



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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**Community Reinvestment Act
Performance Evaluation**

**Whitney National Bank
Charter Number: 14977**

**228 St. Charles Avenue
New Orleans, LA 70130**

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 **Whitney National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Whitney National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
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:

- Whitney National Bank’s (Whitney’s) lending volume is excellent given its size and competition in its primary markets.
- The bank made a substantial majority of its Home Mortgage Disclosure Act loans and small loans to businesses inside the bank’s assessment areas.
- Whitney’s overall geographic distribution of loans is good. The distribution of loans to borrowers of different income levels is also good.
- The bank originated a highly significant number and dollar amount of community development loans during the review period, which had a positive impact on the Lending Test rating.
- The use of innovative and flexible loan products enhances the bank’s performance under the lending test, particularly in the New Orleans AA.
- The bank has an excellent level of qualified community development investments given its resources and capacity.
- Service delivery systems are readily accessible to the bank’s geographies and individuals of different income levels in its AA. Whitney provides a relatively high level of community development services that support and address identified needs in the community.

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 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 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.

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 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.

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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

Whitney National Bank (Whitney) is an interstate bank headquartered in New Orleans, Louisiana. Whitney is a wholly owned subsidiary of Whitney Holding Corporation, a one-bank holding company also headquartered in New Orleans. Whitney is the third largest commercial bank in Louisiana. Whitney Holding Corporation operates the Whitney Community Development Corporation (Whitney CDC). The activities of the Whitney CDC are considered here in evaluating the bank's CRA performance. Whitney does not have any other affiliates or operating subsidiaries that influence the bank's capacity to lend or invest in the community.

As of December 31, 2006, Whitney reported total assets of \$10.2 billion, and net Tier One Capital of \$776 million. The loan to deposit ratio was 82.9%. While there are no legal, financial or other factors that impede the bank's ability to help meet the credit needs in its assessment areas, bank operations were interrupted during a portion of this evaluation period due to the impact of hurricane Katrina in August 2005. At one point, 50% of the bank's branches, the main office, and the operations centers were not functioning. Bank management estimates approximately 70% of customers were affected directly in some way. However, by October 2006, substantially all of the company's branches were open. Remarkably, company financial performance is strong with only limited credit losses related to the hurricane. However, most of Whitney's customers operate in South Louisiana, which faces uncertain economic prospects.

Whitney expanded its footprint during the evaluation period, acquiring Madison Bank in Palm Harbor, Florida (2004), Destin Bank in Destin, Florida (2005), and 1st National Bank & Trust in Bradenton, Florida (2006). All of the acquired banks have been merged into Whitney. Whitney currently operates 150 full-service branches and 204 ATMs in five states. During this evaluation period, 7 branches were opened and 8 offices were closed. Whitney has defined six assessment areas (AAs) in Louisiana, five AAs in Florida, one AA in Texas, three AAs in Alabama, and one AA in Mississippi. These AAs are described in detail in the market profile section of this evaluation (Appendix C).

Banking competition is aggressive in all of Whitney's markets, particularly in the New Orleans and Houston AAs, and includes dominant affiliates of large national banking companies, large regional financial institutions, and numerous small community banks, credit unions, and non-bank financial service providers. Whitney's deposit market share rank in the AAs receiving full-scope reviews ranges from 3rd in the New Orleans AA, with a 9.3% market share in a market with 112 deposit-taking institutions, to 20th in the Houston AA, with a market share of 1.06% in a market with 198 institutions.

Historically, Whitney has been a prominent commercial lender in its various markets. The bank makes commercial loans of all types and sizes including commercial/industrial, commercial mortgage, business credit card, and construction/land development loans. Whitney is a preferred SBA lender and originated SBA loans totaling \$6.7 million during the evaluation period; loans totaling \$5.2 million were originated in the full-scope AAs. Examples of loans to retail customers include residential mortgages, residential construction loans, personal loans (including lines of credit), and auto loans.

Loans represent approximately 68.8% of total assets. The loan portfolio is comprised of 58.3% real estate loans, 36.3% commercial loans, and 5.1% loans to individuals. Farm and agricultural loans comprise 0.2% of the total loan portfolio. The real estate loan portfolio consists of 37.4% construction development loans, 33.9% commercial real estate loans, 25.2% 1-4 family residential loans, and 2.8% multi-family loans.

Whitney demonstrates a strong commitment to, and is very active in, affordable housing efforts in its AAs. Whitney CDC demonstrates excellent performance in the area of affordable housing, by financing projects that provide new housing and rehabilitation of existing housing, and by providing homebuyer financial education and technical expertise for the preparation of grant requests. During the evaluation period, the bank and the CDC originated 469 CD loans totaling \$468 million. Whitney CDC has built significant relationships with non-profit, governmental and economic development organizations, leveraging those relationships to enhance the capacity of the entities and effectively promote home ownership and financial independence. Whitney CDC takes a leadership position and participates in many complex community development projects that involve numerous partners throughout its AAs. These efforts are detailed in the Community Development Lending and Community Development Services sections of this Performance Evaluation.

Whitney's CRA performance was last evaluated on January 6, 2003, at which time the bank was rated "Outstanding." A review of Office of the Comptroller of the Currency (OCC) records and the bank's CRA Public File did not reveal any complaints relating to the bank's CRA performance. We noted during the review of 27 community contacts made in the AAs that many opportunities exist in the bank's markets to participate in community development lending, investment, and service activities. In particular, in the New Orleans and Houston AAs there are substantial community development opportunities. The primary community needs identified by the contacts are affordable housing, small business loans, and technical assistance (financial education).

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed Whitney's residential mortgage loans and small business loans. Farm and multi-family real estate loans comprise less than 0.21% and 1.62% of the bank's loan portfolio, respectively, and are not considered in the evaluation of the bank's performance. The bank did not elect to have us include consumer loans, which represent only 3.0% of gross loans and leases. The evaluation period under the Lending Test is January 1, 2003 through December 31, 2006.

The Office of Management and Budget revised its standards for metropolitan statistical areas (MAs) in 2000, and provided revised MA boundaries/definitions in 2003 and early 2004. The revised MA boundaries are effective for loans originated in 2004 and forward. As such, two separate evaluations were completed. The first to evaluate loans originated in 2003, and the second to evaluate loans originated in 2004 through 2006. Separate analyses were required because of the change in MA boundaries. Our conclusions are based on the results of both analyses covering loans originated from 2003 through 2006.

For community development (CD) loans and the Investment and Service tests, the evaluation period is January 7, 2003 through February 7, 2007. The Investment Test conclusions are based on an evaluation of investments, grants and donations made in the bank's AAs that meet the definition of community development. The Service Test evaluation is based on branch distribution, hours of operation, branch openings and closings, alternative delivery systems, retail and commercial deposit products and services, loan products and services, and community development services.

Data Integrity

Prior to this CRA examination, OCC personnel verified the accuracy of data made available to the public in accordance with the Home Mortgage Disclosure Act (HMDA) and the CRA regulation. Public data includes information on home mortgages and small loans to businesses and farms. In addition, non-public data that was submitted by bank management for CD loans, services and investments were reviewed to ensure they qualified as community development. Based on verification work performed, publicly reported lending data is considered accurate. All the data reported in the above categories are used in this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of assessment areas (AAs) within that state was selected for full-scope reviews. Refer to the "Scope" section under each State Rating for details regarding how the areas were selected and why they are representative.

Ratings

The bank's overall rating is a blend of the state ratings. The state ratings are based primarily on those areas that received full-scope reviews. The State of Louisiana receives the greatest weight in our determination of the overall rating. This state accounts for 56% of the branch network, 74.3% of total deposits, and 72.4% of the CRA reportable loans during the evaluation period.

