



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

July 1, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Harris Bank N.A.
Charter Number: 24380

6720 N. Scottsdale Road
Scottsdale, Arizona 85253

Office of the Comptroller of the Currency

Large Bank Supervision
250 E. Street, SW
Washington, DC 20219

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

Table of Contents

OVERALL CRA RATING	2
DEFINITIONS AND COMMON ABBREVIATIONS	3
DESCRIPTION OF INSTITUTION	7
SCOPE OF THE EVALUATION	8
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
STATE RATINGS	11
STATE OF ARIZONA	11
STATE OF FLORIDA	18
STATE OF WASHINGTON	24
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: SUMMARY OF STATE RATINGS	B-1
APPENDIX C: MARKET PROFILES FOR FULL-SCOPE AREAS	C-1
APPENDIX D: TABLES OF PERFORMANCE DATA	D-1

Overall CRA Rating

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

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

Performance Levels	The Harris Bank N. A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		
Low Satisfactory			X
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:

- An excellent responsiveness to the credit needs within the bank's assessment areas (AA);
- An adequate geographic distribution of loans;
- A good level of lending to borrowers of different income levels;
- A positive impact on lending performance attributed to community development lending;
- An excellent level of qualified investment activity;
- An adequate geographic distribution of bank offices; and
- A good level of 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, not a strict legal definition.

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

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

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

Community Development: Affordable housing (including multi-family rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Multi-family: Refers to a residential structure that contains five or more units.

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

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

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

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 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

The Harris Bank N.A. (THBNA), headquartered in Scottsdale, Arizona, is a full-service interstate bank that is a wholly-owned subsidiary of Harris Bankcorp, Inc. Harris Bankcorp, Inc. is a wholly-owned subsidiary of Harris Financial Corp, which is a subsidiary of BMO Financial Group (BMO). BMO is a Canadian-based North American bank with \$386 (CND) billion in assets as of July 31, 2009.

THBNA reported total assets of \$628 million as of June 30, 2009. This includes total loans of \$527 million which are comprised of \$469 million in real estate related loans (89% of total loans), commercial loans of \$39.7 million (7.5 percent of total loans) and loans to individuals of \$18.4 million (3.5 percent of total loans). Tier One capital is \$49 million.

THBNA received a Satisfactory rating in its last CRA evaluation dated July 1, 2006 by the Office of the Comptroller of the Currency.

THBNA's primary emphasis is to offer a full range of wealth management banking, investment, trust and financial advisory products and services. It also offers a full range of real estate, commercial, consumer credit, and deposit products and services. Its activities, together with those products and services offered through its affiliates (although THBNA has not asked to consider any affiliate activities in this evaluation), provide a wide range of lending, investing and financial management solutions to personal, business, corporate and institutional clients.

There are no legal or financial factors impeding the bank's ability to help meet the credit needs within its communities.

For purposes of this evaluation, THBNA is an interstate bank operating in three states including seven assessment areas (AAs) in Arizona, Florida and Washington. THBNA has asked to be evaluated as a large retail bank using the Lending, Investment and Service Test criteria.

THBNA has 9 office locations and 2 ATMs within its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We reviewed THBNA's origination and purchase of home mortgage loans and small loans to businesses for the time period of January 1, 2006 through December 31, 2008. We placed more weight on home mortgage loans over loans to small businesses since their volume was over ten times the volume of loans to small businesses. Community development loans made between July 1, 2006 and June 30, 2009 were included in our evaluation.

Our review of investments included an analysis of the investment portfolio and the donations and grants made between July 1, 2006 and June 30, 2009. Investments made prior to, but still outstanding on June 30, 2009, were also considered. We considered investments and donations or grants to organizations that have community development as their primary purpose.

Our evaluation of bank services included analyzing the bank's branch and ATM network for the availability and effectiveness of delivering retail banking services. We also considered the extent and innovativeness of the bank's community development services in meeting the credit needs within its assessment areas (AA). We reviewed bank services, including branch openings and closings, and community development services occurring between July 1, 2006 and June 30, 2009.

Data Integrity

We verified the accuracy of the publicly filed home mortgage loans and small loans to businesses. THBNA had no significant errors in its data that would preclude an accurate evaluation of its CRA performance.

We also verified information on community development loans, qualified investments, and community development services to ensure that these activities met the regulatory definitions. THBNA accurately identified its activities submitted to us for consideration. We determined which community development loans, investments and services met the definition of community development and included those under the Lending, Investment, or Services Test, respectively.

Selection of Areas for Full-Scope Review

We selected one AA in each state in which the bank had an office to be evaluated as a full-scope assessment area. In Arizona and Florida, we based our selection on the relative size of each office within these states based on deposits as reported on the FDIC website as of June 30, 2009.

In Arizona, we selected the Maricopa AA for a full-scope review because it had 94 percent of the bank's deposits within that state. In Florida, we selected the Naples AA for a full-scope review with 51 percent of the bank's deposits within that state. In Washington, we selected the King AA because it is the only AA in that state.

Inside/Outside Ratio

The ratio of loans made inside/outside the AAs was evaluated at the bank level. This evaluation determined that 92 percent of all small loans to businesses, and 100 percent of community development loans were made within the bank's AAs. Of the home mortgage loans, 75 percent were made within the bank's AAs with 73 percent of home purchase loans, 79 percent of home refinance, and 83 percent of home improvement loans made were within the bank's AA.

Ratings

The bank's overall rating is a blend of the state ratings. Again, we used deposit information to determine how we would blend the various state ratings. Based on the deposit distribution, we weighted Arizona the most since it had 77 percent of the bank's deposits followed by Florida with 22 percent of the bank's deposits and finally Washington with one percent of the bank's deposits.

State ratings are based primarily on those areas that received full-scope reviews. Refer to the "Selection of Areas for Full-scope Review" section (above) for details.

For each full-scope rating area, when determining the Lending Test conclusion by AA, HMDA loan products were weighted more than small business loans. The combined geographic and borrower distribution of HMDA loans, and small loans to businesses provided the most weight to AA Lending Test conclusions with market share information accounting for a lesser weight. Expectations for lending to low-income borrowers were slightly lower than for lending to moderate-income borrowers due to performance context issues such as the percentage of the population living below the poverty level. Community development lending, based on volume and complexity, and the use of innovative and flexible lending programs provided either a neutral or positive impact to AA conclusions.

In arriving at a conclusion, there are some AAs in which the total number of loans made totaled ten loans or less. In those instances, a meaningful analysis could not be completed and this had a neutral impact on the overall ratings.

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

When determining Service Test conclusions, accessibility to branch offices and changes in branch locations provided the most weight. Branch hours and services as well as community development services received a lesser amount of weight.

Other

We conducted twelve community contacts within the AA. The primary credit need identified is for economic development, affordable housing and affordable small business loans. There is ample opportunity for each of these needs within each AA.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

State of Arizona Rating

State of Arizona

CRA Rating for Arizona:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- An excellent responsiveness to the credit needs within the bank's AA;
- An adequate geographic distribution of HMDA loans;
- A good geographic distribution of small loans to businesses;
- An adequate distribution of HMDA loans to borrowers of different income levels;
- An adequate distribution of small loans to businesses based on the size of the business;
- A positive impact on lending performance attributed to community development lending;
- An excellent level of qualified investment activity;
- An adequate geographic distribution of bank offices; and
- A good level of community development services.

