic distribution of small loans to businesses in low-income CTs was exceeds the percentage of businesses in these CTs, and is excellent. The bank's market share in low-income CTs also exceeds overall market share, which is excellent. The percentage of the bank's loans in moderate-income CTs exceeds the percentage of businesses in these CTs and is excellent. Market share of loans in moderate-income CTs exceeds overall market share, and is also excellent.

2014

MUB's geographic distribution of small loans to businesses in 2014 is consistent with performance in 2012-2013.

The bank's geographic distribution of small loans to businesses in this AA in 2014 is excellent. The percentage of loans in both low- and moderate-income CTs exceeds the percentage of businesses in these census tracts.

Distribution of Loans by Income Level of the Borrower

Overall, MUB's distribution of loans to borrowers in the Seattle-Bellevue-Everett MSA reflects adequate penetration among customers of different income levels.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 for the applicable evaluation period in the state of Washington 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.

Overall, MUB's distribution of home mortgage loans to borrowers in the Seattle-Bellevue-Everett MSA reflects adequate penetration among retail customers of different income levels.

2012-2013

MUB's distribution of home purchase loans to borrowers in the Seattle-Bellevue-Everett MSA reflects adequate penetration among retail customers of different income levels. The percentage of the bank's loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. The bank's market share of loans to low-income borrowers was below overall market share, but it is adequate. The percentage of MUB's loans to moderate-income borrowers was near to the percentage of moderate-income families, which is good. The bank's market share of loans to moderate-income borrowers was below overall market share, but it is adequate.

MUB's distribution of home refinance loans to borrowers in the AA reflects good penetration among retail customers of different levels. The percentage of the bank's home refinance loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. However, the bank's market share to low-income families approximates overall market share, and is excellent. The percentage of MUB's home refinance loans to moderate-income families exceeds the percentage of moderate-income families in this AA, which is excellent. Market share exceeds overall market share and is excellent.

2014

Distribution of home mortgage loans retail customers of different income levels is weaker in 2014 than in 2012-2013.

MUB's distribution of home purchase loans to borrowers in the Seattle-Bellevue-Everett MSA in 2014 reflects poor penetration of these loans among retail customers of different income levels. The percentage of loans to both low- and moderate-income borrowers was substantially below the percentage of families that are low- and moderate-income and is very poor.

The Bank's distribution of home refinance loans to borrowers in this AA reflects adequate penetration of these loans among retail customers of different income levels. The percentage of loans to low-income borrowers was substantially below the percentage of low-income families and is very poor. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families, which is excellent.

Small Loans to Businesses

Refer to Table 11 for the applicable evaluation period in the state of Washington 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.

Overall, MUB's distribution of small loans to businesses is adequate.

2012-2013

The distribution of the bank's loans to businesses that are small (businesses with gross annual revenues of \$1 million or less) is adequate. The percentage of the bank's small loans to businesses was below the percentage of businesses that are small in this AA, but it is adequate. The bank's market share of small loans to businesses substantially meets market share of all lenders and is good.

2014

MUB's distribution of small loans to business in 2014 is consistent with MUB's performance in 2012-2013.

The distribution of the bank's small loans to businesses in 2014 is adequate. The percentage of the bank's small loans to businesses was below the percentage of businesses that are small in this AA, but it is adequate.

Community Development Lending

Refer to Table 1 Lending Volume in the 2014 state of Washington section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

MUB's CD lending in the Seattle-Bellevue-Everett MD is excellent and contributed positively to this AA's lending performance. Over the evaluation period, MUB originated 58 CD loans totaling almost \$81 million in the Seattle-Bellevue-Everett MD. The loans were responsive to identified needs in the AA and had a positive impact on the lending test conclusions in the state of Washington. These include the following, \$40 million provided 565 affordable housing units for LMI individuals and families, \$30 million provided funds for economic development initiatives, and \$12 million helped provide CD services to LMI individuals.

Product Innovation and Flexibility

MUB offers flexible loan products in its Washington AAs. These include the Economic Opportunity Mortgage (EOM) and the newly introduced Fannie Mae "My Community Mortgage" (MCM). These direct loan programs are geared to meet the needs of both LMI families and LMI communities. The Bank's EOM program is available to borrowers that meet income limits or who reside in targeted LMI census tracts. Underwriting standards for the program are flexible, allowing higher loan-to-value, higher debt-to-income ratios, and limited credit history. Within the bank's Washington AAs, MUB originated 335 EOM and MCM loans totaling \$81.6

million during the evaluation period. This positively influenced the lending test rating in the state of Washington.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the Bank's performance under the lending test in the Bellingham MSA, the Bremerton-Silverdale MSA, the Mount Vernon-Anacortes MSA, the Tacoma-Lakewood MSA, and non-MSA AA is weaker than the Bank's overall performance under the lending test in Washington. MUB originated or purchased very few loans of any type in the limited-scope AAs. This had a limited impact on the overall lending test rating for the state of Washington due to MUB's branching network in the full scope areas for loans and deposits. Refer to the Tables 1 through 13 in the state of Washington section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

MUB's performance under the Investment Test in Washington is rated "Outstanding" based on a full-scope review, the Bank's performance in the Seattle-Bellevue-Everett MSA AA is excellent.

Refer to Table 14 in the 2014 state of Washington section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

MUB made 16 investments totaling \$86.6 million in the Seattle-Bellevue-Everett MSA AA in the evaluation period. Nearly 98 percent of the investment made in the Seattle-Bellevue-Everett MSA went towards affordable housing and provided in excess of 600 affordable housing units for low and moderate-income individuals. MUB also made 83 donations totaling \$700 thousand. MUB also reinvested a \$4 thousand Bank Enterprise Award to Washington Community Reinvestment Coalition (WCRA) – Seattle WCRA whose mission is to be a catalyst for the creation and preservation of affordable housing in Washington State.

Many opportunities are available in the Seattle area for financial institutions to meet the affordable housing and economic development initiatives in the community. Eight CDFIs certified by the CDFI Fund of the U.S. Treasury Department directly serve the Seattle area. They serve a wide variety of needs, including providing deposit and credit services to consumers and financing for affordable housing and small businesses. Several of these CDFIs are federally insured depositories.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Bellingham MSA, the Bremerton-Silverdale MSA, the Mount Vernon-Anacortes MSA, and non-MSA AA is weaker than the bank's overall investment performance under the investment test in Washington. MUB invested in few investments except in the Tacoma AA where the performance was consistent with the Seattle-Bellevue-Everett AA. This had a limited impact on the overall lending test rating for the state of Washington considering MUB significant business

activity is in the full scope areas. Refer to the Tables 1 through 13 in the state of Washington 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 Washington is rated "Outstanding." Based on a full-scope review, the bank's performance is excellent in the Seattle-Bellevue-Everett MD. The Bank's performance in the limited-scope AA did not impact the Service Test rating for the AA.

Retail Banking Services

Refer to Table 15 in the 2014 state of Washington section of Appendix D for the facts and data used to evaluate the distribution of the Bank's branch delivery system and branch openings and closings.

The distribution of bank branches is such that MUB's retail banking services are readily accessible to geographies and individuals of different income levels throughout the AA. The percentage of the bank's branches located in low-income CTs is near to the population residing in those CTs. The percentage of the bank's branches in moderate-income CTs exceeds the percentage of the AAs population residing in those CTs. During the evaluation period, MUB opened one branch located in an upper-income CT and did not close any branches.

The reasonableness of business hours and services offered at branch locations are adequate and do not vary in a way that inconveniences LMI geographies or individuals. Typical branch hours are Monday through Thursday from 9:00 a.m. to 5:00 p.m., Fridays until 6:00 p.m., and eight branches have Saturday hours.

MUB's standard products and services are available at the branches. The bank also offers low-cost basic checking accounts targeted to low-income individuals and students. The bank continues to offer the Electronic Transfer Account (ETA). MUB designed the ETA account for recipients of Federal government benefits such as Social Security. The basic checking and ETA accounts require no minimum balance, have modest monthly service fees, and allow unlimited ATM access. Over the course of the evaluation period, the bank developed a new basic banking account the "UB Access Account", which was specifically designed for the unbanked and under-banked. The UB Access Account is a checkless banking account that requires no minimum balance, has modest monthly service fees, (waived with at least \$25 in direct deposits), does not allow overdrafts, and provides unlimited ATM access at MUB ATMs. MUB recognizes the need for affordable savings accounts and established the "Nest Egg Savings Account", an introductory savings account, targeted for lower income households. In addition, the Bank works with one individual non-profit agency in the AA to hold Individual Deposit Accounts (IDA) for low-income consumers saving for college, establishing a business, or purchasing a home.

MUB offers an array of alternative delivery systems for its products and services to help reach its customers. These include online banking, telephone banking, and one ATM at each of its branches. Although these alternative delivery systems are of potential benefit to persons across all income levels, there is no data available to show that these alternative delivery systems increase the accessibility of MUB's services to LMI persons or geographies. As a result, significant weight was not placed on the alternative delivery system when drawing conclusions regarding MUB's performance for each full-scope AA under the Service Test.

Community Development Services

MUB's performance in providing CD services in the full-scope AA is good. During the evaluation period, bank employees provided CD services through 27 community organizations focusing on affordable housing for LMI first-time homebuyers, community economic development, community services, and technical assistance. The 361 MUB employees contributed 1,019 hours towards these organizations, which included board membership, financial education, fundraising efforts, and technical assistance.

Conclusions for Areas Receiving Limited-Scope Reviews

The limited-scope reviews had a neutral impact on the state of Washington. The Bremerton and Mount Vernon AAs are consistent with the full-scope area, but weaker in the Bellingham, Tacoma, and non-MSA AAs. This is due to the minimal number of branches located in LMI CTs in the Bellingham, Tacoma, and non-MSA AAs.

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 areas that received comprehensive examination reviews (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 (excluding CD loans): 1/1/2012 to 12/31/2014, Investment and Service Tests and CD Loans: 4/1/2012 to 12/31/2014	
For the Atlanta-Sandy Springs-Roswell, GA MSA, the Chicago-Naperville-Arlington Heights, IL MD and the Houston-the Woodlands-Sugar Land, TX MSA, the review periods were based on branch opening dates of December 12, 2013, April 16, 2012, and July 11, 2012, respectively.	
Products Reviewed:	
Small loans to business, small loans to farm, home purchase, home improvement, home refinance, CD Loans, CD Services, and qualified Investments. The Bank of Tokyo-Mitsubishi UFJ is an affiliate of MUB and some of the activities in the New York-Jersey City-White Plains, NY/NJ MD activities were considered during our review. These activities were not considered in any other Performance Evaluations.	
Financial Institution: MUFG Union Bank, N.A. New York, NY	
Assessment Area	Type of Exam
California	
Fresno MSA	Full-scope
Los Angeles-Long Beach-Glendale MD	Full-scope
Oakland-Hayward-Berkeley MD	Full-scope
San Diego-Carlsbad MSA	Full-scope
San Francisco-Redwood City-South San Francisco MD	Full-scope
Anaheim-Santa Ana-Irvine MD	Limited-scope
Bakersfield MSA	Limited-scope
El Centro MSA	Limited-scope
Hanford-Corcoran MSA	Limited-scope
Madera MSA	Limited-scope
Modesto MSA	Limited-scope
Oxnard-Thousand Oaks Venture MSA	Limited-scope
Redding MSA	Limited-scope
Riverside-San Bernardino-Ontario MSA	Limited-scope
Sacramento-Roseville-Arden-Arcade MSA	Limited-scope
Salinas MSA	Limited-scope
San Jose-Sunnyvale-Santa Clara MSA	Limited-scope
San Luis Obispo-Paso Robles-Arroyo Grande MSA	Limited-scope
San Rafael MD	Limited-scope
Santa Cruz-Watsonville MSA	Limited-scope
Santa Maria-Santa Barbara MSA	Limited-scope
Santa Rosa MSA	Limited-scope
Stockton-Lodi MSA	Limited-scope

Vallejo-Fairfield MSA Visalia-Porterville MSA Yuba City MSA Non-MSA Areas (includes the counties of Inyo and Mono)	Limited-scope Limited-scope Limited-scope Limited-scope
<p><u>Georgia</u> Atlanta-Sandy Springs-Roswell, GA MSA</p> <p><u>Illinois</u> Chicago-Naperville-Arlington Heights, IL MD</p> <p><u>New York</u> New York-Jersey City-White Plains, NY/NJ MD – Only New York City is selected as MUB’s AA.</p> <p><u>Oregon</u> Portland-Vancouver-Hillsboro, OR/WA MSA Salem, OR MSA – Clackamas, Columbia, Multnomah, Washington and Yarnhill counties in the State of Oregon only.</p> <p><u>Texas</u> Dallas-Plano-Irving, TX MD Houston-the Woodlands-Sugar Land, TX MSA</p> <p><u>Washington</u> Seattle-Bellevue-Everett, WA MD Bellingham, WA MSA Bremerton-Silverdale, WA MSA Mount Vernon-Anacortes, WA MSA Tacoma-Lakewood, WA MD Washington Non-MSA</p>	Full-scope Full-scope Full-scope Full-scope Limited-scope Full-scope Limited-scope Full-scope Limited-scope Limited-scope Limited-scope Limited-scope Limited-scope

Appendix B: Summary of State Ratings

RATINGS MUFG Union Bank N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
MUB	High Satisfactory	Outstanding	Outstanding	Outstanding
State:				
California	High Satisfactory	Outstanding	Outstanding	Outstanding
Georgia	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Illinois	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
New York	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Oregon	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Texas	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Washington	High Satisfactory	Outstanding	Outstanding	Outstanding

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

State of California

Fresno CA MSA

Demographic Information for Full Scope Area: Fresno CA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	199	11.06	28.14	25.63	34.17	1.01
Population by Geography	930,450	10.89	29.44	27.63	31.29	0.74
Owner-Occupied Housing by Geography	156,132	4.95	20.81	27.75	46.49	0.00
Business by Geography	48,677	9.54	23.80	26.19	40.31	0.16
Farms by Geography	3,537	4.35	29.83	34.21	31.58	0.03
Family Distribution by Income Level	205,821	24.70	16.04	17.13	42.13	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	83,858	17.29	40.18	27.00	15.53	0.00
Median Family Income HUD Adjusted Median Family Income for 2014 Households Below Poverty Level		52,306 48,700 19%	Median Housing Value Unemployment Rate (2010 US Census)	249,443 5.10%		

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

Source: 2010 US Census and 2014 HUD updated MFI

The Fresno MSA AA meets regulatory requirements. It does not arbitrarily exclude low- or moderate-income census tracts. The Fresno MSA, consisting of Fresno County California, is located in the San Joaquin Valley in the central part of the state.

The banking market in the Fresno MSA has one deposit-gathering bank for approximately every 37 thousand residents and one insured bank depository office for every six thousand residents. Compared with other large metropolitan areas in the U.S., Fresno has a relatively large number of banks but a smaller number of bank branches per capita. According to the FDIC's June 30, 2014 Deposit Market Share Report 25 financial institutions operate 146 offices in the area. Wells Fargo Bank is the market leader with a 25.4 percent deposit market share, 15 offices and \$3 billion in deposits. Bank of America ranks second with a 16.2 percent share, 22 offices and \$1.9 billion in deposits. Bank of the West ranks third with a 7.3 percent share, nine offices and \$846 million in deposits. MUB ranks fourth with a 7.1 percent share, 14 offices and \$823 million in deposits.

The 2010 population of Fresno County according to the U.S. Census Bureau was 930,450. The city of Fresno, with a 2010 population of 495,000, is the largest city in the MSA and is the fifth largest city in California. The population of the Fresno MSA has been growing for several decades. The growth rate dropped to slightly less than one percent per year in 2011, 2012 and 2013, but it increased to one percent in 2014 and Moody's projects the population of the Fresno MSA to continue growing at a little more than one percent per year.

Fresno has a diverse population with the proportion of foreign-born residents, particularly of Latino and Asian origin, growing for several decades, though the percentage remains lower than in California as a whole. The immigrant residents of Fresno are located throughout the county, but are in larger numbers in the southwestern communities. Many are farm workers or descendants of farm workers who live below the poverty level and in housing units that do not comply with the local housing code. Many immigrants in Fresno do not use banks for their financial service needs.

Median household income, levels of educational attainment, and housing values in the Fresno area and especially in the city of Fresno, all are lower than in California overall, while the percentage of persons living below the poverty level is substantially higher in the Fresno MSA than in California. The U.S. Census Bureau estimated the 2013 median household income in the Fresno MSA to be \$45,563, substantially lower than the median for California, which was \$61,094. Similarly, the Corporation for Enterprise Development reports that the Asset Poverty Rate in Fresno (the percentage of households without sufficient net worth to subsist at the poverty level for three months in the absence of income) in 2011 was 32 percent, several percentage points higher than in California, and substantially higher than the 25.4 percent rate for the U.S. as a whole. In addition, the homeownership rate in Fresno is slightly lower than the rate for California as a whole.

Agricultural production and food processing is the leading industry in Fresno. Other important industries by percent of total employment are Education and Health Services, Retail Trade, and Professional and Business Services. Fresno's central location also is attractive to distribution, warehousing, and transportation operations. Primary employers in the area are the Community Medical Center, California State University – Fresno, Kaiser Permanente Medical Center, and Pelco Corporation. Unemployment in the area historically has been higher than in other areas of the state, a pattern that held through 2014. According to the U.S. Bureau of Labor Statistics, the annual seasonally adjusted unemployment rate in the Fresno MSA in May 2015 was 10.3 percent, as compared to 6.3 percent for the state of California in June 2015.

Housing prices in Fresno increased by nearly six percent in 2012 and they increased at a much higher, double digit pace in 2013 and in 2014. Moody's predicts increases into the future, but at a slower pace than over the last two years.

Community contact interviews and a review of the 2010 – 2014 Consolidated Plan that the City of Fresno prepared identified the following credit and community development needs:

- Increased debt and equity investments in affordable housing for ownership and for rent to decrease overcrowding and the housing cost burden that most LMI residents bear;

- Increased debt and equity investments to improve the existing housing stock to cure physical defects and overcrowding;
- Increased debt and equity investments in housing for low-income senior citizens and for persons with disabilities;
- Support for job training programs;
- Support of various kinds (e.g., investments, donations of cash and expertise) for micro lending programs for small businesses;
- Increased availability of early-stage funding for small businesses – from venture capital and angel investor sources; and
- Capacity building for community based organizations and local government.

Community development opportunities in the area are available and can help banks respond to the needs listed above. Two CDFIs certified by the CDFI Fund of the U.S. Treasury Department are headquartered in Fresno. Several regional CDFIs serve the area, including a statewide CDFI that finances affordable housing and in which many banks have invested and another statewide CDFI that finances underserved, low-income, immigrant and beginning farmers. A nonprofit affiliate of an international organization builds affordable housing in Fresno and a Community Action Agency administers many social services programs such as Head Start as well as a small business micro-loan fund. An active SBA Certified Development Corporation headquartered in Fresno is one of 23 such organizations authorized to make SBA 504 loans in California to small businesses in conjunction with banks. In addition, an economic development association provides job training and seeks to attract businesses, and the state university in Fresno has several economic development initiatives.

State of California

Los Angeles-Long Beach-Glendale, CA MD

Demographic Information for Full Scope Area: Los Angeles-Long Beach-Glendale, CA MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,346	8.99	28.64	26.77	34.02	1.58
Population by Geography	9,818,605	8.01	29.43	28.26	33.92	0.39
Owner-Occupied Housing by Geography	1,552,091	2.13	16.61	28.64	52.61	0.01
Business by Geography	764,610	6.37	18.11	25.29	48.95	1.28
Farms by Geography	7,120	3.24	15.93	27.11	53.06	0.66
Family Distribution by Income Level	2,170,227	24.05	16.43	17.64	41.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	878,478	13.64	41.84	26.84	17.67	0.01
Median Family Income HUD Adjusted Median Family Income for 2014 Households Below Poverty Level		61,622 60,600 14%	Median Housing Value Unemployment Rate (2010 US Census)		526,439 4.39%	

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

Source: 2010 US Census and 2014 HUD updated MFI

The Los Angeles-Long Beach-Glendale, CA MD AA, which consists of Los Angeles County, meets regulatory requirements. It does not arbitrarily exclude low- or moderate-income census tracts.

The banking market in Los Angeles County is competitive, with one deposit-gathering bank for approximately every 91,000 residents but one insured depository office for approximately every 5,600 residents. According to the FDIC's June 30, 2014 Deposit Market Share Report 111 financial institutions operate 1,811 offices in the area. Bank of America is the market leader with a 19.47 percent deposit market share, 249 offices and \$61.7 billion in deposits. Wells Fargo Bank ranks second with a 15.03 percent market share, 242 offices and \$47.6 billion in deposits. MUB ranks third in the market with an 11.40 percent deposit market share, 71 offices and \$36.1 billion in deposits. JP Morgan Chase Bank ranks fourth in the market with a 10.38 percent market share, 309 offices and \$32.9 billion in deposits.

The Los Angeles MD consists of Los Angeles County, which has a population of 10.1 million people and forms a large portion of the Los Angeles MSA. The population of the MSA has grown over the past several decades; from 2012 through 2014, the rate of growth has been 0.6 percent to 0.8 percent but has been negative in previous years. The Los Angeles area has an extremely diverse population, with large concentrations of African-American, Latino and Asian

residents. The foreign-born population of Los Angeles County, at 35.1 percent, is substantially higher than the 27 percent rate for California as a whole.

Median household income, levels of educational attainment and the homeownership rate in the Los Angeles MD all are lower than in California overall, while housing values and the percentage of persons living below the poverty level are substantially higher in the Los Angeles MD than in California overall. The unemployment rate in Los Angeles is comparable to the rates for California as a whole. The 2015 FFIEC estimated median family income in the Los Angeles MD was \$63,000.

Median household income: Los Angeles MD – \$55,909; California – \$61,094
High school graduates, 25 and over: Los Angeles MD – 76.6 percent; California – 81.2 percent
Bachelor's degree or higher, 25 and over: Los Angeles MD – 29.7 percent; California – 30.7 percent

Median value, owner-occupied housing: Los Angeles MD – \$420,200; California – \$366,400
Persons below poverty level: Los Angeles MD – 19 percent; California – 16.8 percent
June 2015 unemployment rate: Los Angeles MD – 7.3 percent; California – 6.3 percent
Homeownership rate: Los Angeles MD – 46.9 percent; California – 55.3 percent
Sources: U.S. Census Bureau, HUD, U.S. Bureau of Labor Statistics

Moody's reports Los Angeles-Long Beach-Glendale MD is growing on par with the nation but more slowly than the state, with service industries powering the middling recovery. Though relatively few jobs have been created directly by the high-tech industry, education/healthcare and hospitality have advanced with its help. The main drivers have been higher tax revenues, increased healthcare insurance enrollment, lower gasoline prices, and strong international tourism.

Excess labor market slack differentiates Los Angeles from the statewide leaders in the Bay Area. Bay Area unemployment rates are approaching all-time lows, compared to Los Angeles' unemployment rate which is still above 7 percent. Although Los Angeles relies heavily on its tech sector for growth, the metro area is larger and more diversified than its Bay Area counterparts, diminishing the technology sector's ability to play a more prominent role in the economy.

Silicon Beach will be Los Angeles' most potent source of growth. As in the Bay Area, the tech industry has been fueled by an influx of capital. The number of venture capital and angel investor firms has grown tenfold in the last 10 years, enabling locally based startups to stay put rather than relocate to Silicon Valley. Equity financing in the fourth quarter of 2014 was three times higher than in the fourth quarter of 2013. Snapchat, JustFab, Tinder and TrueCar are just a few of the Los Angeles tech companies that could have moved north in previous business cycles. Instead, they are investing in the metro area, exemplified by Snapchat's recent acquisition of 40,000 square feet of office space in Silicon Beach. The office vacancy rate on the west side has fallen noticeably faster than that in Los Angeles and is one of the lowest office vacancy rates among the area's submarkets.

Hollywood has been a liability to the Los Angeles economy recently, but it is poised to stage a turnaround. DreamWorks Animation and Paramount Pictures have laid off 540 employees in 2015 as part of company restructurings related to the less than expected performance of some

feature films, which are expensive and difficult to make. Film production days have declined by 15 percent from a year earlier for feature films. There is no panacea for the challenge of making a blockbuster, but legislators have taken action to support Hollywood. The passage of the California Film & TV Tax Credit Program will enable Los Angeles to reclaim some of the market share it has lost to cheaper film destinations outside of California. Moreover, Mayor Eric Garcetti is focused on cutting through red tape, investing in city services that promote entertainment production, and spending more on departments that provide critical services to the film industry.

Once again, the future of the Los Angeles Air Force Base is subject to Government budget cuts. The “base,” which is really a 6,000-worker office park that designs satellites and other military hardware, barely survived the Base Realignment and Closure round in 2005, but the Pentagon is once again asking Congress for the authority to realign and close installations. The base is intertwined with the budding tech sector, fostering industry agglomeration. For that reason, and because of the substantial high-paying job loss that would ensue, losing the base would have a major impact to the economy.

Los Angeles-Long Beach-Glendale’s size will prevent it from growing as quickly as the state’s leaders, but it will match the nation’s rate of income growth in the near term. Silicon Beach tech firms will be the driving force. High business and living costs, domestic out-migration, and a mature structure will keep Los Angeles from growing as fast as the nation over the long run according to Moody’s.

The largest employers in the Los Angeles area include Kaiser Permanente, University of California Los Angeles, Northrop Grumman Corporation, Target Corporation, Providence Health Systems, and University of Southern California.

Information from community contacts with organizations specializing in small business development, economic development and affordable housing identified the following needs:

- Support for loan funds that provide financing for small businesses;
- Technical assistance for small businesses;
- Financial support in the form of grants and loans to programs that assist the homeless;
- Support for programs that help people meet basic day-to-day needs: food, clothing, shelter;
- Workforce development;
- Job creation – including jobs that provide a living wage;
- Collaboration to teach financial literacy;
- Financing for small business incubators; and
- Affordable housing.

Opportunities in the Los Angeles area for financial institutions to help meet community credit and community development needs are abundant. Fourteen CDFIs serve Los Angeles County, including several federally regulated and insured depositories and several of the most sophisticated nonprofit housing-related CDFIs in the nation. Many accomplished non-profit organizations develop commercial real estate and affordable housing, provide financial education, prepare LMI persons to become homebuyers, assist small business owners and provide many social services targeted to LMI populations. In addition, federal, state and local governments have identified multiple areas for redevelopment with designations such as empowerment and brownfield redevelopment sites.

State of California

Oakland-Hayward-Berkeley, CA MD

Demographic Information for Full Scope Area: 06-36084 Oakland-Hayward-Berkeley CA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	567	13.76	21.34	33.33	31.39	0.18
Population by Geography	2,559,296	12.53	20.80	34.45	32.23	0.00
Owner-Occupied Housing by Geography	549,084	5.73	15.64	36.39	42.23	0.00
Business by Geography	189,387	10.19	17.68	31.91	40.19	0.03
Farms by Geography	2,960	6.45	16.52	34.56	42.47	0.00
Family Distribution by Income Level	599,692	23.31	16.42	19.15	41.12	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	238,260	20.56	28.33	34.11	17.00	0.00
Median Family Income		88,024	Median Housing Value	551,319		
HUD Adjusted Median Family Income for 2014		88,500	Unemployment Rate	4.29%		
Households Below Poverty Level		10%	(2010 US Census)			

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

Source: 2010 US Census and 2014 HUD updated MFI

The Oakland-Hayward-Berkeley, CA MD AA meets regulatory requirements. It does not arbitrarily exclude low- or moderate-income census tracts. The Oakland metropolitan division MD (Oakland AA) consists of Alameda and Contra Costa counties.

The banking market in the Oakland-Hayward-Berkeley, CA MD AA is very competitive, with one deposit-gathering bank for approximately every 53,000 residents and one insured bank depository office for every 5,100 residents. According to the FDIC's June 30, 2014 Deposit Market Share Report, 51 financial institutions operate 532 offices in the area. Wells Fargo Bank is the market leader with a 28.45 percent deposit market share, 82 offices and \$19.7 billion in deposits. Bank of America N.A. ranks second with a 16.43 percent market share, 72 offices and \$11.4 billion in deposits. JP Morgan Chase Bank N.A. ranks third with an 8.68 percent market share, 64 offices and \$5.1 billion in deposits. MUB ranks 9th in the market with a 2.79 percent market share, 18 offices and \$2 billion in deposits.

The Oakland-Hayward-Berkeley, CA MD AA consists of Alameda and Contra Costa counties that combined have a population of nearly 2.7 million people. The area's population increased by more than 1.4 percent per year from 2012 through 2014. Moody's, however, projects population to grow at 1 percent per year over the next several years. The Oakland area has a diverse population, with large concentrations of Asian, Latino and African-American residents.

Oakland-Hayward-Berkeley, CA MD AA is keeping pace with the state but trailing its Bay Area neighbors. Although the impetus from technology industries is a notch lower in the Oakland-

Hayward-Berkeley, CA MD AA, it is still strong enough to drive construction, which has been the economy's primary source of growth over the last four months. Income gains are outpacing the state and national averages, and the unemployment rate has plunged to less than 5 percent, lower than it was at the start of the last recession.