The evaluation period was for CRA related activities between January 1, 2003 and December 31, 2006. The evaluation included separate analyses for the year 2003 and the years 2004-2006. CRA performance in 2003 was compared to 1990 census data and performance in 2004-2006 was compared to 2000 census data. Separate analyses were required because 1990 census data was the most recent data available in 2003.

In general, more weight was placed on the 2004-2006 evaluation period when assessing CRA performance because this period was compared to the most recent census data. However, in the New Orleans full-scope AA, slightly more weight was placed on the performance in 2004-2005. New Orleans was devastated by Hurricane Katrina on August 29, 2005. The effects of the storm made it difficult to realistically assess performance for 2006.

Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

Fair Lending Review

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

State Ratings

State of Louisiana

CRA Rating for Louisiana: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: Outstanding

The major factors that support this rating include:

- Whitney demonstrates excellent responsiveness to credit needs particularly in the New Orleans AA. CRA reportable loan volume in Louisiana is excellent, particularly for small loans to businesses.
- Whitney made a very substantial majority of its Home Mortgage Disclosure Act (HMDA) loans and small loans to businesses inside the bank's Louisiana AAs.
- The geographic distribution of reportable loans originated in Louisiana is good. The distribution of loans to borrowers of different income levels is also good.
- The level and responsiveness of CD loans was excellent and had a positive impact on the lending test rating.
- The use of innovative and flexible loan products significantly enhances the bank's performance under the Lending Test, particularly in the New Orleans AA.
- Whitney has an excellent level of qualified community development investments in Louisiana given its resources, capacity, and the environment in which the bank was operating.
- Service delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its AA.
- An excellent level of community development services address identified needs in the community.

Description of Institution's Operations in Louisiana

Whitney operates 84 branches and 129 ATMs within six AAs in the state of Louisiana. The Louisiana AAs include five metropolitan areas (MAs): New Orleans; Baton Rouge; Houma; Lafayette; Lake Charles; and one Louisiana non-metropolitan area, comprised of Iberia, St. James, and St. Mary parishes. Approximately 74.3% of the bank's total deposits were attributed to these AAs. In addition, the bank originated approximately 72.3% of its total reported loans by number, and 68.8% by dollar volume, in these AAs.

The bank's primary market continues to be New Orleans. The New Orleans AA represents 45.2% of the bank's Louisiana branch network, 70.4% of the bank's Louisiana deposit base, and 65.5% of Louisiana CRA reportable loans. The Baton Rouge AA is the next largest market and represents approximately 17.9% of the bank's branch network, 9.6% of the bank's deposit base, and 13.6% of CRA reportable loans. The other assessment areas comprise approximately 36.8% of the branch network, 20% of the bank's deposit base, and 20.8% of CRA reportable loans.

Whitney's deposit market share rank in the state of Louisiana is 4th with a market share of 4.7% in a state with 424 depository institutions. State banking competition is aggressive and includes dominant affiliates of large national banking companies, a large national bank headquartered in New Orleans, and numerous small community banks, credit unions, and non-bank financial service providers. The top five competitors in this market include Amsouth Bank, Capital One, N.A., Hancock Bank of Louisiana, JP Morgan Chase Bank, N.A., and Regions Bank, all of which compete directly with Whitney in its various markets.

Traditionally, Whitney has been an aggressive commercial lender in its Louisiana markets. In recent years, Whitney has expanded its business strategy and is now a prominent HMDA lender in the state of Louisiana. Whitney's CRA reportable loan volume by dollar is comprised of 68.1% small loans to businesses and 31.7% HMDA purpose loans. The bank makes commercial loans of all types and sizes including commercial and industrial, commercial mortgage, business credit cards, and construction and land development loans. Examples of consumer purpose loan products include residential mortgages, residential construction loans, personal loans (including lines of credit) and auto loans.

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

Scope of Evaluation in Louisiana

We evaluated the bank's performance in the State of Louisiana by performing a full-scope review of the New Orleans AA and limited scope reviews of the Baton Rouge, Houma, Lafayette, Lake Charles AAs, and the Louisiana non-metropolitan AA. We selected the New Orleans AA for a full-scope review because the bank maintains a substantial share of its business within the AA: approximately 70.4% of the bank's Louisiana deposits and 62.6% of Louisiana loan originations are in New Orleans. Additionally, the New Orleans AA includes the highest concentration of branches, and Whitney has a long history of serving this market.

The bank's overall rating is based primarily on the area that received a full-scope review. Small business lending, which is the bank's primary business line, was given the greatest weight under the lending test followed by home mortgage loans. Within the home mortgage loans category, we gave more weight to home refinance loans since the bank's originations for this product represent a higher proportion of total home mortgage loans than home purchase and home improvement loans. Significant consideration was given to the bank's lending performance in the New Orleans AA. This is due to the higher volume of lending, especially small loans to businesses.

We assessed CRA performance for the entire evaluation period. In August 2005, hurricane Katrina devastated New Orleans. At one point, a majority of the bank's branches, the main office and the operations centers were not functioning, and remained closed until October 2006. Approximately 70% of the bank's customers were affected directly in some way. Post-Katrina, the population of New Orleans is down substantially, tourism remains weak, and crime escalated. Because of the impact of the hurricane, we gave slightly more weight to the bank's performance during the period January 1, 2003 through August 31, 2005. The entire evaluation period was considered when deriving the bank's final CRA rating.

The geographic distribution of multi-family loans and the distribution of small loans to farms by geography and income level of the borrower are not relevant due to the small volume of these types of loans originated or purchased during the evaluation period. Therefore, an analysis of the geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms has been eliminated from the Public Evaluation.

We noted during the review of nine community contacts made in the AAs that many opportunities exist in the bank's markets to participate in community development lending, investment, and service activities. In the New Orleans AA there are substantial community development opportunities. The primary community needs identified by the contacts are affordable housing, small business loans, and technical assistance (financial education).

Refer to the table in Appendix A for more information regarding the scope of this examination.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Louisiana is rated "Outstanding". The rating was substantially influenced by the bank's excellent performance in the New Orleans AA, which received a full-scope review.

Whitney's rating was based primarily on its overall good geographic and borrower distribution of lending in making home mortgage loans and loans to small businesses. The rating was also positively influenced by strong community development lending targeted towards affordable housing needs.

Lending Activity

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

Whitney's lending activity demonstrates excellent responsiveness to the credit needs of its AA considering its size, resources, deposit market share, and primary business focus. Whitney's deposit market share of 9.3% ranks the bank 3rd among 112 financial institutions with offices in the New Orleans AA. Those institutions with a greater market share include Capital One, N.A., and JP Morgan Chase Bank, N.A., which captured 13.2% and 10.7% of the market, respectively, and are significantly larger than Whitney in total assets.

Small business lending and home mortgage lending is essential to the local economy. In the New Orleans AA, approximately 60.8% of the number, and 66.8% of the dollar amount of Whitney's CRA reported loans were small loans to businesses. Approximately 39.1% of the number, and 33.2% of the dollar amount, were home mortgage loans. Among the home mortgage loans originated in the New Orleans AA, approximately 42.8% were for refinance, 32.6% for home purchase, and 24.3% for home improvement. Whitney also made an excellent level of CD loans targeted to affordable housing totaling \$273 million.

