

Comptroller of the Currency Administrator of National Banks

Washington, DC 20219

## PUBLIC DISCLOSURE

September 22, 2008

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

MetroBank, National Association Charter Number: 21017

9600 Bellaire Boulevard, Suite 252 Houston, TX 77036

Office of the Comptroller of the Currency

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

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## **Overall CRA Rating**

Institution's CRA Rating: This institution is rated Outstanding.

The following table indicates the performance level of MetroBank, National Association (Metro) with respect to the Lending, Investment, and Service Tests:

Performance Levels	MetroBank, National Association Performance Tests								
	Lending Test*	Investment Test	Service Test						
Outstanding	Х		Х						
High Satisfactory		Х							
Low Satisfactory									
Needs to Improve									
Substantial Noncompliance									

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

The major factors that support this rating include:

- The geographic distribution of small loans to businesses and consumer loans was excellent overall and exceeds the characteristics of the assessment areas (AAs).
- Metro officers originated a significant number and dollar amount of community development loans during the evaluation period. This had a positive impact on the Lending Test rating.
- The borrower distribution of consumer loans was excellent and exceeds the characteristics of the AAs.
- Delivery systems are easily accessible to small businesses and individuals of different income levels in the AAs. In addition, community development services support Metro's other community development efforts and address community needs.
- Metro has a good level of qualified community development investments considering its resources and capacity.

## **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 metropolitan area (MA)/assessment area.

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

**Community Development:** Affordable housing (including multifamily rental housing) for lowor 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 C.F.R. Part 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 non-metropolitan 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 the 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, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for pre-approval 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% tabulations, the count of households always equals the count of occupied housing units.

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

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

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

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

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

**Metropolitan Division:** 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% and less than 120% of the area median income, or a median family income that is at least 80% and less than 120%, in the case of a geography.

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

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

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

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

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

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

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

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

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

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

## **Description of Institution**

MetroBank, National Association is wholly owned by MetroCorp Bancshares, a bank holding company organized in 1998. Metro is a full-service community bank headquartered in Houston, Texas at 9600 Bellaire Boulevard. It has 13 locations: seven in Houston in Harris County, Texas; two in Sugar Land in Fort Bend County, Texas; one each in Dallas, Texas; Richardson in Dallas County, Texas; Garland in Dallas County, Texas; and Plano in Collin County, Texas. In an effort to improve efficiency, Metro closed its Houston area Clear Lake branch in 2007. In June 2008, Metro opened a branch in Garland, Texas.

On October 5, 2005, MetroCorp Bancshares acquired Metro United Bank (formerly known as First United Bank) with locations in San Diego and Los Angeles, California. Metro United provides services to various businesses, professionals, and individuals with diversified cultural backgrounds and focuses its lending activities primarily on commercial real estate. During 2006, Metro United added four new locations as it acquired a branch in Irvine, opened Ioan production offices in San Mateo and San Francisco, and established an executive office in the City of Industry, California.

During the fourth quarter 2006, the bank opened and commenced operations of a representative office in Xiamen, China. In late March 2008, a second representative office in Chongqing, China was opened. The opening of these offices is part of the bank's strategy of building an international banking network.

As of June 30, 2008, Metro had assets of \$1.1 billion and a Tier One Leverage Capital ratio of 8.95%. There are no legal or financial factors that impede the bank's ability to help meet the credit needs of the assessment area. The bank received an "Outstanding" rating at the prior examination, dated June 27, 2005. The quarterly loan-to-deposit ratio has averaged 84% since the last examination, and it was 100% on June 30, 2008. Net loans and leases represented 81% of total assets. The loan portfolio consisted of 86% real estate loans, 13% commercial loans, and 1% consumer loans. The real estate loan portfolio consisted of 63% commercial loans, 34% construction and development loans, and 3% one-to-four family and multifamily residential loans.

Metro has two assessment areas (AAs). The Houston AA includes the two counties of Harris and Fort Bend. Harris County has 649 census tracts (CTs), and Fort Bend County has 58 CTs. The Dallas AA includes the two counties of Dallas and Collin. Dallas County has 487 CTs, and Collin County has 85 CTs. As of June 30, 2007, approximately 86% of Metro's rated area deposits were in the Houston AA and 14% were in the Dallas AA. Similarly, approximately 83% of the loans were in the Houston AA, and 17% were in the Dallas AA.

The bank's deposit market share rank in the Houston AA is twenty-first with less than a 1% market share among 114 competing institutions. The banking and financial service industry is highly competitive with commercial banks, savings and loan associations, credit unions, finance companies, and brokerage and investment banking firms in the AA. The five largest competitors in this market include: JPMorgan Chase Bank, Bank of America, National Association (N.A.), Wells Fargo Bank, N.A., Amegy Bank, N.A., and the former Washington Mutual, Federal Savings Bank (FSB).

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Metro's primary lending focus is lending to small- and medium-size businesses. The principal lines of business are commercial and industrial loans, commercial real estate mortgage loans, construction loans, government guaranteed small business lending, trade finance, residential mortgage brokerage and lending, and retail banking. Although a large percentage of the customer base is from Asian and Hispanic communities, Metro has a wide and diverse customer base. The employee base is diverse as well. Bank employees speak numerous languages, and Metro offers services in English, Mandarin, Taiwanese, Korean, Vietnamese, Spanish, and Pakistani.

## Scope of the Evaluation

#### **Evaluation Period/Products Evaluated**

This Performance Evaluation assesses Metro's performance under the Lending, Investment, and Service Tests. In evaluating the lending performance, we reviewed small loans to businesses, residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), and consumer loans. The evaluation period for the Lending Test for small loans to businesses, home mortgage loans, and consumer loans was January 1, 2005 through December 31, 2007. For community development (CD) loans and the Investment and Service Tests, the evaluation period was from June 27, 2005 through September 22, 2008. The Investment Test included a review of investments, donations, and grants originated in the AAs that met the definition of community development investments. The Service Test included a review of retail and community development services provided in the AAs.

The demographic comparators used in the tables in Appendix C for home mortgage products are from 2000 U. S. Census Bureau and U. S. Department of Housing and Urban Development information. The small loans to businesses tables in Appendix C used demographic comparators from 2007 Dunn and Bradstreet data.

Small loans to farms are not a lending product of the bank, and none were originated during the evaluation period.

### **Data Integrity**

Prior to this CRA examination, OCC personnel verified the accuracy of data available to the public in accordance with the HMDA and the CRA regulation. This public data included HMDA-reportable lending and small loans to businesses. In addition, senior management submitted non-public consumer loan information for our review. We reviewed 100% of the HMDA-reportable applications. Our review of the bank's HMDA data revealed errors for some loans in reporting census tracts, rate spreads, and owner occupancy. Management corrected all errors, and resubmitted the data before the start of this CRA examination. We also reviewed a statistically valid sample of 60 loans from the reported CRA data during the three year review period. For CRA data, management had not reported correct gross revenue amounts for some of its small business customers. A complete scrub of all small business data was performed. Management corrected all errors, and resubmitted the data before the start of this examination. We did not find any errors in the consumer loan data.