Description of Institution's Operations in Arizona

THBNA has delineated two AAs within the state of Arizona. Within Arizona, THBNA holds \$388 million of deposits representing nearly 77% of the bank's total deposits. Of these deposits, 94 percent are concentrated in the Phoenix-Mesa-Scottsdale, AZ MSA (Maricopa AA). Remaining deposits, representing 6 percent of state deposits are in the Tucson, AZ MSA (Tucson AA). Because it has the largest portion of THBNA deposits in the state, we selected the Maricopa AA for full-scope analysis. The Tucson AA was analyzed using limited-scope procedures.

THBNA has five office locations within the state of Arizona. Primary competitors include J.P. Morgan Chase Bank, N.A., Bank of America, N.A., and Wells Fargo Bank N.A.

Refer to the Market Profiles for the state of Arizona in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

LENDING TEST

THBNA's performance under the Lending Test in Arizona is rated high satisfactory. Based on a full-scope review, the bank's performance in the Maricopa AA is good. Performance in the limited-scope AA did not negatively impact the Lending Test rating in Arizona. Community development lending had a positive impact on the Lending Test rating in Arizona.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

THBNA's lending activity reflects an excellent responsiveness to the credit needs of its AAs. The lending activity in the Maricopa AA is excellent. Refer to Tables 1 Lending Volume in the state of Arizona section of appendix D for the facts and data used to evaluate the bank's lending activity.

To provide perspective regarding the relative levels of lending volume in each AA, we also compared the bank's deposit market rank and market share to its lending market rank and market share for each loan product. Because of the number of lenders compared to banks in each AA (refer to Market Profiles in appendix C), we based our analysis on the bank's percentile rankings in the deposit and loan markets rather than the actual values of market rank and market share.

THBNA's market share percentile ranking for home purchase loans, home refinance loans, and small loans to businesses was near to or exceeded its percentile ranking for deposit market share. For home improvement loans, THBNA made no such loans in 2007 or 2008, but in 2006 its market share percentile ranking was below its percentile ranking for deposit market share. In addition, THBNA made no multi-family loans in the Maricopa AA during the evaluation period. FDIC deposit market share data as of June 30, 2009 show that the bank ranks at the 79th percentile for deposit market share in the Maricopa AA. THBNA ranks at the 91st percentile for home purchase loans and the 77th for percentile for home refinance loans based on 2008 aggregate HMDA data for the Maricopa AA. According to 2008 aggregate small business loan data, THBNA ranks at the 83rd percentile for small loans to businesses in the Maricopa AA.

Distribution of Loans by Income Level of the Geography

THBNA's distribution of loans is adequate among geographies of different income levels. The geographic distribution of loans in the Maricopa AA is adequate.

Home Mortgage Loans

THBNA's overall geographic distribution of home mortgage loans in the Maricopa AA is adequate. Refer to Tables 2, 3, 4 and 5 in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

THBNA's geographic distribution is adequate for home purchase and home refinance loans. There were only six home improvement loans made in the Maricopa AA during the evaluation period. Consequently, a meaningful analysis of these loans could not be completed. Also, THBNA made no multi-family loans in the state of Arizona during the evaluation period. These two situations had a neutral effect on the Lending Test performance within the state of Arizona.

Home Purchase

The geographic distribution of home purchase loans is adequate. The percentage of home purchase loans made in low- and moderate-income geographies is below the percentage of owner-occupied units in those geographies. The market share for home purchase loans made in low-income geographies is substantially below, and in moderate-income geographies equals, the overall market share for home purchase loans.

Home Improvement

THBNA made only six home improvement loans in the Maricopa AA during the evaluation period and this number was too low to result in a meaningful analysis. This had a neutral effect on the Lending Test in Arizona.

Home Refinance

The geographic distribution of home refinance loans is adequate. The percentage of home refinance loans made in low-income geographies exceeds, and in moderate-income geographies is below, the percentage of owner-occupied units. The market share for home refinance loans made in low-income geographies is substantially below, and in moderate-income geographies is below, the overall market share for home refinance loans.

Multi-family

THBNA made no multi-family loans in the Maricopa AA (or in the Tucson AA) during the evaluation period. This had a neutral effect on the Lending Test in Arizona.

Small Loans to Businesses

THBNA's geographic distribution of small loans to businesses in the Maricopa AA is good. Refer to Table 6 in the state of Arizona section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The percentage of small loans made in low-income geographies is below, and in moderate-income geographies exceeds, the percentage of businesses within those geographies. The market share for small loans to businesses made in low-income geographies is below, and in moderate-income geographies exceeds, the overall market share for small loans to businesses.

Lending Gap Analysis

Reports detailing THBNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified in the Maricopa AA.

Distribution of Loans by Income Level of the Borrower

THBNA's overall borrower distribution of loans by income level of borrowers is adequate. The distribution of loans among borrowers of different income levels in the Maricopa AA is adequate.

Home Mortgage Loans

THBNA's distribution of home mortgage loans among borrowers of different income levels in the Maricopa AA is adequate. Refer to Tables 8, 9 and 10 in the state of Arizona 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.

THBNA's borrower distribution is adequate for home refinance loans, and poor for home purchase loans, taking into consideration the barriers that exist in the Maricopa AA. The poverty rate is a significant barrier to making home mortgage loans to low-income individuals in the AA (see Market Profile in Appendix C). THBNA made only six home improvement loans in the Maricopa AA during the evaluation period and a meaningful analysis on this volume could not be performed.

Home Purchase

The borrower distribution of home purchase loans is poor even after considering the barriers that exist for low-income borrowers in obtaining mortgage loans. The percentage of home purchase loans made to low-income borrowers is substantially below, and to moderate-income borrowers is below, the percentage of families defined as such. The market share for home purchase loans made to low-income borrowers is below, and to moderate-income borrowers is significantly below, the overall market share for home purchase loans. It should be noted that almost ten percent of the households in the AA lived below the poverty level.

Home Improvement

THBNA made only six home improvement loans in the Maricopa AA during the evaluation period and this number was too low to result in a meaningful analysis. This had a neutral effect on the Lending Test performance in the state of Arizona.

Home Refinance

The borrower distribution of home refinance loans is adequate after considering the barriers that exist for low-income borrowers in obtaining mortgage loans. The percentage of home refinance loans made to low-income borrowers is significantly below, and to moderate-income borrowers is below, the percentage of families defined as such. The market share for home refinance loans made to low-income borrowers is below, and to moderate-income borrowers is significantly below, the overall market share for home refinance loans. It should be noted that almost ten percent of the households in the AA lived below the poverty level.

Small Loans to Businesses

THBNA's distribution of small loans to businesses of different revenue sizes in the Maricopa AA is adequate. Refer to Table 11 in the state of Arizona 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.

THBNA's distribution of small loans to businesses of different revenue sizes in the Maricopa AA is adequate. The percentage of small loans made to small businesses is somewhat below the percentage of businesses defined as such. The market share for small loans made to businesses with revenue of \$1 million or less exceeds its overall small business market share.

Community Development Lending

Community development lending has a positive impact on the conclusions for the Maricopa AA. Refer to Table 1 Lending Volume in the state of Arizona section of appendix D for the facts and data used to evaluate the bank's level of community development lending.

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.

THBNA has an excellent level of community development loans in the Maricopa AA, given the community development needs and opportunities that exist in the AA. During the evaluation period for community development loans, the bank made 32 community development loans totaling nearly \$4 million, representing 11.3 percent of the allocated Tier One capital. The bank's community development lending addresses needs for affordable housing and community development services.