Business lending activity is strong. Whitney reported the origination of 12,524 business loans totaling \$2.0 billion over the evaluation period. Whitney originated 10.23% of all small loans to businesses reported by all financial institutions in the New Orleans AA in 2005, ranking Whitney 5th among 71 lenders and 4th among all banks. Whitney's lending performance to businesses with revenues of \$1 million or less is even stronger. Whitney originated 12.10% of all small loans to small businesses reported by all financial institutions in the New Orleans AA in 2005, ranking 4th among 71 lenders and 3rd among all banks. In addition, Whitney's lending volume in home mortgage products is strong. Whitney ranks 6th in home mortgage lending originations with a 2.85% market share. Overall, reportable loan volume is considered strong, given the large number of non-bank financial providers making both home mortgages and small loans to businesses in the New Orleans AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of Whitney's CRA reportable loans is good. The geographic distribution of home mortgage loans is adequate and the geographic distribution of small loans to businesses is good.

For home mortgage loans, the analysis focuses on low- and moderate-income geographies separately, comparing the bank's percentage of the number of home mortgage loans originated and purchased in low- and moderate-income geographies to the percentage of owner-occupied housing units in each of these income level geographies. The other measure of performance is a comparison of the bank's overall market share of loans in low- and moderate-income geographies to its overall market share of home mortgage loans.

In the case of small loans to businesses, the analysis also focuses on low- and moderate-income geographies separately, and compares the percentage distribution of the number of loans to small businesses (businesses with annual revenue less than or equal to \$1 million) originated or purchased by the bank in low- and moderate- income geographies to the percentage of businesses in either low- or moderate-income geographies. The other measure of performance is the comparison of the bank's market share of loans to small businesses in low- and moderate income geographies to its overall market share for loans to small businesses.

Home Mortgage Loans

Refer to Tables 2 – 5 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases in the New Orleans AA.

The geographic distribution of home purchase loans is adequate. The percentage of loans made in low-income and moderate-income geographies is below the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies is below its overall market share. In moderate-income geographies, the bank's market share is somewhat below its overall market share.

The geographic distribution of home improvement loans is good. The percentage of loans made in low-income geographies exceeds the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is below the percentage of owner occupied units in these geographies. The bank's market share in low-income geographies exceeds its overall market share. In moderate income geographies, the bank's market share is near to its overall market share.

The geographic distribution of refinance loans is adequate. The percentage of loans made in low-income geographies is below the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies is also significantly below its overall market share. The percentage of loans made in moderate-income geographies is below the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income geographies is also below its overall market share.

A geographic analysis of multi-family loans was not meaningful; therefore, these loans are not considered in the evaluation of the bank’s home mortgage loan performance.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is good. The percentage of loans made in low-income geographies meets the percentage of businesses located in these geographies. The bank’s market share in low-income geographies substantially exceeds its overall market share. The percentage of loans made in moderate-income geographies is near to the percentage of businesses located in these geographies. The bank’s market share in moderate-income geographies exceeds its overall market share.

Small Loans to Farms

A geographic analysis of small loans to farms was not meaningful therefore small farm loans are not considered in the evaluation of the bank’s performance.

Lending Gap Analysis

Reports and maps detailing Whitney’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 gaps were identified.

Inside/Outside Ratio

At the state level, Whitney has an excellent record of lending inside of its assessment areas. We performed an analysis of the bank’s record of making home mortgage loans and small loans to businesses in Louisiana. The information we reviewed included CRA reportable loan originations and purchases. CD loans made by the CDC were not included in the In/Out ratio. A substantial majority of home mortgage loans and loans to small businesses were originated and purchased in the state of Louisiana. By product, the bank originated the following percentages of CRA reportable loans inside its AAs.

Loan Type	% Inside
Home Purchase	96%
Refinance	96%
Home Improvement	97%
Small Loans to Businesses	97%
Overall	97%

This performance was positively factored in the overall analysis of the geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

The distribution of Whitney's CRA reportable loans to borrowers of different incomes is good. Whitney achieved good penetration to low- and moderate-income borrowers with its home mortgage lending. The distribution of small loans to businesses with revenues of \$1 million or less is also good.

For home mortgage loans, the analysis focuses on low- and moderate-income borrowers separately, comparing the bank's percentage of the number of loans, by product, to the percentage of AA families that are in the low- and moderate- income category. The other measure of performance for borrower distribution is a comparison of the bank's overall market share for home mortgage loans originated and purchased in an AA to the bank's market share of home mortgage loans, by product type, for each borrower income level in the AA.

In the case of loans to small businesses, the analysis focuses on the percentage of businesses within the AA that have annual revenue of \$1 million or less compared to the percentage of reported loans to small businesses that were purchased or originated by Whitney. The other measure of performance is a comparison of the bank's market share of loans to businesses with annual revenues of \$1 million or less to the bank's overall market share for loans to all businesses.

We placed more emphasis on the demographic indicator rather than the market share analysis when deriving conclusions for borrower distribution of mortgage loans. The demographic indicator receives more emphasis because of the difficulty that low-income borrowers have in obtaining home mortgage loans due to the expensive cost of housing and the relatively low-incomes and high poverty rates in the New Orleans AA. The HUD adjusted median family income is \$42,770 and the median housing value is \$113,569 in the New Orleans AA. We equally weighted the two performance measurements (demographic data and market share) to derive an overall conclusion as to the bank's performance in making loans to businesses of different sizes during the 2003 portion of the evaluation period. Loan performance for loans made in 2003 was compared to 1990 census data, which was the census data available in 2003. We placed more emphasis on the demographic performance measurement analysis during the 2004 – 2006 portion of the evaluation period since the current year 2000 U. S. census data is relevant to this time period.

Home Mortgage Loans

Refer to Tables 8 - 10 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases in the New Orleans AA.

The distribution of home purchase loans to borrowers of different incomes is good. The percentage of home purchase loans to low-income borrowers is well below the percentage of low-income families in the AA, but was considered good when considering the percentage of households living below the poverty level. Market share analysis indicates that the bank's performance for low-income families meets its overall market share. Whitney originated 5.6% and 5.2% of its home purchase loans to low-income borrowers for 2003 and the years 2004-2006, respectively. This is significantly below the proportion of low-income families in the AA, which is 23.8% for 2003 and 23.9% for 2004-2006. Approximately 17% of all households lived below the poverty level during 2003-2006. Low-income borrowers, especially those living below the poverty level, would have difficulty in obtaining home purchase loans. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share to moderate-income families meets its overall market share.

The distribution of home improvement loans to borrowers of different income levels is good. The percentage of home improvement loans to low-income borrowers is below the percentage of low-income families in the AA, but is considered good when considering the percentage of low-income families living below the poverty level. Market share analysis indicates that the bank's performance for low-income families meets its overall market share. Whitney originated 9.5% and 10.5% of its home improvement loans to low-income borrowers for 2003 and the years 2004-2006, respectively. This is lower than the proportion of low-income families in the AA during the evaluation period. The percentage of home improvement loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA. The bank's market share of loans to moderate-income borrowers also meets its overall market share.

The distribution of refinance loans to borrowers of different income levels is adequate. The percentage of refinance loans to low-income borrowers is well below the percentage of low-income families in the AA, but is considered adequate when considering the percentage of families living below the poverty level. Market share analysis indicates that the bank's performance for low-income families is also below its overall market share. Whitney originated 3.8% and 6.2% of its home improvement loans to low-income borrowers for 2003 and the years 2004-2006, respectively. This is lower than the proportion of low-income families in the AA during the evaluation period. The percentage of refinance loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share for moderate-income families also meets its overall market share.

Small Loans to Businesses

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

The distribution of small loans to businesses is good. The percentage of small loans made to small businesses is near to the percentage of small businesses with annual revenues of \$1 million or less in the New Orleans AA. The bank's market share of loans to businesses with revenues of \$1 million or less meets its overall market share.