Based on the verification work and data resubmission performed, we considered lending data to be accurate.

#### Selection of Areas for Full-Scope Review

The Houston AA was selected for a full-scope review because most of the bank's loans and deposits are in the Houston AA. In addition, the Houston AA has the largest number of branches, and the bank has a long history of serving this market. Nine of the 13 branches are

located in the Houston AA. We completed a limited-scope review in the Dallas AA. Please refer to the tables in Appendix A for additional information about the bank's lending.

## Ratings

The bank's overall rating was based primarily on the Houston AA that received a full-scope review. For the Lending Test, small loans to businesses were assigned the greatest weight since they were the bank's primary loan product. Consumer lending had the second highest weight in the overall rating. Bank management requested a review of consumer lending products due to the number of consumer loans being significant, especially in low- and moderate-income CTs.

The Houston AA has 64 low-income CTs and 227 moderate-income CTs. As discussed elsewhere, the dispersion levels for consumer loans in the low- and moderate-income CTs and distribution to low- and moderate-income borrowers exceeds the demographic comparators. Home mortgage lending was assigned the least amount of weight. The number of home-related loans originated was low compared to the number of small loans to businesses and consumer loans originated. HMDA reportable loans represent only 1.37% by dollar amount of all reported loans in the Houston AA. The lending rating was supported by a significant number and dollar amount of community development loans.

### Other

An OCC Community Affairs Officer conferred with three community contacts from local organizations during this examination:

- A Chamber of Commerce leader indicated limited credit availability for funds to repair homes and businesses after Hurricane Ike. The contact also stated that small business loans were difficult to obtain.
- The Director for a Small Business Development Center (SBDC) discussed Hurricane lke's effect on small businesses, specifically slow payments, business closings, and employee layoffs. The Director felt small banks were slightly more aggressive in making small business loans. This organization provides business consulting and training seminars for small- and medium-size business owners and managers.
- A third community contact discussed the presence of alternative service providers in the areas the agency serves and estimated that only 30% to 40% of the agency's clients participate in mainstream financial systems. This contact stated the two greatest needs were reliable transportation and affordable credit. The agency provides family services in Harris County and three adjacent counties.

Small business lending is a major focus of Metro's lending strategy. Also, Metro has originated a significant number of consumer loans.

## 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.

## **Conclusions with Respect to Performance Tests**

## LENDING TEST

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

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

### Lending Activity

Refer to Tables 1 Lending Volume and 1 Other Products in Appendix C for the facts and data used to evaluate the bank's lending activity.

Metro's lending activity demonstrated excellent responsiveness to the credit needs of its AA considering its size, resources, and primary focus on commercial lending.

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

The geographic distribution of loans by income level of the geography is excellent.

#### Home Mortgage Loans

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

#### Home Purchase

The geographic distribution of home purchase loans is excellent. In the 2005 through 2007 evaluation period, the percentage of home purchase loans in low-income geographies exceeds the percent of owner-occupied housing units. The percentage of home purchase loans in moderate-income geographies exceeds the percentage of owner-occupied housing units. The bank does not have a notable market share for home purchase loans in the AA.

#### Home Improvement

The geographic distribution of home improvement loans is excellent. In 2005 through 2007, the percentage of home improvement loans in low-income geographies exceeds the percentage of owner-occupied housing units. The percentage of home improvement loans in moderate-income geographies exceeds the percentage of owner-occupied housing units. The bank's market share in low- and moderate-income geographies exceeds its overall market share for home improvement loans.

#### Home Refinancing

The geographic distribution of home refinance loans is good. In 2005 through 2007, the bank did not make any home refinance loans to persons residing in low-income geographies. The percentage of home refinance loans in moderate-income geographies exceeds the percentage

of owner-occupied housing units. The bank does not have a notable market share for home refinance loans in the AA.

#### **Multifamily**

The geographic distribution of multifamily loans is excellent. Metro originated five multifamily loans in the Houston AA for the period from January 1, 2005 through December 31, 2007. The percentage of multifamily loans in low- and moderate-income tracts exceeds the number of multifamily units in these tracts. The bank's market share in low-income geographies exceeds its overall market share for multifamily housing units.

#### Small Loans to Businesses

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

Metro's geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses located in these tracts. The percentage of small loans to businesses in moderate-income geographies exceeds the percentage of businesses located in these tracts. The bank's market share for low- and moderate-income tracts exceeds its overall market share for small loans to businesses. Small business loans represent 96% of the total reported loan volume by number and 93% of the dollar volume in the Houston AA. Therefore, more weight is given to small business lending in the final Lending Test rating.

### Small Loans to Farms

Metro did not have any small loans to farms during the review period.

### **Consumer Loans**

Refer to Table 13 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans is excellent. During the 2005 through 2007 evaluation period, the percentage of consumer loans in low-income geographies exceeds the percentage of households. The percentage of consumer loans in moderate-income geographies exceeds the percentage of households.

### Lending Gap Analysis

A lending gap analysis was conducted for this evaluation period. There were no unexplained conspicuous gaps identified. The bank designated all of Harris and Fort Bend Counties as their AA during this review period. This AA contains census tracts of all income levels. The bank has good to excellent penetration in low- and moderate-income census tracts for home purchase, home refinance and small business loans. Also, the bank has excellent penetration for consumer loans in low- and moderate-income tracts.

#### Inside/Outside Ratio

Overall, the majority of all loans originated during this evaluation period were originated in the Houston and Dallas AAs, with 88% of all loans by number and 82% of all loans by dollar amount.

For the 2005 through 2007 evaluation period, HMDA loans originated in the bank's combined AAs were approximately 71% of the number and 59% of the dollar amount. A substantial majority of small loans to businesses were originated in the combined AAs, with approximately 86% of the number and 83% of the dollar amount. A substantial majority of consumer loans were originated in the combined AAs, with 93% of the number and 91% of the dollar amount.

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

The distribution of loans by income level of the borrower is good.

#### Home Mortgage Loans

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

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. The percentage of total households living below poverty level in the Houston AA based on the 2000 census data is 13%. The median housing value based on the 2000 census data is approximately \$102 thousand. It would be very difficult for persons living below the poverty level to afford a house in this price range.

Home mortgage loans are offered at the bank, but not as a primary product. Metro only had 13 home mortgage loans in the Houston AA during this evaluation period. Home mortgage loans account for only 1% of the reported loans by the institution. Therefore, very little weight was given to this product in the final rating.

#### Home Purchase

Metro has performance that is below satisfactory for addressing the low- and moderate-income borrower credit needs for home purchase loans. During the 2005 through 2007 evaluation period, Metro did not originate any home purchase loans to low- or moderate-income borrowers. The bank does not have notable market share for home purchase loans in the AA.

#### Home Improvement

Metro has excellent performance for addressing low- and moderate-income borrower credit needs for home improvement loans. During the evaluation period 2005 through 2007, the percentage of home improvement loans to low-income borrowers exceeds the percentage of low-income families in the AA. The percentage of home improvement loans to moderateincome borrowers exceeds the percentage of moderate-income families in the AA. The market share of home improvement loans for low-income and moderate-income borrowers exceeds the bank's overall market share for home improvement loans.