Product Innovation and Flexibility

THBNA makes limited use of innovative or flexible lending programs and this had a neutral impact on the Lending Test.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Tucson AA is not inconsistent with the bank's overall performance under the Lending Test in Arizona. Refer to the Tables 1 through 11 in the state of Arizona section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Arizona is rated outstanding. Based on our full-scope review, the bank's performance in the Maricopa AA is excellent. Refer to Table 14 in the state of Arizona section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier One capital to each AA based on the pro rata share of deposits as a means of comparative analysis.

THBNA has an excellent level of qualified investments in the Maricopa AA, given the credit needs and opportunities that exist in the AA. During the evaluation period for qualified investments, the bank made 65 investments totaling \$5.4 million. In addition, we considered the ongoing effects of investments made in prior periods. These prior period investments that continued to be outstanding at the start of this evaluation totaled \$2.1 million. In total, the \$7.5 million in qualified investments represented 21 percent of the allocated Tier One capital. The bank's qualified investments address needs for affordable housing, economic development and community development services.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Tucson AA is not inconsistent with the bank's overall performance in Arizona.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Review

THBNA's performance under the Service Test in Arizona is rated low satisfactory. Based on the full-scope review, the bank's performance in the Maricopa AA is adequate.

Retail Banking Services

THBNA's systems for delivering retail banking services in the state of Arizona are reasonably accessible to geographies and individuals of different income levels. The bank has adequate accessibility of its service delivery systems in the Maricopa AA. Refer to Table 15 in the state of Arizona 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.

THBNA has four office locations within the Maricopa AA, one of which is in a moderate-income geography. There are no branches in low-income geographies, however, only 4.88 percent of the AA population lives within these geographies. The percentage of branches in moderate-income geographies is somewhat below the percentage of the population within these geographies.

During the evaluation period, THBNA closed two offices in the Maricopa AA. One of these was in a moderate-income geography and one was in an upper-income geography. These closings did not adversely impact access to banking services.

There are only minor differences in THBNA's services and business hours throughout the bank's AA, none of which adversely affect low- or moderate income geographies or individuals.

Office lobbies are typically open from 9:00 a.m. and close at 4:00 p.m. Monday through Friday. Two offices in this AA also offer drive-up services. No locations are open on Saturday or Sunday.

Alternative Delivery Systems

The bank offers various alternative systems for delivering retail banking services, including automated teller machines (ATMs), telephone banking, computer banking, direct deposit, bank by mail, night depository, and courier services. Because no data were available concerning the effectiveness of these systems to low- and moderate-income geographies and individuals, we did not place significant weight on these systems in the overall Service Test conclusions.

THNBA has two ATMs located within the Maricopa AA, both are located at THBNA branches. No ATMs are located in low- or moderate-income geographies. Deposits and withdrawals can be made at both ATMs. The distribution of ATMs in this AA is substantially below the distribution of low- and moderate-income individuals.

Community Development Services

THBNA's performance in providing community development services in the Maricopa AA is good. Bank management invests numerous hours in community development programs targeted to low- and moderate-income individuals and geographies within THBNA's AA. These services focus primarily on providing home homebuyer seminars and financial education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, THBNA's performance under the Service Test in the Tucson AA is not inconsistent with the bank's overall performance in the state of Arizona. Since only 3 percent of THBNA's deposits are in the Tucson AA, performance in this AA is not weighted heavily in the overall conclusion for the state of Arizona.

State of Florida Rating

State of Florida

CRA Rating for Florida:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- An adequate responsiveness to the credit needs within the bank's AA;
- An adequate geographic distribution of HMDA loans;
- A good distribution of HMDA loans to individuals of different income levels;
- An excellent level of qualified investment activity;
- An adequate geographic distribution of bank offices; and
- A good level of community development services.

Description of Institution's Operations in Florida

THBNA has delineated four AAs in the state of Florida. Within the state of Florida, THBNA holds nearly \$111 million of deposits representing 22 percent of THBNA's total deposits. Of these deposits, 51 percent are concentrated in the Naples-Marco Island, FL MSA (Naples AA), with 25 percent of deposits in the Bradenton-Sarasota-Venice, FL MSA (Sarasota AA), and 24 percent of deposits in the eastern portion of the West Palm Beach-Boca Raton-Boynton Beach, FL MSA (West Palm Beach AA). Because the Naples AA had the largest portion of THBNA's deposits in Florida, we selected it for a full-scope analysis. The remaining AAs were analyzed using limited-scope procedures. In November 2008, THBNA closed its office in the Sebastian-Vero Beach, FL MSA (Vero AA); however, since it was open for most of the evaluation period it was evaluated using limited-scope procedures as well.

THBNA has 3 offices in Florida at the end of the evaluation period. Primary competitors include Bank of America, N.A. and Wachovia Bank National Association.

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

LENDING TEST

THBNA's performance under the Lending Test in Florida is rated low satisfactory. Based on a full-scope review, the bank's performance in the Naples AA is adequate. Performance in the limited-scope AAs did not impact the Lending Test rating in Florida.

Lending Activity

THBNA's lending activity reflects an adequate responsiveness to the credit needs of its AAs. Refer to Tables 1 Lending Volume in the state of Florida section of appendix D for the facts and data used to evaluate the bank's lending activity.

To provide perspective regarding the relative levels of lending volume in each AA, we also compared the bank's deposit market rank and market share to its lending market rank and market share for each loan product. Because of the number of lenders compared to banks in each AA (refer to Market Profiles in appendix C), we based our analysis on the bank's percentile rankings in the deposit and loan markets rather than the actual values of market rank and market share.

THBNA's market share percentile ranking for home purchase loans and home refinance loans exceeded its percentile ranking for deposit market share. THBNA made no home improvement loans or multi-family loans in the Naples AA during the evaluation period. FDIC deposit market share data as of June 30, 2009 show that the bank ranks at the 29th percentile for deposit market share in the Naples AA. THBNA ranks at the 92nd percentile for home purchase loans and the 72nd percentile for home refinance loans based on 2008 aggregate HMDA data for the Naples AA. According to 2008 aggregate small business loan data, THBNA made no small loans to businesses in the Naples AA, and only nine such loans in 2006 and 2007 combined.

Distribution of Loans by Income Level of the Geography

THBNA's overall distribution of loans is adequate among geographies of different income levels. The geographic distribution of loans in the Naples AA is adequate.

Home Mortgage Loans

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

THBNA's geographic distribution is good for home purchase loans; and very poor for home refinance loans. THBNA made no home improvement or multi-family loans in the Naples AA during the evaluation period. This had a neutral impact on performance.

Home Purchase

The geographic distribution of home purchase loans is good. The percentage of home purchase loans made in low-income geographies is substantially below, and in moderate-income geographies is near to, the percentage of owner-occupied units in those geographies. The market share for home purchase loans made to low-income geographies is substantially

below, and in moderate-income geographies exceeds, the overall market share for home purchase loans.

Home Improvement

THBNA made no home improvement loans in the Naples AA during the evaluation period. This had a neutral effect on the Lending Test performance in Florida.

Home Refinance

The geographic distribution of home refinance loans is very poor. The percentage of home refinance loans made in both low- and moderate-income geographies is substantially below the percentage of owner-occupied units. The market share for home refinance loans made in both low- and moderate-income geographies is substantially below the overall market share for home refinance loans.