Community Development Lending

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

Whitney's level of CD lending is significant and substantially enhances its overall good level of lending in the state of Louisiana. CD lending has a positive impact on the Lending Test conclusions. Since its inception in 1995, Whitney Bank and the CDC have made a significant contribution to meeting the need for affordable housing. During the evaluation period, Whitney Bank and Whitney CDC originated a total of 299 loans totaling \$399.5 million in the state of Louisiana. In the New Orleans AA, Whitney originated 155 CD loans totaling \$273 million.

Bank management and community contacts identified affordable housing and technical financial education assistance as persistent needs in the New Orleans AA. Whitney demonstrated an excellent level of responsiveness to the need for affordable housing. The majority of the CD loans were extended to investors, builders and non-profits specializing in development and rehabilitation of affordable single-family residences and multifamily dwellings in economically depressed low- and moderate-income geographies. For example, the Whitney CDC originated 246 loans totaling \$30.7 million primarily to non-profit entities to construct or rehabilitate affordable 1-4 family residences. Other significant CD loans include more than 19 loans originated by the bank for the purchase and rehabilitation of affordable multi-family housing throughout the AA, totaling more than \$8.9 million. The areas benefiting from this significant amount of affordable housing lending activity include low-income areas, neglected and/or abandoned neighborhoods, as well as areas impacted by hurricanes Katrina and Rita.

Other CD projects support non-profit providers of community services targeted to low- and moderate-income individuals and families. In 2003, Whitney loaned \$2.4 million to renovate and provide operating funds for a hospital located in a low-income neighborhood. These funds allowed the new local owners of the hospital a second chance after being forced into bankruptcy by its creditors. The hospital is located in a low-income geography, drawing most of its patients and staff from the 9th Ward. The hospital renovation supported the provision of much needed health care to the local residents, job preservation, and revitalization of a low-income area.

Another project that benefited from Whitney financing was the purchase and repair of a 202 room hotel located in downtown New Orleans. The hotel was closed and in need of significant repairs as a result of termite damage and extensive looting after the hurricane. The property is located in the downtown Enterprise Zone and has been awarded job creation tax credits under the Enterprise Zone Program, which is a jobs incentive program that provides Louisiana Income and Franchise tax credits to a business hiring a minimum number of net new employees.

The bank's commitment to increasing the stock of affordable housing and revitalization of low- and moderate-income geographies in New Orleans is demonstrated by this excellent level of community development lending.

Product Innovation and Flexibility

The use of innovative and flexible loan products significantly enhances the bank's performance under the Lending Test, and positively impacted the rating. Specifically, the bank offers residential loan programs that benefit low- and moderate-income individuals and geographies, as well as those areas impacted by hurricanes Katrina and Rita. Products offered include loans to small businesses that were also impacted by the hurricanes. Many of the programs have regional and statewide impact and were initiated and developed by the bank, with bank staff expending considerable time and effort in establishing partnerships with government and non-profit mortgage experts.

Louisiana Small Business Bridge Loan Program

The Louisiana Department of Economic Development established a bridge loan program for small businesses impacted by hurricanes Katrina and Rita. To be eligible, the business must employ between 2-100 employees. Financial institutions operating in the storm affected areas administer the program. The goal was to get money to the affected businesses within five business days of loan application.

During phase one of this program, short term (up to 180 days) single pay loans were offered that, depending on the applicant's situation, carried either a 4% interest rate or was interest free. The minimum loan amount was \$5,000 and the maximum amount was \$25,000. The second phase of the program offered short term (up to 180 days) single pay loans that either carried a 6.5% interest rate or was interest free. The minimum loan amount was \$5,000 and the maximum was \$100,000. Loan proceeds could only be used for the purposes of maintaining or restarting a business in a designated area or in a temporary location in one of the qualifying parishes that sustained damage or interruption of operations as a result of hurricanes Katrina or Rita. During the evaluation period, Whitney originated 61 loans totaling \$2.9 million through the Louisiana Small Business Bridge Loan Program.

Reverse Mortgages

Whitney offers a reverse mortgage loan product for senior citizen loan applicants whose income is below 80% of area median income. A reverse mortgage is a special type of mortgage that was developed specifically for people who are sixty-two years old and older and own their own homes. This is a way for the borrowers to obtain funds from the equity in their home. This type of mortgage may be insured and guaranteed by FHA, and monthly mortgage payments are not required as long as the borrower lives in the home as their primary residence. Whitney partnered with Neighborhood Housing Services of New Orleans (NHS) to assist senior citizens with rehabilitation loans when the property did not meet HUD property condition standards. The partnership works as follows:

- Whitney qualifies the borrower for a reverse mortgage loan including the amount for repairs.
- NHS performs property inspections and a work specification write up for repairs, and then puts the job out for bid.
- After the customer has accepted a bid, NHS makes the customer an interim loan for the amount of repairs.
- Repairs are completed; and the property is brought up to standards.
- Whitney originates a reverse mortgage taking out the NHS interim loan.

During the evaluation period, Whitney originated 138 reverse mortgage loans totaling \$12.5 million in the state of Louisiana; 112 loans totaling \$10.2 million were originated in the New Orleans AA.

Whitney Employee Lifeline Loans

The program was offered exclusively to Whitney employees that were residing in a hurricane affected area. Loan funds were available to those who wanted to purchase a new home or who had suffered uninsured residential and/or personal property loss. Loans are based on need rather than credit criteria. The characteristics of the program are described below.

- Purchase Money Second Mortgage: intended purpose is to purchase a primary residence. The loan has a 20 year term at 0% interest rate, with a maximum loan amount of \$35,000. Payments are deferred for 36 months.
- Residential Insurance Gap Loan: intended purpose is to pre-fund anticipated insurance proceeds on homeowner's primary personal residence coverage. Borrower must show proof of insured loss. Loan maturity is 24 months at 0% interest rate. A single payment is due within the 24 months. The maximum loan amount is \$50,000.
- Uninsured Property Loss Program: intended purpose is to assist in replacing uninsured personal property losses. Loan has a 10 year maturity at 0% interest rate. The maximum loan amount is \$10,000. Loan payments are deferred for 36 months.

During the evaluation period, Whitney originated 833 loans totaling \$13.1 million under the Lifeline Loan Program.

Whitney Neighborhood Housing Program

This program is designed to assist low- and moderate-income buyers who cannot qualify for traditional financing. Flexible characteristics of the product include no origination fee or discount points, no reserve requirements, and flexible underwriting criteria, such as expanded debt to income ratios, 97% financing, terms up to 30 years, acceptance of nontraditional credit references, and one year employment and credit history requirements. Due to the flexible underwriting characteristics, Whitney retains these loans in its loan portfolio. Whitney originated 32 loans totaling \$2.2 million in the state of Louisiana between January 1, 2003 and December 31, 2006.

Whitney Neighborhood Housing Program – REHAB

This program is designed to assist low- to moderate-income buyers who cannot qualify for traditional financing and/or borrowers buying property that needs rehabilitation as a condition of sale. Housing rehabilitation has been identified as a critical need in the city of New Orleans. The program provides the purchaser the ability to close the loan and includes escrow funds for the repairs if certain criteria and other conditions are met. This product contains flexible characteristics such as no origination or discount points, low \$100 construction-monitoring fee, no private mortgage insurance requirement, no reserve requirements, and flexible underwriting criteria, such as expanded debt to income ratios, 97% loan to value requirement, and acceptance of nontraditional credit references. Due to the flexible underwriting characteristics, Whitney retains these loans in its loan portfolio. Whitney originated 5 loans totaling \$352,000 in the New Orleans AA between January 1, 2003 and December 31, 2006.