#### Home Refinance

Metro has performance that is less than satisfactory for addressing the low- and moderateincome borrower's credit needs. During the evaluation period 2005 through 2007, Metro did not make any home refinance loans to low- or moderate-income borrowers. The bank does not have notable market share for home refinance loans in the AA.

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

#### Small Loans to Businesses

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

Metro's origination of small loans to businesses with revenues of \$1 million or less is good. During the 2005 through 2007 evaluation period, the percentage of small loans to businesses is near to the percentage of businesses with revenues of \$1 million or less in the AA. The bank's market share to businesses with revenues of \$1 million or less exceeds the bank's overall market share for small loans to businesses, regardless of revenue size.

#### Small Loans to Farms

Metro did not have any small loans to farms during the evaluation period.

#### **Consumer Loans**

Refer to Table 13 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Metro has done an excellent job of addressing the low- and moderate-income borrower credit needs for consumer loans. During the 2005 through 2007 evaluation period, the percentage of consumer loans to low-income borrowers exceeds the percentage of households in the AA. The percentage of consumer loans to moderate-income borrowers exceeds the percentage of households in the AA.

### **Community Development (CD) Lending**

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

During the evaluation period for CD loans beginning with the prior examination dated June 27, 2005 and ending September 22, 2008, Metro originated a significant level of CD loans. The level is excellent, and it enhanced the overall excellent level of lending in the Houston AA.

Metro originated 12 loans for a total of \$31.2 million in the Houston AA that met all aspects of the definition of a CD loan. In the Dallas AA, Metro originated five loans for a total of \$12.5 million. Metro originated another seven loans for a total of \$8 million that were outside the AAs but benefited the greater regional area. We included these loans in our assessment to determine whether Metro was meeting the needs of its AA. These loans helped meet the pressing credit needs of economic development and affordable housing.

One community contact stated that after Hurricane Ike, customers needing home repair and business facility repair loans were not able to get financing and that obtaining small business loans was difficult. Another contact similarly discussed the hurricane's effects on small businesses. A third contact discussed the need for reliable transportation and affordable credit. Metro officers have originated a significant number of loans to small businesses and consumers to help meet these identified credit needs. The following is a sample of the more significant CD loans.

- Metro originated a loan for \$875 thousand to construct a three-story, 60-unit senior housing apartment to a nonprofit organization in Houston, Texas. The project has a combination of additional funding through a loan and grant from the City of Houston. Approximately 73% of 44 units will be designated as affordable housing. Of these 44 units, four units will be restricted to families whose annual income does not exceed 30% of the median income, four units will be restricted to families whose annual income does not exceed 50% of median income, and 36 units will be restricted to families whose annual income does not exceed 60% of median income.
- Metro originated two loans totaling \$14.9 million to construct retail centers that will revitalize and stabilize moderate-income areas in Houston and create permanent jobs in the Houston AA.
- Metro originated a \$2.2 million loan to a newspaper that will create additional permanent jobs in a moderate-income area in Houston.
- Metro originated a total of \$15.3 million in qualified CD loans under the SBA 504 Community Development Corporation program in the Houston AA that were retained in the bank's loan portfolio. Another \$28.4 million was originated, but later funded by the SBA as part of the program.
- Metro originated several loans in the Dallas AA totaling \$10.1 million under the SBA 504 Community Development Corporation that were retained in the bank's loan portfolio.

Most of the loans originated for multifamily affordable housing were not for construction or rehabilitation of these properties. Of the total in both AAs of \$12.4 million, \$1 million was originated for construction or rehabilitation. The remainder was for the purchase or refinance of affordable housing, which supports a significant level of affordable multifamily housing in both AAs.

Although the loans did not meet all aspects of the definition of community development lending, Metro originated several loans to builders who offer newly constructed homes that could be considered affordable. To determine the builder loans in this category, Metro uses a formula based on the Housing Opportunities of Houston's maximum home price that would qualify for a grant. The grant is based on the borrower's income and the assumption any construction loan that is 90% of that qualifying amount is affordable. During the evaluation period, Metro originated a total of \$2.2 million in loans for construction of these affordable homes.

### **Product Innovation and Flexibility**

During the evaluation period, Metro did not originate or participate in any new loan products or introduce any new flexible loan products. However, Metro continued to significantly participate in SBA loan programs and was ranked second in number of loan originations in Houston in 2005, sixteenth in 2006, and twenty-fifth in 2007.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Dallas AA is consistent with the bank's overall "Outstanding" Lending Test rating performance under the Lending Test. Refer to Tables 1 through 13 in Appendix C for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test is rated "High Satisfactory." Based on fullscope reviews, the bank's performance in the Houston AA is good. Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Qualifying investments are investments, deposits, membership shares, or grants that have community development as their primary purpose. Although Metro's qualifying investments were not complex or innovative, all were beneficial to and met identified needs in the counties of: Harris, Fort Bend, Dallas, and Collin County, Texas. The two qualified investments of \$5.7 million are detailed below. Metro had investments in both funds at the prior CRA examination, dated June 27, 2005.

#### Access Capital Strategies Community Investment Fund, Inc. (Fund)

This is a non-diversified closed-end management company operating as a business development company. The Fund invests primarily in private placement debt securities specifically designed to support underlying community development activities targeted to low-and moderate-income individuals such as affordable housing, education, small business lending, and job-creating activities in areas of the United States designed by Fund investors. Investors in the Fund must designate a particular geographic area or region within the United States as part of their agreement to purchase Fund shares. The Fund invests only in areas where Fund shareholders have made targeted designations. Metro had a continuing investment with a value of \$924 thousand in this fund at this examination.

### Community Capital Management - The CRA Qualified Investment Fund

Metro had a continuing investment with a market value of \$4.7 million in this CRA mutual fund that was allocated to both AAs. The level of investment in this fund at the prior examination was \$4.3 million. The allocation to the Houston AA at this examination is \$2.4 million in two affordable housing properties, of which one received low-income housing tax credits. Another \$330 thousand is allocated to the Houston AA for moderate-income home loans. The Dallas AA allocation of \$2.3 million includes two loans totaling \$700 thousand originated to two small businesses located in a moderate-income census tract, a \$1.4 million allocation to an apartment complex in Dallas that has all units set aside for those at or below 60% of the median income, and moderate-income home loans of \$170 thousand.

### **Contributions**

During this evaluation period, Metro originated qualified contributions of \$86 thousand. The majority of these contributions were related to hurricane relief. The largest was a \$50 thousand donation to the American Red Cross for Hurricane Katrina relief. Metro matched every dollar donated by employees, individuals, and organizations up to \$50 thousand through September 30, 2005.

## Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Dallas AA is consistent with the bank's overall "High Satisfactory" performance under the Investment Test. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

## SERVICE TEST

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

The bank's performance under the Service Test is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Houston AA is excellent.