Multi-Family

THBNA made no multi-family loans in the Naples AA during the evaluation period. This had a neutral effect on the Lending Test performance in Florida.

Small Loans to Businesses

THBNA made only nine small loans to businesses in the Naples AA during the evaluation period which had a limited impact on the Lending Test performance in Florida. Refer to Table 6 in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Lending Gap Analysis

Reports detailing THBNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified in the Naples AA.

Distribution of Loans by Income Level of the Borrower

THBNA's overall borrower distribution of HMDA loans is good. THBNA made only nine small loans to businesses in the Naples AA during the evaluation period which was too small a number to allow for a meaningful analysis. This had a limited impact on the Lending Test performance in Florida. The distribution of loans among individuals of different income levels in the Naples AA is good.

Home Mortgage Loans

THBNA's distribution of home mortgage loans among borrowers of different income levels in the Naples AA is good. Refer to Tables 8, 9 and 10 in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

THBNA's borrower distribution is excellent for home purchase loans, and poor for home refinance loans, taking into consideration the barriers that exist in the Naples AA. The poverty rate is a significant barrier to making home mortgage loans to low-income individuals in the AA (see Market Profile in appendix C).

Home Purchase

The borrower distribution of home purchase loans is excellent considering the barriers that exist for low-income borrowers in obtaining mortgage loans. The percentage of home purchase loans made to both low- and moderate-income borrowers exceeds the percentage of families defined as such. The market share for home purchase loans to both low- and moderate-income borrowers exceeded the overall market share for home purchase loans. It should be noted that almost eight percent of the households in the Naples AA live below the poverty level.

Home Improvement

THBNA made no home improvement loans in the Naples AA during the evaluation period. This had a neutral impact on the Lending Test performance in Florida.

Home Refinance

The borrower distribution of home refinance loans is poor even after considering the barriers that exist for low-income borrowers in obtaining mortgage loans. The percentage of home refinance loans made to both low- and moderate-income borrowers is significantly below the percentage of families defined as such. The market share for home refinance loans to both low- and moderate-income borrowers is substantially below the overall market share for home refinance loans. It should be noted that almost eight percent of the households in the Naples AA live below the poverty level.

Small Loans to Businesses

THBNA made only nine small loans to businesses in the Naples AA during the evaluation period which had a limited impact on the Lending Test performance in Florida. Refer to Table 11 in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Community Development Lending

Community development lending had a neutral impact on the conclusions for the Naples AA. Refer to Table 1 Lending Volume in the state of Florida section of appendix D for the facts and data used to evaluate the bank's level of community development lending.

THBNA made no community development loans during the evaluation period in the Naples AA.

Product Innovation and Flexibility

THBNA makes limited use of innovative or flexible lending programs and this had a neutral impact on the Lending Test.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Sarasota AA and West Palm Beach AAs is not inconsistent with the bank's overall performance under the Lending Test in Florida. In the Vero AA the bank's performance is weaker than the bank's overall performance in Florida with worse distributions of lending based on geographies and the income level of borrowers. Refer to the Tables 1 through 11 in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Florida is rated outstanding. Based on our full-scope review, the bank's performance in the Naples AA is excellent. Refer to Table 14 in the state of Florida section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Areas Receiving Full-Scope Reviews

To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier One capital to each AA based on the pro rata share of deposits as a means of comparative analysis.

THBNA has an excellent level of qualified investments in the Naples AA, given the credit needs and opportunities that exist in the AA. During the evaluation period for qualified investments, the bank made 14 investments totaling nearly \$12 thousand. In addition, we considered the ongoing effects of investments made in prior periods. These prior period investments that continued to be outstanding at the start of this evaluation totaled \$2.1 million. In total, the \$2.1 million of qualified investments represent 38% of the allocated Tier One capital. The bank's qualified investments address needs for affordable housing, economic development and community development services.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Sarasota AA, Vero AA, and the West Palm Beach AAs is not inconsistent with the bank's overall performance in Florida.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

THBNA's performance under the Service Test in Florida is rated low satisfactory. Based on the full-scope review, the bank's performance in the Naples AA is adequate.

Retail Banking Services

THBNA's systems for delivering retail banking services in the state of Florida are reasonably accessible to geographies and individuals of different income levels. Refer to Table 15 in the state of Florida section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank has reasonable accessibility of its service delivery systems in the Naples AA. Its office is located in an upper-income geography. There are no branches in low- or moderate-income geographies. There is just over 22 percent of the AA population living within these geographies.

The bank's business hours are 9:00 am to 4:00 pm Monday through Friday and they offer a variety of loan and deposit products. The bank's only office does not offer weekend hours.

Alternative Delivery Systems

The bank offers various alternative systems for delivering retail banking services, including, telephone banking, computer banking, direct deposit, bank by mail, night depository, and courier services. Because no data were available concerning the effectiveness of these systems to low- and moderate-income geographies and individuals, we did not place significant weight on these systems in the overall service test conclusions.

Community Development Services

THBNA's performance in providing community development services in the Naples AA is good. Bank management invests numerous hours in community development programs targeted to low- and moderate-income individuals and geographies within THBNA's AAs. These services focus primarily on providing home homebuyer seminars and financial education.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the West Palm Beach AA is not inconsistent with the bank's overall performance under the service test in Florida. In the Sarasota AA the bank's performance is stronger than the bank's overall performance in Florida primarily because the office location is in a moderate-income geography. In the Vero Beach AA the bank's performance is weaker than the bank's overall performance in Florida because that office was closed during the evaluation period. Refer to Table 15 in the state of Florida section of appendix D for the facts and data that support these conclusions.

State of Washington Rating

State of Washington

CRA Rating for Washington:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- An excellent responsiveness to the credit needs within the AA;
- An adequate geographic distribution of HMDA loans;
- An adequate distribution of HMDA loans to borrowers of different income levels;
- The positive impact of community development lending;
- An excellent level of qualified investment activity;
- An good geographic distribution of bank offices; and
- A good level of community development services.

Description of Institution's Operations in Washington

THBNA has delineated one AA in the state of Washington, in the Seattle-Bellevue-Everett, WA MD (King AA). This AA includes only King county.

Within the state of Washington, THBNA holds \$6.7 million of deposits representing 1.3% of THBNA's total deposits. Because the King AA is the only AA in Washington, we selected it for a full-scope analysis.

THBNA has only one office in Washington. Primary competitors include Bank of America, N.A. and U.S. Bank National Association.

Refer to the Market Profiles for the state of Washington in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

LENDING TEST

THBNA's performance under the Lending Test in Washington is rated low satisfactory. Based on a full-scope review, the bank's performance in the King AA is adequate.

Lending Activity

THBNA's lending activity reflects excellent responsiveness to the credit needs of its AA. Refer to Tables 1 Lending Volume in the state of Washington section of appendix D for the facts and data used to evaluate the bank's lending activity.

To provide perspective regarding the relative levels of lending volume in each AA, we also compared the bank's deposit market rank and market share to its lending market rank and market share for each loan product. Because of the number of lenders compared to banks in each AA (refer to Market Profiles in appendix C), we based our analysis on the bank's percentile rankings in the deposit and loan markets rather than the actual values of market rank and market share.