Moody's reports organic tech sector growth and spillover from San Francisco are the lifeblood of the Oakland-Hayward-Berkeley, CA MD AA expansion. A host of tech companies, including Pandora, Turnitin, VSCO and Tesla, are relocating to or expanding in the East Bay. Within the East Bay, the hot spot is Tesla's home of Warm Springs. A Bay Area Rapid Transit station is under construction there, mega homebuilders Toll Brothers and Lennar plan to bring more than 3,000 housing units on line in the neighborhood over the next few years, and Lennar also plans to build an elementary school and 1.4 million square feet of office space. Moody's forecasts that strong demand will push up rents in Oakland's office core by 5.9 percent through the end of 2017 to \$37.13 per square foot, which would exceed rental rates in the commercial districts of Silicon Valley and Chicago. Still, rents would be half those in San Francisco, which is critical to guaranteeing tech sector spillover growth.

Oakland-Hayward-Berkeley, CA MD AA's considerable technology and education assets will enable it to keep pace with its Bay Area neighbors over the next few years. These drivers, coupled with Bay Area spillover growth and Oakland's lower costs, will power above-average gains in the long term.

The cost of living in the Oakland-Hayward-Berkeley, CA MD AA is higher than the national average and has above average housing costs relative to the Central Valley area. Rents in the Bay area are very high and home prices are appreciating rapidly making it difficult for LMI households to purchase a home

Home sales for May 2015 were up 18 percent compared with the previous month, and down 65 percent compared with a year ago. The median sales price of a non-distressed home was \$650,000. The median sales price of a foreclosure home was \$441,500, or 32 percent lower than non-distressed home sales according to RealtyTrac.

The level of opportunity for community development activities in the Oakland-Hayward-Berkeley, CA MD AA area is very good. Numerous nonprofit community development organizations provide financial education, develop affordable housing and commercial real estate and provide assistance to small businesses. Five CDFIs certified to participate in the programs of the CDFI Fund of the U.S. Treasury Department serve the area directly, and three more regional CDFIs also designate Oakland as part of the area they serve.

A review of community contact information identified the following credit and community development needs in the Oakland-Hayward-Berkeley, CA MD AA:

- Affordable Housing;
- Small Business Loans;
- Small dollar loans for small businesses;

- Small business investment in East Oakland;
- Support for programs linking affordable housing to self-sufficiency increase access to capital for growth companies;
- Support for financial education initiatives;
- Debt and equity financing for affordable housing for large families and for households earning 0-30 percent of AMI; and
- Debt and equity financing to increase the supply of affordable supportive housing for special needs populations, such as the homeless.

State of California

San Diego-Carlsbad CA

Demographic Information for Full Scope Area: San Diego-Carlsbad CA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	628	10.03	21.34	36.15	31.53	0.96
Population by Geography	3,095,313	9.80	21.57	35.24	33.05	0.33
Owner-Occupied Housing by Geography	593,945	3.31	14.32	38.78	43.59	0.00
Business by Geography	272,285	5.76	15.41	35.36	43.35	0.12
Farms by Geography	5,093	3.99	16.41	38.70	40.90	0.00
Family Distribution by Income Level	703,747	22.36	17.55	18.75	41.34	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	280,889	16.43	31.05	33.90	18.62	0.00
Median Family Income HUD Adjusted Median Family Income for 2014 Households Below Poverty Level		73,560 72,700 11%	Median Housing Value Unemployment Rate (2010 US Census)		496,417 3.78%	

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

Source: 2010 US Census and 2014 HUD updated MFI

The MUB San Diego-Carlsbad, MSA AA, which consists of San Diego County, meets regulatory requirements. It does not arbitrarily exclude low- or moderate-income census tracts.

The banking market in the San Diego MSA has one deposit-gathering bank for approximately every 47,000 residents and one insured bank depository office for every 4,000 residents; compared with metropolitan areas in the U.S. with a population of more than 1 million, San Diego has relatively few banks and bank branches per capita. According to the FDIC's June 30, 2014 Deposit Market Share Report 52 financial institutions operate 622 offices in the area. Wells Fargo Bank is the market leader with a 23.8 percent deposit market share, 104 offices and \$16.5 billion in deposits. MUB ranks second with an 18.0 percent share, 58 offices and \$12.5 billion in deposits. Bank of America ranks third with a 14.0 percent share, 72 offices and \$9.7 billion.

The San Diego-Carlsbad, MSA AA consists of San Diego County, California, which has a population of 3.3 million people, making it the 17th largest MSA in the United States. The county consists of 18 incorporated cities, a number of unincorporated regions and 18 American Indian reservations. The largest city is the county seat, San Diego, with a population of 1.4 million residents. The population of the metropolitan area grew by 1.2 percent to 1.3 percent per year from 2012 to 2014. Moody's projects a slightly slower rate of growth in the future.

Mainstays of the San Diego economy are U.S. military spending (of the ten largest employers in the San Diego MSA, five are military bases), biotechnology research and manufacturing, computer technology engineering and manufacturing, and tourism which includes convention business and a port used by many tour ships. The largest employment sector in San Diego is the government, which provides 17.1 percent of jobs, as compared to 15.4 percent in California and 15.7 percent the U.S. The business and professional services sector provides 17.1 percent of jobs in San Diego, as compared to 15.6 percent in California and 13.7 percent the U.S. The leisure and hospitality industry provides 13.1 percent of jobs in San Diego, as compared to 11.2 percent in California and 10.6 percent in the U.S. Large employers in the San Diego area include: Marine Corps Base Camp Pendleton, Naval Base Coronado, the University of California at San Diego, Naval Base San Diego, and Sharp Health Care.

Economic conditions have strengthened in the San Diego metropolitan area since 2011, as measured by job growth in most segments of the economy. The most significant increases were in the professional and business services, leisure and hospitality, and mining, logging, and construction sectors. The number of jobs in the professional and business services sector increased because of growth in the number of biotechnology companies in the San Diego metropolitan area. With the economic improvement and population increases, housing prices also have increased, and affordable housing has become a significant need in San Diego.

The median family income for the San Diego-Carlsbad MSA, as estimated by the FFIEC for 2012 – 2014, decreased each year and overall was 4.22 percent lower at the end of the period compared to the beginning of the period. The U.S. Census Bureau reports that the income of 10.5 percent of all families in the San Diego-Carlsbad, MSA was below the poverty level, which is substantially less than the 12 percent rate for California and the 11.3 percent for the U.S.

The Corporation for Enterprise Development, in an endeavor to measure and improve through public policy the financial security of LMI families, reports that the Asset Poverty Rate (the percentage of households without sufficient net worth to subsist at the poverty level for three months in the absence of income) in the San Diego area was 24.7 percent in 2011. This was substantially lower than the 29.2 percent rate in California and similar to the 25.4 percent rate for the U.S., as a whole.

In December 2014, the OCC met with affordable housing providers, micro business lenders, and social service organizations serving low and moderate-income populations and geographies to ascertain local credit needs in San Diego. From the comments at this meeting and from the 2013 consolidated plan that the City of San Diego submitted to the U.S. Department of Housing and Urban Development, the OCC identified the following credit and community development needs in San Diego:

- Banks willing to use credit support programs, such as the SBA, to increase the availability of credit to small businesses for a variety of purposes;
- Support of various kinds (e.g., donations, financial services expertise, loans) for workforce development initiatives;

- Permanent supportive and group housing for persons with special needs, people with HIV/AIDS, and homeless people;
- Support for social service programs, including those that will move people out of homelessness;
- Rental and single family affordable housing in general, but particularly in proximity to transit, which will enable residents to travel to employment opportunities;
- Support of various kinds (e.g., donations, financial services expertise, loans) for nonprofits, including those providing fair housing assistance;
- Support of various kinds for programs that improve foreclosed homes and make units available to low- and moderate-income families; and
- Banks that use technology to help lower-income citizen's access financial services.

An abundance of opportunities is available to banks in San Diego to meet the above needs. For example, CDFIs serve the area, including three that focus primarily on San Diego. The CDFIs serve a wide variety of needs, including providing financing for affordable housing, small businesses, social service agencies and schools. Other community development organizations in the area include:

- An active SBA 504 Certified Development Corporation that uses a variety of credit support programs to provide small businesses financing;
- A community land trust;
- An affiliate of the NeighborWorks Network;
- A program affiliated with the Local Initiatives Support Corporation; and
- Other capable, accomplished non-profit organizations that work with financial institutions, local government, foundations and others to meet the credit and community development needs of the area.

State of California

San Francisco-Redwood City-South San Francisco, CA MD

Demographic Information for Full Scope Area: San Francisco-Redwood City-South San Francisco, CA MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	355	11.27	16.62	37.18	33.52	1.41
Population by Geography	1,523,686	10.76	18.22	39.96	31.05	0.01
Owner-Occupied Housing by Geography	282,177	3.25	12.32	42.73	41.70	0.00
Business by Geography	155,105	17.89	11.11	31.77	39.12	0.11
Farms by Geography	1,648	7.34	14.26	35.68	42.66	0.06
Family Distribution by Income Level	322,846	23.72	16.23	18.15	41.91	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	128,967	16.13	26.23	39.56	18.08	0.01
Median Family Income HUD Adjusted Median Family Income for 2014 Households Below Poverty Level		93,987 94,800 9%	Median Housing Value Unemployment Rate (2010 US Census)		769,464 3.89%	

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

Source: 2010 US Census and 2014 HUD updated MFI

The MUB San Francisco-Redwood City-South San Francisco MD (SF AA), which includes San Francisco County and San Mateo County, meets regulatory requirements. It does not arbitrarily exclude low- or moderate-income areas.

The banking market in the SF AA has one deposit-gathering bank for approximately every 28,000 residents and one insured bank depository office for every 3,300 residents. According to the FDIC's June 30, 2014 Deposit Market Share Report 54 financial institutions operate 455 offices in the area. Bank of America is the market leader with a commanding 48.03 percent deposit market share, 64 offices and \$109 billion in deposits. Wells Fargo Bank, N.A. ranks second with a 17.2 percent share, 69 offices and \$39 billion in deposits. Bank of America, California ranks third with a 7.11 percent share, one office and \$16 billion in deposits. First Republic Bank ranks fourth with 6.20 percent share, 18 offices and \$14 billion in deposits. MUB ranks seventh with a 2.53 percent market share, 14 offices and \$5.7 billion in deposits.

The SF AA consists of San Francisco and San Mateo counties, which combined have a population more than 1.5 million people. The area's population increased about 1.2 percent to 1.6 percent per year from 2012 through 2014. Moody's, however, projects population to grow about 1 percent per year in the future. The SF AA has a diverse population, with particularly large concentrations of Asian and Latino residents. The foreign-born population of the SF MD at 34.8 percent is higher than the 27 percent rate for California as a whole.

Median household income, levels of educational attainment and housing values in the SF AA all are substantially higher than in California overall, while the homeownership rate in the SF AA, at 38.3 percent, is substantially lower than in California with a the 55.3 percent rate and in the U.S. with a 64.9 percent rate. The percentage of persons living below the poverty level and the unemployment rate in the SF AA are notably smaller than in California as a whole. The 2015 FFIEC estimated median family income in the SF MD was \$96,900.

High school graduates, 25 and over: SF AA – 87.45 percent; California – 81.2 percent
Bachelor's degree or higher, 25 and over: SF AA – 48.4 percent; California – 30.7 percent
Median value, owner-occupied housing: SF AA – \$733,400; California – \$366,400
Persons below poverty level: SF AA – 10.9 percent; California – 16.8 percent
May 2015 unemployment rate: SF AA – 3.4 percent; California – 5.3 percent
Homeownership rate: SF AA – 48 percent; California – 55.3 percent

Sources: U.S. Census Bureau, HUD, U.S. Bureau of Labor Statistics

Moody's reports the housing shortage will drive home prices higher. Nationally, rents were up 4 percent from 12 months earlier as of March 2015 but rents were 15 percent higher in SAF. According to Zillow, rents are now at least a third higher in the metro area than in New York or Washington DC. Single-family house prices are up 70 percent since 2012 compared with just 30 percent nationally. The strong growth in housing costs boosts the wealth of existing homeowners, increasing their consumption. However, it also prices residents out of SF AA, especially LMI residents, and discourages others from coming in. To afford at 30 percent of one's income, the HUD Fair Market Rent for a two-bedroom apartment, a person would have to earn more than \$39 per hour, well out of reach for an LMI person.

Despite the shortage of housing units, the forecast calls for less homebuilding in 2015 and 2016 than in 2014. Developers face long and costly permitting processes in San Francisco and strong opposition to new construction.

Large employers in the area include the University of California, Genentech Inc., California Pacific Medical Center, and Wells Fargo. The region's well-educated workforce is a significant advantage for the future, while its high cost of living is a significant weakness. Moody's projects San Francisco's tech boom is expected to cool over the next few years, but the labor market will remain tight, increasing wages, gentrification and construction.

A review of community contacts and the San Francisco Consolidated Plan identified the following credit and community development needs in the San Francisco area:

- Affordable housing units;
- Small business lending;
- Financial counseling;
- Asset Building Opportunities;

- Support of non-profit organizations addressing homeownership preservation;
- Financing and other support for the disposition of foreclosed properties;
- Support for programs that help create jobs;
- Technical assistance to small businesses;
- Homeless and eviction prevention services;
- Access to rental and homeownership opportunities;
- Workforce development; and
- Financial literacy.

Opportunities in the SF AA for financial institutions to help meet the above community credit and community development needs are abundant. Eleven CDFIs serve the area, including several federally regulated and insured depositories and several accomplished nonprofit housing-related CDFIs. Many accomplished non-profit organizations develop commercial real estate and affordable housing, provide financial education, prepare LMI persons to become homebuyers, provide assistance to small business owners and provide many social services targeted to LMI populations. Among the community development organizations in San Francisco are two-community land trust, two affiliates of NeighborWorks America, an affiliate of the Local Initiatives Support Corporation and several organizations that promote micro business development. In addition, federal, state and local governments have identified multiple areas for redevelopment with designations such as Renewal Communities, empowerment and enterprise zones.

State of Georgia

Atlanta-Sandy Springs-Roswell, GA MSA

Demographic Information for Full Scope Area: Atlanta-Sandy Springs-Roswell, GA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	539	14.66	26.53	24.49	33.40	0.93
Population by Geography	2,692,379	9.68	26.94	28.15	35.02	0.21
Owner-Occupied Housing by Geography	616,895	4.59	20.93	30.27	44.21	0.00
Business by Geography	284,754	6.21	22.56	26.98	44.11	0.14
Farms by Geography	3,785	4.94	21.16	29.99	43.83	0.08
Family Distribution by Income Level	621,078	23.30	16.50	17.61	42.59	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	247,191	17.08	38.63	27.12	17.17	0.00
Median Family Income		67,374	Median Housing Value	230,266		
HUD Adjusted Median Family Income for 2014		70,100	Unemployment Rate	5.12%		
Households Below Poverty Level		12%	(2010 US Census)			

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

Source: 2010 US Census and 2014 HUD updated MFI

The MUB Atlanta-Sandy Springs-Roswell, GA MSA AA – which consists of Clayton, Cobb, DeKalb, Douglas and Fulton Counties – meets regulatory requirements. It does not arbitrarily exclude low- or moderate-income census tracts. The five counties in this AA contain a substantial portion of the population of the Atlanta MSA.

The Atlanta-Sandy Springs-Roswell, GA MSA AA consists of 29 counties, which together have a population of 5.3 million people making it the ninth largest metropolitan area in the U.S. and a major economic and cultural center for the South and for the nation. The population of the Atlanta MSA grew by 1.5 percent to 1.6 percent per year from 2012 to 2014, and Moody's projects a larger and accelerating growth rate in the future.

The banking market in the Atlanta-Sandy Springs-Roswell, GA MSA AA has one deposit-gathering bank for approximately every 56,000 residents and one insured bank depository office for every 4,300 residents. Compared with other large metropolitan areas in the U.S., the Atlanta MSA has a relatively small number of banks and bank branches per capita. The results of a 2013 FDIC survey show that the rates of unbanked and underbanked residents in the Atlanta-Sandy Springs-Roswell, GA MSA AA, 9.1 percent and 27.9 percent respectively, are higher than in the U.S. as a whole but lower than in Georgia.

According to the FDIC's June 30, 2014 Deposit Market Share Report 62 financial institutions operate 687 branches in the MUB Atlanta-Sandy Springs Roswell, GA MSA AA. Sun Trust Bank is the market leader with a 31.98 percent deposit market share, 109 offices and \$31.7 billion in deposits. Wells Fargo Bank, N.A. ranks second with a 21.07 percent share, 116

offices and \$20.9 billion in deposits. Bank of America, N.A. ranks third with a 20.58 percent share, 88 offices and \$20.3 billion in deposits. MUB has one office with 137 million in allocated deposits and ranks 114th in deposit market with a share of less than one percent. The deposit data for MUB in this AA differs from FDIC data because the bank provided updated information subsequent to its filing with the FDIC.

The Atlanta-Sandy Springs-Roswell, GA MSA AA has a diverse, growing economy. The Professional and Business Services sector provides 18 percent of total employment in the region, a substantially higher proportion than in Georgia and in the U.S. The Government sector provides 13 percent of employment, and Education and Health Services provides 12 percent. Large employers in the area include Delta Airlines, Wal-Mart, AT&T, Emory University, Publix Supermarkets and The Home Depot, which has its headquarters in the MSA.

The U.S. Department of Housing and Urban Development reports that during 2011 and the beginning of 2012, the Atlanta area lagged behind other major metropolitan areas in its economic recovery. By the end of 2012, however, the economy of the area began to improve substantially. The labor force in the Atlanta area is well trained and educated relative to many metropolitan areas in the South, which gives it a competitive advantage for economic development.

The median family income for the Atlanta-Sandy Springs-Roswell, GA MSA AA, as estimated by the FFIEC for 2012 – 2014, has been up and down and overall was 1.15 percent higher at the end of the period than at the beginning. The U.S. Census Bureau reports that the income of 11.8 percent of all families in the Atlanta-Sandy Springs-Roswell, GA MSA AA was below the poverty level, which is substantially lower than the 14 percent rate for Georgia and slightly more than the 11.3 percent for the U.S.

The Corporation for Enterprise Development, in an endeavor to measure and improve through public policy the financial security of LMI families, reports that the Asset Poverty Rate (the percentage of households without sufficient net worth to subsist at the poverty level for three months in the absence of income) in the Atlanta area was 24.1 percent in 2011. This was substantially lower than the 32.3 percent rate for Georgia and slightly lower than the 25.4 percent rate for the U.S. as a whole.

Housing prices in Atlanta increased 2.6 percent in 2012 for the first time in several years, and increased at a much higher, double digit pace in 2013 and in 2014. Moody's predicts increases into the future, but at a slower pace than over the last two years. Despite the price increases, housing in Atlanta remains relatively inexpensive as compared to other large metropolitan areas. In a first quarter 2014 ranking of 210 metropolitan areas in the U.S. based on the affordability of homeownership, Atlanta, the ninth largest MSA, ranked 118th for affordability, putting it in the middle range of the ranked MSAs. Atlanta placed 89th among the same metro areas based on the affordability of rental housing – less affordable than for homeownership, but still in the middle range of the U.S. metropolitan areas. The Center for Housing Policy of the National Housing Conference compiled the rankings.

Information from community contact interviews identified the following needs:

- Support of various kinds, including debt and equity investments, to support programs that rehabilitate foreclosed and vacant homes for affordable housing;
- Support for programs that provide homeownership for LMI households through a variety of means, such as financial counseling and down payment and closing cost assistance
- Banks willing to use a variety of credit support programs for homeownership and for small business lending;
- Support of various kinds (e.g., debt, donations of cash and expertise) for initiatives that use of affordable housing as a catalyst to spur economic development in distressed neighborhoods;
- Support for large-scale redevelopment projects that local government is undertaking;
- Debt financing for small building contractors helping to build a new multi-purpose stadium in downtown Atlanta;
- Investments in organizations that are increasing economic development opportunities for small and minority owned businesses; and
- Gap financing for economic development projects.

Many opportunities are available in the Atlanta area to help financial institutions meet the needs above listed above. For example, 150 organizations of many kinds participate in a concerted effort to counter the effects of the foreclosure crisis in the region. Eight CDFIs serve the Atlanta area for a wide variety of needs, including providing deposit and credit services to consumers and financing for affordable housing and small businesses. Two of these certified CDFIs are federally insured depositories. In addition, the National Credit Union Administration has designated five Low Income Credit Unions in the City of Atlanta and more in the Atlanta metropolitan area. Two active SBA Certified Development Corporations are headquartered in the City of Atlanta and are among the eleven such organizations authorized to make SBA 504 loans in Georgia to small businesses in conjunction with banks. Other community development organizations in the region include three community land trusts, two affiliates of the NeighborWorks Network, the Atlanta Land Bank Authority and other capable nonprofit organizations that work with financial institutions, local government, foundations and others to meet the community development needs of the area.

State of Illinois

Chicago-Naperville-Arlington Heights. IL MD

Demographic Information for Full Scope Area: Chicago-Naperville-Arlington Heights, IL MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,758	13.71	22.81	31.97	31.23	0.28
Population by Geography	7,262,718	9.57	22.44	34.32	33.67	0.00
Owner-Occupied Housing by Geography	1,747,808	4.19	16.81	38.14	40.86	0.00
Business by Geography	446,300	4.82	15.14	32.43	47.47	0.13
Farms by Geography	7,051	2.67	11.23	41.14	44.93	0.03
Family Distribution by Income Level	1,734,806	22.74	16.67	19.34	41.25	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	683,628	16.93	32.43	33.58	17.07	0.00
Median Family Income		72,196	Median Housing Value		290,729	
HUD Adjusted Median Family Income for 2014		76,300	Unemployment Rate		4.80%	
Households Below Poverty Level		12%	(2010 US Census)			

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

Source: 2010 US Census and 2014 HUD updated MFI

The MUB Chicago-Naperville-Arlington Heights, IL MD AA – which consists of Cook, DuPage, Grundy, Kendall, McHenry, and Will Counties – meets regulatory requirements. It does not arbitrarily exclude low- or moderate-income census tracts. The Chicago-Naperville-Arlington Heights, IL MD has a population of 7.3 million people. It is a substantial portion of the Chicago MSA, the third largest metropolitan area in the U.S., a major economic and cultural center for the Midwest and for the nation. According to the U.S. Census Bureau, the population of the Chicago MSA grew by less than 1 percent per year from 2012 to 2014. Moody's projects a comparably small growth rate for the MSA well into the future.

The banking market in the Chicago MSA has one deposit-gathering bank for approximately every 40,000 residents and one insured bank depository office for every 3,100 residents. Compared with other large metropolitan areas in the U.S., the number of banks per capita in Chicago is similar to the median, while the per capita number of bank branches is substantially lower than the median. The results of a 2013 FDIC survey show that the rates of unbanked and underbanked residents in the Chicago MSA are 7.6 percent and 13.5 percent, respectively. The percentage of unbanked persons in Chicago is about the same as in Illinois and in the U.S., but the percentage of underbanked persons in Chicago is significantly less than both Illinois and the U.S.

According to the FDIC's June 30, 2014 Deposit Market Share Report 181 financial institutions operate 2,310 branches in the Chicago-Naperville-Arlington Heights, IL MD AA. JP Morgan Chase Bank, N.A. is the market leader with a 25.85 percent deposit market share, 315 offices

and \$80.3 billion in deposits. BMO Harris Bank, N.A. ranks second with a 12.69 percent share, 166 offices and \$39.4 billion in deposits. Bank of America, N.A. ranks third with a 9.03 percent share, 145 offices and \$28.1 billion in deposits. MUB ranks 135th in the MD with a .03 percent share, one office and \$83 million in deposits.

The Chicago-Naperville-Arlington Heights, IL MD AA has a diverse economy that is growing slowly. The Professional and Business Services sector provides 18 percent of total employment in the region, a substantially higher proportion than in Illinois and in the U.S. overall. The Education and Health Services sector provides 16 percent, which is similar to the proportions at the state and national levels, and the Government sector provides 12 percent of employment in the region, significantly less than in Illinois and in the U.S. as a whole. Large employers in the area include Advocate Health Care System, JP Morgan Chase Bank, the University of Chicago, Walgreen Company, AT&T, and Abbott Laboratories.

The U.S. Department of Housing and Urban Development reports that the economy in the Chicago area has been expanding since 2010 after three years of declines, and Moody's reports that new job growth and a decrease in foreclosure inventories have improved the region's economy overall. The downtown area, says Moody's, has seen a dramatic increase in tech-related jobs fueled in part by a large volume of venture capital funding. Suburban areas, meanwhile, have lagged.

Housing prices in the AA increased just less than one percent in 2012 for the first time in several years, and they increased at a higher pace in 2013. Moody's predicts increases into the future at a declining pace. Despite the modest price increases, housing in the AA remains moderately expensive as compared to other large metropolitan areas. In a first quarter 2014 ranking of 210 metropolitan areas in the U.S. based on the affordability of homeownership, Chicago, the third largest MSA in the U.S., ranked 76th, putting it near the top one-third most expensive of the ranked MSAs. Chicago placed 60th among the same metro areas based on the affordability of rental housing – squarely in the upper third of most expensive U.S. metropolitan areas for renting and less affordable than for homeownership. The Center for Housing Policy of the National Housing Conference compiled the rankings.

The median family income for the Chicago-Naperville-Arlington Heights, IL MD MSA, as estimated by the FFIEC for 2012 – 2014, has been up and down and overall was 1.29 percent lower at the end of the period than at the beginning. The U.S. Census Bureau reports that the income of 10.4 percent of all families in the Chicago MSA was below the poverty level, which is substantially the same as for Illinois but is less than the 11.3 percent for the U.S. The Corporation for Enterprise Development, in an endeavor to measure and improve through public policy the financial security of LMI families, reports that the Asset Poverty Rate (the percentage of households without sufficient net worth to subsist at the poverty level for three months in the absence of income) in the Chicago area was 22.2 percent in 2011. This was lower than the 23.5 percent rate in Illinois, and 25.4 percent for the U.S.

Information from community contact interviews identified the following needs:

- Loans for the acquisition and rehabilitation of 1-4 unit and small multifamily residential buildings with 5-50 units in LMI neighborhoods;

- Banks willing to use a variety of credit support programs for home purchase mortgages and for small business lending;
- Small loans to businesses of less than \$250,000 for working capital and fixed assets;
- Donations of cash and expertise for financial education, first time homebuyers training, volunteer income tax preparation, small business development, and job training programs;
- Donations of cash and expertise to CDFIs;
- Equity equivalent investments in CDFIs; and
- Responsible small dollar loans for LMI consumers, second chance checking accounts, credit builder loans (secured by a certificate of deposit or similar account), low cost deposit and transaction accounts, incentives and budgeting tools that encourage consumers to fund emergency savings accounts.

The Chicago area presents abundant opportunities for financial institutions to serve all of the credit and community development needs of low- and moderate-income persons and areas identified above. Many sophisticated, accomplished and well-capitalized community development organizations operate in the region, and these organizations receive support from an extensive network of foundations, research centers and universities that provide them with funding, information and expertise. In addition, local government agencies have designated many areas for redevelopment and devote a variety of resources (e.g., Tax Increment Financing districts, Empowerment Zones, CDBG and HOME Funds) to increase investment in those areas.

The inventory of organizations that primarily serve LMI needs in the Chicago area is unusually large. An indicative list includes the following highlights:

- Thirty-three CDFIs certified by the CDFI Fund of the U.S. Treasury Department;
- Thirty-seven NCUA-designated Low-Income Credit Unions;
- An affiliate of NeighborWorks America that serves the entire region;
- An affiliate of the Local Initiatives Support Corporation;
- Thirty-one nonprofit housing development organizations;
- Sixty-five HUD-Approved housing counseling agencies;
- Four community land trusts;
- Forty locally based small business and economic development organizations;
- Four organizations devoted to various forms of asset building for LMI families;

- Sixty-one organizations providing employment and training services to LMI persons;
and
- Twenty-seven nonprofit social service agencies that target primarily LMI families.

State of New York

New York-Jersey City-White Plains, NY, MD

Demographic Information for Full Scope Area: New York-Jersey City-White Plains NY						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,535	13.81	26.71	28.68	28.05	2.76
Population by Geography	9,808,746	16.31	28.70	25.13	29.62	0.25
Owner-Occupied Housing by Geography	1,381,343	3.34	15.95	30.59	50.11	0.00
Business by Geography	698,572	9.28	20.06	21.51	46.59	2.56
Farms by Geography	5,589	3.35	11.97	21.60	62.66	0.43
Family Distribution by Income Level	2,244,059	28.81	16.29	16.38	38.52	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	1,011,984	27.17	37.62	22.74	12.46	0.01
Median Family Income HUD Adjusted Median Family Income for 2014 Households Below Poverty Level		68,006 68,900 17%	Median Housing Value Unemployment Rate (2010 US Census)	517,504 4.18%		

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

Source: 2010 US Census and 2014 HUD updated MFI

The New York assessment area (NY AA) meets regulatory requirements. It does not arbitrarily exclude low- or moderate-income areas.

The banking market in the NY AA is competitive, with one deposit-gathering bank for approximately every 75 thousand residents and one insured bank depository office for every 4,300 residents. According to the FDIC's June 30, 2014 Deposit Market Share Report 135 financial institutions operate 2,355 offices in the area. JP Morgan Chase, N.A. is the market leader with a 41.13 percent deposit market share, 545 offices and \$435.1 billion in deposits. Bank of New York Mellon ranks second with an 11.83 percent market share, one office and \$125.2 billion in deposits. MUB has one office with \$389 million in deposits and ranks 67th in market share at 0.04 percent.