### **Retail Banking Services**

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

We utilized the 2000 Census information to assess the distribution of branch offices. The distribution of branches throughout the AA and accessibility to products and services is excellent. The bank's delivery systems are easily accessible to essentially all geographies and individuals of different income levels in the Houston AA. The branches are particularly accessible to individuals and businesses in low- and moderate-income CTs.

Metro operates nine full-service branches in the Houston AA. Seven branches are located in Harris County, and two are located in Fort Bend County. Five of the nine branches or 56% are located in low- and moderate-income CTs. Approximately 22% of the bank's offices are

located in low-income census tracts, compared to 9% of the population that reside in lowincome CTs in the Houston AA according to 2000 Census information.

Branches in the Houston AA located in moderate-income census tracts represent 33% of the number of branches compared to 42% of the population that reside in moderate-income CTs. All branches are located on primary roadways and are easily accessible from Houston's extensive freeway system. The bank's two branches in Fort Bend County are located in upper-income CTs, however, both branches are on primary roadways and are easily accessible to low- and moderate-income individuals. Two branches in Harris County were closed during the evaluation period for lack of business: one branch in a low-income CT in 2006, and one branch in a middle-income CT in 2007. Despite these closures, the bank still has more than half of its branches in low- and moderate-income CTs, as noted above.

Nine automated teller machines (ATMs) supplement the Houston AA delivery system and are located in the branches. As with the branches, the dispersion of the ATMs represents an excellent distribution across the AA, particularly in low- and moderate-income CTs. All ATMs are available 24-hours a day and seven days a week. ATM services are available in English, Spanish, and Chinese. In addition to branches and ATMs, Metro offers Telebank. This is a telephone inquiry system with options in languages including English, Spanish, Chinese, Korean, and Vietnamese.

Products, services and hours of operation are tailored to the needs of each community. Metro's hours, services, and products do not vary in a way that would pose an inconvenience to any parts of the AA, particularly businesses and individuals in low- and moderate-income CTs. Banking hours are similar throughout the AA. All branches have extended walk-up and/or drive-in hours. Standard lobby hours in seven of the nine branches consist of the following, with the exceptions also noted:

- Monday through Thursday 9:00 AM to 4:00 PM.
- Friday 9:00 AM to 6:00 PM.
- Saturday 9:00 AM to 1:00 PM.
- The Milam Branch has Friday hours of operation ending at 5:30 PM.
- The Boone Branch has hours of 9:00 AM to 6:00 PM Monday through Friday.

A variety of deposit and loan products and business services are available at all Metro branch locations. Several deposit products are responsive to the needs of low- or moderate-income individuals and small businesses. They provide basic low cost banking products throughout the AA thereby increasing financial service access to low- and moderate-income individuals and small businesses.

#### Success Checking

This is a basic checking account, with no minimum opening deposit requirements or service fees assessed on this account. Account holders received unlimited check writing privileges, unlimited ATM usage at all Metro ATM locations, and free 24-hour access to the bank's Telebank service.

#### Senior Citizens Checking

This checking account is reserved for individuals who are 55 years of age or older. There is no minimum opening deposit requirement or monthly service fees assessed on this account. The account features unlimited check writing privileges and free ATM usage at all Metro ATM locations, discounts on checks, free check imaging with the monthly statement, and free access to the bank's Telebank service.

#### Success Business Checking

This is an account for small- to medium-size businesses with limited transactions. The account requires a \$100 opening deposit. Account holders are not assessed the monthly service fee if a daily ledger balance of \$2,500 is maintained. Free check imaging with the monthly statement is available as well as free access to the bank's Telebank service.

#### Matricula Checking

This is a basic checking account, with no minimum deposit or monthly fee, designed for Mexican Nationals. The account provides convenience for low volume activity, with 10 checks free per month and a charge of \$.50 per item in excess of 10 checks.

#### Remote Deposit Capture

During the evaluation period, Metro introduced remote deposit capture as a supplement to its Cash Manager Plus product for business customers. The remote deposit capture product, called "Deposit at Work," provides remote deposit access to over 60 businesses.

#### Other Products

In addition to the above, Metro offers Personal NOW, money market, savings accounts, and certificates of deposits, as well as commercial checking, money market, savings, and certificates of deposit.

#### **Community Development Services**

Metro provided a good level of community development services in the Houston AA, and these services had a positive impact on the Service Test rating.

- Annually, the bank hosts seminars in its Community Center on various topics, including finance, health, immigration, computer technology, and the arts.
- The bank's Chairman attended many community functions representing both the bank's and the City of Houston's diversity.
- In 2005, the bank was awarded the 2004-2005 Silver Sponsor status from the Better Business Bureau (BBB) and the Upper Gulf Coast for supporting the BBB's efforts in promoting business ethics through voluntary self regulation and excellent service.
- In 2006, the bank sponsored the "Salute to Asian American All-Stars" gala for the Chinese Community Center.

- In 2007, Metro sponsored the dinner for the Twelfth Annual Gala of the Asian Chamber of Commerce.
- In 2008, Metro initiated a fund-raising drive for the victims of the earthquake in China's Sichuan Province.

Metro brokered 217 home mortgage loans to secondary market lenders during the Lending Test evaluation period. Of the 217 brokered loans, 186 or 86% were located within the Houston AA. A review of these loans was performed during this evaluation. The review of the brokered loans reflected good penetration in the Houston AA to borrowers residing in low- and moderate-income tracts. The amount of home mortgage loans was near to the amount of owner-occupied units for said tracts in the AA. However, the penetration levels were weaker for low- and moderate-income borrowers.

The review reflected less than satisfactory penetration to low-income borrowers and adequate penetration to moderate-income borrowers. Loans to borrowers in low-income CTs represented 2.99%, compared with 3.53% of owner-occupied units in these tracts. Loans to borrowers in moderate-income CTs represented 19.76%, compared with 23.46% of owner-occupied units in these CTs. Loans to low-income borrowers represented 2.99%, compared to 23.15% of low-income individuals in said CTs. Loans to moderate-income borrowers represented 10.18%, compared to 17.43% of moderate-income individuals in these CTs.

Metro established a Small Business Loan Center in 2004 to streamline the approval, closing, and monitoring of commercial loan requests of \$250 thousand and less. In 2007, the loan limit was increased to \$750 thousand. Refer to the tables in Appendix C for data related to loan originations.

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

Based on a limited-scope review, the bank's performance under the Service Test in the Dallas AA is consistent with the bank's overall "Outstanding" performance under the Service Test. Although performance is weaker in the Dallas AA, it is reasonable considering the majority of the bank's loans and deposits are in the Houston AA. The bank has four branches in the Dallas AA. Three branches are located in Dallas County, with one located in a moderate-income CT, and the other two in middle-income CTs, including a branch in Garland that was opened in June 2008. The other branch in the Dallas AA is located in an upper-income CT in Collin County. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes	s CD test):	January 1, 2005 to December 32, 2007					
	Investment and Service Loans:	e Test and CD	June 28, 2005 to September 22, 2008					
Financial Institution		Products Reviewed						
MetroBank, National Association (N Houston, Texas	1etro)	Home Mortgage Loa Businesses, and Co						
Affiliate(s)	Affiliate Relationship	Products Reviewe	d					
None								
List of Assessment Areas and Ty	pe of Examination							
Assessment Area	Type of Exam	Other Information						
Houston AA #26420 Dallas AA #19124	Full-Scope Limited-Scope							

## **Appendix B: Market Profiles for Full-Scope Areas**

Metro has two AAs in Texas. One is within the Houston-Sugar Land-Baytown Metropolitan Statistical Area (MSA). It is known as the Houston AA. The other is within the Dallas-Fort Worth MSA. It is known as the Dallas AA. Both AAs meet the requirements of the regulation and do not arbitrarily exclude low- or moderate-income census tracts (CTs). The full scope AA is Houston.