THBNA's market share percentile ranking for home purchase loans, home refinance loans and small loans to businesses exceeded its percentile ranking for deposit market share. THBNA made only two home improvement loans, and no multi-family loans, during the evaluation period. FDIC deposit market share data as of June 30, 2009 show that the bank ranks at the 3rd percentile for deposit market share in the King AA. THBNA ranks at the 71st percentile for home purchase loans and the 64th percentile for home refinance loans based on 2008 aggregate HMDA data for the King AA. According to 2008 aggregate small business loan data, THBNA ranks at the 73rd percentile for small loans to businesses in the King AA.

Distribution of Loans by Income Level of the Geography

THBNA's overall distribution of HMDA loans is adequate. THBNA made only five small loans to businesses during the evaluation period. This volume was too low to allow for a meaningful analysis, and this had a neutral effect on the Lending Test performance in Washington.

Home Mortgage Loans

THBNA's geographic distribution of home mortgage loans in the King AA is adequate. Refer to Tables 2, 3, 4, and 5 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.

THBNA's geographic distribution is good for home purchase loans; and very poor for home refinance loans. The volume of home improvement loans was too low to allow for a meaningful analysis, and this had a neutral effect on the Lending Test performance in Washington.

Home Purchase

The geographic distribution of home purchase loans is good. The percentage of home purchase loans made in low-income geographies exceeds, and in moderate-income geographies is somewhat below, the percentage of owner-occupied units in those geographies. The market share for home purchase loans made to both low- and moderate-

income geographies is substantially below the overall market share for home purchase loans; however, the market share distribution is so low that a meaningful analysis of this comparator is not meaningful. The conclusion for the geographic distribution of home purchase loans is based primarily on the comparison to the percentage of owner-occupied units.

Home Improvement

THBNA made only two home improvement loans during the evaluation period within the King AA.

Home Refinance

The geographic distribution of home refinance loans is very poor. THBNA made 25 home refinance loans in the King AA and none of these were made in low- or moderate income geographies. The percentage of home refinance loans made in low- and moderate-income geographies is substantially below the percentage of owner-occupied units. The market share for home refinance loans made in low- and moderate-income geographies is substantially below the overall market share for home refinance loans.

Multi-Family

THBNA made no multi-family loans within the King AA during the evaluation period. This had a neutral effect on the Lending Test performance in Washington.

Small Loans to Businesses

Refer to Table 6 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.

THBNA made only five small loans to businesses during the evaluation period within the King AA. This had a limited effect on the Lending Test performance in Washington.

Lending Gap Analysis

Reports detailing THBNA's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified in the King AA.

Distribution of Loans by Income Level of the Borrower

THBNA's overall borrower distribution of HMDA loans is adequate. The volume of home improvement loans and small loans to businesses was too low to allow for a meaningful analysis and this had a neutral effect on the Lending Test performance in Washington.

Home Mortgage Loans

THBNA's distribution of home mortgage loans among borrowers of different income levels in the King AA is adequate. Refer to Tables 8, 9 and 10 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.

THBNA's borrower distribution is good for home purchase loans, and very poor for home refinance loans, considering the significant barriers that exist in the King AA with nearly eight percent of the families living below the poverty level. The volume of home improvement loans was too low to allow for a meaningful analysis.

Home Purchase

The borrower distribution of home purchase loans is good considering the barriers that exist for low-income borrowers in obtaining mortgage loans. The percentage of home purchase loans made to low-income borrowers is below, and to moderate-income borrowers is equal to, the percentage of families defined as such. The market share for home purchase loans made to low-income borrowers exceeds, and to moderate-income borrowers is substantially below, the overall market share for home purchase loans. It should be noted that nearly eight percent of the households in the AA lived below the poverty level.

Home Improvement

THBNA made only two home improvement loans within the King AA during the evaluation period. This had a neutral effect on the Lending Test performance in Washington.

Home Refinance

The borrower distribution of home refinance loans is very poor even after considering the barriers that exist for low-income borrowers in obtaining mortgage loans. The percentage of home refinance loans made to low-income borrowers is substantially below, and to moderate-income borrowers is significantly below, the percentage of families defined as such. The market share for home refinance loans made to both low- and moderate-income borrowers is substantially below the overall market share for home refinance loans. It should be noted that nearly eight percent of the households in the AA lived below the poverty level.

Small Loans to Businesses

THBNA made only five small loans to businesses during the evaluation period within the King AA. This had a limited effect on the Lending Test performance in Washington. Refer to Table 11 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.

Community Development Lending

Community development lending had a positive impact on the conclusions for the King AA. Refer to Table 1 Lending Volume in the state of Washington section of appendix D for the facts and data used to evaluate the bank's level of community development lending.

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 the pro rata share of deposits as a means of comparative analysis.

THBNA had an excellent level of community development lending in the King AA, given the community development needs and opportunities that exist in the AA. During the evaluation period for community development loans, the bank made one community development loan totaling \$250 thousand, representing nearly 38 percent of the allocated Tier One capital. This loan addressed a need for affordable housing.

Product Innovation and Flexibility

THBNA makes limited use of innovative or flexible lending programs and this had a neutral impact on the lending test.

INVESTMENT TEST

The bank's performance under the Investment Test in Washington is rated outstanding. Based on our full-scope review, the bank's performance in the King AA is excellent. Refer to Table 14 in the state of Washington section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier One capital to each AA based on the pro rata share of deposits as a means of comparative analysis.

THBNA has an excellent level of qualified investments in the King AA, given the credit needs and opportunities that exist in the AA. During the evaluation period for qualified investments, the bank made 10 investments totaling \$2.1 million. In addition, we considered the ongoing effects of investments made in prior periods. These prior period investments that continued to be outstanding at the start of this evaluation totaled \$1.8 million. In total, the \$3.9 million in qualified investments represented nearly 600 percent of the allocated Tier One capital. The bank's qualified investments address needs for affordable housing, and community development services.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

THBNA's performance under the Service Test in Washington is rated high satisfactory.

Retail Banking Services

The bank's systems for delivering retail banking services in the state of Washington are accessible to geographies and individuals of different income levels. Refer to Table 15 in the state of Washington section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system.

The bank has reasonable accessibility of its service delivery systems in the King AA. Its office is located in a moderate-income geography in downtown Seattle. This office has no cash tellers, but does provide lending, deposit opening, and wealth management services.

Alternative Delivery Systems

The bank offers various alternative systems for delivering retail banking services, including telephone banking, computer banking, direct deposit, and bank by mail. Because no data were available concerning the effectiveness of these systems to low- and moderate-income geographies and individuals, we did not place significant weight on these systems in the overall service test conclusions.

Community Development Services

THBNA's performance in providing community development services in the King AA is good, especially considering the bank's limited resources and staffing levels. Bank management invests numerous hours in community development programs targeted to low- and moderate-income individuals and geographies within THBNA's AAs. These services focus primarily on providing home homebuyer seminars and financial education.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 1/1/06 to 12/31/08 Investments, Services and CD Loans: 7/1/06 to 6/30/09	
Financial Institution	Products Reviewed	
The Harris Bank National Association (THBNA) Scottsdale, Arizona	HMDA reported loans; CRA reported loans; community development loans; investments; and, community development services.	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
State of Arizona Phoenix-Mesa-Scottsdale, MSA #38060	Full-Scope	Includes only Maricopa County.
Tucson, MSA #46060	Limited-Scope	
State of Florida Naples-Marco Island, MSA #34940	Full-Scope	
Bradenton-Sarasota-Venice, MSA #14600	Limited-Scope	
Sebastian-Vero Beach, MSA #42680	Limited-Scope	
West Palm Beach-Boca Raton-Boynton Beach, MSA #48424	Limited-Scope	
State of Washington Seattle-Bellevue-Everett, MSA #42644	Full-Scope	Includes only King County.