The NY AA consists of eight New York counties –Bronx, Kings, New York, Orange, Queens, Richmond, Rockland and Westchester in New York – which together have a population of 10.1 million people and form a large portion of the New York MSA. The population of the New York AA has been growing at a slow pace most years, and Moody's projects an even slower pattern for the foreseeable future. The population of the New York area is diverse with significant concentrations of African-American, Latino and Asian residents. The foreign-born population of

the NY MSA, at 28.4 percent, is higher than the 22.1 percent foreign-born population of New York State.

Median household income and housing values are higher in the NY AA than in the state overall, while levels of educational attainment are comparable in both places. Persons living below the poverty level are 17.5 percent in the NY AA compared to 16 percent for New York State. The homeownership rate is notably lower in the NY AA at 48.2 percent than in New York State at 54.2 percent. The 2015 FFIEC estimated median family income in the NY AA was \$71,300.

Median household income: NY AA – \$71,300; NY State – \$60,000
 High school graduates age 25 and over: NY AA – 83.1 percent; NY State – 85.2 percent
 Bachelor's degree or higher, age 25 and over: NY AA – 35.2 percent; NY State – 33.1 percent
 Median value, owner-occupied housing: NY AA – \$485,275; NY State – \$288,200
 Persons below poverty level: NY AA – 17.5 percent; NY State – 16.0 percent
 Unemployment rate as of May 2015: NY AA – 5.7 percent; NY State – 5.6 percent
 Homeownership rate: NY AA – 48.2 percent; NY State – 54.2 percent

Sources: U.S. Census Bureau, HUD, U.S. Bureau of Labor Statistics

Moody's report the New York-Jersey City- White Plains MD is comfortably in expansion, but growth is falling back into a more sustainable territory. While the unemployment rate has flattened, labor force expansion in the first quarter was its strongest in five years. International visitors so far have ignored the appreciating U.S. dollar, with tourism employment and hotel occupancy holding strong.

Powered by growth in tech and more stability on Wall Street, Moody's forecasts office-using employment will rise at an above-average clip and widen an already-sizable gulf with blue-collar industries. NY AA's share of high-tech jobs leapfrogged that of the U.S. in 2013 and is advancing its lead. With Google and Facebook moving into new spaces, Twitter outgrowing its Manhattan offices, and tech startups attracting a flood of venture capital, growth prospects are bright.

Finance has been the traditional mainstay of the NY AA economy and now is showing signs of turning a corner as well. Following three years of declines, Wall Street hiring has increased rapidly to begin 2015. Most major banks reported strong first-quarter earnings, supporting an optimistic outlook for wage gains. Job creation, however, is likely to slow in the second half of the year as firms in the industry cut costs.

Builders have taken advantage of a hot commercial market and seemingly endless demand for high-end residential properties, but growth is set to slow among high-end builders. According to the National Association of Realtors, the first quarter office vacancy rate in NY AA was the lowest among the 54 metro areas in the MSA. Despite the increase in supply, especially with the completion of One World Trade Center, demand from tech and professional services remains robust.

The NY AA has an extremely high cost of living, which makes it often prohibitive for LMI families to qualify for a mortgage, start a business or recover from a financial set back. For instance, the area Cypress Hills LDC serves has the third highest foreclosure rate in Brooklyn

and sixth highest in New York City. The residential market has also been a source of strength. Although multifamily starts slowed during the winter, March permit issuance spiked for the second consecutive year. The ultra-luxury condominium market is driving gains as wealthy foreign investors prop up demand in Manhattan. Although there are few signs of a major slowdown, a glut of high-end units is weighing on prices; this will likely make builders more cautious in the short run.

Substandard infrastructure has been a long-standing concern and will become increasingly problematic in the coming years. NY AA residents are by far the most reliant in the nation on public transportation, and upgrades are needed with population additions far ahead of state levels. A \$32 billion capital improvement plan being discussed by state government, would go a long way to help, but funding gaps mean that significant fare hikes are still likely. This would weigh on disposable income, especially among NY AA's low-income residents. Needed improvements to the Port Authority Bus Terminal and LaGuardia Airport, meanwhile, have not yet materialized. Without significant new investment, these represent constraints on the outlook, weighing on productivity and population growth.

NY AA will ride high-tech and a stable finance industry to its strongest output gains in a decade. A healthy commercial real estate market will power construction, even as residential building slows. In the coming years, sustainable competitive advantages and solid demographics will provide additional support despite continued cost cutting at banks.

The NY AA environment is very competitive. New York City by its sheer size, dominates the region's economy. Some of the largest employers in the area are North-Shore Long Island Jewish Health System, JPMorgan Chase, Mount Sinai Medical Center, Macys, and Citigroup.

The opportunities for community development participation within the AA are quite numerous. Many community development organizations and government agencies engage in affordable housing and economic development activities and provide a variety of financial and social services targeted to low- and moderate-income persons. Forty-nine CDFIs operate in New York City; most are large and offer multiple opportunities for lending, investments and services. In addition, New York City government has several initiatives and resources to encourage the development of affordable housing and to promote small business lending.

Information from community contacts with organizations specializing in small business development, economic development and affordable housing identified the following needs:

- Multifamily lending is a great need in New York City especially since it is a city with a very high rate of renters;
- Preservation of existing multifamily housing units that are not adequately maintained;
- Foreclosure assistance and streamlined mortgage and refinance processes are needed;
- More flexible mortgage products including loans with a 40 year term and no PMI;
- Closing cost and down payment assistance grants;

- Credit builder loans and products that help people re-establish credit;
- Secured credit cards and lines of credit in conjunction with financial education
- Access to credit for small businesses including small dollar loans;
- Deposit account with no fees and low minimum balance accounts for individuals and small businesses;
- Funding for housing counseling and legal services agencies that help homeowners facing foreclosure;
- Rehabilitate and improve the energy efficiency of the aging housing stock;
- Grant support for nonprofit neighborhood-based CDCs and community organizations; and
- Provide support for tax credit programs.

State of Oregon

Portland-Vancouver-Hillsboro, OR MSA

Demographic Information for Full Scope Area: Portland-Vancouver-Hillsboro, OR Partial						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	382	2.62	24.08	44.76	28.01	0.52
Population by Geography	1,789,580	2.51	24.71	45.41	27.35	0.02
Owner-Occupied Housing by Geography	430,893	1.24	18.98	47.52	32.26	0.00
Business by Geography	186,563	4.65	22.10	42.19	30.92	0.14
Farms by Geography	5,317	1.97	14.63	52.91	30.43	0.06
Family Distribution by Income Level	429,247	20.70	17.47	21.04	40.79	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	163,821	3.81	34.67	44.98	16.54	0.00
Median Family Income		68,924	Median Housing Value		311,526	
HUD Adjusted Median Family Income for 2014		69,400	Unemployment Rate (2010		4.44%	
Households Below Poverty Level		11%	US Census)			

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

Source: 2010 US Census and 2014 HUD updated MFI

The MUB Portland-Vancouver-Hillsboro, OR MSA (Portland AA) meets regulatory requirements. It does not arbitrarily exclude low- and moderate-income areas.

The banking market in the Portland AA has one deposit-gathering bank for approximately every 52,000 residents and one insured bank depository office for every 4,000 residents. According to the FDIC's June 30, 2014 Deposit Market Share Report 36 financial institutions operate 471 offices in the area. U.S. Bank is the market leader with a 23.76 percent deposit market share, 97 offices and \$8.4 billion in deposits. Bank of America ranks second with a 22.17 percent market share, 44 offices and \$7.8 billion in deposits. Wells Fargo Bank ranks third with an 18.13 percent market share, 61 offices and \$6.4 billion in deposits. MUB ranks 9th in the market with a 1.09 percent deposit market share, two offices and \$3.8 million in deposits. Banks with deposit market shares in Portland comparable to MUB include Washington Federal with \$3.3 million in deposits and seven offices and First Republic Bank with \$3.1 million in deposits and one office.

The MUB Portland AA consists of five counties – Clackamas, Columbia, Multnomah, Washington and Yamhill in Oregon—which together have a population of 1.9 million people. The population of the area grew at 1.1 percent to 1.4 percent per year 2012 - 2014, and Moody's projects future growth in the same range.

Large employers in the Portland AA include Intel, Providence Health Systems, Oregon Health & Science University, Fred Meyer, Inc. The area has a highly skilled workforce –more than 30 percent of Portland-area residents have a college degree, which is higher than the U.S. average of less than 29 percent. The highly skilled workforce, an attractive environment, and favorable migration patterns are strengths for economic development.

Moody's reports that the Portland-Vancouver-Hillsboro MSA economy is expanding as high-tech firms continue to hire and increase demand for services. Employment gains are broad-based, with many industries outpacing national growth rates. Demand for Portland's goods has increased, enabling both durable and nondurable manufacturers to expand from a year ago, and manufacturers of durable goods accelerated their pace of hiring in the first quarter of 2015. Homebuilding activity plateaued in 2014, but builders have started 2015 on the right foot.

Increasing demand for computer and electronic products will drive export growth and make up for near-term losses in containerized shipping. Container shipping has all but vanished from Portland now that Hapag Lloyd and Hanjin ended service to the port; they had made up about 99 percent of container transport. A silver lining, however, is that Oregon relies less on exports to drive growth than the U.S. and far less than neighboring Washington. Portland's exports, high-value-added computer and electronic products provide the most value and are shipped by alternative methods to shipping containers.

Transportation employment has increased rapidly over the last year, after multiple years of little recovery following the recession. The cuts at the port will likely be in the hundreds, as around 600 longshoremen were operating Terminal 6, although this will be a short-term effect. As exporters that use shipping containers redirect their goods to Washington, the increased traffic for truck and rail freight will call for hiring and investment because Oregon's current rail structure is insufficient to accommodate the increased traffic. Freight companies have been delaying or turning down shipments because they are already running at maximum capacity.

Portland's concentration of semiconductor manufacturing is anticipated to drive the high-tech industry, although growth may cool as the economy nears full employment. Major chipmakers such as Intel are supporting service providers, spinning off companies and fostering startups in the Silicon Forest. The footprint of semiconductors is massive: before the recession, six percent of the nation's semiconductor manufacturers worked in the metro area, but the share has increased to nearly eight percent since. This share is second to only the Silicon Valley. The tech industry is not as diversified as San Jose's, as the latter manufactures a large amount of computer and peripheral equipment in addition to semiconductors, but the overall economy is much more diverse because it relies more on government, trade and transportation. Portland's increasing software presence and other tech startups will likely improve tech diversity over the next five years.

Residential construction will likely contribute more to Portland's economy than Oregon's in the next two years. Single-family homebuilding is heating up alongside housing demand. Low unemployment and strong income growth will further bolster housing affordability, reinforcing demand. Massive commercial projects have taken up much of the workforce. Intel's \$6 billion project on its Hillsboro campus will wrap up this year. Stronger homebuilding may be needed so that the workers finishing the Intel campus can be reabsorbed into the workforce.

Moody's predicts the Portland-Vancouver-Hillsboro's economy will accelerate into 2016 but will slow from its above-average pace as the metro area nears full employment. A highly educated workforce and increasing number of tech firms will drive demand for services and attract workers and startups to the Silicon Forest. Longer term, Portland is anticipated to outperform the nation because of its status as a regional tech and trade hub with large international export demand.

According to the US Census Bureau, the median value of owner-occupied housing units is \$284,900 pricing moderate-income first time homebuyers out of the housing market. Moderate-income first time homebuyers can only purchase a home if the purchase is supported by housing subsidies, "soft" seconds and other sources of equity like financing that do not significantly increase monthly payments. The homeownership rate is 53.4 percent. The Portland AA is a high cost area, which makes the availability of first time homebuyer opportunities for LMI individuals limited.

Information from community contacts identified the following needs in the Portland AA:

- Financing for multifamily rental buildings;
- Home purchase mortgages in conjunction with homebuyer counseling;
- There is a significant need for affordable rental housing – up to 20,000 new rental housing according to one community contact;
- Financing to maintain existing affordable housing;
- Volunteers for small business counseling and funding for operating expense for non-profits to offer small business counseling services;
- Volunteers for financial education training; and
- Small business financing for new and micro businesses.

A number of opportunities are available in the Portland AA for financial institutions to meet the above needs. Capable, accomplished nonprofit organizations, including a community land trust and two affiliates of NeighborWorks America, work with financial institutions, local government, foundations and other organizations to meet the affordable housing and other community development needs of the area. Thirteen CDFIs are located in the Portland AA. They serve a wide variety of needs, including providing deposit and credit services to consumers, and financing for affordable housing and small businesses. Several are federally insured depositories.

State of Texas

Dallas-Plano-Irving, TX MD

Demographic Information for Full Scope Area Dallas-Plano-Irving, TX MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	897	12.93	24.75	26.42	35.56	0.33
Population by Geography	4,230,520	11.42	24.62	28.04	35.93	0.00
Owner-Occupied Housing by Geography	898,449	5.34	19.26	29.76	45.64	0.00
Business by Geography	399,389	8.18	17.76	26.33	47.52	0.22
Farms by Geography	7,906	5.44	17.72	33.63	43.14	0.06
Family Distribution by Income Level	1,004,926	23.06	16.62	18.27	42.05	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	398,737	20.48	35.71	27.54	16.28	0.00
Median Family Income		67,175	Median Housing Value		173,315	
HUD Adjusted Median Family Income for 2014		69,100	Unemployment Rate (2010 US Census)		3.56%	
Households Below Poverty Level		12%				

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

Source: 2010 US Census and 2014 HUD updated MFI

The MUB Dallas-Plano-Irving, TX MD AA – which consists of Collin, Dallas, Denton, Ellis, Hunt, Kaufman, and Rockwall Counties – meets regulatory requirements. It does not arbitrarily exclude low- or moderate-income census tracts.

The Dallas-Plano-Irving, TX MD has a population of 4.2 million people, which is about 17.5 percent of the population of Texas and two-thirds of the population of the Dallas-Fort Worth-Arlington, TX MSA, which is the fourth largest metropolitan area in the U.S. and a major economic and cultural center for the Texas and the South. According to the U.S. Census Bureau, the population of the Dallas MSA grew by two percent per year from 2012 to 2014. Moody's projects a similar growth rate well into the future.

The banking market in the Dallas-Plano-Irving, TX MD has one deposit-gathering bank for approximately every 33,000 residents and 1 bank branch for every 4,000 residents. Compared with other large metropolitan areas in the U.S., the Dallas-Plano-Irving, TX MD has a relatively small per capita number of banks but a relatively large number of bank branches per capita. The results of a 2013 FDIC survey show that the rates of unbanked and underbanked residents in the Dallas-Fort Worth-Arlington, TX MSA are 8.4 percent and 27.3 percent respectively. The unbanked proportion in the Dallas MSA is lower than in Texas, which was 10.4 percent but higher than in the U.S., which was 7.7 percent. The percentage of underbanked persons in the Dallas MSA is substantially the same as in Texas but significantly higher than in the U.S.

According to the FDIC's June 30, 2014 Deposit Market Share Report 139 financial institutions operate 1,161 branches in the Dallas-Plano-Irving, TX MD. Bank of America, N.A. is the market leader with a 31.89 percent deposit market share, 115 offices and \$54 billion in deposits. Chase Bank, N.A. ranks second with a 23.65 percent share, 185 branches and \$40.1 billion in deposits. Wells Fargo Bank, N.A. ranks third with a 7.56 percent share, 120 branches and \$12.8 billion in deposits. MUB ranks 34th in the market with a 0.25 percent share, one office and \$426 million in deposits.

The Professional and Business Services sector provides 18.5 percent of total employment in the Dallas-Plano-Irving, TX MD, a substantially higher proportion than in Texas and in the U.S., where the percentages were 13.4 and 13.7, respectively. The Education and Health Services sector provides 12.1 percent, and the Government sector provides 11.8 percent. Large employers in the area include Wal-Mart, Bank of America, Carlson Restaurants Worldwide, Texas Health Resources and Baylor Health Care System.

Moody's reports that the economy of the Dallas-Plano-Irving, TX MD grew between 2012 and 2014, as measured by Gross Metro Product, which increased by more than 7.5 percent, and as measured by employment growth, which grew at a similar pace of more than 7.1 percent. As a result, the unemployment rate in the region declined to from 6.6 in 2012 to 5.0 percent by the end of 2014.

Housing prices in the Dallas-Plano-Irving, TX MD increased by 7 percent in 2012, 10 percent in 2013 and 6.9 percent in 2014. Moody's predicts increases into the future at a declining pace. Dallas remains moderately expensive as compared to other large metropolitan areas. In a first quarter 2014 ranking of 210 metropolitan areas in the U.S. based on the affordability of homeownership, Dallas, the fourth largest MSA in the U.S., ranked 53rd, putting it in top quarter of the ranked MSAs. Dallas ranked 83rd among the same metro areas based on the affordability of rental housing, indicating that the area is significantly more affordable for renting than for homeownership. The Center for Housing Policy of the National Housing Conference compiled the rankings.

The median family income for the Dallas-Plano-Irving, TX MD, as estimated by the FFIEC for 2012 – 2014, has been down and then up and overall was 2.1 percent lower at the end of the period than at the beginning. The U.S. Census Bureau reports that the incomes of 11.3 percent of all families in the Dallas MSA were below the poverty level, which is substantially lower than the 13.7 percent rate for Texas and the same as the 11.3 percent for the U.S. The Corporation for Enterprise Development, in an endeavor to measure and improve through public policy the financial security of LMI families, reports that the Asset Poverty Rate (the percentage of households without sufficient net worth to subsist at the poverty level for three months in the absence of income) in the Dallas area was 25.2 percent in 2011. This was notably higher than the 23.8 percent rate for Texas, and substantially the same as the 25.4 percent rate for the U.S., as a whole.

Community contact interviews and a community forum sponsored by the OCC in Dallas, identified the following needs:

- Affordable single family and multifamily housing, including new construction and rehabilitation of the existing stock;
- Affordable housing for people transitioning from prison, addiction or mental illness;
- Start-up financing and longer-term working capital loans for small businesses;
- Partnerships and referral relationships between banks and micro lenders;
- Second chance checking accounts in conjunction with financial education, and credit builder loans secured by a certificate of deposit or similar deposit account;
- Low cost deposit and transaction accounts for consumers;
- Lines of credit and predevelopment financing for nonprofit housing developers; and
- Debt financing for multifamily buildings with up to 250 units.

Opportunities are available in the Dallas area for financial institutions to help meet community credit and community development needs. Five CDFIs have an office in Dallas, and three statewide CDFIs also serve the area. In addition, a number of effective non-profit organizations develop affordable housing and prepare prospective LMI homebuyers, including an affiliate of the NeighborWorks network. A number of other organizations assist small business owners with business planning and financing. Many other nonprofits in the Dallas area provide social services targeted to LMI populations. Local governments, most notably the City of Dallas, have a range of programs including the Texas Housing Trust Fund to assist in meeting the affordable housing and small business needs of the area.

State of Washington

Seattle-Bellevue-Everett, WA MD

Demographic Information for Full Scope Area: Seattle-Bellevue-Everett, WA MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	549	4.55	20.58	45.72	28.42	0.73
Population by Geography	2,644,584	4.50	20.34	47.23	27.72	0.22
Owner-Occupied Housing by Geography	648,302	1.84	15.62	49.34	33.20	0.00
Business by Geography	255,029	4.71	17.22	44.29	33.65	0.13
Farms by Geography	5,272	2.50	15.57	51.04	30.86	0.02
Family Distribution by Income Level	636,092	20.39	17.77	22.17	39.67	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	242,717	6.51	30.20	47.44	15.84	0.00
Median Family Income		83,852	Median Housing Value	405,176		
HUD Adjusted Median Family Income for 2014		88,200	Unemployment Rate	3.54%		
Households Below Poverty Level		9%	(2010 US Census)			

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

Source: 2010 US Census and 2014 HUD updated MFI

The Seattle-Bellevue-Everett, WA MD assessment area (Seattle AA) meets regulatory requirements. It does not arbitrarily exclude low- and moderate-income census tracts.

The banking market in the Seattle AA has one deposit-gathering bank for approximately every 53,000 residents and one insured bank depository office for every 3,600 residents. According to the FDIC's June 30, 2014 Deposit Market Share Report 50 financial institutions operate 735 offices in the area. Bank of America is the market leader with a 27.38 percent deposit market share, 110 offices and \$19.8 billion in deposits. Wells Fargo Bank ranks second with a 13.74 percent share, 84 offices and \$10 billion in deposits. JP Morgan Chase Bank ranks third with an 11.67 percent share, 112 offices and \$8.4 billion. MUB ranks seventh in the market with a 3.40 percent share, 27 offices and \$2.4 billion in deposits.

The Seattle AA consists of two Washington counties – King and Snohomish – which together have a population of 2.6 million people. The population of the area grew by 1.3 percent to 1.9 percent per year from 2012 to 2014. Moody's projects a 1.3 percent growth rate in the future.

The core of Seattle's economy is aerospace products, parts manufacturing and software publishing. Seattle also is an important port with connections to emerging Asian markets, making shipping and distribution another strength of the economy. Manufacturing activity provides 11 percent of employment in the Seattle area, Professional and Business Services provides 14.9 percent, and Education and Health Services provides 13 percent. Large employers in the Seattle area include Boeing, Microsoft, the University of Washington, Providence Health & Services and Wal-Mart. The Seattle area has a highly trained, well-

educated labor force – 92 percent of residents have graduated from high school, as compared to 87 percent for the U.S. as a whole, and 28 percent of Seattle residents have a college degree, as compared to 18 percent for the nation.

In 2015, Moody's reported that single-family construction started recovering in Seattle earlier than in most metro areas; the pace of construction has slowed in recent months as house price appreciation has outpaced income gains, eroding affordability. However, lower near-term house price growth will keep housing affordable. Meanwhile, rapidly rising rents, a function of the booming multifamily market, will make homeownership more attractive. As new-home sales accelerate, the large knock-on effects from residential construction will boost employment in real estate and consumer-dependent industries.

Housing in the Seattle AA remains expensive. In a first quarter 2014 ranking of 208 metropolitan areas in the U.S. based on the affordability of homeownership, Seattle ranked 23rd, putting it among the most expensive markets in the country. Seattle placed 44th among the same metro areas based on the affordability of rental housing – somewhat more affordable than for homeownership, but still in the top 20 percent of expensive rental markets. The rankings were compiled by the Center for Housing Policy of the National Housing Conference compiled the rankings.

Homebuilding in Seattle is surging and soon will join employment and industrial production in surpassing the prerecession peak thanks to strong multifamily activity. Sharp increases in rents and house prices have done little to dent demand. Local consumers are in better shape than in most other parts of the country. Employment and personal income growth are supporting a self-sustaining recovery, with retail spending rising faster than the national average.

The City of Seattle's new minimum wage ordinance does not greatly alter the near-term forecast for income or employment. The baseline outlook assumes employers will absorb much of the increase by either demanding higher productivity from their minimum-wage employees or passing the increase along to consumers in the form of higher prices. Any drag on hiring is estimated to amount to less than 1,000 fewer jobs per year. A lift to personal income growth is anticipated to come from hiring in tech-producing employers such as Amazon.com, which is enlarging its downtown presence.

Information from community contacts identified the following needs:

- There is a need for lower cost capital for loan pools that provide predevelopment lending to nonprofit affordable housing developers and small businesses;
- Opportunities include board membership and service on advisory committees;
- Because of high real estate costs, financing LMI homeownership relies heavily on equity-like subsidies, such as "soft seconds" that do not require debt service ;
- Affordable home ownership in the MSA is heavily dependent on the leverage of technical resources and capital provided by community development housing organizations. Bank support of these technical resources and capital is a critical need

and creates an opportunity for banks willing to expand the availability of credit for LMI homeowners;

- Debt and equity investments in affordable housing, especially housing that includes supportive services for homeless persons;
- Support for programs that provide sustainable homeownership for low-income households through a variety of means;
- Investments in organizations that seek to increase economic development opportunities for small and minority owned businesses;
- Debt and equity financing for initiatives that maintain the existing supply of affordable rental housing;
- Gap financing for economic development projects; and
- Organizations providing technical support and access to non-traditional small business credit, SBDCs and revolving loan funds are important in supporting small business growth. There are significant opportunities for banks to provide financial and technical support to SBDCs and revolving loan funds.

Many opportunities are available in the Seattle AA for financial institutions to meet the above needs. For example, eight CDFIs directly serve the Seattle area. They serve a wide variety of needs, including providing deposit and credit services to consumers and financing for affordable housing and small businesses. Several of these CDFIs are federally insured depositories. Other community development organizations in the area include five-community land trust, two affiliates of the NeighborWorks Network, a statewide program affiliated with the Local Initiatives Support Corporation, and many other capable, accomplished nonprofit organizations that work with financial institutions, local government, foundations and others to meet the community development needs of the area.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA; (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/AA. Community development loans to statewide or regional entities or made outside the bank’s AA 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 AA.

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 AA.

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/AA. 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/AA.

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 AA. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

State of California

Table 1. Lending Volume

LENDING VOLUME												
Geography: CALIFORNIA												
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013												
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:												
Fresno CA	1.68	167	33,022	580	48,614	30	2,883	0	0	777	84,519	0.00
Los Angeles CA	29.23	8,740	7,339,732	4,738	579,116	6	580	0	0	13,484	7,919,428	0.00
Oakland CA	5.33	1,797	1,189,100	659	96,957	2	450	0	0	2,458	1,286,507	0.00
San Diego CA	15.44	3,173	1,968,139	3,921	386,233	30	1,092	0	0	7,124	2,355,464	0.00
San Francisco CA	9.80	3,652	3,095,622	866	155,104	4	22	0	0	4,522	3,250,748	0.00
Limited Review:												
Bakersfield CA	0.85	149	20,256	231	20,862	13	1,313	0	0	393	42,431	0.00
El Centro CA	0.22	28	2,655	63	8,480	9	1,022	0	0	100	12,157	0.00
Hanford-Corcoran CA	0.24	28	3,518	69	3,666	14	876	0	0	111	8,060	0.00
Madera CA	0.18	25	2,238	39	2,113	17	2,810	0	0	81	7,161	0.00
Modesto CA	0.42	33	5,476	112	20,699	51	12,970	0	0	196	39,145	0.00
Oxnard-Ventura CA	2.45	779	432,188	346	39,379	7	415	0	0	1,132	471,982	0.00
Redding CA	0.14	16	3,108	47	3,782	1	45	0	0	64	6,935	0.00
Riverside-San Bernardino CA	4.70	996	400,477	1,163	137,589	8	935	0	0	2,167	539,001	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** Community Development Loan data is contained on the 2014 tables.

*** Deposit Data is contained on the 2014 tables.

Table 1. Lending Volume

LENDING VOLUME												
Geography: CALIFORNIA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
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)	excell nt#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Limited Review:												
Sacramento CA	1.80	348	163,049	461	59,642	22	4,787	0	0	831	227,478	0.00
Salinas CA	1.23	377	195,873	180	29,368	11	2,300	0	0	568	227,541	0.00
San Jose CA	5.96	2,080	1,542,572	662	99,753	7	1,326	0	0	2,749	1,643,651	0.00
San Luis Obispo CA	0.66	225	90,124	74	12,485	5	1,103	0	0	304	103,712	0.00
Santa Ana-Anaheim CA	14.31	3,164	2,545,137	3,432	437,973	5	568	0	0	6,601	2,983,678	0.00
Santa Barbara CA	2.89	1,159	725,521	170	27,759	5	730	0	0	1,334	754,010	0.00
Santa Cruz CA	0.56	172	89,151	82	9,960	6	1,610	0	0	260	100,721	0.00
Santa Rosa CA	0.48	193	161,054	29	6,654	0	0	0	0	222	167,708	0.00
Stockton CA	0.48	66	14,735	95	16,139	59	13,632	0	0	220	44,506	0.00
Vallejo CA	0.11	29	9,968	22	4,261	1	300	0	0	52	14,529	0.00
Visalia-Porterville CA	0.49	69	8,647	135	12,628	23	2,905	0	0	227	24,180	0.00
Yuba City CA	0.15	5	846	30	2,277	33	9,845	0	0	68	12,968	0.00
Inyo-Mono Non-MSA CA	0.19	37	17,469	51	2,969	0	0	0	0	88	20,438	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** Community Development Loan data is contained on the 2014 tables.