#### Houston Assessment Area (AA)

Demographic Info	ormation for	Full-Scope A	Area: (Hous	ston AA)		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	707	9.05	32.11	28.15	29.70	0.99
Population by Geography	3,755,030	7.56	31.49	29.32	31.57	0.06
Owner-Occupied Housing by Geography	756,757	3.53	23.46	30.35	42.66	0.00
Businesses by Geography	314,375	5.64	25.82	26.53	41.73	0.28
Farms by Geography	4,861	3.74	18.14	34.71	43.35	0.06
Family Distribution by Income Level	934,438	23.15	17.43 18.63		40.79	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	379,190	13.33	45.32	27.66	13.69	0.00
Median Family Income: HUD Adjusted Median Family Income for 2008: Households Below the Poverty Level:	\$ 51,431 \$ 61,100 13%		Median Hou Unemploym	0	\$ 102,231 3.06%	

(\*) 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 AA includes 707 census tracts (CTs) in two counties. It includes all of the 649 census tracts (CTs) of Harris County and all 58 CTs of Fort Bend County. Approximately 41% or 291 CTs are designated as low- or moderate-income. The updated median family income for 2007 is \$57,300 and \$61,100 for 2008. Harris and Fort Bend Counties are within the Houston-Sugar Land-Baytown Metropolitan Statistical Area (MSA). This MSA is a ten-county metropolitan area in the Gulf Coast region of Southeast Texas. This MSA is the sixth largest in the nation with a population of 5.6 million as of the 2007 U.S. Census estimate. The population is centered in Houston, Texas. It is the largest economic and cultural center in Texas with a population estimated at 2.2 million.

#### Harris County

All of Harris County, Texas is designated as part of Metro's Houston AA. There are 64 CTs (10%) designated as low-income and 223 CTs (35%) designated as moderate-income. Middle-income CTs in the AA total 178 (27%), upper-income CTs total 178 (27%), and 7 CTs

do not have a designation (1%). Harris County is the largest county in Texas and the third most populous county in the nation. The population is estimated at 3.9 million according to a 2007 U.S. Census Bureau estimate with a growth rate since the 2000 Census of 15%. The 2006 U.S. Census Bureau shows an unemployment rate of 7.5%, and 16% of the population lives below the poverty level. The county seat is Houston which is the largest city in Texas and the fourth largest city in the nation.

Houston has the largest medical center in the world, the Texas Medical Center. The Center's economic impact exceeds \$10 billion annually, and it has approximately 61 thousand employees. Houston is second only to New York City in Fortune 500 company headquarters, and more than 5 thousand energy-related firms are located in the city. Among the ten most populous metropolitan areas, Houston ranked second in employment growth rate and fourth in nominal employment growth. Houston is home to the Johnson Space Center, NASA's largest research and development facility, employing nearly 3 thousand federal civil service workers and more than 14 thousand contract personnel. Texas Governor Rick Perry recently announced a \$7.5 million Texas Enterprise Fund grant to Lockheed Martin, which should bring approximately 1 thousand jobs to the Houston area.

The Metropolitan Transit Authority of Harris County (METRO) operates bus, light rail, and METROlift (paratransit) service in Harris County. METRO's service area encompasses 1,285 square miles. Most METRO buses run on city streets with the majority of the routes serving downtown Houston. This allows people and small businesses easy access to branch locations through public transportation. METRO also operates one light rail line, with 4 other lines expected to be completed by 2012.

Major employers include Continental Airlines, Administaff, Halliburton, Wal-Mart Stores, Exxon Mobil, Kroger Company, Memorial Hermann Healthcare System, and The University of Texas Medical Branch, all with more than 13 thousand employees each.

Banking competition is intense. The 5 largest competitors in the county include: JP Morgan Chase Bank, National Association (N.A.), Bank of America, N.A., Wells Fargo Bank, N.A., Amegy Bank, N.A., and the former, Washington Mutual Bank, FSB.

#### Fort Bend County

All of Fort Bend County, Texas has been designated as part of the AA. The county has only one low-income CT (2%), four moderate-income CTs (7%), 21 middle-income CTs (36%), and 32 upper-income CTs (55%). It is one of the fastest growing counties in the United States. The county had a population of 510 thousand as of the 2007 U.S. Census Bureau estimate with a growth rate since the 2000 Census of 44%. Part of Houston is in Fort Bend County. The unemployment rate is 7%, and 7.5% of the population lives below the poverty level.

Major employers in Fort Bend County include the Fort Bend Independent School District with more than 8 thousand employees and Fluor Corporation with approximately 3 thousand employees. Fort Bend's county seat is Richmond, while its largest city is Sugar Land. Sugar Land has the second largest level of economic activity after Houston, and it is the third largest city in the Houston-Sugar Land-Baytown MSA. Sugar Land has the most important and fastest growing economic center in Fort Bend County. It is the headquarters for Western Airways. Engineering firms and related industries are an economic engine for Sugar Land and the county.

Banking competition is intense. Major competitors in the area include: Capital One, N.A., Wells Fargo Bank, N.A., JP Morgan Chase Bank, N.A., Citibank, N.A., and GE Capital Financial, Inc.

Demographic Info	rmation for L	imited-Scop	e Area: (Da	allas AA)		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	572	10.49	30.94	28.50	29.37	0.70
Population by Geography	2,710,574	9.25	30.91	30.29	29.55	0.00
Owner-Occupied Housing by Geography	549,723	3.27	23.21	32.67	40.85	0.00
Businesses by Geography	252,307	5.09	26.20	30.79	36.78	1.14
Farms by Geography	3,886	3.47	23.21	33.74	39.14	0.44
Family Distribution by Income Level	671,309	22.85	18.30	19.73	39.12	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	276,239	15.72	43.04	28.88	12.36	0.00
Median Family Income: HUD Adjusted Median Family Income for 2008: Households Below the Poverty Level:	\$ 56,313 \$ 65,000 10%		Median Hou Unemploym		\$ 123,122 2.60%	

#### Dallas Assessment Area (Limited Scope)

(\*) 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 AA includes 572 CTs in two counties. It includes all of the 487 CTs in Dallas County and 85 CTs in Collin County. Approximately 41% or 237 CTs of the total are designated as low- or moderate-income. The updated MSA median family income for 2007 is \$63,200 and \$65,000 for 2008. The city is the main economic center of the 12-county Dallas-Fort Worth MSA, which is the fourth largest MSA in the nation with a population of 6.1 million as of the 2007 U.S. Census estimate.