Appendix B: Summary of State Ratings

RATINGS The Harris Bank National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
The Harris Bank National Association	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State:				
State of Arizona	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Florida	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State of Washington	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory

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

Appendix C: Market Profiles for Full-Scope Areas

State of Arizona Full-Scope Areas

Phoenix-Mesa-Scottsdale, AZ MSA (38060)

Demographic Information for Full-Scope Area: Phoenix-Mesa-Scottsdale, AZ MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	663	6.03	27.30	34.69	31.37	0.60
Population by Geography	3,072,149	4.88	28.69	36.78	29.64	0.01
Owner-Occupied Housing by Geography	764,563	1.53	21.47	40.34	36.66	0.00
Businesses by Geography	288,570	5.03	22.49	32.04	40.38	0.06
Farms by Geography	4,989	2.89	20.14	36.72	40.21	0.04
Family Distribution by Income Level	768,800	19.09	18.51	21.75	40.65	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	289,057	7.44	41.75	36.25	14.56	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below the Poverty Level	= \$51,172 = \$64,200 = 9.65%		Median Housing Value Unemployment Rate (June 2009)	= \$130,648 = 8.2%		

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

Source: 2000 U.S. Census, and 2008 HUD updated MFI.

The Maricopa AA comprises only one of the two counties that comprise the Phoenix-Mesa-Scottsdale, AZ MSA. Included is Maricopa County, while Pima County is excluded. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

As of June 30, 2009, THBNA had \$363 million in deposits (market share of 0.62 percent) and ranked as the 16th largest deposit taking financial institution of the 78 financial institutions in the AA. HNA has four banking offices in this AA and two ATMs. Primary competitors are JP Morgan Chase Bank N.A., Bank of America N.A. and Wells Fargo Bank N.A. with a combined market share of over 65 percent.

The state of Arizona and the Maricopa AA are in a recession and has been deeply affected by current economic events. The unemployment rate has risen in the Maricopa AA from 3.9 percent in June 2006 to 8.2 percent as of June 2009 which is less than the unemployment rates for the state of Arizona (8.7 percent) and the national rate (9.5 percent).

We conducted four community contacts and determined the primary credit needs are for: affordable housing, small loans to small businesses, economic development, and community development services.

State of Florida Full-Scope Areas

Naples-Marco Island, FL MSA (34940)

Demographic Information for Full-Scope Area: Naples-Marco Island, FL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	52	7.69	17.31	44.23	30.77	0.00
Population by Geography	251,377	7.48	18.77	45.24	28.51	0.00
Owner-Occupied Housing by Geography	77,829	2.30	13.08	47.98	36.65	0.00
Businesses by Geography	43,217	1.65	11.25	44.56	42.54	0.00
Farms by Geography	1,070	4.39	21.40	50.93	23.27	0.00
Family Distribution by Income Level	71,823	19.06	19.32	20.65	40.97	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	27,566	11.06	23.57	46.02	19.35	0.00
Median Family Income = \$54,531 HUD Adjusted Median Family Income for 2008 = \$69,200 Households Below the Poverty Level = 7.85%			Median Housing Value = \$191,305 Unemployment Rate = 11.4%			

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 U.S. Census, and 2008 HUD updated MFI.

The Naples AA comprises all of the Naples-Marco Island, FL MSA. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

The state of Florida and the Naples-Marco Island, FL MSA currently is in a recession. The unemployment rate has risen from 2.9 percent in June 2006 to 11.4 percent as of June 2009 which exceeds the unemployment rates for the state of Florida (10.7 percent) and the national rate (9.5 percent).

We conducted four community contacts in the Naples AA and determined that the credit needs in the community are for affordable housing, economic development, community development services, and small loans to small businesses.

State of Washington Full Scope Areas

Seattle-Bellevue-Everest, WA MD (42644)

Demographic Information for Full-Scope Area: Seattle-Bellevue-Everest, WA MD						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	373	2.41	19.84	50.94	26.81	0.00
Population by Geography	1,737,034	2.10	20.65	50.92	26.33	0.00
Owner-Occupied Housing by Geography	425,451	0.53	14.33	53.54	31.60	0.00
Businesses by Geography	167,505	2.80	23.39	44.54	29.27	0.00
Farms by Geography	3,122	1.35	16.40	54.55	27.71	0.00
Family Distribution by Income Level	423,511	18.27	18.00	23.46	40.27	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	153,599	2.76	30.00	51.46	15.78	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below the Poverty Level	= \$63,951 = \$81,400 =8%				Median Housing Value = \$241,750 Unemployment Rate = 9.3%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2008 HUD updated MFI.

The King AA is comprised of only King County. Not included in the AA is Snohomish County. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies.

The King AA is currently in a recession. The high unemployment rate, high housing and business costs will continue to impact the area for some time.

The unemployment rate has risen in the AA from 4.6 percent in June 2006 to 9.3 percent as of June 2009 which is fairly similar to the unemployment rates for the state of Washington (9.2 percent) and the national rate (9.5 percent).

We conducted two community contacts in the Seattle-Bellevue-Everest, WA MD and learned that the credit needs of the community are for small loans to businesses, economic development, affordable housing, and community development services.

Appendix D: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multi-family Loans** - Compares the percentage distribution of the number of multi-family loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage

distribution of multi-family housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and

purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

Tables of Performance Data

State of Arizona	D-5
State of Florida	D-17
State of Washington	D-29

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF ARIZONA						Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Maricopa AA	84.98	645	266,861	262	62,721	0	0	32	3,955	939	333,537	93.96
Limited Review:												
Tucson AA	15.02	145	37,227	19	6,448	0	0	2	1,403	166	45,078	6.04

* Loan Data as of December 31, 2008. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is July 1, 2006 to June 30, 2009.

*** Deposit Data as of June 30, 2009. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF ARIZONA								Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% Owner Occ ^{***} Units	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Maricopa AA	386	78.62	1.53	0.78	21.47	12.69	40.34	23.58	36.66	62.95	0.20	0.00	0.20	0.07	0.35
Limited Review:															
Tucson AA	105	21.38	2.25	1.90	24.74	25.71	36.40	15.24	36.61	57.14	0.14	0.32	0.24	0.10	0.13

^{*} Based on 2008 Peer Mortgage Data: Western Region.

^{**} 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 housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF ARIZONA								Evaluation Period: January 1, 2006 to December 31, 2008					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Maricopa AA	6	85.71	1.53	0.00	21.47	16.67	40.34	50.00	36.66	33.33	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Tucson AA	1	14.29	2.25	0.00	24.74	0.00	36.40	0.00	36.61	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data: Western Region.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF ARIZONA								Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Maricopa AA	253	86.64	1.53	2.37	21.47	17.39	40.34	18.18	36.66	62.06	0.12	0.00	0.07	0.04	0.21
Limited Review:															
Tucson AA	39	13.36	2.25	0.00	24.74	10.26	36.40	15.38	36.61	74.36	0.06	0.00	0.03	0.02	0.10

* Based on 2008 Peer Mortgage Data: Western Region.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: STATE OF ARIZONA						Evaluation Period: January 1, 2006 TO December 31, 2008						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Maricopa AA	0	0.00	6.97	0.00	40.88	0.00	36.33	0.00	15.82	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Tucson AA	0	0.00	5.05	0.00	38.28	0.00	38.41	0.00	18.26	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data: Western Region.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: STATE OF ARIZONA				Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Maricopa AA	262	93.24	5.03	2.67	22.49	29.39	32.04	20.23	40.38	47.71	0.04	0.03	0.08	0.03	0.04					
Limited Review:																				
Tucson AA	19	6.76	4.10	0.00	30.30	15.79	34.20	26.32	31.39	57.89	0.01	0.00	0.00	0.02	0.02					

* Based on 2008 Peer Small Business Data: US.