*** Deposit Data is contained on the 2014 tables.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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:																								
Fresno CA	66	0.82	4.95	6.06	20.81	30.30	27.75	19.70	46.49	43.94	0.40	1.26	0.95	0.27	0.26									
Los Angeles CA	2,746	34.01	2.13	1.93	16.61	11.65	28.65	15.26	52.61	71.16	1.80	1.35	1.21	0.90	2.53									
Oakland CA	567	7.02	5.73	10.41	15.64	11.82	36.39	17.64	42.23	60.14	0.96	1.80	0.82	0.48	1.34									
San Diego CA	836	10.35	3.31	3.59	14.32	11.12	38.78	23.21	43.59	62.08	1.29	1.56	1.14	0.90	1.61									
San Francisco CA	944	11.69	3.41	6.14	14.46	9.11	39.92	29.13	42.21	55.61	2.79	3.19	2.39	2.19	3.39									
Limited Review:																								
Bakersfield CA	36	0.45	2.00	0.00	23.16	22.22	30.78	30.56	44.06	47.22	0.20	0.00	0.47	0.15	0.15									
El Centro CA	6	0.07	0.00	0.00	22.37	0.00	51.89	66.67	25.74	33.33	0.23	0.00	0.00	0.20	0.36									
Hanford-Corcoran CA	7	0.09	0.00	0.00	27.94	14.29	25.61	28.57	46.45	57.14	0.34	0.00	0.34	0.23	0.38									
Madera CA	5	0.06	0.00	0.00	19.83	40.00	60.66	60.00	19.51	0.00	0.12	0.00	0.00	0.21	0.00									
Modesto CA	21	0.26	1.15	0.00	14.56	23.81	44.38	38.10	39.91	38.10	0.17	0.00	0.42	0.13	0.15									
Oxnard-Ventura CA	240	2.97	1.92	1.67	17.13	18.33	43.17	35.83	37.79	44.17	1.50	0.93	2.16	1.27	1.51									
Redding CA	4	0.05	0.00	0.00	20.80	0.00	53.76	50.00	25.44	50.00	0.14	0.00	0.00	0.14	0.30									
Riverside-San Bernardino CA	357	4.42	2.87	2.24	21.60	11.76	36.29	33.89	39.24	52.10	0.30	0.20	0.19	0.29	0.36									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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, 2012 TO DECEMBER 31, 2013				
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:																								
Sacramento CA	168	2.08	3.73	1.79	17.99	26.19	41.15	37.50	37.13	34.52	0.25	0.08	0.34	0.24	0.24									
Salinas CA	89	1.10	1.79	0.00	16.11	3.37	37.70	22.47	44.41	74.16	1.03	0.00	0.18	0.43	1.88									
San Jose CA	595	7.37	4.35	2.35	18.70	11.76	39.49	26.05	37.45	59.83	1.68	1.42	1.09	1.24	2.65									
San Luis Obispo CA	46	0.57	0.30	0.00	5.63	6.52	66.30	60.87	27.78	32.61	0.40	0.00	0.60	0.36	0.46									
Santa Ana-Anaheim CA	887	10.99	2.99	1.01	19.61	10.82	33.21	15.90	44.19	72.27	1.49	0.94	1.22	0.89	2.01									
Santa Barbara CA	255	3.16	2.85	0.78	15.09	8.24	34.95	21.96	47.11	69.02	2.72	1.46	1.36	1.60	4.51									
Santa Cruz CA	46	0.57	0.47	0.00	22.33	26.09	36.59	45.65	40.62	28.26	0.99	0.00	1.23	1.28	0.60									
Santa Rosa CA	67	0.83	0.09	0.00	16.64	17.91	58.49	55.22	24.78	26.87	0.73	0.00	0.95	0.56	1.00									
Stockton CA	37	0.46	2.21	0.00	20.81	13.51	32.98	29.73	44.00	56.76	0.26	0.00	0.07	0.24	0.33									
Vallejo CA	12	0.15	0.55	0.00	16.50	16.67	51.00	33.33	31.95	50.00	0.10	0.00	0.13	0.07	0.13									
Visalia-Porterville CA	18	0.22	0.73	0.00	22.50	11.11	34.56	27.78	42.21	61.11	0.22	0.00	0.22	0.22	0.23									
Yuba City CA	4	0.05	1.36	0.00	19.05	0.00	36.03	50.00	43.56	50.00	0.14	0.00	0.00	0.25	0.11									
Inyo-Mono Non-MSA CA	15	0.19	0.00	0.00	9.11	0.00	42.86	0.00	48.03	100.00	2.13	0.00	0.00	0.00	2.86									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *						
Full Review:																
Fresno CA	3	0.60	4.95	0.00	20.81	0.00	27.75	0.00	46.49	100.00	0.55	0.00	0.00	0.00	0.90	
Los Angeles CA	144	28.69	2.13	1.39	16.61	9.03	28.65	17.36	52.61	72.22	1.23	1.38	0.96	0.71	1.53	
Oakland CA	29	5.78	5.73	0.00	15.64	3.45	36.39	17.24	42.23	79.31	0.67	0.00	0.28	0.44	1.05	
San Diego CA	43	8.57	3.31	2.33	14.32	16.28	38.78	30.23	43.59	51.16	0.96	1.15	1.43	0.74	1.03	
San Francisco CA	52	10.36	3.41	5.77	14.46	15.38	39.92	19.23	42.21	59.62	1.49	2.56	1.50	0.53	2.18	
Limited Review:																
Bakersfield CA	2	0.40	2.00	0.00	23.16	0.00	30.78	50.00	44.06	50.00	0.20	0.00	0.00	0.00	0.32	
El Centro CA	0	0.00	0.00	0.00	22.37	0.00	51.89	0.00	25.74	0.00	0.00	0.00	0.00	0.00	0.00	
Hanford-Corcoran CA	1	0.20	0.00	0.00	27.94	0.00	25.61	100.00	46.45	0.00	0.00	0.00	0.00	0.00	0.00	
Madera CA	1	0.20	0.00	0.00	19.83	0.00	60.66	0.00	19.51	100.00	1.20	0.00	0.00	0.00	3.70	
Modesto CA	0	0.00	1.15	0.00	14.56	0.00	44.38	0.00	39.91	0.00	0.00	0.00	0.00	0.00	0.00	
Oxnard-Ventura CA	23	4.58	1.92	0.00	17.13	0.00	43.17	65.22	37.79	34.78	0.93	0.00	0.00	1.34	0.88	
Redding CA	0	0.00	0.00	0.00	20.80	0.00	53.76	0.00	25.44	0.00	0.00	0.00	0.00	0.00	0.00	
Riverside-San Bernardino CA	10	1.99	2.87	0.00	21.60	10.00	36.29	50.00	39.24	40.00	0.17	0.00	0.00	0.26	0.17	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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, 2012 TO DECEMBER 31, 2013				
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*** *	Overa ll	Low	Mod	Mid	Upp									
Limited Review:																								
Sacramento CA	8	1.59	3.73	0.00	17.99	0.00	41.15	25.00	37.13	75.00	0.18	0.00	0.00	0.18	0.24									
Salinas CA	20	3.98	1.79	0.00	16.11	0.00	37.70	20.00	44.41	80.00	3.60	0.00	0.00	0.00	6.90									
San Jose CA	28	5.58	4.35	0.00	18.70	14.29	39.49	25.00	37.45	60.71	0.96	0.00	0.96	0.70	1.27									
San Luis Obispo CA	12	2.39	0.30	0.00	5.63	0.00	66.30	66.67	27.78	33.33	1.23	0.00	0.00	1.42	1.08									
Santa Ana-Anaheim CA	51	10.16	2.99	1.96	19.61	7.84	33.21	15.69	44.19	74.51	0.93	1.79	0.52	0.45	1.37									
Santa Barbara CA	67	13.35	2.85	0.00	15.09	1.49	34.95	22.39	47.11	76.12	10.13	0.00	2.70	10.47	12.14									
Santa Cruz CA	1	0.20	0.47	0.00	22.33	0.00	36.59	0.00	40.62	100.00	0.44	0.00	0.00	0.00	0.98									
Santa Rosa CA	6	1.20	0.09	0.00	16.64	0.00	58.49	50.00	24.78	50.00	0.97	0.00	0.00	0.72	1.81									
Stockton CA	0	0.00	2.21	0.00	20.81	0.00	32.98	0.00	44.00	0.00	0.00	0.00	0.00	0.00	0.00									
Vallejo CA	1	0.20	0.55	0.00	16.50	0.00	51.00	0.00	31.95	100.00	0.27	0.00	0.00	0.00	0.67									
Visalia-Porterville CA	0	0.00	0.73	0.00	22.50	0.00	34.56	0.00	42.21	0.00	0.00	0.00	0.00	0.00	0.00									
Yuba City CA	0	0.00	1.36	0.00	19.05	0.00	36.03	0.00	43.56	0.00	0.00	0.00	0.00	0.00	0.00									
Inyo-Mono Non-MSA CA	0	0.00	0.00	0.00	9.11	0.00	42.86	0.00	48.03	0.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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, 2012 TO DECEMBER 31, 2013				
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:																								
Fresno CA	97	0.53	4.95	4.12	20.81	15.46	27.75	30.93	46.49	49.48	0.39	0.85	0.35	0.61	0.29									
Los Angeles CA	5,488	29.98	2.13	1.20	16.61	9.95	28.65	14.05	52.61	74.80	1.37	1.30	1.32	0.87	1.60									
Oakland CA	1,177	6.43	5.73	2.72	15.64	7.99	36.39	17.25	42.23	72.05	0.73	0.71	0.61	0.43	0.97									
San Diego CA	2,225	12.16	3.31	3.55	14.32	11.87	38.78	23.60	43.59	60.99	1.41	2.39	1.86	1.00	1.55									
San Francisco CA	2,608	14.25	3.41	3.80	14.46	10.28	39.92	24.50	42.21	61.43	2.23	2.48	2.24	1.52	2.79									
Limited Review:																								
Bakersfield CA	110	0.60	2.00	0.00	23.16	15.45	30.78	38.18	44.06	46.36	0.46	0.00	0.66	0.67	0.33									
El Centro CA	22	0.12	0.00	0.00	22.37	31.82	51.89	36.36	25.74	31.82	0.78	0.00	1.90	0.61	0.68									
Hanford-Corcoran CA	20	0.11	0.00	0.00	27.94	20.00	25.61	40.00	46.45	40.00	0.57	0.00	0.96	0.98	0.32									
Madera CA	19	0.10	0.00	0.00	19.83	36.84	60.66	52.63	19.51	10.53	0.49	0.00	1.47	0.40	0.00									
Modesto CA	12	0.07	1.15	8.33	14.56	33.33	44.38	25.00	39.91	33.33	0.10	0.88	0.34	0.04	0.08									
Oxnard-Ventura CA	504	2.75	1.92	0.99	17.13	13.10	43.17	29.17	37.79	56.75	1.04	0.66	1.20	0.68	1.36									
Redding CA	12	0.07	0.00	0.00	20.80	33.33	53.76	41.67	25.44	25.00	0.13	0.00	0.12	0.13	0.15									
Riverside-San Bernardino CA	627	3.43	2.87	1.28	21.60	14.04	36.29	33.97	39.24	50.72	0.38	0.39	0.39	0.40	0.36									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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, 2012 TO DECEMBER 31, 2013				
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									
Limited Review:																								
Sacramento CA	169	0.92	3.73	1.18	17.99	11.24	41.15	37.87	37.13	49.70	0.14	0.06	0.14	0.14	0.15									
Salinas CA	263	1.44	1.79	0.76	16.11	4.56	37.70	25.48	44.41	69.20	1.42	0.00	0.42	0.85	2.12									
San Jose CA	1,447	7.90	4.35	3.32	18.70	17.62	39.49	23.57	37.45	55.49	1.15	1.29	1.63	0.75	1.31									
San Luis Obispo CA	162	0.89	0.30	0.00	5.63	4.32	66.30	64.20	27.78	31.48	0.56	0.00	0.23	0.56	0.63									
Santa Ana-Anaheim CA	2,175	11.88	2.99	1.06	19.61	13.98	33.21	17.52	44.19	67.45	1.31	1.07	1.54	0.79	1.58									
Santa Barbara CA	816	4.46	2.85	1.10	15.09	6.74	34.95	17.03	47.11	75.12	3.14	1.39	2.00	1.55	4.56									
Santa Cruz CA	121	0.66	0.47	0.00	22.33	23.97	36.59	32.23	40.62	43.80	0.79	0.00	1.15	0.61	0.81									
Santa Rosa CA	112	0.61	0.09	0.00	16.64	6.25	58.49	44.64	24.78	49.11	0.40	0.00	0.21	0.30	0.74									
Stockton CA	29	0.16	2.21	0.00	20.81	34.48	32.98	24.14	44.00	41.38	0.11	0.00	0.26	0.06	0.09									
Vallejo CA	16	0.09	0.55	0.00	16.50	6.25	51.00	50.00	31.95	43.75	0.12	0.00	0.07	0.12	0.13									
Visalia-Porterville CA	51	0.28	0.73	0.00	22.50	37.25	34.56	27.45	42.21	35.29	0.56	0.00	1.88	0.40	0.35									
Yuba City CA	1	0.01	1.36	0.00	19.05	0.00	36.03	0.00	43.56	100.00	0.03	0.00	0.00	0.00	0.06									
Inyo-Mono Non-MSA CA	22	0.12	0.00	0.00	9.11	0.00	42.86	9.09	48.03	90.91	1.03	0.00	0.00	0.51	1.21									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ⁷													
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{***}	% BANK Loans ^{****}	Overa ll	Low	Mod	Mid	Upp							
Full Review:																								
Fresno CA	1	0.16	17.36	100.00	32.69	0.00	29.99	0.00	19.96	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Los Angeles CA	361	57.76	13.18	11.63	31.63	33.52	24.71	25.21	30.48	29.64	2.51	1.25	2.28	2.71	3.45									
Oakland CA	24	3.84	19.71	20.83	31.65	33.33	34.25	25.00	14.38	20.83	1.32	1.37	0.94	1.36	2.78									
San Diego CA	69	11.04	14.62	13.04	26.63	26.09	33.39	39.13	25.36	21.74	3.05	1.19	2.05	6.84	3.57									
San Francisco CA	48	7.68	26.66	27.08	14.81	20.83	29.94	29.17	28.59	22.92	2.00	3.15	2.59	1.06	1.70									
Limited Review:																								
Bakersfield CA	1	0.16	8.38	0.00	37.14	0.00	27.60	100.00	26.88	0.00	0.00	0.00	0.00	0.00	0.00									
El Centro CA	0	0.00	0.00	0.00	39.27	0.00	33.71	0.00	27.02	0.00	0.00	0.00	0.00	0.00	0.00									
Hanford-Corcoran CA	0	0.00	0.00	0.00	41.95	0.00	17.35	0.00	40.70	0.00	0.00	0.00	0.00	0.00	0.00									
Madera CA	0	0.00	0.00	0.00	66.71	0.00	24.34	0.00	8.96	0.00	0.00	0.00	0.00	0.00	0.00									
Modesto CA	0	0.00	6.64	0.00	17.98	0.00	50.02	0.00	25.36	0.00	0.00	0.00	0.00	0.00	0.00									
Oxnard-Ventura CA	12	1.92	7.56	0.00	34.46	58.33	46.44	33.33	11.54	8.33	2.99	0.00	7.41	0.00	0.00									
Redding CA	0	0.00	0.00	0.00	53.33	0.00	35.30	0.00	11.38	0.00	0.00	0.00	0.00	0.00	0.00									
Riverside-San Bernardino CA	2	0.32	11.28	0.00	36.12	0.00	35.44	50.00	17.17	50.00	0.61	0.00	0.00	0.92	2.00									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 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, 2012 TO DECEMBER 31, 2013																
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ⁷					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overa ll	Low	Mod	Mid
Limited Review:																
Sacramento CA	3	0.48	11.50	0.00	34.86	0.00	35.67	33.33	17.96	66.67	0.43	0.00	0.00	0.00	2.78	
Salinas CA	5	0.80	8.24	0.00	33.38	20.00	40.99	60.00	17.39	20.00	0.00	0.00	0.00	0.00	0.00	
San Jose CA	10	1.60	10.18	20.00	32.23	10.00	39.62	60.00	17.98	10.00	1.61	1.23	0.00	3.64	1.85	
San Luis Obispo CA	5	0.80	1.18	0.00	13.55	20.00	63.47	80.00	21.79	0.00	8.57	0.00	16.67	9.09	0.00	
Santa Ana-Anaheim CA	51	8.16	10.56	21.57	35.81	49.02	32.80	17.65	20.84	11.76	3.29	3.77	3.04	2.54	5.00	
Santa Barbara CA	21	3.36	19.05	14.29	29.23	38.10	29.08	33.33	22.64	14.29	11.70	8.00	12.50	21.74	0.00	
Santa Cruz CA	4	0.64	5.53	0.00	39.40	25.00	43.08	75.00	11.99	0.00	0.00	0.00	0.00	0.00	0.00	
Santa Rosa CA	8	1.28	1.80	0.00	38.46	37.50	51.56	50.00	8.17	12.50	4.88	0.00	3.33	4.76	20.00	
Stockton CA	0	0.00	21.80	0.00	33.80	0.00	28.11	0.00	16.29	0.00	0.00	0.00	0.00	0.00	0.00	
Vallejo CA	0	0.00	5.68	0.00	36.67	0.00	46.23	0.00	11.42	0.00	0.00	0.00	0.00	0.00	0.00	
Visalia-Porterville CA	0	0.00	4.85	0.00	38.42	0.00	29.16	0.00	27.56	0.00	0.00	0.00	0.00	0.00	0.00	
Yuba City CA	0	0.00	3.75	0.00	55.92	0.00	27.65	0.00	12.68	0.00	0.00	0.00	0.00	0.00	0.00	
Inyo-Mono Non-MSA CA	0	0.00	0.00	0.00	1.13	0.00	11.83	0.00	87.04	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 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, 2012 TO DECEMBER 31, 2013				
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:																					
Fresno CA	580	3.20	9.68	13.62	23.99	20.34	26.26	25.52	39.91	40.52	2.49	4.81	2.55	2.43	2.27						
Los Angeles CA	4,672	25.77	6.40	6.25	18.38	15.43	25.22	20.98	48.79	57.34	1.05	1.25	0.97	0.88	1.16						
Oakland CA	659	3.63	10.38	11.53	17.97	19.12	31.86	23.07	39.76	46.28	0.57	0.85	0.71	0.43	0.59						
San Diego CA	3,919	21.61	5.78	5.05	15.61	16.97	35.37	36.06	43.13	41.92	2.79	3.13	3.38	3.05	2.50						
San Francisco CA	866	4.78	16.10	25.75	12.82	10.28	30.59	24.71	40.39	39.26	0.71	1.36	0.44	0.59	0.69						
Limited Review:																					
Bakersfield CA	231	1.27	3.72	5.19	20.32	18.61	30.61	19.91	45.33	56.28	1.12	1.59	1.21	0.90	1.23						
El Centro CA	63	0.35	0.00	0.00	32.22	33.33	45.26	38.10	22.52	28.57	1.97	0.00	1.93	1.87	2.62						
Hanford-Corcoran CA	69	0.38	0.00	0.00	40.73	33.33	21.60	31.88	37.52	34.78	2.97	0.00	3.05	3.74	2.59						
Madera CA	39	0.22	0.00	0.00	24.30	38.46	60.78	46.15	14.93	15.38	1.24	0.00	2.57	1.00	0.68						
Modesto CA	112	0.62	2.30	1.79	19.44	19.64	44.04	39.29	34.22	39.29	0.77	0.62	1.20	0.73	0.68						
Oxnard-Ventura CA	346	1.91	3.31	1.73	19.27	20.23	44.53	40.17	32.88	37.86	1.04	0.73	1.38	0.96	1.06						
Redding CA	47	0.26	0.00	0.00	33.61	46.81	48.82	23.40	17.57	29.79	0.67	0.00	1.14	0.41	0.81						
06-40140 Riverside-San Bernardino CA	1,163	6.41	4.28	4.73	24.25	27.77	34.45	38.69	36.95	28.80	0.95	1.36	1.28	1.13	0.67						

* Based on 2013 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 (2013).

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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 es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Limited Review:																								
Sacramento CA	461	2.54	7.03	4.77	20.82	23.43	38.92	39.05	33.22	32.75	0.59	0.47	0.78	0.64	0.52									
Salinas CA	178	0.98	1.33	1.12	19.29	15.73	38.64	47.19	40.25	35.96	1.29	0.00	1.24	1.80	1.06									
San Jose CA	662	3.65	5.92	3.93	22.28	35.80	34.68	35.05	37.02	25.23	0.71	0.53	1.08	0.72	0.52									
San Luis Obispo CA	74	0.41	2.07	1.35	10.86	9.46	60.55	55.41	26.45	33.78	0.55	0.00	0.38	0.55	0.69									
Santa Ana-Anaheim CA	3,376	18.62	4.69	5.81	25.53	29.83	32.52	33.86	36.26	30.51	2.02	2.40	2.60	2.15	1.56									
Santa Barbara CA	170	0.94	13.06	19.41	20.76	25.29	26.62	31.18	38.96	24.12	1.25	2.62	1.00	1.53	1.00									
Santa Cruz CA	82	0.45	2.03	0.00	21.00	36.59	43.32	36.59	33.65	26.83	0.66	0.00	1.14	0.56	0.55									
Santa Rosa CA	29	0.16	3.76	0.00	19.42	0.00	53.33	37.93	23.49	62.07	0.11	0.00	0.00	0.09	0.26									
Stockton CA	95	0.52	7.60	15.79	22.42	14.74	31.64	34.74	38.34	34.74	0.52	1.31	0.38	0.60	0.46									
Vallejo CA	22	0.12	2.05	9.09	24.24	36.36	47.13	50.00	26.41	4.55	0.27	3.13	0.40	0.27	0.07									
Visalia-Porterville CA	135	0.74	1.23	0.00	28.18	26.67	28.24	31.11	42.32	42.22	1.60	0.00	1.82	1.62	1.65									
Yuba City CA	30	0.17	0.63	0.00	32.39	46.67	31.45	26.67	35.53	26.67	0.61	0.00	1.32	0.38	0.46									
Inyo-Mono Non-MSA CA	51	0.28	0.00	0.00	8.37	0.00	44.53	29.41	47.10	70.59	4.85	0.00	0.00	3.20	8.02									

* Based on 2013 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Fresno CA	30	8.13	4.37	0.00	30.36	40.00	34.37	30.00	30.87	30.00	4.36	0.00	4.35	4.14	5.88	
Los Angeles CA	6	1.63	3.15	0.00	16.67	0.00	26.96	66.67	52.63	33.33	1.05	0.00	0.00	2.94	0.61	
Oakland CA	2	0.54	7.07	0.00	16.70	0.00	34.13	100.00	42.08	0.00	0.00	0.00	0.00	0.00	0.00	
San Diego CA	30	8.13	4.30	0.00	16.40	23.33	39.10	23.33	40.18	53.33	6.02	0.00	13.04	4.23	6.48	
San Francisco CA	4	1.08	8.77	0.00	14.21	0.00	35.21	100.00	41.76	0.00	0.82	0.00	0.00	2.50	0.00	
Limited Review:																
Bakersfield CA	13	3.52	1.17	0.00	28.62	30.77	31.51	53.85	38.70	15.38	2.97	0.00	1.61	8.33	1.22	
El Centro CA	9	2.44	0.00	0.00	20.29	0.00	40.79	11.11	38.91	88.89	3.19	0.00	0.00	0.00	6.98	
Hanford-Corcoran CA	14	3.79	0.00	0.00	22.19	0.00	42.33	57.14	35.34	42.86	7.55	0.00	0.00	8.89	9.30	
Madera CA	17	4.61	0.00	0.00	17.25	0.00	68.77	70.59	13.98	29.41	6.12	0.00	0.00	7.07	8.70	
Modesto CA	51	13.82	0.72	0.00	8.20	3.92	51.67	74.51	39.41	21.57	6.30	0.00	5.56	9.74	2.50	
Oxnard-Ventura CA	7	1.90	5.24	28.57	25.85	14.29	44.81	57.14	24.10	0.00	1.09	0.00	0.00	3.03	0.00	
Redding CA	1	0.27	0.00	0.00	24.15	0.00	53.81	100.00	22.04	0.00	0.00	0.00	0.00	0.00	0.00	
Riverside-San Bernardino CA	8	2.17	3.53	0.00	23.54	87.50	35.65	0.00	37.26	12.50	2.82	0.00	13.79	0.00	1.47	

* Based on 2013 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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:																					
Sacramento CA	22	5.96	3.92	4.55	16.66	4.55	45.52	54.55	33.90	36.36	3.04	0.00	3.85	3.83	2.14						
Salinas CA	11	2.98	0.73	0.00	16.76	0.00	43.00	54.55	39.27	45.45	1.89	0.00	0.00	3.33	1.79						
San Jose CA	7	1.90	6.88	0.00	25.65	42.86	36.53	57.14	30.86	0.00	0.83	0.00	2.86	0.00	0.00						
San Luis Obispo CA	5	1.36	0.64	0.00	6.64	0.00	62.74	60.00	29.98	40.00	1.39	0.00	0.00	1.22	1.89						
Santa Ana-Anaheim CA	5	1.36	4.31	0.00	25.85	20.00	33.30	80.00	35.98	0.00	1.94	0.00	0.00	6.45	0.00						
Santa Barbara CA	5	1.36	6.64	0.00	16.47	0.00	25.19	60.00	51.49	40.00	0.68	0.00	0.00	0.00	2.38						
Santa Cruz CA	6	1.63	1.98	0.00	27.26	83.33	38.92	16.67	31.84	0.00	2.08	0.00	1.64	4.35	0.00						
Santa Rosa CA	0	0.00	0.93	0.00	12.42	0.00	55.67	0.00	30.97	0.00	0.00	0.00	0.00	0.00	0.00						
Stockton CA	59	15.99	4.82	5.08	11.69	8.47	31.90	23.73	51.59	62.71	6.51	8.33	3.45	7.83	6.41						
Vallejo CA	1	0.27	0.36	0.00	13.99	0.00	54.04	100.00	31.60	0.00	1.67	0.00	0.00	2.56	0.00						
Visalia-Porterville CA	23	6.23	2.35	8.70	26.26	30.43	41.95	43.48	29.44	17.39	3.17	12.50	3.45	3.55	2.13						
Yuba City CA	33	8.94	0.26	0.00	8.01	0.00	36.78	18.18	54.95	81.82	6.22	0.00	0.00	2.90	8.76						
Inyo-Mono Non-MSA CA	0	0.00	0.00	0.00	3.96	0.00	38.61	0.00	57.43	0.00	0.00	0.00	0.00	0.00	0.00						

* Based on 2013 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 (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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:																					
Fresno CA	66	0.82	24.70	12.12	16.04	33.33	17.13	25.76	42.13	28.79	0.46	0.74	1.02	0.60	0.14						
Los Angeles CA	2,746	34.01	24.05	2.17	16.43	10.40	17.64	10.85	41.88	76.58	2.00	1.41	1.98	0.93	2.35						
Oakland CA	567	7.02	23.31	4.94	16.42	16.05	19.15	13.58	41.12	65.43	1.06	0.61	1.02	0.72	1.24						
San Diego CA	836	10.35	22.36	3.49	17.55	14.66	18.75	12.74	41.34	69.11	1.40	2.65	2.54	0.79	1.43						
San Francisco CA	944	11.69	23.97	0.75	16.18	2.88	18.63	8.73	41.22	87.65	2.99	0.39	0.82	1.59	3.61						
Limited Review:																					
Bakersfield CA	36	0.45	23.03	5.56	17.18	25.00	17.96	16.67	41.83	52.78	0.23	0.42	0.36	0.18	0.20						
El Centro CA	6	0.07	24.44	0.00	17.03	33.33	16.45	0.00	42.09	66.67	0.28	0.00	0.71	0.00	0.30						
Hanford-Corcoran CA	7	0.09	22.37	28.57	18.52	14.29	18.90	0.00	40.21	57.14	0.40	2.30	0.37	0.00	0.39						
Madera CA	5	0.06	20.48	0.00	18.88	0.00	20.67	60.00	39.97	40.00	0.14	0.00	0.00	0.49	0.00						
Modesto CA	21	0.26	22.58	14.29	16.69	42.86	19.60	33.33	41.12	9.52	0.20	1.01	0.34	0.20	0.04						
Oxnard-Ventura CA	240	2.97	21.43	5.53	17.35	16.17	20.51	24.68	40.71	53.62	1.67	3.18	1.99	1.78	1.42						
Redding CA	4	0.05	22.67	0.00	18.03	0.00	19.08	25.00	40.22	75.00	0.16	0.00	0.00	0.14	0.26						
Riverside-San Bernardino CA	357	4.42	21.83	5.62	17.53	13.48	19.81	13.20	40.84	67.70	0.34	0.26	0.29	0.20	0.46						

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															
Geography: CALIFORNIA															
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013															
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
Limited Review:															
Sacramento CA	168	2.08	22.01	32.14	17.00	17.26	19.98	13.10	41.01	37.50	0.27	0.86	0.30	0.20	0.23
Salinas CA	89	1.10	21.84	2.25	16.71	8.99	19.49	11.24	41.97	77.53	1.12	0.00	0.24	0.26	1.67
San Jose CA	595	7.37	23.65	1.51	16.34	7.56	19.49	13.45	40.51	77.48	1.80	1.01	1.55	1.30	2.04
San Luis Obispo CA	46	0.57	19.80	2.17	18.20	10.87	21.60	10.87	40.40	76.09	0.43	0.00	0.00	0.28	0.56
Santa Ana-Anaheim CA	887	10.99	22.02	1.24	17.33	8.69	19.49	6.88	41.16	83.18	1.62	0.81	1.38	0.74	2.00
Santa Barbara CA	255	3.16	21.72	1.21	17.79	6.05	18.61	13.71	41.88	79.03	2.98	0.81	1.12	1.29	4.23
Santa Cruz CA	46	0.57	23.85	2.17	16.93	13.04	18.29	8.70	40.92	76.09	1.07	0.00	0.37	0.58	1.33
Santa Rosa CA	67	0.83	20.14	0.00	18.47	2.99	20.77	4.48	40.62	92.54	0.79	0.00	0.27	0.08	1.23
Stockton CA	37	0.46	22.05	11.11	17.73	13.89	19.13	38.89	41.09	36.11	0.30	0.00	0.29	0.52	0.23
Vallejo CA	12	0.15	19.90	0.00	17.71	8.33	22.56	16.67	39.83	75.00	0.11	0.00	0.00	0.07	0.22
Visalia-Porterville CA	18	0.22	22.78	11.11	17.63	33.33	17.83	22.22	41.76	33.33	0.26	0.63	0.37	0.15	0.21
Yuba City CA	4	0.05	21.41	0.00	17.29	25.00	20.30	75.00	40.99	0.00	0.16	0.00	0.23	0.38	0.00
Inyo-Mono Non-MSA CA	15	0.19	15.41	0.00	16.45	0.00	18.01	6.67	50.13	93.33	2.28	0.00	0.00	2.04	2.50