Whitney participates in various bond programs offered by state and local housing and finance agencies. These programs generally offer lower than market rate loans, down payment and closing cost assistance to first time homebuyers or buyers whose income is below income limits set by the bonding authority.

Finance Authority of New Orleans (FANO)

Under the FANO housing program, bond funds are available for low interest FHA or conventional loans to borrowers whose income is less than 115% of the AA median income. Bond funds are used to help borrowers purchase a new home, renovate a home, or purchase and renovate an existing home in Orleans Parish. Down payment and closing cost assistance is available to qualified borrowers. Whitney originated 15 loans under this program totaling \$1.3 million, from January 1, 2003 through December 31, 2006, to borrowers whose income was at or below 80% of AA median income.

Home of My Own Program

This is a collaborative program between Whitney, The Human Development Center of Louisiana State University, and an approved non-profit. This initiative is designed to assist low- and moderate-income individuals whose lives are influenced by disabilities (cognitive, developmental, and physical) to become homeowners. The product contains flexible terms and underwriting characteristics, such as no origination or discount points, no application fee, terms up to 30 years, 97% financing (borrower's contribution is limited based on income), no reserve or private mortgage insurance requirements, expanded debt to income ratio requirements, reduced credit history requirements, and non traditional credit references are accepted. Due to the flexible underwriting characteristics, Whitney retains these loans in its loan portfolio. The bank originated 2 loans totaling \$76,000 in the New Orleans AA between January 1, 2003 and December 31, 2006.

Jefferson Bond Authority

The Jefferson Parish Finance Authority makes loan funds available for low- and moderate-income families through local lending institutions. Funds assist first time homebuyers in purchasing their homes by subsidizing closing costs and/or down payment requirements in conjunction with a loan obtained through the Jefferson Parish Finance Authority or other qualified lenders. Qualified applicants may receive \$10,000 to be applied toward the down payment and closing costs. Participants are required to grant a mortgage to the Parish in the amount of assistance provided. The mortgage is for a term of 10 years, non-interest bearing, and is non-repayable if certain conditions are met. Qualified borrowers can choose from FHA, VA, or conventional loans. Whitney originated 47 loans under this program, totaling \$5.2 million in the New Orleans AA during the evaluation period of January 1, 2003 through December 31, 2006, to borrowers whose income was at or below 80% of the median income for the area.

Louisiana Housing and Finance Agency (LHFA)

Whitney participates in this Mortgage Revenue Bond Assisted Program and Low Rate Mortgage Assisted Program (MRB). The MRB *Assisted Program* helps prospective homebuyers who may not have enough money to meet down payment and closing costs. The program has interest rates that are at or below market level. Down payment and closing costs assistance comes in the form of a grant that is equal to 4% of the mortgage amount, the property must be in Louisiana, and the borrower must meet income requirements. Whitney originated 55 loans totaling \$5.3 million in the state of Louisiana, and 52 loans totaling \$4.9 million in the New Orleans AA to borrowers whose income was at or below 80% of area median income.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Lake Charles and Non-MSA AAs is not inconsistent with the bank's overall "Outstanding" lending test performance in Louisiana. However, performance in the Baton Rouge, Houma, and Lafayette AAs is weaker. Performance in the Baton Rouge AA is good and performance in the Houma and Lafayette AAs is adequate.

Refer to Tables 1-11 in the state of Louisiana section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the Investment Test in Louisiana is rated "Outstanding". Based on full-scope reviews, the bank's performance in the New Orleans AA is excellent, given the impact and responsiveness of statewide, regional, and direct investments in the AA and the context in which the bank was operating.

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose community development, as defined in the CRA regulation. Consideration was given to investment activities of both the bank and its affiliate; the Whitney Community Development Corporation (CDC). However, the majority of investment activity was accomplished by the bank. The CDC primarily provides community development loans, as discussed in the Lending Test. In spite of the fact that normal business activities were interrupted during the latter part of the evaluation period as a result of Hurricane Katrina, Whitney's investments are beneficial to, and meet identified needs in the New Orleans AA and in the State of Louisiana. The responsiveness of the Louisiana statewide investment that benefited portions of the state that are outside the bank's AA has a positive impact on the overall Investment Test rating. The impact of the benefits of the outside AA investments was given consideration since the bank has adequately met community development needs in its AAs.

An investment was made in a Small Business Investment Company (SBIC) during the evaluation period. Activities of the SBIC occurred in more than one of the states in which the bank operates. Therefore, this investment is presented in Table 14 as a "Gulf Coast Region" investment since it benefits multiple AAs. In addition, the bank made two investments in bonds issued by the States of Louisiana and Mississippi that benefit the bank's AA as well as other segments of the respective states. These investments are shown in Table 14 as statewide investments under the appropriate state. The qualitative and quantitative impact of these regional and statewide investments is taken into consideration when reaching conclusions about performance in each of the individual AAs under analysis.

Specifically, during the current evaluation period, the bank made a \$4.5 million investment in an SBIC that operates primarily in the Gulf Coast (southeastern states and Texas) region of the United States, an area that includes the bank's AA. The company invests in privately-owned businesses that qualify as small businesses under SBIC regulations and that are in need of capital either to open or expand their operations. In this way, the investment helps to provide economic development assistance to a community by helping to provide additional jobs. The New Orleans AA benefited from this regional investment.

Also during the current evaluation period, the bank invested \$25 million in State of Louisiana General Obligation Gulf Tax Credit Bonds, otherwise known as GO Bonds. The purpose of the bonds is to provide funds for debt service so that political subdivisions and their entities affected by Hurricanes Katrina and Rita could make timely payment of principal and/or interest on outstanding bonds, notes, etc. issued prior to the hurricanes.

The bonds helped to revitalize and stabilize disaster areas allowing the impacted communities to direct all of their available financial resources to help them recover and provide basic services to their citizens. For example, in the city of New Orleans, proceeds from the GO bonds were used to make payments on existing debts of the Port of New Orleans, which provided as many as 160,000 jobs prior to the hurricane, and the Regional Transit Authority (NORTA). New Orleans has one of the highest poverty rates in America and, most often, public transportation is the only option. NORTA operated one of the largest fleets of buses in the nation, prior to Hurricane Katrina. The bank's entire AA in Louisiana benefited from the issuance of these bonds, but the majority of the AA benefit was experienced in the New Orleans AA. Approximately 25% (based on population impact) of the Louisiana GO bond purchase benefited areas outside the bank's AA, but inside the state of Louisiana.

During the current evaluation period, the bank originated 184 qualified investments totaling \$2.3 million directly in the New Orleans AA. Two investments were deposits in a Community Development Financial Institution (CDFI) operating in New Orleans which helps to provide financial services in low- and moderate-income geographies. The bank's initial \$100,000 deposit was made in 2005, and renewed in 2006. The remaining direct investments consist of 182 donations totaling \$2.2 million to organizations in the New Orleans AA whose primary purpose meets the definition of community development. About 80% of donation dollars helped to provide community services to low- and moderate-income persons. The city's high rate of poverty speaks to the need for such services. Based on the 2000 U. S. census, 26% of the households in the city of New Orleans live below the poverty level.

Approximately 10% of donation dollars represent operating grants to entities that provide affordable housing through their lending relationship with the Whitney CDC, and 5% of total donations are grants under "The Federal Home Loan Bank (FHLB) of Dallas Partnership Grant Program. This program is designed to enhance building capacity of community based organizations involved in affordable housing programs, provide local development funds, and money to small business technical assistance providers. The bank's grant is matched by the FHLB on a basis of three to one, making this grant activity highly responsive to community needs. (For a further discussion of the bank's activities with the FHLB of Dallas, please see the Community Development Services portion of the Service Test).