** 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 (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF ARIZONA								Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Maricopa AA	386	78.62	19.09	4.04	18.51	11.80	21.75	6.52	40.65	77.64	0.23	0.13	0.11	0.03	0.43
Limited Review:															
Tucson AA	105	21.38	20.12	6.32	18.51	33.68	21.13	6.32	40.24	53.68	0.17	0.47	0.30	0.05	0.17

* Based on 2008 Peer Mortgage Data: Western Region.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 5.1% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: STATE OF ARIZONA								Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK ****	% Families ***	% BANK ****	% Families ***	% BANK ****	% Families ***	% BANK ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Maricopa AA	6	85.71	19.09	20.00	18.51	40.00	21.75	0.00	40.65	40.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Tucson AA	1	14.29	20.12	0.00	18.51	0.00	21.13	100.00	40.24	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data: Western Region.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 4.3% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF ARIZONA								Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Maricopa AA	253	86.64	19.09	7.62	18.51	12.56	21.75	10.76	40.65	69.06	0.15	0.11	0.06	0.02	0.25
Limited Review:															
Tucson AA	39	13.36	20.12	0.00	18.51	13.89	21.13	5.56	40.24	80.56	0.07	0.00	0.00	0.03	0.12

* Based on 2008 Peer Mortgage Data: Western Region.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 11.3 of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: STATE OF ARIZONA			Evaluation Period: January 1, 2006 TO December 31, 2008	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Maricopa AA	262	93.24	61.73	49.62	39.31	31.30	29.39	0.04	0.08
Limited Review:									
Tucson AA	19	6.76	64.08	57.89	15.79	47.37	36.84	0.01	0.02

* Based on 2008 Peer Small Business Data: US.

** 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 - 2008).

**** 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 7.12% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF ARIZONA				Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
Full Review:										
Maricopa AA	7	2,094	65	5,351	72	7,445	92.21	0	0	
Limited Review:										
Tucson AA	4	607	17	22	21	629	7.79	0	0	

* 'Prior Period Investments' means investments made in a previous evaluation 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: STATE OF ARIZONA																	
Evaluation Period: January 1, 2006 TO December 31, 2008																	
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:																	
Maricopa AA	93.96	4	80.00	0	25	25	50	0	2	0	-1	0	-1	4.88	28.69	36.78	29.64
Limited Review:																	
Tucson AA	6.04	1	20.00	0	0	0	100	0	0	0	0	0	0	4.41	33.94	33.03	28.62

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF FLORIDA						Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Naples AA	29.52	123	61,925	6	1,280	0	0	0	0	129	63,205	51.32
Limited Review:												
Sarasota AA	22.20	91	37,519	6	942	0	0	2	2,000	99	40,461	24.64
Vero AA	21.74	87	44,613	7	2,185	0	0	0	0	95	46,798	0.00
West Palm Beach AA	26.54	107	28,737	9	875	0	0	11	1,126	127	30,738	24.04

* Loan Data as of December 31, 2008. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is July 1, 2006 to June 30, 2009.

*** Deposit Data as of June 30, 2009. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: STATE OF FLORIDA								Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Naples AA	92	29.68	2.30	0.00	13.08	15.22	47.98	36.96	36.65	47.83	0.69	0.00	0.70	0.72	0.66
Limited Review:															
Sarasota AA	65	20.97	0.30	6.15	20.46	16.92	54.68	30.77	24.56	46.15	0.29	6.67	0.47	0.20	0.32
Vero AA	64	20.65	0.00	0.00	14.23	3.13	59.44	20.31	26.33	76.56	0.84	0.00	0.00	0.18	2.76
West Pam Beach AA	89	28.71	1.03	6.74	24.36	42.70	36.49	32.58	38.12	17.98	0.16	0.34	0.29	0.16	0.10

* Based on 2008 Peer Mortgage Data: Eastern Region.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF FLORIDA								Evaluation Period: January 1, 2006 to December 31, 2008					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Naples AA	0	0.00	2.3	0.00	13.08	0.00	47.98	0.00	36.65	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Sarasota AA	0	0.00	0.30	0.00	20.46	0.00	54.68	0.00	24.56	0.00	0.00	0.00	0.00	0.00	0.00
Vero AA	0	0.00	0.00	0.00	14.23	0.00	59.44	0.00	26.33	0.00	0.00	0.00	0.00	0.00	0.00
West Pam Beach AA	1	100.0	1.03	0.00	24.36	0.00	36.49	0.00	38.12	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data: Eastern Region.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF FLORIDA								Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Naples AA	31	31.96	2.30	0.00	13.08	0.00	47.98	29.03	36.65	70.97	0.09	0.00	0.00	0.05	0.17
Limited Review:															
Sarasota AA	26	26.80	0.30	3.85	20.46	11.54	54.68	26.92	24.56	57.69	0.16	5.00	0.00	0.14	0.23
Vero AA	23	23.71	0.00	0.00	14.23	0.00	59.44	26.09	26.33	73.91	0.38	0.00	0.00	0.13	1.01
West Palm Beach AA	17	17.53	1.03	11.76	24.36	23.53	36.49	23.53	38.12	41.18	0.02	0.53	0.04	0.00	0.02

* Based on 2008 Peer Mortgage Data: Eastern Region.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: STATE OF FLORIDA								Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Naples AA	0	0.00	2.08	0.00	7.03	0.00	35.11	0.00	55.78	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Sarasota AA	0	0.00	0.53	0.00	20.94	0.00	43.00	0.00	35.54	0.00	0.00	0.00	0.00	0.00	0.00
Vero AA	0	0.00	0.00	0.00	18.93	0.00	45.98	0.00	35.08	0.00	0.00	0.00	0.00	0.00	0.00
West Palm Beach AA	0	0.00	2.32	0.00	32.80	0.00	31.87	0.00	33.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data: Eastern Region.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: STATE OF FLORIDA				Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Naples AA	6	21.43	1.65	0.00	11.25	0.00	44.56	0.00	42.54	100.00	0.01	0.00	0.00	0.00	0.01					
Limited Review:																				
Sarasota AA	6	21.43	0.46	0.00	20.81	50.00	51.31	33.33	27.42	16.67	0.00	0.00	0.02	0.00	0.00					
Vero AA	7	25.00	0.00	0.00	14.06	14.29	57.91	14.29	28.03	71.43	0.02	0.00	0.00	0.00	0.06					
West Palm Beach AA	9	32.14	2.87	0.00	21.12	11.11	34.68	33.33	41.16	55.56	0.00	0.00	0.00	0.00	0.00					

* Based on 2008 Peer Small Business Data: US.