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]													
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Fresno CA	3	0.60	24.70	0.00	16.04	33.33	17.13	33.33	42.13	33.33	0.57	0.00	1.39	0.95	0.30									
Los Angeles CA	144	28.69	24.05	8.39	16.43	18.18	17.64	5.59	41.88	67.83	1.29	2.88	1.86	0.28	1.43									
Oakland CA	29	5.78	23.31	3.45	16.42	20.69	19.15	0.00	41.12	75.86	0.74	0.55	0.79	0.00	1.11									
San Diego CA	43	8.57	22.36	11.63	17.55	20.93	18.75	13.95	41.34	53.49	1.01	2.73	1.76	0.56	0.92									
06-41884 San Francisco CA	52	10.36	23.97	7.69	16.18	13.46	18.63	17.31	41.22	61.54	1.58	0.00	1.42	1.22	1.92									
Limited Review:																								
Bakersfield CA	2	0.40	23.03	0.00	17.18	50.00	17.96	50.00	41.83	0.00	0.21	0.00	2.17	0.00	0.00									
El Centro CA	0	0.00	24.44	0.00	17.03	0.00	16.45	0.00	42.09	0.00	0.00	0.00	0.00	0.00	0.00									
Hanford-Corcoran CA	1	0.20	22.37	0.00	18.52	0.00	18.90	0.00	40.21	100.00	0.00	0.00	0.00	0.00	0.00									
Madera CA	1	0.20	20.48	100.00	18.88	0.00	20.67	0.00	39.97	0.00	1.32	14.29	0.00	0.00	0.00									
Modesto CA	0	0.00	22.58	0.00	16.69	0.00	19.60	0.00	41.12	0.00	0.00	0.00	0.00	0.00	0.00									
Oxnard-Ventura CA	23	4.58	21.43	17.39	17.35	8.70	20.51	34.78	40.71	39.13	1.00	3.77	0.00	1.54	0.62									
Redding CA	0	0.00	22.67	0.00	18.03	0.00	19.08	0.00	40.22	0.00	0.00	0.00	0.00	0.00	0.00									
Riverside-San Bernardino CA	10	1.99	21.83	20.00	17.53	10.00	19.81	20.00	40.84	50.00	0.19	0.61	0.00	0.26	0.16									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*										
	#	% of Total**	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp						
Limited Review:																					
Sacramento CA	8	1.59	22.01	0.00	17.00	25.00	19.98	0.00	41.01	75.00	0.19	0.00	0.00	0.00	0.35						
Salinas CA	20	3.98	21.84	0.00	16.71	15.79	19.49	21.05	41.97	63.16	3.52	0.00	3.57	2.27	4.17						
San Jose CA	28	5.58	23.65	3.70	16.34	14.81	19.49	7.41	40.51	74.07	0.95	0.76	0.36	0.24	1.38						
San Luis Obispo CA	12	2.39	19.80	8.33	18.20	33.33	21.60	33.33	40.40	25.00	1.28	0.00	4.00	1.19	0.62						
Santa Ana-Anaheim CA	51	10.16	22.02	1.96	17.33	17.65	19.49	9.80	41.16	70.59	0.97	0.51	1.61	0.12	1.21						
Santa Barbara CA	67	13.35	21.72	1.54	17.79	16.92	18.61	16.92	41.88	64.62	10.73	0.00	11.76	5.48	13.29						
Santa Cruz CA	1	0.20	23.85	0.00	16.93	0.00	18.29	0.00	40.92	100.00	0.45	0.00	0.00	0.00	0.73						
Santa Rosa CA	6	1.20	20.14	0.00	18.47	16.67	20.77	0.00	40.62	83.33	1.04	0.00	1.45	0.00	1.50						
Stockton CA	0	0.00	22.05	0.00	17.73	0.00	19.13	0.00	41.09	0.00	0.00	0.00	0.00	0.00	0.00						
Vallejo CA	1	0.20	19.90	0.00	17.71	0.00	22.56	0.00	39.83	100.00	0.29	0.00	0.00	0.00	0.66						
Visalia-Porterville CA	0	0.00	22.78	0.00	17.63	0.00	17.83	0.00	41.76	0.00	0.00	0.00	0.00	0.00	0.00						
Yuba City CA	0	0.00	21.41	0.00	17.29	0.00	20.30	0.00	40.99	0.00	0.00	0.00	0.00	0.00	0.00						
Inyo-Mono Non-MSA CA	0	0.00	15.41	0.00	16.45	0.00	18.01	0.00	50.13	0.00	0.00	0.00	0.00	0.00	0.00						

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overa II	Low	Mod	Mid	Upp	
Full Review:																
Fresno CA	97	0.53	24.70	7.29	16.04	21.88	17.13	22.92	42.13	47.92	0.47	0.47	0.90	0.60	0.33	
Los Angeles CA	5,488	29.98	24.05	3.85	16.43	15.01	17.64	6.08	41.88	75.06	1.54	1.18	2.83	0.62	1.62	
Oakland CA	1,177	6.43	23.31	6.21	16.42	16.51	19.15	10.04	41.12	67.23	0.80	0.78	1.04	0.45	0.89	
San Diego CA	2,225	12.16	22.36	6.22	17.55	18.53	18.75	14.64	41.34	60.61	1.62	2.05	3.32	1.40	1.37	
San Francisco CA	2,608	14.25	23.97	2.81	16.18	11.03	18.63	8.84	41.22	77.33	2.37	1.05	2.50	1.20	2.85	
Limited Review:																
Bakersfield CA	110	0.60	23.03	11.82	17.18	25.45	17.96	27.27	41.83	35.45	0.57	1.13	1.21	0.93	0.31	
El Centro CA	22	0.12	24.44	13.64	17.03	31.82	16.45	31.82	42.09	22.73	0.99	2.50	4.14	1.78	0.28	
Hanford-Corcoran CA	20	0.11	22.37	5.00	18.52	25.00	18.90	15.00	40.21	55.00	0.74	0.00	1.69	0.71	0.66	
Madera CA	19	0.10	20.48	10.53	18.88	42.11	20.67	31.58	39.97	15.79	0.59	1.27	1.14	1.11	0.17	
Modesto CA	12	0.07	22.58	0.00	16.69	33.33	19.60	16.67	41.12	50.00	0.12	0.00	0.30	0.10	0.10	
Oxnard-Ventura CA	504	2.75	21.43	7.49	17.35	13.36	20.51	15.38	40.71	63.77	1.19	0.93	1.05	0.67	1.54	
Redding CA	12	0.07	22.67	8.33	18.03	41.67	19.08	25.00	40.22	25.00	0.16	0.32	0.00	0.24	0.14	
Riverside-San Bernardino CA	627	3.43	21.83	7.57	17.53	18.91	19.81	19.57	40.84	53.95	0.46	0.52	0.72	0.45	0.39	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]										
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overa II	Low	Mod	Mid	Upp				
Limited Review:																					
06-40900 Sacramento CA	169	0.92	22.01	5.39	17.00	13.17	19.98	16.17	41.01	65.27	0.16	0.10	0.17	0.12	0.19						
Salinas CA	263	1.44	21.84	3.83	16.71	8.43	19.49	18.77	41.97	68.97	1.61	0.26	0.79	1.62	1.87						
06-41940 San Jose CA	1,447	7.90	23.65	5.13	16.34	16.63	19.49	11.92	40.51	66.32	1.22	1.03	1.84	0.89	1.22						
06-42020 San Luis Obispo CA	162	0.89	19.80	3.13	18.20	12.50	21.60	15.63	40.40	68.75	0.63	0.23	0.73	0.37	0.75						
Santa Ana-Anaheim CA	2,175	11.88	22.02	5.02	17.33	17.96	19.49	8.84	41.16	68.17	1.43	1.39	2.38	0.67	1.51						
Santa Barbara CA	816	4.46	21.72	3.27	17.79	9.81	18.61	13.21	41.88	73.71	3.57	2.04	3.32	2.13	4.17						
Santa Cruz CA	121	0.66	23.85	7.50	16.93	18.33	18.29	13.33	40.92	60.83	0.85	0.57	0.93	0.65	0.92						
Santa Rosa CA	112	0.61	20.14	0.89	18.47	6.25	20.77	6.25	40.62	86.61	0.44	0.00	0.19	0.11	0.69						
Stockton CA	29	0.16	22.05	17.24	17.73	27.59	19.13	27.59	41.09	27.59	0.13	0.30	0.26	0.15	0.08						
Vallejo CA	16	0.09	19.90	0.00	17.71	20.00	22.56	20.00	39.83	60.00	0.15	0.00	0.17	0.12	0.18						
Visalia-Porterville CA	51	0.28	22.78	13.73	17.63	29.41	17.83	23.53	41.76	33.33	0.68	1.23	1.88	1.05	0.32						
Yuba City CA	1	0.01	21.41	0.00	17.29	0.00	20.30	100.00	40.99	0.00	0.04	0.00	0.00	0.16	0.00						
Inyo-Mono Non-MSA CA	22	0.12	15.41	0.00	16.45	0.00	18.01	13.64	50.13	86.36	1.11	0.00	0.00	1.77	1.13						

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES										Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
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:													
Fresno CA	580	3.18	72.69	53.62	78.97	14.66	6.38	2.49	2.94				
Los Angeles CA	4,738	25.95	73.07	43.60	78.13	10.89	10.98	1.05	0.89				
Oakland CA	659	3.61	73.53	41.27	67.68	18.21	14.11	0.57	0.43				
San Diego CA	3,921	21.48	72.72	44.94	82.05	9.84	8.11	2.79	2.47				
San Francisco CA	866	4.74	71.98	43.76	64.43	14.43	21.13	0.71	0.58				
Limited Review:													
Bakersfield CA	231	1.27	73.55	51.52	80.95	12.55	6.49	1.12	1.34				
El Centro CA	63	0.35	67.13	46.03	73.02	15.87	11.11	1.97	2.24				
Hanford-Corcoran CA	69	0.38	71.82	42.03	89.86	7.25	2.90	2.97	2.92				
Madera CA	39	0.21	75.48	46.15	92.31	5.13	2.56	1.24	1.33				
Modesto CA	112	0.61	74.32	41.96	61.61	17.86	20.54	0.77	0.55				
Oxnard-Ventura CA	346	1.90	74.87	47.11	79.48	10.12	10.40	1.04	1.08				
Redding CA	47	0.26	76.79	76.60	76.60	14.89	8.51	0.67	0.97				
Riverside-San Bernardino CA	1,163	6.37	74.06	44.11	77.64	10.66	11.69	0.95	0.82				

* Based on 2013 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 - 2013).

**** 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 22.17% 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, 2012 TO DECEMBER 31, 2013				
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:									
Sacramento CA	461	2.53	74.46	44.69	70.50	15.18	14.32	0.59	0.48
Salinas CA	180	0.99	74.27	40.56	66.11	15.56	18.33	1.29	1.43
San Jose CA	662	3.63	69.65	40.18	68.13	16.47	15.41	0.71	0.60
San Luis Obispo CA	74	0.41	76.10	47.30	67.57	17.57	14.86	0.55	0.58
Santa Ana-Anaheim CA	3,432	18.80	73.09	40.76	74.53	13.75	11.71	2.02	1.57
Santa Barbara CA	170	0.93	74.19	35.29	64.12	17.06	18.82	1.25	1.19
Santa Cruz CA	82	0.45	77.48	43.90	67.07	19.51	13.41	0.66	0.56
Santa Rosa CA	29	0.16	75.10	55.17	72.41	6.90	20.69	0.11	0.11
Stockton CA	95	0.52	72.70	49.47	66.32	13.68	20.00	0.52	0.47
Vallejo CA	22	0.12	74.76	54.55	59.09	18.18	22.73	0.27	0.34
06- CA	135	0.74	73.71	48.89	85.93	5.19	8.89	1.60	1.92
Yuba City CA	30	0.16	73.80	56.67	90.00	6.67	3.33	0.61	0.64
Inyo-Mono Non-MSA CA	51	0.28	73.15	39.22	86.27	11.76	1.96	4.85	5.10

* Based on 2013 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 - 2013).

**** 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 22.17% 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, 2012 TO DECEMBER 31, 2013									
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:									
Fresno CA	30	8.13	91.56	46.67	76.67	10.00	13.33	4.36	3.52
Los Angeles CA	6	1.63	94.87	0.00	66.67	33.33	0.00	1.05	0.00
Oakland CA	2	0.54	94.85	0.00	0.00	100.00	0.00	0.00	0.00
San Diego CA	30	8.13	94.97	63.33	100.00	0.00	0.00	6.02	6.48
San Francisco CA	4	1.08	95.47	50.00	100.00	0.00	0.00	0.82	0.00
Limited Review:									
Bakersfield CA	13	3.52	89.43	7.69	84.62	0.00	15.38	2.97	1.18
El Centro CA	9	2.44	81.38	0.00	77.78	11.11	11.11	3.19	0.00
Hanford-Corcoran CA	14	3.79	89.59	78.57	78.57	21.43	0.00	7.55	11.76
Madera CA	17	4.61	91.94	23.53	52.94	23.53	23.53	6.12	1.43
Modesto CA	51	13.82	93.11	64.71	17.65	33.33	49.02	6.30	9.60
Oxnard-Ventura CA	7	1.90	91.11	57.14	85.71	14.29	0.00	1.09	1.12
Redding CA	1	0.27	96.43	100.00	100.00	0.00	0.00	0.00	0.00
Riverside-San Bernardino CA	8	2.17	94.27	50.00	62.50	37.50	0.00	2.82	2.44

* Based on 2013 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 - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 16.26% 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, 2012 TO DECEMBER 31, 2013									
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:									
Sacramento CA	22	5.96	95.47	45.45	22.73	50.00	27.27	3.04	2.96
Salinas CA	11	2.98	83.89	27.27	45.45	27.27	27.27	1.89	1.47
San Jose CA	7	1.90	93.78	0.00	57.14	14.29	28.57	0.83	0.00
San Luis Obispo CA	5	1.36	96.57	20.00	20.00	40.00	40.00	1.39	1.43
Santa Ana-Anaheim CA	5	1.36	93.58	40.00	60.00	40.00	0.00	1.94	2.22
Santa Barbara CA	5	1.36	90.93	20.00	80.00	0.00	20.00	0.68	0.00
Santa Cruz CA	6	1.63	93.76	33.33	16.67	33.33	50.00	2.08	0.00
Santa Rosa CA	0	0.00	95.00	0.00	0.00	0.00	0.00	0.00	0.00
Stockton CA	59	15.99	92.52	66.10	33.90	25.42	40.68	6.51	8.88
Vallejo CA	1	0.27	95.90	100.00	0.00	0.00	100.00	1.67	3.23
Visalia-Porterville CA	23	6.23	89.60	43.48	60.87	34.78	4.35	3.17	2.13
Yuba City CA	33	8.94	94.06	69.70	9.09	30.30	60.61	6.22	6.29
Inyo-Mono Non-MSA CA	0	0.00	96.04	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2013 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 - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 16.26% of small loans to farms originated and purchased by the bank.

State of Georgia

Table 1. Lending Volume

LENDING VOLUME												
Geography: GEORGIA												
Evaluation Period: DECEMBER 12, 2013 TO DECEMBER 31, 2013												
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:												
Atlanta GA	100.00	9	1,101	0	0	0	0	0	0	9	1,101	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** Community Development Loan data is contained on the 2014 tables.

*** Deposit Data is contained on the 2014 tables.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: GEORGIA				Evaluation Period: DECEMBER 12, 2013 TO DECEMBER 31, 2013					Market Share (%) by Geography [†]				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{***}	% Owner Occ Units ^{***}	% BANK Loans ^{***}	% Owner Occ Units ^{***}	% BANK Loans ^{***}					
Full Review:															
Atlanta GA	5	100.00	4.59	20.00	21.17	0.00	31.17	0.00	43.07	80.00	0.01	0.09	0.00	0.00	0.02

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: GEORGIA				Evaluation Period: DECEMBER 12, 2013 TO DECEMBER 31, 2013					Market Share (%) by Geography'				
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****					
Full Review:															
Atlanta GA	4	100.00	4.59	0.00	21.17	75.00	31.17	0.00	43.07	25.00	0.01	0.00	0.03	0.00	0.00

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

**** 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: GEORGIA					Evaluation Period: DECEMBER 12, 2013 TO DECEMBER 31, 2013					Market Share*				
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****	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Atlanta GA	5	100.00	23.51	20.00	16.56	60.00	17.62	0.00	42.31	20.00	0.01	0.03	0.04	0.00	0.00	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: GEORGIA					Evaluation Period: DECEMBER 12, 2013 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa II	Low	Mod	Mid	Upp	
Full Review:																
Atlanta GA	4	100.00	23.51	0.00	16.56	25.00	17.62	50.00	42.31	25.00	0.01	0.00	0.01	0.02	0.00	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

State of Illinois

Table 1. Lending Volume

LENDING VOLUME		Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						
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 IL	100.00	150	20,959	2	210	0	0	0	0	152	21,169	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** Community Development Loan data is contained on the 2014 tables.

*** Deposit Data is contained on the 2014 tables.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: ILLINOIS					Evaluation Period: April 16, 2012 TO DECEMBER 31, 2013				
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 IL	77	100.00	3.95	2.60	17.80	19.48	38.25	49.35	40.00	28.57	0.07	0.08	0.11	0.10	0.04									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: ILLINOIS				Evaluation Period: APRIL 16, TO DECEMBER 31, 2013						Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *						
Full Review:																
Chicago IL	3	100.00	3.95	0.00	17.80	0.00	38.25	33.33	40.00	66.67	0.06	0.00	0.00	0.06	0.09	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: ILLINOIS					Evaluation Period: APRIL 16, TO DECEMBER 31, 2013									
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:																													
Chicago IL	70	100.00	3.95	4.29	17.80	11.43	38.25	47.14	40.00	37.14	0.04	0.06	0.04	0.05	0.03														

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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: ILLINOIS					Evaluation Period: APRIL 16, TO DECEMBER 31, 2013				
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 es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Chicago IL	2	100.00	4.93	0.00	15.79	0.00	33.45	0.00	45.71	100.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2013 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 (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ILLINOIS				Evaluation Period: APRIL 16, TO DECEMBER 31, 2013						Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Chicago IL	77	100.00	22.57	22.08	16.85	66.23	19.53	6.49	41.05	5.19	0.08	0.21	0.25	0.02	0.01	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: ILLINOIS					Evaluation Period: APRIL 16, TO DECEMBER 31, 2013				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [†]													
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Chicago IL	3	100.00	22.57	33.33	16.85	66.67	19.53	0.00	41.05	0.00	0.07	0.24	0.26	0.00	0.00									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS					Evaluation Period: APRIL 16, TO DECEMBER 31, 2013									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa II	Low	Mod	Mid	Upp	
Full Review:																
Chicago IL	70	100.00	22.57	8.57	16.85	77.14	19.53	2.86	41.05	11.43	0.04	0.05	0.23	0.01	0.01	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: ILLINOIS					Evaluation Period: APRIL 16, TO DECEMBER 31, 2013				
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 IL	2	100.00	71.06	50.00	50.00	50.00	0.00	0.00	0.00

* Based on 2013 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 - 2013).

**** 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 0.00% of small loans to businesses originated and purchased by the bank.

State of New York

Table 1. Lending Volume

LENDING VOLUME												Geography: NEW YORK		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
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 NY	100.00	78	20,339	1	500	0	0	0	0	79	20,839	0.00			

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** Community Development Loan data is contained on the 2014 tables.

*** Deposit Data is contained on the 2014 tables.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *						
Full Review:																
New York NY	42	100.00	2.78	7.14	13.54	50.00	29.11	23.81	54.57	19.05	0.07	0.15	0.27	0.07	0.02	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
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*** *	Overa ll	Low	Mod	Mid	Upp
Full Review:															
New York NY	2	100.00	2.78	0.00	13.54	100.00	29.11	0.00	54.57	0.00	0.06	0.00	0.51	0.00	0.00

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013									
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:															
New York NY	34	100.00	2.78	5.88	13.54	55.88	29.11	26.47	54.57	11.76	0.06	0.14	0.32	0.07	0.01

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

**** 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: NEW YORK					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013								
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 NY	42	100.00	27.27	2.38	15.95	42.86	16.28	16.67	40.51	38.10	0.08	0.21	0.48	0.07	0.04

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: NEW YORK					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [†]													
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp									
Full Review:																								
New York NY	2	100.00	27.27	0.00	15.95	0.00	16.28	50.00	40.51	50.00	0.07	0.00	0.00	0.18	0.05									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers						
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa ll	Low	Mod	Mid	Upp
Full Review:															
New York NY	34	100.00	27.27	5.88	15.95	61.76	16.28	11.76	40.51	20.59	0.07	0.16	0.67	0.05	0.02

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
				Geography: NEW YORK		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
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 NY	1	100.00	72.57	0.00	0.00	0.00	100.00	0.00	0.00

* Based on 2013 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 - 2013).

**** 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 0.00% of small loans to businesses originated and purchased by the bank.

State of Oregon

Table 1. Lending Volume

LENDING VOLUME												
Geography: OREGON												
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013												
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:												
Portland OR	91.64	226	126,497	92	29,506	0	0	0	0	318	156,003	0.00
Limited Review:												
Salem OR	8.36	14	9,859	15	2,181	0	0	0	0	29	12,040	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** Community Development Loan data is contained on the 2014 tables.

*** Deposit Data is contained on the 2014 tables.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: OREGON				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Portland OR	75	94.94	1.24	1.33	18.98	16.00	47.52	21.33	32.26	61.33	0.16	0.19	0.18	0.08	0.26	
Limited Review:																
Salem OR	4	5.06	0.00	0.00	11.87	0.00	60.16	100.00	27.96	0.00	0.08	0.00	0.00	0.14	0.00	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: OREGON				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013						Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *						
Full Review:																
Portland OR	4	100.00	1.24	0.00	18.98	0.00	47.52	50.00	32.26	50.00	0.08	0.00	0.00	0.11	0.08	
Limited Review:																
Salem OR	0	0.00	0.00	0.00	11.87	0.00	60.16	0.00	27.96	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: OREGON					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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:																								
Portland OR	132	95.65	1.24	2.27	18.98	12.88	47.52	23.48	32.26	61.36	0.17	0.44	0.18	0.11	0.23									
Limited Review:																								
Salem OR	6	4.35	0.00	0.00	11.87	0.00	60.16	66.67	27.96	33.33	0.07	0.00	0.00	0.09	0.08									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: OREGON					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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****	Overa ll	Low	Mod	Mid	Upp							
Full Review:																								
Portland OR	15	78.95	5.64	0.00	29.70	73.33	42.39	6.67	22.27	20.00	0.92	0.00	1.13	0.57	1.75									
Limited Review:																								
Salem OR	4	21.05	0.00	0.00	36.80	25.00	44.03	75.00	19.17	0.00	3.26	0.00	3.45	4.26	0.00									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: OREGON		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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 es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Portland OR	92	85.98	4.68	19.57	21.80	17.39	42.30	43.48	31.07	19.57	0.12	0.74	0.07	0.13	0.08						
Limited Review:																					
Salem OR	15	14.02	0.00	0.00	20.64	20.00	56.68	33.33	22.68	46.67	0.12	0.00	0.09	0.07	0.29						

* Based on 2013 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 (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: OREGON					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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:																								
Portland OR	75	94.94	20.70	0.00	17.47	17.33	21.04	8.00	40.79	74.67	0.18	0.00	0.21	0.06	0.25									
Limited Review:																								
Salem OR	4	5.06	19.90	25.00	18.83	0.00	21.12	0.00	40.15	75.00	0.09	0.43	0.00	0.00	0.16									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: OREGON					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Portland OR	4	100.00	20.70	25.00	17.47	50.00	21.04	0.00	40.79	25.00	0.11	0.63	0.51	0.00	0.00									
Limited Review:																								
Salem OR	0	0.00	19.90	0.00	18.83	0.00	21.12	0.00	40.15	0.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: OREGON					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans***	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Portland OR	132	95.65	20.70	6.82	17.47	23.48	21.04	9.09	40.79	60.61	0.19	0.31	0.43	0.09	0.16	
Limited Review:																
Salem OR	6	4.35	19.90	0.00	18.83	16.67	21.12	33.33	40.15	50.00	0.09	0.00	0.11	0.12	0.09	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
				Geography: OREGON		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
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:									
Portland OR	92	85.98	70.53	47.83	38.04	18.48	43.48	0.12	0.09
Limited Review:									
Salem OR	15	14.02	72.29	60.00	66.67	20.00	13.33	0.12	0.14

* Based on 2013 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 - 2013).

**** 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 3.74% of small loans to businesses originated and purchased by the bank.

State of Texas

Table 1. Lending Volume

LENDING VOLUME												
Geography: TEXAS												
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013												
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 TX	56.79	157	17,428	2	1,086	0	0	0	0	159	18,514	0.00
Limited Review:												
- Houston-Sugar Land-Baytown TX	43.21	117	13,319	4	1,998	0	0	0	0	121	15,317	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** Community Development Loan data is contained on the 2014 tables.

*** Deposit Data is contained on the 2014 tables.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: TEXAS					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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 TX	63	53.85	5.36	1.59	19.26	30.16	30.12	31.75	45.27	36.51	0.07	0.06	0.21	0.07	0.04									
Limited Review:																								
Houston-Sugar Land-Baytown TX	54	46.15	4.14	1.85	21.53	33.33	30.58	20.37	43.75	44.44	0.05	0.07	0.16	0.03	0.03									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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, 2012 TO DECEMBER 31, 2013				
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*** *	Overa ll	Low	Mod	Mid	Upp						
Full Review:																					
Dallas TX	3	50.00	5.36	33.33	19.26	0.00	30.12	33.33	45.27	33.33	0.05	0.87	0.00	0.10	0.00						
Limited Review:																					
Houston-Sugar Land-Baytown TX	3	50.00	4.14	0.00	21.53	66.67	30.58	33.33	43.75	0.00	0.05	0.00	0.21	0.07	0.00						

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****					
Full Review:															
Dallas TX	91	60.26	5.36	3.30	19.26	23.08	30.12	27.47	45.27	46.15	0.11	0.23	0.29	0.12	0.08
Limited Review:															
Houston-Sugar Land-Baytown TX	60	39.74	4.14	6.67	21.53	23.33	30.58	25.00	43.75	45.00	0.07	0.34	0.16	0.07	0.05

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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: TEXAS					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
Full Review:																
Dallas TX	2	33.33	8.30	0.00	17.83	50.00	26.86	0.00	46.80	50.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Houston-Sugar Land-Baytown TX	4	66.67	8.19	0.00	20.39	25.00	25.61	0.00	45.75	75.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2013 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 (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: TEXAS					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
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:																								
Dallas TX	63	53.85	23.23	17.46	16.67	63.49	18.29	4.76	41.81	14.29	0.08	0.27	0.29	0.02	0.02									
Limited Review:																								
Houston-Sugar Land-Baytown TX	54	46.15	23.85	11.11	16.60	61.11	17.62	5.56	41.94	22.22	0.05	0.14	0.21	0.01	0.02									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: TEXAS		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013												
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*																		
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp														
Full Review:																													
Dallas TX	3	50.00	23.23	33.33	16.67	33.33	18.29	0.00	41.81	33.33	0.05	0.45	0.24	0.00	0.00														
Limited Review:																													
Houston-Sugar Land-Baytown TX	3	50.00	23.85	0.00	16.60	33.33	17.62	33.33	41.94	33.33	0.05	0.00	0.16	0.11	0.03														

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: TEXAS					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans***	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Dallas TX	91	60.26	23.23	21.98	16.67	64.84	18.29	4.40	41.81	8.79	0.14	0.66	0.75	0.03	0.02	
Limited Review:																
Houston-Sugar Land-Baytown TX	60	39.74	23.85	25.00	16.60	56.67	17.62	6.67	41.94	11.67	0.08	0.43	0.43	0.03	0.01	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: TEXAS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					
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 TX	2	33.33	71.53	0.00	0.00	0.00	100.00	0.00	0.00
Limited Review:									
Houston-Sugar Land-Baytown TX	4	66.67	71.83	0.00	0.00	0.00	100.00	0.00	0.00

* Based on 2013 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 - 2013).

**** 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 50.00% of small loans to businesses originated and purchased by the bank.