Prior period investments, which are not given as much consideration as current period investments, were originated during previous examination evaluation periods and remain on the books of the bank. In the New Orleans AA, there are two prior period investments totaling \$644,000. One investment, totaling \$394,000 is a stock investment in a New Orleans savings bank that is a certified CDFI and provides financial services for low- and moderate-income individuals and families. The other prior period investment is a stock investment in a Small Business Industrial Development Company (SBIDCO) also operating in New Orleans that helps to provide capital to businesses meeting the definition of small business under the CRA. Both of these organizations continue to provide community service and economic development assistance to the New Orleans AA.

Overall, the bank's qualified investments in the New Orleans AA are highly responsive to AA needs, primarily addressing the need to revitalize and stabilize disaster areas. This responsiveness is considered particularly important in the New Orleans AA given the level of low- and moderate-income geographies and persons in the city. The SBIC investment is highly responsive in that the bank's investment allows the SBIC to leverage the investment amount via borrowings from the Small Business Administration, doubling the amount of funds available for its investment. However, the bank's investments are not considered innovative or complex. Private investors routinely provide the types of qualified investments noted here.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Baton Rouge, Houma, Lafayette, Lake Charles and Louisiana non-MSA AAs is not consistent with the bank's overall "Outstanding" performance under the investment test in Louisiana. Performance in each of these AAs is weaker. Given the impact of the bank's statewide investment, performance in the Lafayette and Louisiana non-MSA AAs, performance is good. Performance in the Baton Rouge, Houma, and Lake Charles AAs is adequate.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

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

The dispersion of branches and accessibility to products and services is excellent. Whitney's delivery systems are readily accessible to geographies and individuals of different income levels. Whitney's banking services and hours are tailored to the convenience and needs of its AA, particularly low- and moderate-income individuals. Whitney offers extended lobby and drive-in hours at a majority of its locations, including Saturday banking hours. These services enhance the accessibility of the branches.

Whitney operates 38 branches in the New Orleans AA, representing 45% of all Whitney branches in the state of Louisiana. Service delivery systems are readily accessible to the bank's geographies and individuals of different income levels in its AA. The percentage of branches in low-income geographies is comparable to the percentage of the population residing in those tracts with 11% of the branches and 11% of the New Orleans AA population residing in those geographies. The percentage of branches located in moderate-income geographies is only slightly below the percentage of the population residing in those geographies, with 16% of the branches located in moderate-income census tracts and 21% of the population residing in those census tracts. We also considered in evaluating performance that many of the bank's other branches are in close proximity to low- and moderate-income geographies and are therefore accessible to these areas. For example, seven of the nine branches located in middle-income census tracts are in tracts adjoining moderate-income tracts. Three of these also adjoin low-income census tracts. Also, eight of the branches in upper-income geographies adjoin moderate-income census tracts and one of those also adjoins a low-income tract.

Although several branches in the New Orleans AA were temporarily closed due to flood and wind damage in the wake of Hurricane Katrina, no branches have been permanently closed and no new branches have been opened in the New Orleans AA since our previous examination.

Lobby hours, services, and products offered do not vary in a way that inconveniences any portion of the assessment area. Banking hours are consistent throughout the AA. Branch lobbies are open 9 a.m. to 4 p.m. Monday through Thursday and until 5:30 p.m. on Friday. Drive-up facilities are generally open from 9 a.m. until 5:30 p.m., with some open 9 a.m. to 11 a.m. on Saturday. Although a number of branch offices are closed on Saturdays, this is largely due to decreased weekend business in those locations, and there is no apparent correlation that Saturday closing resulted because the branch was in a low- or moderate-income area.

Automated Teller Machines (ATMs), one of Whitney's alternative delivery systems, significantly supplements the branch network, and provide consumers and small business account holders access to funds both during and outside traditional banking hours. Whitney operates a total of 69 ATMs throughout the New Orleans AA as part of its overall service delivery system. The dispersion of the ATMs represents a good distribution across the AA, including the low- and moderate-income geographies. Each of the four branches located in low-income tracts includes an ATM. Seventeen other ATMs, or 25% of the total, are located in moderate-income census tracts. All external ATMs are available 24 hours a day, seven days a week. However, some ATMs are located inside branch buildings, at the New Orleans airport, or in office buildings, and may be subject to the hours of operation of the building in which they are located. All Whitney ATMs have bilingual (English and Spanish) screens.

Other alternative delivery systems include debit cards, bank-by-mail, online banking with a bill-payment feature and telephone banking. Various internet banking services for consumers, as well as businesses, are available at www.whitneybank.com. Services offered are relatively standard, including services such as, bill payment (with a fee schedule), transfer between accounts (including loan payments) and balance inquiry. The bank also offers free telephone banking with service in English as well as Spanish. In evaluating the bank's services, no significant weight was given to these systems since the bank does not track how well these services benefit low- and moderate-income individuals or geographies.

Bank-wide, Whitney offers a variety of loan and deposit products at its many locations. Several are of particular use to low- and moderate-income individuals, as well as small businesses. Examples of the products and services offered include:

Smart Checking

This consumer checking account is free for accounts with direct deposit. The account includes free unlimited internet bill payment, free E-Statements and a free VISA Platinum Check Card. Account holders are also eligible for Whitney's "Points Plus" rewards program.

Community Edge Checking

This is a checking account product reserved for non-profit and community development organizations that allows for 50 free checks per month, no monthly service fees with a \$500 minimum balance, and free access to Whitney ATMs and the bank's Information Line services. Funds can be accessed by check, ATM, check card, telephone, or internet.

Individual Development Accounts (IDAs)

Whitney provides these savings accounts to qualified applicants in the state of Louisiana, in cooperation with the IDA Collaborative of Louisiana (IDACL). The IDACL aids low-income families throughout the state in building an asset base by providing matching funds needed to accumulate a down payment for a home purchase loan, as well as small grants for education or business purposes. The bank opened 118 IDA savings accounts and originated 16 related residential mortgage loans totaling \$1.2 million during our evaluation period. The bank is also involved with a Federal Home Loan Bank of Dallas IDA program (also in the state of Louisiana) designed to provide matching funds and closing cost assistance for first time homebuyers.

Economy Edge Small Business Checking

This is a business checking account for accounts with 100 transactions or less per month. The account has no minimum balance requirement, and funds can be accessed by check, check card, telephone, or internet. There is no charge for Whitney ATM or VISA Check Card transactions, or for transfers between Whitney accounts.

E-Z Pay Card

This product is a special VISA debit card that allows businesses to offer direct deposit services to their employees who do not have a banking relationship. Instead of receiving a paycheck, the employee can elect to have their net pay deposited into a special account at Whitney that they can access using the E-Z Pay card. Aside from reaching the “unbanked” community, the product is a useful payroll alternative for small businesses with limited accounting expertise or resources.

Secured VISA Credit Card

For customers in difficult financial circumstances, or with otherwise poor credit scores, the bank offers a VISA credit card secured by a deposit account at the bank. The product is considered to be particularly useful in helping borrowers re-establish credit.

Community Development Services

Whitney is a leader in providing CD services. Community development services significantly enhance performance under the service test. Whitney has exerted strong efforts to build relationships and provide community development services in its Louisiana AAs. The Whitney CDC has been extremely effective in providing community development services in the New Orleans AA and has developed projects in many of the other Louisiana AAs. The CDC’s activities include technical assistance for non-profit organizations; financial education for low- and moderate-income individuals; help to secure grant financing; loans; project management and organizational development. In particular, the CDC provides substantial levels of technical expertise to educate other professionals involved in affordable housing. The efforts of the CDC help increase the stock of affordable housing and help people to become self-sufficient. These activities help to ensure the continuation of community development activities bank-wide and in the Louisiana AAs.