Dallas is served by two commercial airports: Dallas/Fort Worth International Airport (DFW) and Dallas Love Field. DFW is the largest airport in the state, second largest in the nation, and third largest in the world. American Airlines, the largest air carrier in the world, is located less than a mile from DFW.

According to the Greater Dallas Chamber of Commerce, the 10 largest employers in the Dallas-Irving-Plano area are Wal-Mart, Dallas Independent School District, Baylor Health Care System, SBC Communications, Verizon Communications, City of Dallas, Texas Instruments, HCA Healthcare, Brinker International Inc., and the University of Texas Southwestern Medical Center.

#### **Dallas County**

All 487 CTs of Dallas County, Texas are part of the AA. The county has 60 low-income CTs (12%), 174 moderate-income CTs (36%), and 141 middle-income CTs (29%). Upper-income CTs total 108 (22%), and 4 CTs do not have a designation (1%). Dallas County is the ninth most populous county in the United States and had a population of 2.4 million according to the 2007 U.S. Census Bureau estimate. Its county seat is Dallas, which is the largest city in the

county. Dallas is the second largest city in Texas and the ninth-largest city in the United States.

The Dallas Area Rapid Transit (DART) is the Dallas-area public transportation authority, providing buses, rails, and High Occupancy Vehicle (HOV) lanes to commuters. The DART bus system operates local routes which serve downtown Dallas. DART also offers an On-Call and Flex shuttle service that provides curbside pick up by calling DART one hour before the destination time. This allows people and small businesses easy access to branch locations through public transportation.

The Dallas County economy is primarily based on petroleum, telecommunications, computer technology, banking, and transportation. Love Field Airport, close to downtown Dallas, serves many domestic passengers and is the home of Southwest Airlines. Information from the 2006 U.S. Census Bureau shows an unemployment rate of 7.1%, and 16.5% of the population lives below the poverty level. The updated median family income in 2006 was \$49,777.

Banking competition is intense. The 6 largest competitors in the county include: JP Morgan Chase Bank, N.A., Bank of America, N.A., Wells Fargo Bank, N.A., Comerica Bank, and the former, Washington Mutual Bank, FSB.

### **Collin County**

All of Collin County, Texas has been designated as part of the AA. Of the 85 CTs, there are no low-income CTs, 3 CTs are moderate-income (3%), and 22 are middle-income CTs (26%). Upper-income CTs total 60 (71%). In 2000, Collin County had a population of 492 thousand. In 2007, the U.S. Census Bureau estimated the population to be 731 thousand, a 49% growth rate in seven years. The unemployment rate is 4.5% and 6.2% of the population lives below the poverty level. The U.S. Census Bureau reported in 2000 that Collin County is the wealthiest county in Texas for per capita income. As of 2006, the median family income was estimated to be \$88 thousand.

The county seat is McKinney with 107 thousand residents, and its largest city is Plano with an estimated population of 255 thousand. As of the 2000 census, Plano is the ninth largest city in Texas. Recently, Plano has drawn retail businesses to the area with the opening of The Shops at Legacy. It features apartments and numerous shops and restaurants and is known as an upscale area. In addition, Wal-Mart considered the city's affluence when it established the experimental luxury Wal-Mart Supercenter on Park Road and the Dallas North Tollway. Plano is home to many corporate headquarters including Ericsson Inc, Rent-A-Center, Crossmark, Perot Systems, Electronic Data Systems, JCPenney, Frito-Lay, Cinemark Theatres, and UGS. Plano also has many semiconductor and telecommunications companies in its Research and Technology District due to its proximity to Dallas' Telecom Corridor.

### **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:

 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;
 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 Performance Evaluation.

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

- Table 1.Lending Volume Presents the number and dollar amount of reportable loans<br/>originated and purchased by the bank over the evaluation period by<br/>MA/assessment area. Community development loans to statewide or regional<br/>entities or made outside the bank's assessment area may receive positive CRA<br/>consideration.
- Table 1.Other Products Presents the number and dollar amount of any unreported<br/>category of loans originated and purchased by the bank over the evaluation period<br/>by MA/assessment area. Examples include consumer loans or other data that a<br/>bank may provide, at its option, concerning its lending performance. This is a two-<br/>page table that lists specific categories.
- Table 2.Geographic Distribution of Home Purchase Loans Compares the percentage<br/>distribution of the number of loans originated and purchased by the bank in low-,<br/>moderate-, middle-, and upper-income geographies to the percentage distribution<br/>of owner-occupied housing units throughout those geographies. The table also<br/>presents market share information based on the most recent aggregate market<br/>data available.
- Table 3.
   Geographic Distribution of Home Improvement Loans See Table 2.
- Table 4.
   Geographic Distribution of Home Mortgage Refinance Loans See Table 2.
- Table 5.Geographic Distribution of Multifamily Loans Compares the percentage<br/>distribution of the number of multifamily loans originated and purchased by the<br/>bank in low-, moderate-, middle-, and upper-income geographies to the percentage

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

- **Table 6. Geographic Distribution of Small Loans to Businesses** The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- **Table 7. Geographic Distribution of Small Loans to Farms** The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8.Borrower Distribution of Home Purchase Loans Compares the percentage<br/>distribution of the number of loans originated and purchased by the bank to low-,<br/>moderate-, middle-, and upper-income borrowers to the percentage distribution of<br/>families by income level in each MA/assessment area. The table also presents<br/>market share information based on the most recent aggregate market data<br/>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<br/>distribution of the number of small loans (less than or equal to \$500,000) originated<br/>and purchased by the bank to farms with revenues of \$1 million or less to the<br/>percentage distribution of farms with revenues of \$1 million or less. In addition, the<br/>table presents the percentage distribution of the number 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/assessment area. 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.
- Table 15.Distribution of Branch Delivery System and Branch Openings/Closings -<br/>Compares the percentage distribution of the number of the bank's branches in<br/>low-, moderate-, middle-, and upper-income geographies to the percentage of the<br/>population within each geography in each MA/assessment area. The table also<br/>presents data on branch openings and closings in each MA/assessment area.