State of Washington

Table 1. Lending Volume

LENDING VOLUME												
Geography: WASHINGTON												
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013												
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:												
Seattle WA	86.83	1,249	741,298	464	101,721	1	400	0	0	1,714	843,419	0.00
Limited Review:												
Bellingham WA	1.67	23	6,846	10	3,284	0	0	0	0	33	10,130	0.00
Bremerton WA	3.44	36	19,222	32	5,594	0	0	0	0	68	24,816	0.00
Mt Vernon WA	0.46	3	928	6	1,950	0	0	0	0	9	2,878	0.00
Tacoma WA	5.62	67	36,891	43	16,050	1	2	0	0	111	52,943	0.00
Clallam-Jefferson Non-MSA WA	1.98	13	2,472	24	1,289	2	150	0	0	39	3,911	0.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** Community Development Loan data is contained on the 2014 tables.

*** Deposit Data is contained on the 2014 tables.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															
Geography: WASHINGTON															
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013															
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:															
Seattle WA	587	92.44	1.84	0.85	15.62	12.10	49.34	37.48	33.20	49.57	0.79	0.34	0.60	0.61	1.17
Limited Review:															
Bellingham WA	8	1.26	0.10	0.00	16.79	0.00	60.32	75.00	22.79	25.00	0.12	0.00	0.00	0.21	0.00
Bremerton WA	13	2.05	0.00	0.00	13.17	7.69	61.74	7.69	25.09	84.62	0.23	0.00	0.15	0.04	0.72
Mt Vernon WA	1	0.16	0.00	0.00	9.86	0.00	67.82	0.00	22.32	100.00	0.05	0.00	0.00	0.00	0.30
Tacoma WA	24	3.78	0.84	0.00	15.39	4.17	53.64	50.00	30.13	45.83	0.15	0.00	0.05	0.13	0.21
Clallam-Jefferson Non-MSA WA	2	0.31	0.00	0.00	8.69	0.00	72.16	50.00	19.15	50.00	0.14	0.00	0.00	0.10	0.33

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *						
Full Review:																
Seattle WA	15	100.0 0	1.84	0.00	15.62	0.00	49.34	40.00	33.20	60.00	0.29	0.00	0.00	0.18	0.54	
Limited Review:																
Bellingham WA	0	0.00	0.10	0.00	16.79	0.00	60.32	0.00	22.79	0.00	0.00	0.00	0.00	0.00	0.00	
Bremerton WA	0	0.00	0.00	0.00	13.17	0.00	61.74	0.00	25.09	0.00	0.00	0.00	0.00	0.00	0.00	
Mt Vernon WA	0	0.00	0.00	0.00	9.86	0.00	67.82	0.00	22.32	0.00	0.00	0.00	0.00	0.00	0.00	
Tacoma WA	0	0.00	0.84	0.00	15.39	0.00	53.64	0.00	30.13	0.00	0.00	0.00	0.00	0.00	0.00	
Clallam-Jefferson Non-MSA WA	0	0.00	0.00	0.00	8.69	0.00	72.16	0.00	19.15	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: WASHINGTON					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography ¹				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
Seattle WA	618	88.16	1.84	0.97	15.62	7.77	49.34	35.76	33.20	55.50	0.49	0.36	0.32	0.40	0.66	
Limited Review:																
Bellingham WA	14	2.00	0.10	0.00	16.79	21.43	60.32	57.14	22.79	21.43	0.13	0.00	0.28	0.09	0.14	
Bremerton WA	23	3.28	0.00	0.00	13.17	0.00	61.74	17.39	25.09	82.61	0.15	0.00	0.00	0.04	0.47	
Mt Vernon WA	2	0.29	0.00	0.00	9.86	50.00	67.82	0.00	22.32	50.00	0.03	0.00	0.36	0.00	0.00	
Tacoma WA	33	4.71	0.84	0.00	15.39	6.06	53.64	42.42	30.13	51.52	0.11	0.00	0.07	0.08	0.16	
Clallam-Jefferson Non-MSA WA	11	1.57	0.00	0.00	8.69	9.09	72.16	63.64	19.15	27.27	0.31	0.00	0.51	0.19	0.64	

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: WASHINGTON Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013																
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ⁷					
	#	% 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
Full Review:																
Seattle WA	29	72.50	10.52	13.79	27.43	37.93	41.24	41.38	20.82	6.90	1.34	4.11	2.14	0.68	0.00	
Limited Review:																
Bellingham WA	1	2.50	4.39	0.00	44.38	100.00	40.15	0.00	11.08	0.00	2.22	0.00	5.00	0.00	0.00	
Bremerton WA	0	0.00	0.00	0.00	37.78	0.00	53.57	0.00	8.66	0.00	0.00	0.00	0.00	0.00	0.00	
Mt Vernon WA	0	0.00	0.00	0.00	28.11	0.00	70.15	0.00	1.74	0.00	0.00	0.00	0.00	0.00	0.00	
Tacoma WA	10	25.00	8.38	10.00	35.11	50.00	46.76	40.00	9.75	0.00	3.05	0.00	3.33	3.95	0.00	
Clallam-Jefferson Non-MSA WA	0	0.00	0.00	0.00	30.64	0.00	68.19	0.00	1.18	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2013 Peer Mortgage Data -- US and PR

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

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: WASHINGTON Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013															
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 es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle WA	464	80.14	4.69	9.05	17.41	23.06	44.63	39.87	33.17	28.02	0.40	0.74	0.59	0.39	0.30
Limited Review:															
Bellingham WA	10	1.73	5.06	0.00	20.40	30.00	55.52	70.00	19.02	0.00	0.10	0.00	0.12	0.12	0.00
Bremerton WA	32	5.53	0.00	0.00	14.77	18.75	54.60	59.38	30.63	21.88	0.41	0.00	0.23	0.50	0.37
Mt Vernon WA	6	1.04	0.00	0.00	15.93	33.33	63.41	50.00	20.66	16.67	0.15	0.00	0.32	0.16	0.00
Tacoma WA	43	7.43	4.31	6.98	19.08	18.60	50.28	39.53	26.32	34.88	0.17	0.71	0.20	0.14	0.13
Clallam-Jefferson Non-MSA WA	24	4.15	0.00	0.00	14.45	33.33	71.12	66.67	14.44	0.00	0.57	0.00	1.48	0.58	0.00

* Based on 2013 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: WASHINGTON					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
Full Review:																
Seattle WA	1	25.00	2.52	0.00	16.46	0.00	50.55	100.00	30.47	0.00	0.49	0.00	0.00	0.91	0.00	
Limited Review:																
Bellingham WA	0	0.00	0.59	0.00	14.75	0.00	73.43	0.00	11.23	0.00	0.00	0.00	0.00	0.00	0.00	
Bremerton WA	0	0.00	0.00	0.00	7.78	0.00	57.84	0.00	34.38	0.00	0.00	0.00	0.00	0.00	0.00	
Mt Vernon WA	0	0.00	0.00	0.00	8.28	0.00	56.53	0.00	35.19	0.00	0.00	0.00	0.00	0.00	0.00	
Tacoma WA	1	25.00	1.53	0.00	16.45	100.00	56.02	0.00	25.99	0.00	2.38	0.00	20.00	0.00	0.00	
Clallam-Jefferson Non-MSA WA	2	50.00	0.00	0.00	8.03	0.00	75.91	100.00	16.06	0.00	6.67	0.00	0.00	7.69	0.00	

* Based on 2013 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 (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															
Geography: WASHINGTON															
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013															
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:															
Seattle WA	587	92.44	20.39	5.97	17.77	16.55	22.17	21.84	39.67	55.63	0.87	0.68	0.64	0.73	1.07
Limited Review:															
Bellingham WA	8	1.26	20.19	0.00	17.67	12.50	23.83	12.50	38.31	75.00	0.13	0.00	0.00	0.11	0.25
Bremerton WA	13	2.05	17.87	16.67	18.99	0.00	22.92	8.33	40.22	75.00	0.23	0.87	0.00	0.09	0.39
Mt Vernon WA	1	0.16	18.77	0.00	17.29	0.00	25.39	0.00	38.55	100.00	0.06	0.00	0.00	0.00	0.14
Tacoma WA	24	3.78	19.72	4.17	18.37	29.17	22.09	29.17	39.83	37.50	0.16	0.11	0.18	0.16	0.17
Clallam-Jefferson Non-MSA WA	2	0.31	19.23	0.00	17.92	0.00	21.80	0.00	41.04	100.00	0.15	0.00	0.00	0.00	0.32

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: WASHINGTON					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [†]													
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Seattle WA	15	100.00	20.39	6.67	17.77	6.67	22.17	13.33	39.67	73.33	0.30	0.46	0.00	0.22	0.43									
Limited Review:																								
Bellingham WA	0	0.00	20.19	0.00	17.67	0.00	23.83	0.00	38.31	0.00	0.00	0.00	0.00	0.00	0.00									
Bremerton WA	0	0.00	17.87	0.00	18.99	0.00	22.92	0.00	40.22	0.00	0.00	0.00	0.00	0.00	0.00									
Mt Vernon WA	0	0.00	18.77	0.00	17.29	0.00	25.39	0.00	38.55	0.00	0.00	0.00	0.00	0.00	0.00									
Tacoma WA	0	0.00	19.72	0.00	18.37	0.00	22.09	0.00	39.83	0.00	0.00	0.00	0.00	0.00	0.00									
Clallam-Jefferson Non-MSA WA	0	0.00	19.23	0.00	17.92	0.00	21.80	0.00	41.04	0.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: WASHINGTON					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa ll	Low	Mod	Mid	Upp									
Full Review:																								
Seattle WA	618	88.16	20.39	5.37	17.77	20.85	22.17	14.33	39.67	59.45	0.56	0.54	0.91	0.30	0.58									
Limited Review:																								
Bellingham WA	14	2.00	20.19	14.29	17.67	14.29	23.83	14.29	38.31	57.14	0.16	0.55	0.11	0.14	0.13									
Bremerton WA	23	3.28	17.87	4.35	18.99	8.70	22.92	17.39	40.22	69.57	0.20	0.00	0.10	0.06	0.34									
Mt Vernon WA	2	0.29	18.77	0.00	17.29	50.00	25.39	50.00	38.55	0.00	0.04	0.00	0.22	0.00	0.00									
Tacoma WA	33	4.71	19.72	21.21	18.37	15.15	22.09	33.33	39.83	30.30	0.14	0.33	0.07	0.22	0.10									
Clallam-Jefferson Non-MSA WA	11	1.57	19.23	18.18	17.92	18.18	21.80	27.27	41.04	36.36	0.36	1.37	0.32	0.64	0.10									

* Based on 2013 Peer Mortgage Data -- US and PR

** 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 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES										Geography: WASHINGTON		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
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:													
Seattle WA	464	80.14	67.05	44.61	55.82	17.03	27.16	0.40	0.38				
Limited Review:													
Bellingham WA	10	1.73	70.89	50.00	40.00	20.00	40.00	0.10	0.10				
Bremerton WA	32	5.53	71.68	71.88	68.75	9.38	21.88	0.41	0.51				
Mt Vernon WA	6	1.04	70.33	50.00	66.67	0.00	33.33	0.15	0.09				
Tacoma WA	43	7.43	71.00	44.19	37.21	11.63	51.16	0.17	0.12				
Clallam-Jefferson Non-MSA WA	24	4.15	75.40	83.33	87.50	12.50	0.00	0.57	0.86				

* Based on 2013 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 - 2013).

**** 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 1.90% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013					
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:									
Seattle WA	1	25.00	96.62	0.00	0.00	0.00	100.00	0.49	0.00
Limited Review:									
Bellingham WA	0	0.00	96.73	0.00	0.00	0.00	0.00	0.00	0.00
Bremerton WA	0	0.00	98.09	0.00	0.00	0.00	0.00	0.00	0.00
Mt Vernon WA	0	0.00	94.59	0.00	0.00	0.00	0.00	0.00	0.00
Tacoma WA	1	25.00	96.33	100.00	100.00	0.00	0.00	2.38	6.25
Clallam-Jefferson Non-MSA WA	2	50.00	97.45	50.00	100.00	0.00	0.00	6.67	6.67

* Based on 2013 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 - 2013).

**** 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 1. Lending Volume

LENDING VOLUME												
Geography: CALIFORNIA												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014												
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:												
Fresno CA	1.83	141	22,419	307	22,379	17	1,962	7	60,490	472	107,250	1.35
Los Angeles-Long Beach-Glendale CA	29.37	4,766	3,235,388	2,555	309,951	5	362	269	524,066	7,595	4,069,767	32.94
Oakland-Hayward-Berkeley CA	6.29	1,218	782,123	339	53,676	0	0	70	276,149	1,627	1,111,948	4.64
San Diego-Carlsbad CA	14.27	1,598	1,037,032	1,949	179,345	15	623	128	301,582	3,690	1,518,582	18.35
San Francisco-Redwood City-SSF CA	6.25	1,222	901,361	333	53,567	1	8	61	165,174	1,617	1,120,110	7.81
Limited Review:												
Anaheim-Santa Ana-Irvine CA	15.21	2,056	1,307,991	1,805	235,572	2	285	70	245,706	3,933	1,789,554	10.24
Bakersfield CA	0.98	118	21,831	120	12,546	8	725	7	51,578	253	86,680	1.03
El Centro CA	0.27	32	3,298	33	6,458	5	411	0	0	70	10,167	0.43
Hanford-Corcoran CA	0.34	34	4,195	46	2,088	7	405	0	0	87	6,688	0.20
Madera CA	0.23	30	4,763	24	2,730	6	1,070	0	0	60	8,563	0.16
Modesto CA	0.32	24	6,564	42	5,979	17	4,428	1	1,430	84	18,401	0.27
Oxnard-Thousand Oaks-Ventura CA	2.93	473	214,269	259	23,549	6	460	19	40,019	757	278,297	2.11
Redding CA	0.14	11	1,601	21	1,505	1	10	2	36,100	35	39,216	0.09

* Loan Data as of December 31, 2014. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 13, 2012 to December 31, 2014.

*** Deposit Data as of June 30, 2014. 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, 2014 TO DECEMBER 31, 2014												
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:												
Riverside-San Bernardino-Ontario CA	5.54	774	235,353	611	67,562	4	325	43	177,532	1,432	480,772	4.98
Sacramento-Roseville-Arden-Arcade CA	2.23	298	132,061	255	32,595	11	1,945	13	15,971	577	182,572	2.98
Salinas CA	1.03	140	77,583	124	17,618	2	333	1	1,170	267	96,704	1.31
San Jose-Sunnyvale-Santa Clara CA	5.58	1,082	793,462	338	41,670	3	122	20	79,099	1,443	914,353	4.78
San Luis Obispo-Paso Robles-Arroyo Grande CA	0.47	49	31,683	63	7,678	3	195	6	9,059	121	48,615	0.43
San Rafael CA	1.50	291	251,317	96	12,534	0	0	1	50	388	263,901	0.77
Santa Cruz-Watsonville CA	0.54	83	55,276	52	4,742	2	300	3	21,194	140	81,512	0.53
Santa Maria-Santa Barbara CA	2.37	414	253,286	177	19,840	2	250	19	97,222	612	370,598	2.70
Santa Rosa CA	0.41	80	53,035	19	1,970	0	0	8	20,314	107	75,319	0.20
Stockton-Lodi CA	0.70	124	30,102	38	5,926	12	3,965	7	58,244	181	98,237	0.31
Vallejo-Fairfield CA	0.18	30	9,581	16	1,742	0	0	0	0	46	11,323	0.43
Visalia-Porterville CA	0.65	68	8,189	83	7,220	16	1,950	1	10	168	17,369	0.48
Yuba City CA	0.15	7	1,260	14	607	16	5,365	2	113	39	7,345	0.17
Inyo-Mono Cos CA Non-MSA	0.22	20	7,965	27	1,568	0	0	10	50,666	57	60,199	0.32

* Loan Data as of December 31, 2014. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2014.

*** Deposit Data as of June 30, 2014. 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, 2014 TO DECEMBER 31, 2014				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Fresno CA	67	1.09	4.95	2.99	20.81	23.88	27.75	29.85	46.49	43.28														
Los Angeles-Long Beach-Glendale CA	1,918	31.31	2.13	3.91	16.61	23.62	28.65	12.67	52.61	59.80														
Oakland-Hayward-Berkeley CA	508	8.29	5.73	4.72	15.64	12.60	36.39	18.70	42.23	63.98														
San Diego-Carlsbad CA	626	10.22	3.31	6.39	14.32	15.02	38.78	21.09	43.59	57.51														
San Francisco-Redwood City-SSF CA	480	7.84	3.25	8.13	12.32	12.92	42.73	31.67	41.70	47.29														
Limited Review:																								
Anaheim-Santa Ana-Irvine CA	781	12.75	2.99	3.33	19.61	20.10	33.21	18.31	44.19	58.26														
Bakersfield CA	41	0.67	2.00	0.00	23.16	9.76	30.78	24.39	44.06	65.85														
El Centro CA	4	0.07	0.00	0.00	22.37	25.00	51.89	25.00	25.74	50.00														
Hanford-Corcoran CA	7	0.11	0.00	0.00	27.94	14.29	25.61	28.57	46.45	57.14														
Madera CA	6	0.10	0.00	0.00	19.83	16.67	60.66	50.00	19.51	33.33														
Modesto CA	14	0.23	1.15	0.00	14.56	7.14	44.38	42.86	39.91	50.00														
Oxnard-Thousand Oaks-Ventura CA	198	3.23	1.92	3.54	17.13	28.79	43.17	29.80	37.79	37.88														
Redding CA	1	0.02	0.00	0.00	20.80	0.00	53.76	0.00	25.44	100.00														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.
 ** 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 2010 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, 2014 TO DECEMBER 31, 2014				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	Overall	Low	Mod	Mid	Upp									
Limited Review:																								
Riverside-San Bernardino-Ontario CA	305	4.98	2.87	2.95	21.60	18.03	36.29	34.10	39.24	44.92														
Sacramento-Roseville-Arden-Arcade CA	163	2.66	3.73	4.29	17.99	17.18	41.15	32.52	37.13	46.01														
Salinas CA	50	0.82	1.79	0.00	16.11	6.00	37.70	18.00	44.41	76.00														
San Jose-Sunnyvale-Santa Clara CA	498	8.13	4.35	5.02	18.70	20.48	39.49	34.14	37.45	40.36														
San Luis Obispo-Paso Robles-Arroyo Grande CA	18	0.29	0.30	0.00	5.63	16.67	66.30	66.67	27.78	16.67														
San Rafael CA	106	1.73	1.19	0.94	14.78	9.43	56.49	49.06	27.54	40.57														
Santa Cruz-Watsonville CA	37	0.60	0.47	0.00	22.33	16.22	36.59	45.95	40.62	37.84														
Santa Maria-Santa Barbara CA	138	2.25	2.85	2.90	15.09	19.57	34.95	16.67	47.11	60.87														
Santa Rosa CA	42	0.69	0.09	0.00	16.64	4.76	58.49	61.90	24.78	33.33														
Stockton-Lodi CA	67	1.09	2.21	4.48	20.81	16.42	32.98	28.36	44.00	50.75														
Vallejo-Fairfield CA	12	0.20	0.55	0.00	16.50	8.33	51.00	25.00	31.95	66.67														
Visalia-Porterville CA	24	0.39	0.73	8.33	22.50	20.83	34.56	37.50	42.21	33.33														
Yuba City CA	4	0.07	1.36	0.00	19.05	0.00	36.03	50.00	43.56	50.00														
Inyo-Mono Cos CA Non-MSA	10	0.16	0.00	0.00	9.11	0.00	42.86	10.00	48.03	90.00														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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, 2014 TO DECEMBER 31, 2014				
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*** *	Overa ll	Low	Mod	Mid	Upp						
Full Review:																					
Fresno CA	3	0.52	4.95	0.00	20.81	0.00	27.75	66.67	46.49	33.33	0.55										
Los Angeles-Long Beach-Glendale CA	177	30.89	2.13	3.39	16.61	20.90	28.65	15.82	52.61	59.89	1.23										
Oakland-Hayward-Berkeley CA	43	7.50	5.73	2.33	15.64	11.63	36.39	20.93	42.23	65.12	0.67										
San Diego-Carlsbad CA	70	12.22	3.31	2.86	14.32	14.29	38.78	32.86	43.59	50.00	0.96										
San Francisco-Redwood City-SSF CA	64	11.17	3.25	4.69	12.32	10.94	42.73	40.63	41.70	43.75	1.21										
Limited Review:																					
Anaheim-Santa Ana-Irvine CA	82	14.31	2.99	1.22	19.61	29.27	33.21	28.05	44.19	41.46	0.93										
Bakersfield CA	1	0.17	2.00	0.00	23.16	0.00	30.78	100.00	44.06	0.00	0.20										
El Centro CA	1	0.17	0.00	0.00	22.37	0.00	51.89	0.00	25.74	100.00	0.00										
Hanford-Corcoran CA	3	0.52	0.00	0.00	27.94	0.00	25.61	33.33	46.45	66.67	0.00										
Madera CA	3	0.52	0.00	0.00	19.83	0.00	60.66	66.67	19.51	33.33	1.20										
Modesto CA	0	0.00	1.15	0.00	14.56	0.00	44.38	0.00	39.91	0.00	0.00										
Oxnard-Thousand Oaks-Ventura CA	11	1.92	1.92	0.00	17.13	9.09	43.17	27.27	37.79	63.64	0.93										
Redding CA	0	0.00	0.00	0.00	20.80	0.00	53.76	0.00	25.44	0.00	0.00										

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
Limited Review:																
Riverside-San Bernardino-Ontario CA	27	4.71	2.87	0.00	21.60	22.22	36.29	37.04	39.24	40.74						
Sacramento-Roseville-Arden-Arcade CA	10	1.75	3.73	0.00	17.99	20.00	41.15	50.00	37.13	30.00						
Salinas CA	5	0.87	1.79	0.00	16.11	20.00	37.70	0.00	44.41	80.00						
San Jose-Sunnyvale-Santa Clara CA	28	4.89	4.35	3.57	18.70	7.14	39.49	42.86	37.45	46.43						
San Luis Obispo-Paso Robles-Arroyo Grande CA	1	0.17	0.30	0.00	5.63	0.00	66.30	0.00	27.78	100.00						
San Rafael CA	13	2.27	1.19	0.00	14.78	0.00	56.49	53.85	27.54	46.15						
Santa Cruz-Watsonville CA	4	0.70	0.47	0.00	22.33	50.00	36.59	25.00	40.62	25.00						
Santa Maria-Santa Barbara CA	16	2.79	2.85	0.00	15.09	12.50	34.95	25.00	47.11	62.50						
Santa Rosa CA	4	0.70	0.09	0.00	16.64	0.00	58.49	25.00	24.78	75.00						
Stockton-Lodi CA	4	0.70	2.21	0.00	20.81	0.00	32.98	75.00	44.00	25.00						
Vallejo-Fairfield CA	2	0.35	0.55	0.00	16.50	0.00	51.00	50.00	31.95	50.00						
Visalia-Porterville CA	1	0.17	0.73	0.00	22.50	100.00	34.56	0.00	42.21	0.00						
Yuba City CA	0	0.00	1.36	0.00	19.05	0.00	36.03	0.00	43.56	0.00						
Inyo-Mono Cos CA Non-MSA	0	0.00	0.00	0.00	9.11	0.00	42.86	0.00	48.03	0.00						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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, 2014 TO DECEMBER 31, 2014				
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:																								
Fresno CA	71	0.86	4.95	5.63	20.81	21.13	27.75	25.35	46.49	47.89														
Los Angeles-Long Beach-Glendale CA	2,552	30.91	2.13	4.00	16.61	29.82	28.65	14.34	52.61	51.84														
Oakland-Hayward-Berkeley CA	644	7.80	5.73	6.21	15.64	24.69	36.39	20.34	42.23	48.76														
San Diego-Carlsbad CA	858	10.39	3.31	4.78	14.32	16.43	38.78	27.97	43.59	50.82														
San Francisco-Redwood City-SSF CA	673	8.15	3.25	7.73	12.32	21.55	42.73	28.53	41.70	42.20														
Limited Review:																								
Anaheim-Santa Ana-Irvine CA	1,182	14.32	2.99	3.64	19.61	25.21	33.21	20.73	44.19	50.42														
Bakersfield CA	76	0.92	2.00	0.00	23.16	22.37	30.78	26.32	44.06	51.32														
El Centro CA	27	0.33	0.00	0.00	22.37	33.33	51.89	40.74	25.74	25.93														
Hanford-Corcoran CA	24	0.29	0.00	0.00	27.94	16.67	25.61	29.17	46.45	54.17														
Madera CA	21	0.25	0.00	0.00	19.83	33.33	60.66	61.90	19.51	4.76														
Modesto CA	10	0.12	1.15	0.00	14.56	0.00	44.38	30.00	39.91	70.00														
Oxnard-Thousand Oaks-Ventura CA	263	3.19	1.92	1.14	17.13	20.91	43.17	32.32	37.79	45.63														
Redding CA	10	0.12	0.00	0.00	20.80	20.00	53.76	30.00	25.44	50.00														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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, 2014 TO DECEMBER 31, 2014				
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					
Limited Review:																				
Riverside-San Bernardino-Ontario CA	439	5.32	2.87	2.96	21.60	23.46	36.29	33.94	39.24	39.64										
Sacramento-Roseville-Arden-Arcade CA	124	1.50	3.73	1.61	17.99	4.84	41.15	34.68	37.13	58.87										
Salinas CA	85	1.03	1.79	1.18	16.11	12.94	37.70	23.53	44.41	62.35										
San Jose-Sunnyvale-Santa Clara CA	546	6.61	4.35	5.49	18.70	31.14	39.49	27.11	37.45	36.26										
San Luis Obispo-Paso Robles-Arroyo Grande CA	24	0.29	0.30	0.00	5.63	0.00	66.30	75.00	27.78	25.00										
San Rafael CA	170	2.06	1.19	0.00	14.78	11.76	56.49	51.18	27.54	37.06										
Santa Cruz-Watsonville CA	40	0.48	0.47	2.50	22.33	25.00	36.59	35.00	40.62	37.50										
Santa Maria-Santa Barbara CA	257	3.11	2.85	5.45	15.09	29.18	34.95	20.23	47.11	45.14										
Santa Rosa CA	34	0.41	0.09	0.00	16.64	2.94	58.49	41.18	24.78	55.88										
Stockton-Lodi CA	53	0.64	2.21	0.00	20.81	22.64	32.98	20.75	44.00	56.60										
Vallejo-Fairfield CA	16	0.19	0.55	0.00	16.50	18.75	51.00	43.75	31.95	37.50										
Visalia-Porterville CA	43	0.52	0.73	0.00	22.50	27.91	34.56	37.21	42.21	34.88										
Yuba City CA	3	0.04	1.36	0.00	19.05	0.00	36.03	0.00	43.56	100.00										
Inyo-Mono Cos CA Non-MSA	10	0.12	0.00	0.00	9.11	0.00	42.86	50.00	48.03	50.00										

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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, 2014 TO DECEMBER 31, 2014				
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****	Overa ll	Low	Mod	Mid	Upp							
Full Review:																								
Fresno CA	0	0.00	17.36	0.00	32.69	0.00	29.99	0.00	19.96	0.00														
Los Angeles-Long Beach-Glendale CA	118	51.53	13.18	8.47	31.63	33.90	24.71	27.12	30.48	30.51														
Oakland-Hayward-Berkeley CA	23	10.04	19.71	26.09	31.65	34.78	34.25	21.74	14.38	17.39														
San Diego-Carlsbad CA	44	19.21	14.62	22.73	26.63	38.64	33.39	29.55	25.36	9.09														
San Francisco-Redwood City-SSF CA	5	2.18	26.82	40.00	12.92	0.00	29.46	40.00	30.79	20.00														
Limited Review:																								
Anaheim-Santa Ana-Irvine CA	11	4.80	10.56	0.00	35.81	45.45	32.80	45.45	20.84	9.09														
Bakersfield CA	0	0.00	8.38	0.00	37.14	0.00	27.60	0.00	26.88	0.00														
El Centro CA	0	0.00	0.00	0.00	39.27	0.00	33.71	0.00	27.02	0.00														
Hanford-Corcoran CA	0	0.00	0.00	0.00	41.95	0.00	17.35	0.00	40.70	0.00														
Madera CA	0	0.00	0.00	0.00	66.71	0.00	24.34	0.00	8.96	0.00														
Modesto CA	0	0.00	6.64	0.00	17.98	0.00	50.02	0.00	25.36	0.00														
Oxnard-Thousand Oaks-Ventura CA	1	0.44	7.56	0.00	34.46	100.00	46.44	0.00	11.54	0.00														
Redding CA	0	0.00	0.00	0.00	53.33	0.00	35.30	0.00	11.38	0.00														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

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

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 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, 2014 TO DECEMBER 31, 2014				
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				
Limited Review:																					
Riverside-San Bernardino-Ontario CA	3	1.31	11.28	0.00	36.12	33.33	35.44	33.33	17.17	33.33											
Sacramento-Roseville-Arden-Arcade CA	1	0.44	11.50	0.00	34.86	0.00	35.67	100.00	17.96	0.00											
Salinas CA	0	0.00	8.24	0.00	33.38	0.00	40.99	0.00	17.39	0.00											
San Jose-Sunnyvale-Santa Clara CA	10	4.37	10.18	10.00	32.23	40.00	39.62	50.00	17.98	0.00											
San Luis Obispo-Paso Robles-Arroyo Grande CA	6	2.62	1.18	0.00	13.55	0.00	63.47	50.00	21.79	50.00											
San Rafael CA	2	0.87	9.04	0.00	24.21	0.00	53.11	0.00	13.64	100.00											
Santa Cruz-Watsonville CA	2	0.87	5.53	0.00	39.40	0.00	43.08	0.00	11.99	100.00											
Santa Maria-Santa Barbara CA	3	1.31	19.05	66.67	29.23	0.00	29.08	0.00	22.64	33.33											
Santa Rosa CA	0	0.00	1.80	0.00	38.46	0.00	51.56	0.00	8.17	0.00											
Stockton-Lodi CA	0	0.00	21.80	0.00	33.80	0.00	28.11	0.00	16.29	0.00											
Vallejo-Fairfield CA	0	0.00	5.68	0.00	36.67	0.00	46.23	0.00	11.42	0.00											
Visalia-Porterville CA	0	0.00	4.85	0.00	38.42	0.00	29.16	0.00	27.56	0.00											
Yuba City CA	0	0.00	3.75	0.00	55.92	0.00	27.65	0.00	12.68	0.00											
Inyo-Mono Cos CA Non-MSA	0	0.00	0.00	0.00	1.13	0.00	11.83	0.00	87.04	0.00											

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.
 ** Multi-family loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
 *** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 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, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
Fresno CA	307	3.18	9.54	10.10	23.80	20.85	26.19	26.38	40.31	42.67						
Los Angeles-Long Beach-Glendale CA	2,505	25.95	6.37	5.43	18.11	16.17	25.29	21.44	48.95	56.97						
Oakland-Hayward-Berkeley CA	339	3.51	10.19	9.14	17.68	16.81	31.91	25.66	40.19	48.38						
San Diego-Carlsbad CA	1,948	20.18	5.76	5.60	15.41	16.84	35.36	36.14	43.35	41.43						
San Francisco-Redwood City-SSF CA	333	3.45	17.89	24.02	11.11	11.71	31.77	24.02	39.12	40.24						
Limited Review:																
Anaheim-Santa Ana-Irvine CA	1,767	18.31	4.72	7.07	25.21	28.41	32.57	34.86	36.46	29.65						
Bakersfield CA	120	1.24	3.69	4.17	20.60	16.67	30.36	22.50	45.34	56.67						
El Centro CA	33	0.34	0.00	0.00	31.45	30.30	46.09	51.52	22.46	18.18						
Hanford-Corcoran CA	46	0.48	0.00	0.00	40.15	36.96	21.36	28.26	38.36	34.78						
Madera CA	24	0.25	0.00	0.00	24.10	33.33	60.60	58.33	15.30	8.33						
Modesto CA	42	0.44	2.35	2.38	19.01	30.95	44.31	42.86	34.32	23.81						
Oxnard-Thousand Oaks-Ventura CA	259	2.68	3.30	0.77	18.84	14.29	44.79	43.63	33.07	41.31						
Redding CA	21	0.22	0.00	0.00	33.78	61.90	48.07	28.57	18.15	9.52						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 (2014).