The bank’s community development services are particularly strong in the New Orleans AA due to Whitney’s long history and extensive branch network in the area. Efforts in the New Orleans AA received positive consideration in evaluating performance. As described in the Description of the Institution and in the Community Development Lending Sections of the Performance Evaluation, Whitney and its CDC have been very active in the promotion and creation of affordable housing in its AAs, particularly in New Orleans. Several members of Whitney’s Community Affairs staff serve as an officer of the Whitney CDC, devoting a substantial amount of time and expertise to increasing affordable housing capacity in the Louisiana markets.

Bank officers, including members of the bank's community affairs department, are very active in providing expertise to non-profit organizations regarding community and economic development, community action, affordable home loan programs, property management, construction and renovation. They participate in, and lead public forums and meetings with government agencies and economic groups to identify credit needs and CD opportunities.

Bank officers share their expertise with members of their communities through their participation in housing and business forums and seminars. Bank employees in the New Orleans AA are regularly involved in homeownership and purchase education and counseling, as well as basic credit counseling. Officers of the bank are represented on national and local housing service boards, as well as organizations specific to post-Hurricane Katrina recovery efforts in New Orleans and the greater Gulf Coast region. Ongoing services provided by the bank, or the Whitney CDC, in the New Orleans AA for the benefit of low- and moderate-income individuals include:

- Homebuyer/homeownership training
- Small business education and counseling
- Community development training for non-profits
- Credit and homeownership counseling

Specific CD services offered include:

Association of Community Organizations for Reform Now (ACORN)

This nationwide organization is involved in community outreach and education, as well as advocacy for a wide variety of issues such as affordable housing, health care, education, and neighborhood safety. Whitney has been active in providing first time homebuyer training and counseling for the organization. ACORN has local chapters in several of Whitney's AAs, including New Orleans.

Federal Home Loan Bank Grant Assistance (FHLB)

Whitney Community Affairs personnel assist housing development groups in completing applications for affordable housing grants offered by the Federal Home Loan Bank of Dallas. The majority of the grants approved during the evaluation period helped subsidize closing costs and provided down payment assistance for first time homebuyers. Whitney offers this service on a bank-wide basis, aiding in applications made by organizations in several different AA's during the evaluation period. Eight applications totaling \$498,000 in the New Orleans AA were approved during the period. The bank also assists non-profit groups in applying for direct funding through FHLB "Partnership" Grants.

IDA Collaborative of Louisiana (IDACL)

A Whitney bank officer serves on the board of IDACL which aids lower income families (defined as 200% of the poverty level) throughout the state of Louisiana by encouraging saving by providing matching funds to help with the accumulation of funds for a home purchase loan down payment. IDACL also provides lower income families small grants for education or business purposes. Whitney offers the individual development account deposit product which is a key element of the program.

Local Recovery Authority (LRA)

This organization was created after Hurricane Katrina to plan and coordinate rebuilding efforts within the state of Louisiana. A Whitney bank officer serves on the board of directors. The chairman of the Whitney CDC also serves on the funding committee of the LRA Support Foundation, which approves grants for affordable housing and redevelopment projects.

Neighborhood Housing Services of America (NHS)

The Whitney CDC president serves as a board member as well as on the loan, audit, and executive committees of this nationwide, secondary market affordable housing group. Whitney is also involved at the local level, with a bank officer serving as a board member of NHS New Orleans. Several bank officers in the New Orleans AA are also active in making presentations and providing homebuyer counseling for the organization.

The bank participates in, and often helps directly underwrite events for other local organizations, such as, New Schools for New Orleans, Junior Achievement of Greater New Orleans, and a variety of homebuyer seminars, all of which are targeted to low- and moderate-income families. Bank employees also participate in small business development forums, and provide a host of other services targeted towards the AA at large.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Baton Rouge, Lafayette, Lake Charles, Houma, and Louisiana non-MSA AAs is not consistent with the bank's overall "Outstanding" performance under the Service Test in Louisiana. Performance in each of these AAs is weaker than the performance in the state. Performance in the Baton Rouge, Lafayette, and Louisiana non-MSA AAs is good. Performance in the Houma AA is adequate. Performance in the Lake Charles AA is poor.

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

State of Florida

CRA Rating for Florida: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: Needs to Improve

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- Whitney demonstrates an adequate responsiveness to the credit needs of its AAs.
- A substantial majority of the bank's originations and purchases are inside its AAs.
- The geographic distribution of loans originated in Florida is good. The distribution of loans to borrowers of different income levels is good.
- Whitney's level of community development lending is strong and has a positive impact on the lending test rating.
- The use of innovative and flexible loan products enhances the bank's performance under the lending test.
- Lending performance in the limited-scope assessment areas had a negative impact on the Lending Test rating.
- Community development investment performance is poor given the bank's resources and capacity.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in all the Florida AAs.
- Whitney provides an adequate level of community development services in support of affordable housing needs.

Description of Institution's Operations in Florida

Whitney operates 27 branches and 29 ATMs in the state of Florida. The Florida AAs include four metropolitan areas: Pensacola; Fort Walton; Tampa; Sarasota; and one non-metropolitan area, Walton County. Approximately 11.1% of the bank's total deposits were attributed to these AAs, and the bank originated 7.3% by number and 9.6% by dollar volume, of its total reported loans in these AAs.

The bank's primary market in the state is Pensacola. The Pensacola AA represents 33.3% of the Florida branch network, 28.3% of the Florida deposit base, and 47.4% of the total reported loans in the state of Florida. The Sarasota AA is actually larger than the Pensacola AA in terms of deposit market share (31.8%) but it only represents 1.1% of the bank's total reported loans during the evaluation period. This is attributed to the fact that Whitney entered the Sarasota AA with the acquisition of the 1st National Bank & Trust in Bradenton, Florida in 2006. Prior to its acquisition, the 1st National Bank was not subject to the CRA data collection and reporting requirements. The other Florida AAs (excluding Sarasota) comprise 48.1% of the branch network, 39.9% of the bank's deposit base, and 51.1% of the CRA reportable loan volume for this evaluation period.

Whitney's deposit market share rank in the state of Florida is 26th, with a market share of 0.44% in a state with 568 financial institutions. State banking competition is aggressive and includes dominant affiliates of large national banking companies, several regional institutions, and numerous community banks, credit unions and non-bank financial service providers. The top five competitors in this market include: Amsouth Bank, Bank of America, N.A., SunTrust Bank, Wachovia Bank, N.A., and Washington Mutual Bank, all of which are considerably larger in asset size than Whitney and directly compete with the bank within its various markets.

Whitney's CRA reportable loan volume by number is comprised of 51% small loans to businesses and 49% HMDA purpose loans. The bank makes commercial loans of all types and sizes including commercial and industrial, commercial mortgage, business credit cards, and construction and land development loans. Examples of consumer purpose loan products include residential mortgages of all types, residential construction loans, personal loans (including lines of credit), and auto loans.

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.

Scope of Evaluation in Florida

We evaluated the bank's performance in the state of Florida by performing a full-scope review of the Pensacola AA and limited scope reviews of the Fort Walton, Sarasota, Tampa, and the Florida non-metropolitan AAs. We selected the Pensacola AA for a full-scope review because the bank maintains a significant share of its business within the AA: approximately 28.3% of the deposits in Florida and 60.1% of reportable loan originations during the evaluation period. Additionally, the Pensacola AA is where the highest concentration of branches is located.