#### Table 1. Lending Volume

LENDING VOLUME				Geograph	ny: METRO	2005-2007		Evaluation Period: January, 01, 2005 TO December 31, 2007					
	% of Rated	Home Mortgage			oans to esses	Small Loar	Small Loans to Farms		Community Development Loans**		eported ans	% of Rated Area	
MA/Assessment Area:	Area Loans (#) in MA/AA	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	Deposits in MA/AA <sup>***</sup>	
Full Review:	1							1					
Houston AA	82.98	13	5,038	938	245,203	0	0	12	31,210	963	281,451	86.14	
Limited Review:							[						
Dallas AA	17.02	3	737	150	44,438	0	0	5	12,546	158	57,721	13.86	

Loan Data as of December 31, 2007 Rated area refers to either the state or multi-state MA rating area. The evaluation period for Community Development Loans is June 28, 2005 to September 22, 2008. Deposit Data as of June 30, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

#### Table 1. Other Products

LENDING VOLUME				G	eography:	METRO	2005-200	7	E	valuation	Period: J	lanuary, 01,	2005 TO De	ecember 31, 2007	
MA/Assessment Area:	% of Rated Area	Total C Loa	Fotal Optional Loans**		Small Business Real Estate Secured**		Equity**	Motor \	/ehicle**	Credit Card**			Secured umer**	% of Rated Area	
MA/Assessment Area:	Loans (#) in MA/AA <sup>*</sup>	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	Deposits in AA***	
Full Review:	1				I		I				1	i			
Houston AA	95.79	637	10,454	1	40	0	0	154	3,561	0	0	301	6,090	86.14	
Limited Review:															
Dallas AA	4.21	28	859	3	385	0	0	9	171	0	0	12	281	13.86	

Loan Data as of December 31, 2007 Rated area refers to either the state or multi-state MA rating area. The evaluation period for Optional Product Line(s) is From January 1, 2005 to December 31, 2007. Deposit Data as of June 30, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

#### Table 1. Other Products

LENDING VOLUME		Geography: METRO 2005-2007	Evaluation Period: Januar	y, 01, 2005 TO December 31, 2007									
	Other Unsecured	Consumer Loans <sup>*</sup>	Other Optional Loans*										
MA/Assessment Area:	#	\$ (000's)	#	\$ (000's)									
Full Review:													
Houston AA	181	763	0	0									
Limited Review:													
Dallas AA	4	22	0	0									

<sup>(\*)</sup>The evaluation period for Optional Product Line(s) is from January 1, 2005 toDecember 31, 2007.

# Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: I	HOME PUR	CHASE		Geography: METRO 2005-2007 Evaluation Period: January, 01, 2005 TO December 31, 2										, 2007	
	Total Purchas		Low-Ir Geogr	ncome aphies	Moderate Geogr	e-Income aphies	Middle-Income Geographies		Upper-Income Geographies		Marke	et Share	(%) by	Geogra	phy <sup>*</sup>
MA/Assessment Area:	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% 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:	1							[		Γ					
Houston AA	7	77.78	3.53	14.29	23.46	57.14	30.35	28.57	42.66	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:	1														
Dallas AA	2	22.22	3.27	0.00	23.21	100.00	32.67	0.00	40.85	0.00	0.00	0.00	0.00	0.00	0.00
I															I

<sup>\*</sup> Based on 2006 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 II	MPROVE	MENT		Geograph	ny: METRO	2005-2007		Evaluation Period: January, 01, 2005 TO December 31, 2007								
	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography						
MA/Assessment Area:	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% 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:		1															
Houston AA	3	100.0	3.53	66.67	23.46	33.33	30.35	0.00	42.66	0.00	0.02	0.41	0.06	0.00	0.00		
Limited Review:																	
Dallas AA	0	0.00	3.27	0.00	23.21	0.00	32.67	0.00	40.85	0.00	0.00	0.00	0.00	0.00	0.00		

<sup>\*</sup> Based on 2006 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	MORTGA	GE REFINA	ANCE	Geograph	y: METRO 2	2005-2007		Evaluation	n <b>Period</b> : Ja	nuary, 0	1, 2005 <sup>-</sup>	TO Dece	mber 31	, 2007
MA/Assessment Area:	Morte Refin	Home gage ance ans	Low-Ir Geogr	ncome aphies	Moderate Geogr	e-Income aphies	Middle- Geogr	Income aphies	Upper- Geogra	Income aphies	Mar	ket Shar	e (%) by	Geogra	phy <sup>*</sup>
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% 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:			I		-	1	1								
Houston AA	2	100.0	3.53	0.00	23.46	100.00	30.35	0.00	42.66	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Dallas AA	0	0.00	3.27	0.00	23.21	0.00	32.67	0.00	40.85	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2006 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:	MULTIF	AMILY			Geography	: METRO 2	005-2007		Evaluation	<b>Period</b> : Ja	nuary, 0'	1, 2005 1	O Decei	mber 31	, 2007
MA/Assessment Area:	Multif	otal family ans	Low-Ir Geogr	ncome aphies	Moderate Geogr	e-Income aphies	Middle- Geogra	Income aphies		Income aphies	Mar	ket Shar	e (%) by	Geogra	phy <sup>*</sup>
W/W/GSCSSMCht / Acd.	#	% of Total <sup>**</sup>	% 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:		r T	[							1		1			
Houston AA	5	83.33	10.36	20.00	35.68	40.00	30.88	40.00	23.08	0.00	0.34	0.00	0.81	0.00	0.00
Limited Review:															
Dallas AA	1	16.67	15.56	0.00	32.10	100.00	30.97	0.00	21.37	0.00	0.41	0.00	1.22	0.00	0.00

<sup>\*</sup> Based on 2006 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 multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2000 Census information.

## Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distributi	on: SM/	ALL LOAI	NS TO BUSINE	ESSES	Geogra	phy: ME	TRO 2005-200	7	Evaluat	ion Perio	<b>d</b> : January	, 01, 200	5 TO Dec	cember 3	1, 2007
MA/Assessment	Bus	Small iness ans	Low-Inco Geograph		Moderate-Ir Geograp		Middle-In Geograp		Upper-Inc Geograp		Marl	ket Shar	e (%) by	Geograp	ohy <sup>*</sup>
Area:	#	% of Total <sup>**</sup>	% of Businesses	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Houston AA	933	86.23	5.64	12.54	25.82	41.59	26.53	21.86	41.73	24.01	0.17	0.52	0.32	0.14	0.09
Limited Review:															
Dallas AA	149	13.77	5.09	8.06	26.20	40.94	30.79	24.83	36.78	26.17	0.03	0.06	0.04	0.03	0.02

Based on 2006 Peer Small Business Data: US. 0.28% of the businesses are located in NA census tracts in the Houston AA and 1.14% in the Dallas AA. 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 - Dunn and Bradstreet 2007

# Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution:	SMALL	LOANS	FO FARMS		Geograph	y: METRO	2005-2007		Evaluati	on Period:	January, 01	I, 2005 T	O Decem	ber 31,	2007
		al Small n Loans		ncome aphies	Moderate Geogr	e-Income aphies	Middle- Geogr	Income aphies		Income aphies	Marke	et Share	(%) by G	Geograpi	hy <sup>*</sup>
MA/Assessment Area:	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:	1				L	L	L								I
Houston AA	0	0.00	3.74	0.00	18.14	0.00	34.71	0.00	43.35	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Dallas AA	0	0.00	3.47	0.00	23.21	0.00	33.74	0.00	39.14	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2006 Peer Small Business Data: US. 0.06% of the farms are located in NA census tracts in the Houston AA and 0.44% in the Dallas AA. Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area. Source Data - Dunn and Bradstreet 2007.

#### Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: H	OME P	URCHAS	SE		Geograph	ny: METRO	2005-2007		Evaluation	Period: Ja	nuary, 0	1, 2005	TO Dece	mber 31	, 2007
MA/Assessment Area:	Purc	Home chase ans	Low-Inc Borrov		Moderate Borro		Middle-I Borrov		Upper-Ir Borrov	icome vers		Mai	ket Sha	are <sup>*</sup>	
MA/Assessment Area.	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:			Γ												
Houston AA	7	77.78	23.15	0.00	17.43	0.00	18.63	28.57	40.79	71.43	0.00	0.00	0.00	0.00	0.00
Limited Review:			[					[							
Dallas AA	2	22.22	22.85	0.00	18.30	0.00	19.73	0.00	39.12	0.00	0.00	0.00	0.00	0.00	0.00

Based on 2006 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 22.2% of loans originated and purchased by Bank.

#### Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: H	IOME	IMPROVE	MENT		Geography	: METRO	2005-2007		Evaluation	Period: Ja	nuary, 0	1, 2005 <sup>-</sup>	TO Dece	mber 31	, 2007
MA/Assessment Area:	Impi	al Home rovement _oans	Low-Inc Borrov		Moderate- Borrov		Middle-II Borrov		Upper-Ir Borrov	ncome vers		Mai	ket Sha	are <sup>*</sup>	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans	Over all	Low	Mod	Mid	Upp						
Full Review:															
Houston AA	3	100.0	23.15	33.34	17.43	33.33	18.63	33.33	40.79	0.00	0.02	0.14	0.07	0.00	0.00
Limited Review:															
Dallas AA	0	0.00	22.85	0.00	18.30	0.00	19.73	0.00	39.12	0.00	0.00	0.00	0.00	0.00	0.00

Based on 2006 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 0.0% of loans originated and purchased by Bank.

#### Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: H	IOME N	/ORTGAG	GE REFINANC	E	Geograph	y: METRO	2005-2007		Evaluation	Period: Ja	inuary, 0	1, 2005 <sup>-</sup>	TO Dece	mber 31	, 2007
MA/Assessment Area:	Mor Refi	Home tgage nance bans	Low-Inc Borrov		Moderate Borrov		Middle-I Borrov		Upper-Ir Borrov	ncome wers		Mai	rket Sha	are <sup>*</sup>	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans	% Families <sup>***</sup>	% BANK Loans <sup>*****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Over all	Low	Mod	Mid	Upp
Full Review:						I	ł	i		I	1				
Houston AA	2	100.00	23.15	0.00	17.43	0.00	18.63	0.00	40.79	100.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Dallas AA	0	0.00	22.85	0.00	18.30	0.00	19.73	0.00	39.12	0.00	0.00	0.00	0.00	0.00	0.00

Based on 2006 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 0.0% of loans originated and purchased by Bank.

#### Table 11. Borrower Distribution of Small Loans to Businesses

	Total	Small	Business	ses With					
MA/Assessment Area:	Loa	ns to lesses	Revenues o or I	f \$1 million	Loans by C	Driginal Amount Regardles	s of Business Size	Mar	ket Share <sup>*</sup>
MA/Assessment Area.	#	% of Total <sup>**</sup>	% of Businesses	% BANK Loans	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Houston AA	938	86.21	69.92	54.58	36.57	25.80	37.63	0.17	0.27
Limited Review:									
Dallas AA	150	13.79	68.71	62.00	24.67	29.33	46.00	0.03	0.04

Based on 2006 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 – 2007).

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 4.69% of small loans to businesses originated and purchased by the Bank.

#### Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: S	MALL LC	OANS TO F	ARMS	Ge	ography: METRC	2005-2007	Evaluation Period: Janua	ry, 01, 2005 TO	December 31, 2007
		Small to Farms	Farms With I \$1 millior		Loans b	y Original Amount Regard	ess of Farm Size	Mar	ket Share <sup>*</sup>
MA/Assessment Area:	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:	1								
Houston AA	0	0.00	95.00	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Dallas AA	0	0.00	95.03	0.00	0.00	0.00	0.00	0.00	0.00

Based on 2006 Peer Small Business Data: US.

Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area. Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B – 2007). Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.0% of small loans to farms originated and purchased by Bank.

#### Geography: METRO 2005-2007 Geographic and Borrower Distribution: CONSUMER LOANS Evaluation Period: January, 01, 2005 TO December 31, 2007 Geographic Distribution Borrower Distribution Total Moderate-Moderate-Middle-Income Upper-Income Low-Income Low-Income Middle-Income Upper-Income Consumer Income Income MA/Assessment Geographies Borrowers Geographies Geographies Borrowers Borrowers Geographies Loans Borrowers Area: % of BANK BANK BANK BANK % of # Hhlds BANK Hhlds BANK Hhlds BANK Hhlds BANK Hhlds Hhlds Hhlds Hhlds Total Loans Loans Loans Loans \*\* \*\* 44 \*\* Loans Loans Loans Loans \*\*\* \*\*\* \*\*\* \*\*\* Full Review: 636 23.02 Houston AA 96.22 6.99 7.08 29.38 42.61 30.57 21.07 33.06 29.09 26.89 17.14 19.18 18.16 14.47 41.68 21.07 Limited Review: Dallas AA 25 3.78 8.28 4.00 28.28 20.00 32.32 28.00 31.12 48.00 21.92 24.00 18.22 20.00 19.15 12.00 40.71 40.00

Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area. 0.15% were originated in NA census tracts. Percentage of Households is based on the 2000 Census Information.

As a percentage of loans with borrower income information available, no information was available for 18.39% of loans in the Houston AA and 4.00% in the Dallas AA originated and purchased by Bank.

#### Table 14. Qualified Investments

QUALIFIED INVESTME	NTS		Geogra	aphy: METRO 2005	5-2007	Evaluation Period	<b>l</b> : June 28, 2005	to September	22, 2008
MA/Assessment Area:	Prior Perio	d Investments <sup>*</sup>	Current Perio	od Investments		Total Investments		Unfunded C	commitments**
MAYASSESSITIETILATEA.	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:							1		· ·
Houston AA	2	3,354	6	86	8	3,440			
Limited Review:									
Dallas AA	1	2,270			1	2,270			

<sup>&#</sup>x27;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

	Deposits			Branche	s			l	Branch Ope		-				Popu	lation	
MA/Assessment Area:	% of Rated Area	# of BANK	% of Rated Area			Branche eographi		# of Branch	# of Branch	Net	change of Bra (+ o	nches	ation	% of	Populatio Geog	on within raphy*	Each
	Deposits in AA	Branches	Branches in AA	Low	Mod	Mid	Upp	Openings	Closings	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:		[						[									
Houston AA																	
Harris County	73.68	7	53.85	28.57	42.85	14,29	14.29	0	2	-1	0	-1	0	8.24	33.98	29.11	28.6
Ft. Bend County	12.00	2	15.38	0.00	0.00	0.00	100.00	0	0	0	0	0	0	1.00	7.63	31.29	60.0
Limited Review:																	<u> </u>
Dallas AA																	
Dallas County	12.41	3	23.08	0.00	33.33	66.67	0.00	1	0	0	0	+1	0	11.31	37.04	30.75	20.9
Collin County	1.91	1	7.69	0.00	0.00	0.00	100.00	1	0	0	0	0	+1	0.00	3.22	28.19	68.5
																	<u> </u>