** 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 (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF FLORIDA								Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Naples AA	92	29.68	19.06	19.72	19.32	32.39	20.65	4.23	40.97	43.66	0.82	2.65	2.47	0.25	0.43
Limited Review:															
Sarasota AA	65	20.97	17.71	9.26	19.64	22.22	23.60	9.26	39.06	59.26	0.33	0.49	0.63	0.14	0.31
Vero AA	64	20.65	17.14	2.08	19.47	4.17	22.43	2.08	40.96	91.67	0.97	0.90	0.42	0.00	1.46
West Palm Beach AA	89	28.71	19.13	9.20	18.54	55.17	20.68	17.24	41.64	18.39	0.20	0.32	0.66	0.10	0.09

* Based on 2008 Peer Mortgage Data: Eastern Region.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 16.1% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF FLORIDA						Evaluation Period: January 1, 2006 TO December 31, 2008						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK ****	% Families ***	% BANK ****	% Families ***	% BANK ****	% Families ***	% BANK ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Naples AA	0	0.00	19.06	0.00	19.32	0.00	20.65	0.00	40.97	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Sarasota AA	0	0.00	17.71	0.00	19.64	0.00	23.60	0.00	39.06	0.00	0.00	0.00	0.00	0.00	0.00
Vero AA	0	0.00	17.14	0.00	19.47	0.00	22.43	0.00	40.96	0.00	0.00	0.00	0.00	0.00	0.00
West Pam Beach AA	1	100.00	19.13	0.00	18.54	0.00	20.68	0.00	41.64	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data: Eastern Region.

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF FLORIDA						Evaluation Period: January 1, 2006 TO December 31, 2008						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Naples AA	31	31.96	19.06	4.76	19.32	9.52	20.65	14.29	40.97	71.43	0.12	0.00	0.00	0.15	0.16
Limited Review:															
Sarasota AA	26	26.80	17.71	12.50	19.64	0.00	23.60	16.67	39.06	70.83	0.20	0.75	0.00	0.19	0.21
Vero AA	23	23.71	17.14	0.00	19.47	0.00	22.43	13.33	40.96	86.67	0.47	0.00	0.00	0.00	0.96
West Palm Beach AA	17	17.53	19.13	6.67	18.54	13.33	20.68	20.00	41.64	60.00	0.03	0.16	0.00	0.04	0.02

* Based on 2008 Peer Mortgage Data: Eastern Region.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 22.7% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: STATE OF FLORIDA			Evaluation Period: January 1, 2006 TO December 31, 2008	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Naples AA	6	21.43	64.91	83.33	83.33	0.00	16.67	0.01	0.02
Limited Review:									
Sarasota AA	6	21.43	64.70	33.33	66.67	0.00	33.33	0.00	0.00
Vero AA	7	25.00	65.71	57.14	28.57	71.43	0.00	0.02	0.06
West Pam Beach AA	9	32.14	65.32	77.78	66.67	33.33	0.00	0.00	0.01

* Based on 2008 Peer Small Business Data: US.

** 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 - 2008).

**** 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 3.57% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF FLORIDA				Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
Full Review:										
Naples AA	6	2,142	14	12	20	2,154	20.04	0	0	
Limited Review:										
Sarasota AA	7	2,633	24	2,220	31	4,853	45.15	0	0	
Vero AA	4	1,123	11	9	15	1,132	10.53	0	0	
West Palm Beach AA	4	404	39	2,206	43	2,610	24.28	0	0	

* 'Prior Period Investments' means investments made in a previous evaluation 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: STATE OF FLORIDA																		
Evaluation Period: January 1, 2006 TO December 31, 2008																		
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:																		
Naples AA	51.32	1	33.33	0	0	0	100	0	0	0	0	0	0	0	3.96	18.21	55.36	22.47
Limited Review:																		
Sarasota AA	24.64	1	33.33	0	100	0	0	0	0	0	0	0	0	0.67	25.18	52.01	22.14	
Vero AA	0.00	0	0.00	0	0	0	0	0	1	0	0	0	-1	0.00	17.80	58.63	23.57	
West Palm Beach AA	24.04	1	33.33	0	0	100	0	0	0	0	0	0	0	2.71	28.98	34.62	33.57	

Table 1. Lending Volume

LENDING VOLUME		Geography: STATE OF WASHINGTON						Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
King AA	100.00	112	66,158	5	5,641	0	0	1	250	119	72,049	100.00

* Loan Data as of December 31, 2008. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is July 1, 2006 to June 30, 2009.

*** Deposit Data as of June 30, 2009. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: STATE OF WASHINGTON						Evaluation Period: January 1, 2006 TO December 31, 2008						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% Owner Occ ^{***} Units	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
King AA	85	100.00	0.53	3.53	14.33	12.94	53.54	37.65	31.60	45.88	0.05	0.00	0.00	0.04	0.10

^{*} Based on 2008 Peer Mortgage Data: Western Region.

^{**} 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 housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: STATE OF WASHINGTON								Evaluation Period: January 1, 2006 to December 31, 2008					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
King AA	2	100.00	0.53	0.00	14.33	0.00	53.54	50.00	31.60	50.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data: Western Region.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: STATE OF WASHINGTON						Evaluation Period: January 1, 2006 TO December 31, 2008						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
King AA	25	100.00	0.53	0.00	14.33	0.00	53.54	36.00	31.60	64.00	0.03	0.00	0.00	0.02	0.06

* Based on 2008 Peer Mortgage Data: Western Region.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: STATE OF WASHINGTON						Evaluation Period: January 1, 2006 TO December 31, 2008						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
King AA	0	0.00	3.67	0.00	33.73	0.00	44.41	0.00	18.19	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data: Western Region.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: STATE OF WASHINGTON					Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
King AA	5	100.00	2.80	0	23.39	0.00	44.54	0.00	29.27	0.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2008 Peer Small Business Data: US.

** 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 (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: STATE OF WASHINGTON								Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
King AA	85	100.00	18.27	11.94	18.00	17.91	23.46	7.46	40.27	62.69	0.06	0.09	0.00	0.03	0.10

* Based on 2008 Peer Mortgage Data: Western Region.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 5.1% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: STATE OF WASHINGTON						Evaluation Period: January 1, 2006 TO December 31, 2008						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK ****	% Families ***	% BANK ****	% Families ***	% BANK ****	% Families ***	% BANK ****	Over all	Low	Mod	Mid	Upp
Full Review:															
King AA	2	100.00	18.27	0.00	18.00	0.00	23.46	0.00	40.27	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data: Western Region.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 4.3% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: STATE OF WASHINGTON								Evaluation Period: January 1, 2006 TO December 31, 2008					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
King AA	25	100.00	18.27	0.00	18.00	4.17	23.46	12.50	40.27	83.33	0.03	0.00	0.00	0.02	0.06

* Based on 2008 Peer Mortgage Data: Western Region.

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

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

**** As a percentage of loans with borrower income information available. No information was available for 11.3 of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: STATE OF WASHINGTON			Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
King AA	5	100.00	68.87	60.00	40.00	60.00	0.00	0.00	0.00

* Based on 2008 Peer Small Business Data: US.

** 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 - 2008).

**** 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 7.12% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: STATE OF WASHINGTON				Evaluation Period: January 1, 2006 TO December 31, 2008				
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
Full Review:										
King AA	5	1,762	10	2,094	15	3,856	100.00	0	0	

* 'Prior Period Investments' means investments made in a previous evaluation 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: STATE OF WASHINGTON																		
Evaluation Period: January 1, 2006 TO December 31, 2008																		
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:																		
King AA	100.00	1	100.00	0	100	0	0	0	0	0	0	0	0	0	2.10	20.65	50.92	26.33