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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 es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Limited Review:																		
Riverside-San Bernardino-Ontario CA	610	6.32	4.37	6.39	23.98	28.36	34.28	37.54	37.30	27.70								
Sacramento-Roseville-Arden-Arcade CA	255	2.64	6.92	4.71	20.83	23.53	38.90	39.61	33.33	32.16								
Salinas CA	123	1.27	1.37	0.00	18.76	12.20	38.84	43.09	40.52	44.72								
San Jose-Sunnyvale-Santa Clara CA	338	3.50	5.97	5.33	22.06	36.09	34.68	34.62	37.17	23.96								
San Luis Obispo-Paso Robles-Arroyo Grande CA	63	0.65	2.11	0.00	10.41	12.70	60.82	53.97	26.61	33.33								
San Rafael CA	96	0.99	4.06	6.25	14.25	10.42	54.70	62.50	26.99	20.83								
Santa Cruz-Watsonville CA	52	0.54	2.04	0.00	20.86	40.38	43.32	32.69	33.78	26.92								
Santa Maria-Santa Barbara CA	174	1.80	13.14	11.49	21.45	26.44	26.21	22.41	38.63	39.66								
Santa Rosa CA	19	0.20	3.58	0.00	19.78	10.53	53.10	36.84	23.53	52.63								
Stockton-Lodi CA	38	0.39	7.86	10.53	22.44	21.05	31.18	34.21	38.52	34.21								
Vallejo-Fairfield CA	16	0.17	1.93	12.50	23.95	25.00	46.98	43.75	26.98	18.75								
Visalia-Porterville CA	83	0.86	1.21	1.20	27.50	27.71	28.45	26.51	42.81	44.58								
Yuba City CA	14	0.15	0.65	0.00	32.04	35.71	30.81	28.57	36.49	35.71								
Inyo-Mono Cos CA Non-MSA	27	0.28	0.00	0.00	7.44	0.00	46.48	29.63	46.08	70.37								

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 (2014).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans						
Full Review:																
Fresno CA	17	10.56	4.35	0.00	29.83	47.06	34.21	29.41	31.58	23.53						
Los Angeles-Long Beach-Glendale CA	5	3.11	3.24	0.00	15.93	0.00	27.11	40.00	53.06	60.00						
Oakland-Hayward-Berkeley CA	0	0.00	6.45	0.00	16.52	0.00	34.56	0.00	42.47	0.00						
San Diego-Carlsbad CA	15	9.32	3.99	0.00	16.41	20.00	38.70	33.33	40.90	46.67						
San Francisco-Redwood City-SSF CA	1	0.62	7.34	0.00	14.26	0.00	35.68	100.00	42.66	0.00						
Limited Review:																
Anaheim-Santa Ana-Irvine CA	2	1.24	4.33	0.00	26.51	0.00	33.49	100.00	35.27	0.00						
Bakersfield CA	8	4.97	1.25	0.00	28.74	25.00	30.43	62.50	39.58	12.50						
El Centro CA	5	3.11	0.00	0.00	19.13	0.00	40.77	0.00	40.09	100.00						
Hanford-Corcoran CA	7	4.35	0.00	0.00	21.39	0.00	41.78	57.14	36.69	42.86						
Madera CA	6	3.73	0.00	0.00	17.19	0.00	69.03	66.67	13.78	33.33						
Modesto CA	17	10.56	0.73	0.00	7.91	0.00	51.75	82.35	39.61	17.65						
Oxnard-Thousand Oaks-Ventura CA	6	3.73	5.79	16.67	25.40	0.00	44.57	83.33	24.24	0.00						
Redding CA	1	0.62	0.00	0.00	23.23	0.00	53.55	100.00	23.23	0.00						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 (2014).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans						
Limited Review:																
Riverside-San Bernardino-Ontario CA	4	2.48	3.63	0.00	22.73	75.00	35.79	25.00	37.83	0.00						
Sacramento-Roseville-Arden-Arcade CA	11	6.83	3.71	9.09	16.53	9.09	45.83	63.64	33.94	18.18						
Salinas CA	2	1.24	0.61	0.00	14.65	0.00	43.60	100.00	40.79	0.00						
San Jose-Sunnyvale-Santa Clara CA	3	1.86	6.84	0.00	25.20	33.33	36.38	33.33	31.49	33.33						
San Luis Obispo-Paso Robles-Arroyo Grande CA	3	1.86	0.47	0.00	6.23	0.00	63.64	66.67	29.65	33.33						
San Rafael CA	0	0.00	4.56	0.00	17.38	0.00	59.40	0.00	18.66	0.00						
Santa Cruz-Watsonville CA	2	1.24	2.04	0.00	27.78	0.00	37.41	100.00	32.77	0.00						
Santa Maria-Santa Barbara CA	2	1.24	6.63	0.00	16.35	0.00	23.82	50.00	52.97	50.00						
Santa Rosa CA	0	0.00	1.03	0.00	12.86	0.00	54.71	0.00	31.40	0.00						
Stockton-Lodi CA	12	7.45	4.54	8.33	11.93	0.00	31.58	16.67	51.95	75.00						
Vallejo-Fairfield CA	0	0.00	0.40	0.00	11.45	0.00	55.39	0.00	32.76	0.00						
Visalia-Porterville CA	16	9.94	2.54	18.75	25.22	25.00	42.21	37.50	30.03	18.75						
Yuba City CA	16	9.94	0.29	0.00	6.56	0.00	36.64	25.00	56.51	75.00						
Inyo-Mono Cos CA Non-MSA	0	0.00	0.00	0.00	3.41	0.00	39.77	0.00	56.82	0.00						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 (2014).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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****	Overa ll	Low	Mod	Mid	Upp									
Full Review:																								
Fresno CA	67	1.09	24.70	7.58	16.04	24.24	17.13	22.73	42.13	45.45														
Los Angeles-Long Beach-Glendale CA	1,919	31.33	24.05	1.98	16.43	6.36	17.64	10.58	41.88	81.07														
Oakland-Hayward-Berkeley CA	508	8.29	23.31	0.39	16.42	5.91	19.15	9.25	41.12	84.45														
San Diego-Carlsbad CA	626	10.22	22.36	2.40	17.55	8.49	18.75	14.74	41.34	74.36														
San Francisco-Redwood City-SSF CA	480	7.84	23.72	0.21	16.23	3.75	18.15	4.58	41.91	91.46														
Limited Review:																								
Anaheim-Santa Ana-Irvine CA	781	12.75	22.02	1.92	17.33	9.60	19.49	12.42	41.16	76.06														
Bakersfield CA	41	0.67	23.03	7.32	17.18	12.20	17.96	31.71	41.83	48.78														
El Centro CA	4	0.07	24.44	0.00	17.03	0.00	16.45	75.00	42.09	25.00														
Hanford-Corcoran CA	7	0.11	22.37	0.00	18.52	14.29	18.90	57.14	40.21	28.57														
Madera CA	6	0.10	20.48	0.00	18.88	16.67	20.67	33.33	39.97	50.00														
Modesto CA	14	0.23	22.58	0.00	16.69	14.29	19.60	28.57	41.12	57.14														
Oxnard-Thousand Oaks-Ventura CA	198	3.23	21.43	4.04	17.35	24.75	20.51	16.16	40.71	55.05														
Redding CA	1	0.02	22.67	0.00	18.03	0.00	19.08	0.00	40.22	100.00														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.
 ** 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 2010 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 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															
Geography: CALIFORNIA															
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014															
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
Limited Review:															
Riverside-San Bernardino-Ontario CA	305	4.98	21.83	4.62	17.53	15.51	19.81	16.17	40.84	63.70	0.34				
Sacramento-Roseville-Arden-Arcade CA	163	2.66	22.01	6.75	17.00	14.72	19.98	18.40	41.01	60.12	0.27				
Salinas CA	50	0.82	21.84	0.00	16.71	2.00	19.49	4.00	41.97	94.00	1.12				
San Jose-Sunnyvale-Santa Clara CA	498	8.13	23.65	0.80	16.34	2.81	19.49	14.46	40.51	81.93	1.80				
San Luis Obispo-Paso Robles-Arroyo Grande CA	18	0.29	19.80	0.00	18.20	11.11	21.60	0.00	40.40	88.89	0.43				
San Rafael CA	106	1.73	22.40	0.00	16.40	1.89	20.36	4.72	40.84	93.40	2.99				
Santa Cruz-Watsonville CA	37	0.60	23.85	0.00	16.93	5.41	18.29	16.22	40.92	78.38	1.07				
Santa Maria-Santa Barbara CA	138	2.25	21.72	0.72	17.79	10.14	18.61	12.32	41.88	76.81	2.98				
Santa Rosa CA	42	0.69	20.14	0.00	18.47	0.00	20.77	9.52	40.62	90.48	0.79				
Stockton-Lodi CA	67	1.09	22.05	1.49	17.73	16.42	19.13	26.87	41.09	55.22	0.30				
Vallejo-Fairfield CA	12	0.20	19.90	0.00	17.71	9.09	22.56	27.27	39.83	63.64	0.11				
Visalia-Porterville CA	24	0.39	22.78	0.00	17.63	20.83	17.83	29.17	41.76	50.00	0.26				
Yuba City CA	4	0.07	21.41	0.00	17.29	0.00	20.30	75.00	40.99	25.00	0.16				
Inyo-Mono Cos CA Non-MSA	10	0.16	15.41	0.00	16.45	0.00	18.01	10.00	50.13	90.00	2.28				

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Fresno CA	3	0.52	24.70	0.00	16.04	33.33	17.13	0.00	42.13	66.67						
Los Angeles-Long Beach-Glendale CA	177	30.89	24.05	6.21	16.43	15.82	17.64	11.30	41.88	66.67						
Oakland-Hayward-Berkeley CA	43	7.50	23.31	2.33	16.42	11.63	19.15	6.98	41.12	79.07						
San Diego-Carlsbad CA	70	12.22	22.36	8.57	17.55	21.43	18.75	14.29	41.34	55.71						
San Francisco-Redwood City-SSF CA	64	11.17	23.72	6.25	16.23	10.94	18.15	3.13	41.91	79.69						
Limited Review:																
Anaheim-Santa Ana-Irvine CA	82	14.31	22.02	7.32	17.33	20.73	19.49	18.29	41.16	53.66						
Bakersfield CA	1	0.17	23.03	0.00	17.18	0.00	17.96	0.00	41.83	100.00						
El Centro CA	1	0.17	24.44	0.00	17.03	0.00	16.45	100.00	42.09	0.00						
Hanford-Corcoran CA	3	0.52	22.37	0.00	18.52	33.33	18.90	0.00	40.21	66.67						
Madera CA	3	0.52	20.48	33.33	18.88	33.33	20.67	0.00	39.97	33.33						
Modesto CA	0	0.00	22.58	0.00	16.69	0.00	19.60	0.00	41.12	0.00						
Oxnard-Thousand Oaks-Ventura CA	11	1.92	21.43	9.09	17.35	9.09	20.51	0.00	40.71	81.82						
Redding CA	0	0.00	22.67	0.00	18.03	0.00	19.08	0.00	40.22	0.00						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Limited Review:																
Riverside-San Bernardino-Ontario CA	27	4.71	21.83	14.81	17.53	11.11	19.81	14.81	40.84	59.26						
Sacramento-Roseville-Arden-Arcade CA	10	1.75	22.01	10.00	17.00	0.00	19.98	10.00	41.01	80.00						
Salinas CA	5	0.87	21.84	0.00	16.71	40.00	19.49	20.00	41.97	40.00						
San Jose-Sunnyvale-Santa Clara CA	28	4.89	23.65	3.57	16.34	0.00	19.49	10.71	40.51	85.71						
San Luis Obispo-Paso Robles-Arroyo Grande CA	1	0.17	19.80	0.00	18.20	0.00	21.60	0.00	40.40	100.00						
San Rafael CA	13	2.27	22.40	0.00	16.40	7.69	20.36	7.69	40.84	84.62						
Santa Cruz-Watsonville CA	4	0.70	23.85	25.00	16.93	0.00	18.29	0.00	40.92	75.00						
Santa Maria-Santa Barbara CA	16	2.79	21.72	0.00	17.79	18.75	18.61	6.25	41.88	75.00						
Santa Rosa CA	4	0.70	20.14	0.00	18.47	0.00	20.77	0.00	40.62	100.00						
Stockton-Lodi CA	4	0.70	22.05	0.00	17.73	0.00	19.13	25.00	41.09	75.00						
Vallejo-Fairfield CA	2	0.35	19.90	0.00	17.71	50.00	22.56	50.00	39.83	0.00						
Visalia-Porterville CA	1	0.17	22.78	0.00	17.63	0.00	17.83	0.00	41.76	100.00						
Yuba City CA	0	0.00	21.41	0.00	17.29	0.00	20.30	0.00	40.99	0.00						
Inyo-Mono Cos CA Non-MSA	0	0.00	15.41	0.00	16.45	0.00	18.01	0.00	50.13	0.00						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.
 ** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa II	Low	Mod	Mid	Upp	
Full Review:																
Fresno CA	71	0.86	24.70	7.04	16.04	14.08	17.13	28.17	42.13	50.70						
Los Angeles-Long Beach-Glendale CA	2,552	30.91	24.05	4.13	16.43	16.54	17.64	12.38	41.88	66.95						
Oakland-Hayward-Berkeley CA	644	7.80	23.31	4.67	16.42	16.17	19.15	14.46	41.12	64.70						
San Diego-Carlsbad CA	858	10.39	22.36	4.91	17.55	17.66	18.75	13.45	41.34	63.98						
San Francisco-Redwood City-SSF CA	673	8.15	23.72	5.79	16.23	16.05	18.15	11.44	41.91	66.72						
Limited Review:																
Anaheim-Santa Ana-Irvine CA	1,182	14.32	22.02	7.63	17.33	18.32	19.49	14.42	41.16	59.63						
Bakersfield CA	76	0.92	23.03	3.95	17.18	25.00	17.96	27.63	41.83	43.42						
El Centro CA	27	0.33	24.44	7.41	17.03	14.81	16.45	40.74	42.09	37.04						
Hanford-Corcoran CA	24	0.29	22.37	16.67	18.52	41.67	18.90	25.00	40.21	16.67						
Madera CA	21	0.25	20.48	9.52	18.88	19.05	20.67	23.81	39.97	47.62						
Modesto CA	10	0.12	22.58	0.00	16.69	20.00	19.60	10.00	41.12	70.00						
Oxnard-Thousand Oaks-Ventura CA	263	3.19	21.43	8.37	17.35	19.77	20.51	17.87	40.71	53.99						
Redding CA	10	0.12	22.67	10.00	18.03	10.00	19.08	30.00	40.22	50.00						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.
 ** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: CALIFORNIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa II	Low	Mod	Mid	Upp									
Limited Review:																								
Riverside-San Bernardino-Ontario CA	439	5.32	21.83	7.78	17.53	21.51	19.81	20.37	40.84	50.34														
Sacramento-Roseville-Arden-Arcade CA	124	1.50	22.01	8.13	17.00	13.01	19.98	10.57	41.01	68.29														
Salinas CA	85	1.03	21.84	2.35	16.71	9.41	19.49	9.41	41.97	78.82														
San Jose-Sunnyvale-Santa Clara CA	546	6.61	23.65	4.04	16.34	9.91	19.49	17.61	40.51	68.44														
San Luis Obispo-Paso Robles-Arroyo Grande CA	24	0.29	19.80	4.17	18.20	4.17	21.60	16.67	40.40	75.00														
San Rafael CA	170	2.06	22.40	1.76	16.40	2.94	20.36	12.35	40.84	82.94														
Santa Cruz-Watsonville CA	40	0.48	23.85	7.50	16.93	5.00	18.29	12.50	40.92	75.00														
Santa Maria-Santa Barbara CA	257	3.11	21.72	7.03	17.79	20.31	18.61	16.02	41.88	56.64														
Santa Rosa CA	34	0.41	20.14	2.94	18.47	0.00	20.77	0.00	40.62	97.06														
Stockton-Lodi CA	53	0.64	22.05	11.32	17.73	9.43	19.13	26.42	41.09	52.83														
Vallejo-Fairfield CA	16	0.19	19.90	12.50	17.71	12.50	22.56	18.75	39.83	56.25														
Visalia-Porterville CA	43	0.52	22.78	13.95	17.63	20.93	17.83	23.26	41.76	41.86														
Yuba City CA	3	0.04	21.41	0.00	17.29	0.00	20.30	33.33	40.99	66.67														
Inyo-Mono Cos CA Non-MSA	10	0.12	15.41	0.00	16.45	10.00	18.01	20.00	50.13	70.00														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.
 ** 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 2010 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.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CALIFORNIA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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:									
Fresno CA	307	3.15	71.97	56.35	83.39	11.73	4.89		
Los Angeles-Long Beach-Glendale CA	2,555	26.22	72.92	46.69	78.63	10.84	10.53		
Oakland-Hayward-Berkeley CA	339	3.48	73.14	38.64	66.67	18.58	14.75		
San Diego-Carlsbad CA	1,949	20.00	72.65	46.95	83.53	9.65	6.82		
San Francisco-Redwood City-SSF CA	333	3.42	70.93	40.84	68.77	17.42	13.81		
Limited Review:									
Anaheim-Santa Ana-Irvine CA	1,805	18.52	73.00	38.67	73.02	15.07	11.91		
Bakersfield CA	120	1.23	72.42	51.67	76.67	12.50	10.83		
El Centro CA	33	0.34	66.28	36.36	66.67	12.12	21.21		
Hanford-Corcoran CA	46	0.47	70.71	54.35	91.30	6.52	2.17		
Madera CA	24	0.25	74.51	41.67	83.33	0.00	16.67		
Modesto CA	42	0.43	73.44	50.00	69.05	19.05	11.90		
- Oaks-Ventura CA	259	2.66	74.23	52.90	85.71	7.72	6.56		
Redding CA	21	0.22	75.67	52.38	80.95	14.29	4.76		

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 - 2014).

**** 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 22.07% 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, 2014 TO DECEMBER 31, 2014				
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:									
Riverside-San Bernardino-Ontario CA	611	6.27	73.73	42.39	78.40	10.80	10.80		
Sacramento-Roseville-Arden-Arcade CA	255	2.62	74.16	40.39	71.37	14.51	14.12		
Salinas CA	124	1.27	73.86	51.61	75.00	8.87	16.13		
San Jose-Sunnyvale-Santa Clara CA	338	3.47	69.91	44.67	78.40	9.76	11.83		
San Luis Obispo-Paso Robles-Arroyo Grande ca	63	0.65	76.09	55.56	71.43	12.70	15.87		
San Rafael CA	96	0.99	76.19	52.08	77.08	13.54	9.38		
Santa Cruz-Watsonville CA	52	0.53	77.41	55.77	75.00	13.46	11.54		
Santa Maria-Santa Barbara CA	177	1.82	73.44	56.50	76.27	12.43	11.30		
Santa Rosa CA	19	0.19	74.86	73.68	89.47	0.00	10.53		
Stockton-Lodi CA	38	0.39	71.67	42.11	76.32	5.26	18.42		
Vallejo-Fairfield CA	16	0.16	73.89	75.00	68.75	25.00	6.25		
Visalia-Porterville CA	83	0.85	72.85	67.47	86.75	4.82	8.43		
Yuba City CA	14	0.14	72.92	64.29	100.00	0.00	0.00		
Inyo-Mono Cos CA Non-MSA	27	0.28	73.08	40.74	88.89	11.11	0.00		

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 - 2014).

**** 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 22.07% 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, 2014 TO DECEMBER 31, 2014				
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:									
Fresno CA	17	10.56	90.90	35.29	76.47	11.76	11.76		
Los Angeles-Long Beach-Glendale CA	5	3.11	94.09	40.00	80.00	20.00	0.00		
Oakland-Hayward-Berkeley CA	0	0.00	94.29	0.00	0.00	0.00	0.00		
San Diego-Carlsbad CA	15	9.32	94.89	46.67	100.00	0.00	0.00		
San Francisco-Redwood City-SSF CA	1	0.62	94.42	0.00	100.00	0.00	0.00		
Limited Review:									
Anaheim-Santa Ana-Irvine CA	2	1.24	92.90	50.00	50.00	50.00	0.00		
Bakersfield CA	8	4.97	87.92	25.00	87.50	0.00	12.50		
El Centro CA	5	3.11	79.95	0.00	80.00	20.00	0.00		
Hanford-Corcoran CA	7	4.35	88.67	57.14	85.71	14.29	0.00		
Madera CA	6	3.73	91.41	16.67	66.67	0.00	33.33		
Modesto CA	17	10.56	92.57	64.71	11.76	35.29	52.94		
Oxnard-Thousand Oaks-Ventura CA	6	3.73	90.36	50.00	83.33	16.67	0.00		
Redding CA	1	0.62	95.92	100.00	100.00	0.00	0.00		

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 - 2014).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 18.01% 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, 2014 TO DECEMBER 31, 2014				
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:									
Riverside-San Bernardino-Ontario CA	4	2.48	93.69	25.00	75.00	25.00	0.00		
Sacramento-Roseville-Arden-Arcade CA	11	6.83	94.80	54.55	45.45	36.36	18.18		
Salinas CA	2	1.24	83.86	0.00	50.00	0.00	50.00		
San Jose-Sunnyvale-Santa Clara CA	3	1.86	93.33	66.67	100.00	0.00	0.00		
San Luis Obispo-Paso Robles-Arroyo Grande CA	3	1.86	96.21	66.67	66.67	33.33	0.00		
San Rafael CA	0	0.00	96.01	0.00	0.00	0.00	0.00		
Santa Cruz-Watsonville CA	2	1.24	92.97	50.00	50.00	50.00	0.00		
Santa Maria-Santa Barbara CA	2	1.24	90.05	0.00	50.00	50.00	0.00		
Santa Rosa CA	0	0.00	95.04	0.00	0.00	0.00	0.00		
Stockton-Lodi CA	12	7.45	92.24	58.33	16.67	25.00	58.33		
Vallejo-Fairfield CA	0	0.00	95.47	0.00	0.00	0.00	0.00		
Visalia-Porterville CA	16	9.94	88.87	56.25	62.50	25.00	12.50		
Yuba City CA	16	9.94	93.25	75.00	0.00	37.50	62.50		
Inyo-Mono Cos CA Non-MSA	0	0.00	95.45	0.00	0.00	0.00	0.00		

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 - 2014).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 18.01% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: CALIFORNIA									
Evaluation Period: APRIL 1, 2012 TO DECEMBER 31, 2014									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Fresno CA	1	45	66	586	67	631	0.06	0	0
Los Angeles-Long Beach-Glendale CA	106	40,412	570	274,058	676	314,470	29.89	19	2,176
Oakland-Hayward-Berkeley CA	22	24,807	193	137,216	215	162,023	15.40	7	839
San Diego-Carlsbad CA	22	8,322	345	79,533	367	87,855	8.35	2	536
San Francisco-Redwood City-SSF CA	31	34,221	310	85,844	341	120,065	11.41	2	5,086
Limited Review:									
Anaheim-Santa Ana-Irvine CA	66	37,614	188	51,435	254	89,049	8.46	4	692
Bakersfield CA	3	6,487	15	106	18	6,593	0.63	2	120
El Centro CA	1	3	8	19	9	22	0.00	0	0
Hanford-Corcoran CA	1	133	5	8	6	141	0.01	0	0
Madera CA	0	0	13	30	13	30	0.00	0	0
Modesto CA	0	0	7	27	7	27	0.00	0	0
Oxnard-Thousand Oaks-Ventura CA	8	13,366	33	5,888	41	19,254	1.83	2	130
Redding CA	1	126	6	20	7	146	0.01	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, 2012 TO DECEMBER 31, 2014									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Limited Review:									
Bernardino-Ontario CA	40	27,062	110	24,784	150	51,846	4.93	5	699
Sacramento-Roseville-Arden-Arcade CA	14	17,330	67	11,481	81	28,811	2.74	3	353
Salinas CA	5	598	35	21,000	40	21,598	2.05	1	557
San Jose-Sunnyvale-Santa Clara CA	17	2,703	61	24,340	78	27,043	2.57	1	656
San Luis Obispo-Paso Robles-Arroyo Grande CA	3	1,838	19	274	22	2,112	0.20	1	124
San Rafael CA	4	3,946	26	10,317	30	14,263	1.36	1	39
Santa Cruz-Watsonville CA	2	315	11	16,732	13	17,047	1.62	1	0
Santa Maria-Santa Barbara CA	2	300	38	29,248	40	29,548	2.81	1	220
Santa Rosa CA	4	5,554	12	26,813	16	32,367	3.08	3	0
Stockton-Lodi CA	3	2,752	7	7,353	10	10,105	0.96	2	165
Vallejo-Fairfield CA	4	8,365	11	269	15	8,634	0.82	0	0
Visalia-Porterville CA	2	4,239	7	40	9	4,279	0.41	0	0
Yuba City CA	1	4,048	6	49	7	4,097	0.39	0	0
Inyo-Mono Cos CA Non-MSA	0	0	5	7	5	7	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: CALIFORNIA Evaluation Period: APRIL 1, 2012 TO DECEMBER 31, 2014																	
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:																	
Fresno CA	1.35	13	3.74	7.69	30.77	23.08	38.46	0	2	0	- 1	0	- 1	10.89	29.44	27.63	31.29
Los Angeles-Long Beach-Glendale CA	32.94	69	19.83	8.70	15.94	18.84	56.52	3	10	0	- 2	- 3	- 2	8.01	29.43	28.26	33.92
Oakland-Hayward-Berkeley CA	4.64	18	5.17	22.22	16.67	22.22	38.89	1	0	0	0	1	0	12.53	20.80	34.45	32.23
San Diego-Carlsbad CA	18.35	58	16.67	10.34	20.69	32.76	36.21	1	2	- 1	- 1	0	1	9.80	21.57	35.24	33.05
San Francisco-Redwood City-SSF CA	7.81	13	3.74	23.08	23.08	15.38	38.46	1	1	0	0	0	0	10.76	18.22	39.96	31.05
Limited Review:																	
Anaheim-Santa Ana-Irvine CA	10.24	44	12.64	0.00	18.18	34.09	47.73	0	0	0	0	0	0	6.49	29.75	31.47	32.28
Bakersfield CA	1.03	8	2.30	0.00	25.00	12.50	62.50	0	1	0	0	0	- 1	3.38	32.56	28.83	33.16
El Centro CA	0.43	3	0.86	0.00	33.33	33.33	33.33	0	0	0	0	0	0	0.00	31.41	48.42	20.17
Hanford-Corcoran CA	0.20	2	0.57	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	35.27	21.19	31.41
Madera CA	0.16	1	0.29	0.00	100.00	0.00	0.00	0	1	0	0	- 1	0	0.00	41.01	46.06	12.92
Modesto CA	0.27	2	0.57	0.00	50.00	0.00	50.00	0	0	0	0	0	0	3.01	19.75	44.49	32.74
Oxnard-Thousand Oaks-Ventura CA	2.11	14	4.02	7.14	28.57	57.14	7.14	0	3	0	0	0	- 3	5.38	26.09	40.80	27.72
Redding CA	0.09	1	0.29	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	26.93	51.36	21.70

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, 2014 TO DECEMBER 31, 2014																	
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:																	
Riverside-San Bernardino-Ontario CA	4.98	28	8.05	3.57	35.71	42.86	17.86	0	3	- 2	- 1	0	0	5.71	26.45	35.43	32.09
Sacramento-Roseville-Arden-Arcade CA	2.98	9	2.59	0.00	33.33	44.44	22.22	0	1	0	0	0	- 1	7.15	23.70	37.93	30.90
Salinas CA	1.31	8	2.30	0.00	12.50	37.50	50.00	0	2	0	- 1	0	- 1	5.97	26.06	38.13	27.01
San Jose-Sunnyvale-Santa Clara CA	4.78	18	5.17	11.11	38.89	33.33	16.67	0	3	0	- 2	- 1	0	8.95	25.33	37.20	28.38
San Luis Obispo-Paso Robles-Arroyo Grande CA	0.43	4	1.15	0.00	25.00	50.00	25.00	0	1	0	0	- 1	0	0.48	8.16	63.95	24.62
San Rafael CA	0.77	8	2.30	0.00	12.50	50.00	37.50	0	2	0	- 1	- 1	0	4.76	17.32	53.03	22.96
Santa Cruz-Watsonville CA	0.53	3	0.86	33.33	0.00	66.67	0.00	0	1	- 1	0	0	0	2.56	34.19	34.41	28.83
Santa Maria-Santa Barbara CA	2.70	15	4.29	6.67	13.33	33.33	46.67	0	3	0	- 1	- 2	0	10.48	25.09	31.38	33.04
Santa Rosa CA	0.20	1	0.29	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.43	24.20	55.15	20.22
Stockton-Lodi CA	0.31	2	0.57	50.00	50.00	0.00	0.00	0	4	0	- 1	- 2	- 1	5.71	26.08	32.39	35.83
Vallejo-Fairfield CA	0.43	1	0.29	0.00	0.00	0.00	100.00	0	0	0	0	0	0	1.27	22.65	48.19	26.00
Visalia-Porterville CA	0.48	4	1.15	0.00	25.00	0.00	75.00	0	2	0	0	- 1	- 1	1.37	32.69	33.38	32.44
Yuba City CA	0.17	1	0.29	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.02	28.10	36.24	33.65
Inyo-Mono Cos CA Non-MSA	0.32	2	0.57	0.00	0.00	50.00	50.00	0	1	0	0	- 1	0	0.00	10.32	41.21	48.48

State of Georgia

Table 1. Lending Volume

LENDING VOLUME												
Geography: GEORGIA												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014												
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:												
Atlanta-Sandy Springs-Roswell GA	100.00	80	12,385	0	0	0	0	0	0	80	12,385	100.00

* Loan Data as of December 31, 2014. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2014.

*** Deposit Data as of December 31, 2014. 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: GEORGIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Atlanta-Sandy Springs-Roswell GA	58	100.00	4.59	8.62	20.93	36.21	30.27	31.03	44.21	24.14														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: GEORGIA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography'				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies						
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Atlanta-Sandy Springs-Roswell GA	22	100.00	4.59	4.55	20.93	50.00	30.27	22.73	44.21	22.73					

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

**** 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: GEORGIA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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:																					
Atlanta-Sandy Springs-Roswell GA	58	100.00	23.30	22.41	16.50	34.48	17.61	15.52	42.59	27.59											

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: GEORGIA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans***	% Families*	% BANK Loans**	Overa ll	Low	Mod	Mid
Full Review:																
Atlanta-Sandy Springs-Roswell GA	22	100.00	23.30	18.18	16.50	40.91	17.61	9.09	42.59	31.82						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: GEORGIA			Evaluation Period: DECEMBER 12, 2013 TO DECEMBER 31, 2014				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Atlanta-Sandy Springs-Roswell GA	2	661	7	67	9	728	68.04	0	0
Statewide/Regional	1	342	0	0	1	342	31.96	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: GEORGIA Evaluation Period: DECEMBER 12, 2013 TO DECEMBER 31, 2014																	
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:																	
Atlanta-Sandy Springs-Roswell GA	100.00	1	100.00	0.00	0.00	0.00	100.00	1	0	0	0	0	1	9.68	26.94	28.15	35.02

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System		Geography: GEORGIA				Evaluation Period: DECEMBER 12, 2013 TO DECEMBER 31, 2014											
Assessment Area:	Deposits	Branches				ATMs				Population							
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Atlanta-Sandy Springs-Roswell GA	100.00	1	100.00	0	0	0	100	0	0.00	0	0	0	0	9.68	26.94	28.15	35.02

State of Illinois

Table 1. Lending Volume

LENDING VOLUME												
Geography: ILLINOIS												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014												
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-Naperville-Arlington Hts IL	0.00	0	0	0	0	0	0	0	0	0	0	100.00

* Loan Data as of December 31, 2014. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2014.

*** Deposit Data as of December 31, 2014. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: ILLINOIS Evaluation Period: APRIL 16, 2012 TO DECEMBER 31, 2014									
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-Naperville-Arlington Hts IL	2	808	12	899	14	1,707	100.00	2	1,702

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: ILLINOIS Evaluation Period: APRIL 16, 2012 TO DECEMBER 31, 2014																	
Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branc h Closin gs	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-Naperville- Arlington Hts IL	100.00	1	100.00	0.00	0.00	0.00	100.00	1	0	0	0	0	1	9.57	22.44	34.32	33.67

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																	
Geography: ILLINOIS																	
Evaluation Period: APRIL 16, 2012 TO DECEMBER 31, 2014																	
Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
17-16974 Chicago-Naperville-Arlington Hts IL Part	100.00	1	100.00	0	0	0	100	0	0.00	0	0	0	0	9.57	22.44	34.32	33.67

State of New York

Table 1. Lending Volume

LENDING VOLUME												
Geography: NEW YORK												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014												
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-Jersey City-White Plains NY	100.00	77	150,717	0	0	0	0	1	46,250	78	196,967	100.00

* Loan Data as of December 31, 2014. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2014.

*** Deposit Data as of December 31, 2014. 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 YORK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies						
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-Jersey City-White Plains NY	49	100.00	3.34	6.12	15.95	67.35	30.59	16.33	50.11	10.20					

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *					
Full Review:															
New York-Jersey City-White Plains NY	3	100.00	3.34	66.67	15.95	33.33	30.59	0.00	50.11	0.00					

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: NEW YORK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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:																								
New York-Jersey City-White Plains NY	23	100.00	3.34	17.39	15.95	60.87	30.59	17.39	50.11	4.35														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: NEW YORK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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****	Overa ll	Low	Mod	Mid	Upp							
Full Review:																								
New York-Jersey City-White Plains NY	2	100.00	20.65	0.00	29.90	50.00	18.46	0.00	30.99	50.00														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

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

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014								
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-Jersey City-White Plains NY	49	100.00	28.81	8.16	16.29	20.41	16.38	12.24	38.52	59.18					

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: NEW YORK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
New York-Jersey City-White Plains NY	3	100.00	28.81	0.00	16.29	66.67	16.38	0.00	38.52	33.33														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans***	Overa ll	Low	Mod	Mid	Upp	
Full Review:																
New York-Jersey City-White Plains NY	23	100.00	28.81	4.35	16.29	30.43	16.38	43.48	38.52	21.74						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: NEW YORK		Evaluation Period: APRIL 1, 2012 TO DECEMBER 31, 2014				
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-Jersey City-White Plains NY	0	0	292	26,359	292	26,359	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 YORK Evaluation Period: APRIL 1, 2012 TO DECEMBER 31, 2014																	
Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branc h Closin gs	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-Jersey City- White Plains NY	100.00	1	100.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	16.31	28.70	25.13	29.62

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																	
Geography: NEW YORK																	
Evaluation Period: APRIL 1, 2012 TO DECEMBER 31, 2014																	
/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
New York-Jersey City-White Plains NY	100.00	1	100.00	0	0	0	100	0	0.00	0	0	0	0	16.31	28.70	25.13	29.62

State of Oregon

Table 1. Lending Volume

LENDING VOLUME												
Geography: OREGON												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014												
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:												
Portland-Vancouver-Hillsboro OR	91.81	190	80,984	50	15,359	0	0	18	9,414	258	105,757	78.76
Limited Review:												
Salem OR	8.19	8	2,046	11	1,278	0	0	4	1,436	23	4,760	21.24

* Loan Data as of December 31, 2014. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2014.

*** Deposit Data as of December 31, 2014. 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: OREGON					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014								
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp													
Full Review:																												
Portland-Vancouver-Hillsboro OR	91	94.79	1.24	3.30	18.98	23.08	47.52	36.26	32.26	37.36																		
Limited Review:																												
Salem OR	5	5.21	0.00	0.00	11.87	0.00	60.16	20.00	27.96	80.00																		

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: OREGON					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *						
Full Review:																
Portland-Vancouver-Hillsboro OR	1	50.00	1.24	0.00	18.98	100.00	47.52	0.00	32.26	0.00						
Limited Review:																
Salem OR	1	50.00	0.00	0.00	11.87	0.00	60.16	0.00	27.96	100.00						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE														Geography: OREGON		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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:																				
Portland-Vancouver-Hillsboro OR	91	98.91	1.24	2.20	18.98	46.15	47.52	24.18	32.26	27.47										
Limited Review:																				
Salem OR	1	1.09	0.00	0.00	11.87	100.00	60.16	0.00	27.96	0.00										

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: OREGON					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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****	Overa ll	Low	Mod	Mid	Upp							
Full Review:																								
Portland-Vancouver-Hillsboro OR	7	87.50	5.64	28.57	29.70	14.29	42.39	28.57	22.27	28.57														
Limited Review:																								
Salem OR	1	12.50	0.00	0.00	36.80	100.00	44.03	0.00	19.17	0.00														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

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

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: OREGON		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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 es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Portland-Vancouver-Hillsboro OR	50	81.97	4.65	10.00	22.10	28.00	42.19	42.00	30.92	20.00								
Limited Review:																		
Salem OR	11	18.03	0.00	0.00	20.94	27.27	56.69	18.18	22.37	54.55								

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 (2014).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: OREGON					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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:																								
Portland-Vancouver-Hillsboro OR	91	94.79	20.70	2.22	17.47	21.11	21.04	11.11	40.79	65.56														
Limited Review:																								
Salem OR	5	5.21	19.90	0.00	18.83	0.00	21.12	20.00	40.15	80.00														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: OREGON					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families**	% BANK Loans***	% Families**	% BANK Loans***	% Families**	% BANK Loans***	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Portland-Vancouver-Hillsboro OR	1	50.00	20.70	0.00	17.47	0.00	21.04	100.00	40.79	0.00														
Limited Review:																								
Salem OR	1	50.00	19.90	0.00	18.83	0.00	21.12	0.00	40.15	100.00														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: OREGON					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014										
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*																			
	#	% of Total**	% Families***	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp															
Full Review:																														
Portland-Vancouver-Hillsboro OR	91	98.91	20.70	6.59	17.47	34.07	21.04	18.68	40.79	40.66																				
Limited Review:																														
Salem OR	1	1.09	19.90	0.00	18.83	100.00	21.12	0.00	40.15	0.00																				

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.
 ** 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 2010 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.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
				Geography: OREGON		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014			
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:									
Portland-Vancouver-Hillsboro OR	50	81.97	70.47	38.00	42.00	20.00	38.00		
Limited Review:									
Salem OR	11	18.03	72.01	45.45	72.73	18.18	9.09		

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 - 2014).

**** 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 8.20% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: OREGON		Evaluation Period: APRIL 1, 2012 TO DECEMBER 31, 2014					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Portland-Vancouver-Hillsboro OR	2	5,065	14	9,689	16	14,754	100.00	4	1,026
Limited Review:									
Salem OR	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: OREGON				Evaluation Period: APRIL 1, 2012 TO DECEMBER 31, 2014					
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:																	
Portland-Vancouver-Hillsboro OR	78.76	2	66.67	50.00	0.00	0.00	50.00	0	1	- 1	0	0	0	2.51	24.71	45.41	27.35
Limited Review:																	
Salem OR	21.24	1	33.33	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	21.03	56.99	21.98

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																	
Geography: OREGON																	
Evaluation Period: APRIL 1, 2012 TO DECEMBER 31, 2014																	
Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Portland-Vancouver-Hillsboro OR	78.76	2	66.67	50	0	0	50	2	66.67	1	0	0	1	2.51	24.71	45.41	27.35
Limited Review:																	
Salem OR	21.24	1	33.33	0	0	0	100	1	33.33	0	0	0	1	0.00	21.03	56.99	21.98

State of Texas

Table 1. Lending Volume

LENDING VOLUME												
Geography: TEXAS												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014												
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-Plano-Irving TX	2.38	0	0	0	0	0	0	1	9,375	1	9,375	74.15
Limited Review:												
Houston-The Woodlands-Sugar Land TX	97.62	39	4,990	0	0	0	0	2	11,225	41	16,215	25.85

* Loan Data as of December 31, 2014. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2014.

*** Deposit Data as of December 31, 2014. 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, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***					
Full Review:															
Dallas-Plano-Irving TX	0	0.00	5.34	0.00	19.26	0.00	29.76	0.00	45.64	0.00					
Limited Review:															
Houston-The Woodlands-Sugar Land TX	29	100.00	4.04	6.90	21.16	37.93	30.37	27.59	44.44	27.59					

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies						
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Dallas-Plano-Irving TX	0	0.00	5.34	0.00	19.26	0.00	29.76	0.00	45.64	0.00					
Limited Review:															
Houston-The Woodlands-Sugar Land TX	10	100.00	4.04	10.00	21.16	50.00	30.37	20.00	44.44	20.00					

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

**** 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: TEXAS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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:																					
Dallas-Plano-Irving TX	0	0.00	23.06	0.00	16.62	0.00	18.27	0.00	42.05	0.00											
Limited Review:																					
Houston-The Woodlands-Sugar Land TX	29	100.00	23.70	10.34	16.53	58.62	17.58	24.14	42.18	6.90											

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: TEXAS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*							
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa II	Low	Mod	Mid	Upp			
Full Review:																		
Dallas-Plano-Irving TX	0	0.00	23.06	0.00	16.62	0.00	18.27	0.00	42.05	0.00								
Limited Review:																		
Houston-The Woodlands-Sugar Land TX	10	100.00	23.70	20.00	16.53	40.00	17.58	10.00	42.18	30.00								

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: TEXAS		Evaluation Period: APRIL 1, 2012 TO DECEMBER 31, 2014					
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-Plano-Irving TX	4	525	17	503	26	1,028	5.89	1	5,299
Limited Review:									
Houston-The Woodlands-Sugar Land TX	1	76	9	54	10	130	0.74	0	0
Statewide/Regional	3	29	5	16,263	8	16,292	93.36	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: TEXAS Evaluation Period: APRIL 1,2012 TO DECEMBER 31, 2014																	
Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branche s	% of Rated Area Branche s in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branc h Closin gs	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-Plano-Irving TX	74.15	1	50.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	11.42	24.62	28.04	35.93
Limited Review:																	
Houston-The Woodlands-Sugar Land TX	25.85	1	50.00	0.00	0.00	0.00	100.00	1	0	0	0	0	1	9.33	26.03	29.00	35.30

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																	
Geography: TEXAS																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014																	
Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Dallas-Plano-Irving TX	74.15	1	50.00	0	0	0	100	0	0.00	0	0	0	0	11.42	24.62	28.04	35.93
Limited Review:																	
Houston-The Woodlands-Sugar Land TX	25.85	1	50.00	0	0	0	100	0	0.00	0	0	0	0	9.33	26.03	29.00	35.30

State of Washington

Table 1. Lending Volume

LENDING VOLUME		Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014						
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:												
Seattle-Bellevue-Everett WA	88.52	739	430,156	244	39,722	0	0	58	80,912	1,041	550,790	77.34
Limited Review:												
Bellingham WA	0.85	4	1,183	5	1,210	0	0	1	1,179	10	3,572	2.35
Bremerton-Silverdale WA	2.89	16	8,669	16	1,125	0	0	2	2,329	34	12,123	5.17
Mount Vernon-Anacortes WA	0.68	4	872	4	1,830	0	0	0	0	8	2,702	0.94
Tacoma-Lakewood WA	5.19	33	15,858	16	3,187	0	0	12	13,719	61	32,764	9.83
Clallam-Jefferson Cos WA Non-MSA	1.87	2	276	15	900	2	150	3	790	22	2,116	4.38

* Loan Data as of December 31, 2014. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2014.

*** Deposit Data as of December 31, 2014. 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: WASHINGTON					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																		
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans***	Overall	Low	Mod	Mid	Upp														
Full Review:																													
Seattle-Bellevue-Everett WA	449	93.93	1.84	3.56	15.62	9.80	49.34	34.74	33.20	51.89																			
Limited Review:																													
Bellingham WA	1	0.21	0.10	0.00	16.79	0.00	60.32	100.00	22.79	0.00																			
Bremerton-Silverdale WA	7	1.46	0.00	0.00	13.17	14.29	61.74	14.29	25.09	71.43																			
Mount Vernon-Anacortes WA	3	0.63	0.00	0.00	9.86	0.00	67.82	100.00	22.32	0.00																			
Tacoma-Lakewood WA	17	3.56	0.84	0.00	15.39	29.41	53.64	23.53	30.13	47.06																			
Clallam-Jefferson Cos WA Non-MSA	1	0.21	0.00	0.00	8.69	0.00	72.16	100.00	19.15	0.00																			

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans*** *						
Full Review:																
Seattle-Bellevue-Everett WA	13	92.86	1.84	0.00	15.62	30.77	49.34	15.38	33.20	53.85						
Limited Review:																
Bellingham WA	0	0.00	0.10	0.00	16.79	0.00	60.32	0.00	22.79	0.00						
Bremerton-Silverdale WA	0	0.00	0.00	0.00	13.17	0.00	61.74	0.00	25.09	0.00						
Mount Vernon-Anacortes WA	0	0.00	0.00	0.00	9.86	0.00	67.82	0.00	22.32	0.00						
Tacoma-Lakewood WA	1	7.14	0.84	0.00	15.39	0.00	53.64	0.00	30.13	100.00						
Clallam-Jefferson Cos WA Non-MSA	0	0.00	0.00	0.00	8.69	0.00	72.16	0.00	19.15	0.00						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: WASHINGTON					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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:																								
Seattle-Bellevue-Everett WA	260	91.55	1.84	2.31	15.62	19.23	49.34	35.77	33.20	42.69														
Limited Review:																								
Bellingham WA	3	1.06	0.10	0.00	16.79	33.33	60.32	33.33	22.79	33.33														
Bremerton-Silverdale WA	9	3.17	0.00	0.00	13.17	0.00	61.74	55.56	25.09	44.44														
Mount Vernon-Anacortes WA	1	0.35	0.00	0.00	9.86	100.00	67.82	0.00	22.32	0.00														
Tacoma-Lakewood WA	10	3.52	0.84	0.00	15.39	10.00	53.64	70.00	30.13	20.00														
Clallam-Jefferson Cos WA Non-MSA	1	0.35	0.00	0.00	8.69	0.00	72.16	100.00	19.15	0.00														

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.
 ** 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 2010 Census information.
 **** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****					
Full Review:															
Seattle-Bellevue-Everett WA	17	77.27	10.52	5.88	27.43	29.41	41.24	35.29	20.82	29.41					
Limited Review:															
Bellingham WA	0	0.00	4.39	0.00	44.38	0.00	40.15	0.00	11.08	0.00					
Bremerton-Silverdale WA	0	0.00	0.00	0.00	37.78	0.00	53.57	0.00	8.66	0.00					
Mount Vernon-Anacortes WA	0	0.00	0.00	0.00	28.11	0.00	70.15	0.00	1.74	0.00					
Tacoma-Lakewood WA	5	22.73	8.38	0.00	35.11	60.00	46.76	40.00	9.75	0.00					
Clallam-Jefferson Cos WA Non-MSA	0	0.00	0.00	0.00	30.64	0.00	68.19	0.00	1.18	0.00					

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

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

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: WASHINGTON Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014															
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 es ***	% BANK Loans	% of Business es ***	% BANK Loans	% of Business es ***	% BANK Loans	% of Business es ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle-Bellevue-Everett WA	244	81.33	4.71	6.15	17.22	25.41	44.29	43.03	33.65	25.41					
Limited Review:															
Bellingham WA	5	1.67	5.03	0.00	20.61	40.00	55.95	60.00	18.42	0.00					
Bremerton-Silverdale WA	16	5.33	0.00	0.00	15.09	6.25	53.97	56.25	30.95	37.50					
Mount Vernon-Anacortes WA	4	1.33	0.00	0.00	16.61	25.00	63.79	75.00	19.60	0.00					
Tacoma-Lakewood WA	16	5.33	4.34	18.75	18.95	6.25	50.07	56.25	26.64	18.75					
Clallam-Jefferson Cos WA Non-MSA	15	5.00	0.00	0.00	14.29	26.67	71.54	73.33	14.17	0.00					

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 (2014).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans						
Full Review:																
Seattle-Bellevue-Everett WA	0	0.00	2.50	0.00	15.57	0.00	51.04	0.00	30.86	0.00						
Limited Review:																
Bellingham WA	0	0.00	0.40	0.00	13.52	0.00	74.25	0.00	11.83	0.00						
Bremerton-Silverdale WA	0	0.00	0.00	0.00	6.89	0.00	59.18	0.00	33.93	0.00						
Mount Vernon-Anacortes WA	0	0.00	0.00	0.00	9.17	0.00	58.17	0.00	32.66	0.00						
Tacoma-Lakewood WA	0	0.00	1.37	0.00	15.32	0.00	56.25	0.00	27.06	0.00						
Clallam-Jefferson Cos WA Non-MSA	2	100.00	0.00	0.00	8.26	0.00	74.78	100.00	16.96	0.00						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 (2014).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: WASHINGTON					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Seattle-Bellevue-Everett WA	449	93.93	20.39	4.23	17.77	8.24	22.17	14.03	39.67	73.50						
Limited Review:																
Bellingham WA	1	0.21	20.19	0.00	17.67	0.00	23.83	0.00	38.31	100.00						
Bremerton-Silverdale WA	7	1.46	17.87	0.00	18.99	0.00	22.92	28.57	40.22	71.43						
Mount Vernon-Anacortes WA	3	0.63	18.77	0.00	17.29	66.67	25.39	33.33	38.55	0.00						
Tacoma-Lakewood WA	17	3.56	19.72	5.88	18.37	17.65	22.09	23.53	39.83	52.94						
Clallam-Jefferson Cos WA Non-MSA	1	0.21	19.23	100.00	17.93	0.00	21.78	0.00	41.06	0.00						

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT												Geography: WASHINGTON		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Seattle-Bellevue-Everett WA	13	92.86	20.39	7.69	17.77	0.00	22.17	15.38	39.67	76.92								
Limited Review:																		
Bellingham WA	0	0.00	20.19	0.00	17.67	0.00	23.83	0.00	38.31	0.00								
Bremerton-Silverdale WA	0	0.00	17.87	0.00	18.99	0.00	22.92	0.00	40.22	0.00								
Mount Vernon-Anacortes WA	0	0.00	18.77	0.00	17.29	0.00	25.39	0.00	38.55	0.00								
Tacoma-Lakewood WA	1	7.14	19.72	0.00	18.37	100.00	22.09	0.00	39.83	0.00								
Clallam-Jefferson Cos WA Non-MSA	0	0.00	19.23	0.00	17.93	0.00	21.78	0.00	41.06	0.00								

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 2010 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.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: WASHINGTON		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans***	Overa ll	Low	Mod	Mid	Upp			
Full Review:																		
Seattle-Bellevue-Everett WA	260	91.55	20.39	3.89	17.77	23.74	22.17	13.62	39.67	58.75								
Limited Review:																		
Bellingham WA	3	1.06	20.19	0.00	17.67	33.33	23.83	33.33	38.31	33.33								
Bremerton-Silverdale WA	9	3.17	17.87	0.00	18.99	33.33	22.92	11.11	40.22	55.56								
Mount Vernon-Anacortes WA	1	0.35	18.77	0.00	17.29	0.00	25.39	100.00	38.55	0.00								
Tacoma-Lakewood WA	10	3.52	19.72	10.00	18.37	60.00	22.09	0.00	39.83	30.00								
Clallam-Jefferson Cos WA Non-MSA	1	0.35	19.23	0.00	17.93	0.00	21.78	100.00	41.06	0.00								

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.
 ** 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 2010 Census information.
 **** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: WASHINGTON					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014				
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:									
53-42644 Seattle-Bellevue-Everett WA	244	81.33	69.75	45.08	65.98	16.39	17.62		
Limited Review:									
Bellingham WA	5	1.67	72.51	40.00	40.00	20.00	40.00		
Bremerton-Silverdale WA	16	5.33	75.49	56.25	87.50	6.25	6.25		
Mount Vernon-Anacortes WA	4	1.33	73.55	0.00	50.00	0.00	50.00		
Tacoma-Lakewood WA	16	5.33	73.27	56.25	68.75	12.50	18.75		
Clallam-Jefferson Cos WA Non-MSA	15	5.00	78.69	80.00	80.00	20.00	0.00		

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 - 2014).

**** 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 3.33% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: WASHINGTON									
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014									
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:									
Seattle-Bellevue-Everett WA	0	0.00	95.88	0.00	0.00	0.00	0.00		
Limited Review:									
Bellingham WA	0	0.00	96.12	0.00	0.00	0.00	0.00		
Bremerton-Silverdale WA	0	0.00	97.54	0.00	0.00	0.00	0.00		
Mount Vernon-Anacortes WA	0	0.00	93.58	0.00	0.00	0.00	0.00		
Tacoma-Lakewood WA	0	0.00	95.96	0.00	0.00	0.00	0.00		
53-99999 Clallam-Jefferson Cos WA Non-MSA	2	100.00	97.77	50.00	100.00	0.00	0.00		

* Market share data was not available at the time of the evaluation therefore the 2014 analysis does not include a discussion of market share.

** 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 - 2014).

**** 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: WASHINGTON									
Evaluation Period: APRIL 1, 2012 TO DECEMBER 31, 2014									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Seattle-Bellevue-Everett WA	2	872	97	85,741	99	86,613	85.57	1	125
Limited Review:									
Bellingham WA	0	0	2	3	2	3	0.00	0	0
Bremerton-Silverdale WA	0	0	1	4	1	4	0.00	0	0
Mount Vernon-Anacortes WA	0	0	2	5	2	5	0.00	0	0
Tacoma-Lakewood WA	1	2,445	5	8,548	6	10,993	10.86	0	0
Clallam-Jefferson Cos WA Non-MSA	1	2,743	1	856	2	3,599	3.56	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: WASHINGTON Evaluation Period: APRIL 1, 2012 TO DECEMBER 31, 2014																	
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:																	
Seattle-Bellevue-Everett WA	77.34	28	65.12	3.57	35.71	42.86	17.86	1	0	0	0	0	1	4.50	20.34	47.23	27.72
Limited Review:																	
Bellingham WA	2.35	1	2.33	0.00	0.00	0.00	100.00	0	2	- 1	0	- 1	0	0.81	22.82	57.66	18.71
Bremerton-Silverdale WA	5.17	4	9.30	0.00	25.00	50.00	25.00	0	0	0	0	0	0	0.00	19.47	57.87	22.66
Mount Vernon-Anacortes WA	0.94	1	2.33	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	12.79	69.18	18.03
Tacoma-Lakewood WA	9.83	6	13.95	0.00	16.67	66.67	16.67	0	2	0	0	- 2	0	2.52	22.24	50.77	24.47
Clallam-Jefferson Cos WA Non-MSA	4.38	3	6.98	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	11.54	72.32	16.14

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System																	
Geography: WASHINGTON																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2014																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Seattle-Bellevue-Everett WA	77.34	28	65.12	4	36	43	18	28	65.12	1	10	12	5	4.50	20.34	47.23	27.72
Limited Review:																	
Bellingham WA	2.35	1	2.33	0	0	0	100	1	2.33	0	0	0	1	0.81	22.82	57.66	18.71
Bremerton-Silverdale WA	5.17	4	9.30	0	25	50	25	4	9.30	0	1	2	1	0.00	19.47	57.87	22.66
Mount Vernon-Anacortes WA	0.94	1	2.33	0	100	0	0	1	2.33	0	1	0	0	0.00	12.79	69.18	18.03
Tacoma-Lakewood WA	9.83	6	13.95	0	17	67	17	6	13.95	0	1	4	1	2.52	22.24	50.77	24.47
Clallam-Jefferson Cos WA Non-MSA	4.38	3	6.98	0	0	100	0	3	6.98	0	0	3	0	0.00	11.54	72.32	16.14