The bank's overall rating is based primarily on the area that received a full-scope review. Home mortgage loans and small loans to business were equally weighted in the performance evaluation. Small loans to business represent 49.8% of reported loans in the state and home mortgage loans represent 48.5%. We gave more weight to home purchase and refinance loan performance, since the bank's originations and purchases for these products represent a higher proportion of total home mortgage loans.

The geographic distribution of multi-family loans and the distribution of small loans to farms by geography and income level of the borrower are not relevant due to the small volume of these types of loans originated or purchased during the evaluation period. Therefore, an analysis of the geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms has been eliminated from the Public Evaluation.

We noted during the review of eight community contacts made in the AAs that many opportunities exist in the bank's markets to participate in community development lending, investment, and service activities. The contacts identified affordable housing as the most critical need in all AAs.

Refer to the table in Appendix A for more information regarding the scope of this examination.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Florida is rated "High Satisfactory". Based on the bank's performance in the Pensacola AA, which received a full-scope review, the bank's performance is excellent. Whitney's rating was based primarily on its good geographic and borrower distribution, which was enhanced by excellent community development lending, which was responsive to the affordable housing needs in the AA. However, performance in the limited-scope AAs had a negative impact on the lending test rating.

Lending Activity

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 lending activity.

Whitney's lending activity demonstrates adequate responsiveness to the credit needs of its AA considering its size, resources, deposit market share, and primary business focus. Whitney's deposit market share of 7.1% ranks the bank 6th among 35 financial institutions with offices in the Pensacola AA. The top five institutions with a greater market share include Amsouth Bank, Bank of America, Bank of Pensacola, Regions Bank, and Wachovia Bank, N.A.

Small business lending and home mortgage lending is essential to the local economy. In the Pensacola AA, approximately 50.6% of the number, and 55.6% of the dollar amount of Whitney's CRA reportable loans, were small loans to businesses. Approximately 49.3% of the number, and 44.4% of the dollar amount, were home mortgage loans. Among the home mortgage loans originated in the Pensacola AA, approximately 50.2% were for home purchase, 40.7% were refinance loans, and 8.6% were home improvement loans.

Business lending activity is adequate. Whitney reported 1,009 business loans totaling \$181 million over the evaluation period. Whitney originated 1.9% of all reported 2005 small loans to businesses in the Pensacola AA, ranking 12th among 66 lenders in the AA. Whitney's lending performance to businesses with revenues of \$1 million or less is proportional. Whitney originated 2.0% of all reported 2005 small loans to businesses in the Pensacola AA, ranking 13th among all banks. In addition, Whitney's lending volume in home mortgage products is adequate. Whitney ranks 38th in home mortgage lending originations with a 0.64% market share. Overall, reportable loan volume is adequate given the large number of non-bank financial providers making both home mortgages and small loans to businesses in the Pensacola AA.

Distribution of Loans by Income Level of the Geography

Whitney's geographic distribution of lending is good. The geographic distribution of home mortgage lending is good. The geographic distribution of small loans to businesses is excellent.

For home mortgage loans, the analysis focuses on low- and moderate-income geographies separately, comparing the bank's percentage of the number of home mortgage loans originated and purchased in low- and moderate-income geographies to the percentage of owner-occupied housing units in each of these income level geographies. The other measure of performance is a comparison of the bank's market share of loans in low- and moderate-income geographies to its overall market share of home mortgage loans.

In the case of small loans to businesses, the analysis also focuses on low- and moderate-income geographies separately, and compares the percentage distribution of the number of loans to small businesses (businesses with annual revenue less than or equal to \$1 million) originated or purchased by the bank to the percentage of businesses in either low- or moderate- income geographies. The other measure of performance is the comparison of the bank's market share of loans to small businesses in low- and moderate income geographies compared to its overall market share of loans to small businesses.

Home Mortgage Loans

Refer to Tables 2 – 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 and purchases in the Pensacola AA.

The geographic distribution of home purchase loans is good. The percentage of loans in low-income geographies is near to the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is somewhat below the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies exceeds its overall market share. In moderate-income geographies, the bank's market share also exceeds its overall market share.

The geographic distribution of home improvement loans is good. The percentage of loans in low-income geographies exceeds the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is near to the percentage of owner-occupied units in these geographies. The bank's market share in low- and moderate-income geographies is well below its overall market share.

The geographic distribution of refinance loans is adequate. The percentage of loans in low-income geographies is well below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is near to the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies is well below its overall market share. In moderate-income geographies, the bank's market share is near to its overall market share.

A geographic analysis of multi-family loans was not meaningful; therefore, these loans are not considered in the evaluation of the bank’s home mortgage loan performance.

Small Loans to Businesses

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 and purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The percentage of loans made in low-income geographies exceeds the percentage of businesses located in these geographies. The bank’s market share in low-income geographies also exceeds its overall market share. The percentage of loans made in moderate-income geographies exceeds the percentage of businesses located in these geographies. The bank’s market share in moderate-income geographies significantly exceeds its overall market share.

Small Loans to Farms

A geographic analysis of small loans to farms was not meaningful therefore small farm loans are not considered in the evaluation of the bank’s performance.

Lending Gap Analysis

Reports and maps detailing Whitney’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 gaps were identified.

Inside/Outside Ratio

At the state level, Whitney has an excellent record of lending inside its assessment areas. We performed an analysis of the bank’s record of making home mortgage loans and small loans to businesses in Florida. The information we reviewed included CRA reportable loan originations and purchases. CD loans made by the CDC were not included in the In/Out ratio. A substantial majority of home mortgage loans and loans to small businesses were originated and purchased in the state of Florida. By product, the bank originated the following percentages of CRA reportable loans inside its AAs.

Loan Type	% Inside
Home Purchase	95%
Refinance	96%
Home Improvement	97%
Small Loans to Businesses	95%
Overall	96%

This performance was positively factored in the overall analysis of the geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

The distribution of Whitney's CRA reportable loans to borrowers of different incomes is good. Whitney achieved good penetration to low- and moderate-income borrowers with its home mortgage lending. The distribution of small loans to businesses with revenues of \$1 million or less is adequate.

For home mortgage loans, the analysis focuses on low- and moderate-income borrowers separately, comparing the percentage of the number of loans, by product, to the percentage of AA families that are in either the low- or moderate- income category. The other measure of performance for borrower distribution is a comparison of the bank's market share of home mortgage loans originated and purchased in an AA to the bank's market share of home mortgage loans, by product type, for each borrower income category in the AA.

In the case of loans to small businesses, the analysis focuses on the percentage of businesses within the AA that have revenues of \$1 million or less, compared to the percentage of reported loans to small businesses that were purchased or originated by Whitney. The other measure of performance is a comparison of the bank's market share of loans to businesses with annual revenues of \$1 million or less to the bank's overall market share for loans to businesses.

Generally, it is more difficult for low-income borrowers to obtain home mortgage loans due to the high cost of housing compared to the relatively low-incomes in the Pensacola AA. In the AA, the HUD adjusted median family income is \$43,355 and the median housing value is \$90,973. As such, we placed more emphasis on the demographic indicator than the market share analysis when deriving conclusions for borrower distribution of mortgage loans. We equally weighted the two performance measurements (demographic data and market share) to derive an overall conclusion as to the bank's performance in making loans to businesses of different sizes during the 2003 portion of the evaluation period. Loan performance during 2003 was compared to 1990 census data, which was the census available in 2003. We placed more emphasis on the demographic performance measurement analysis during the 2004 – 2006 portion of the evaluation period since the current year 2000 U. S. census data is relevant to this time period

Home Mortgage Loans

Refer to Tables 8 – 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 in the Pensacola AA.

The distribution of home purchase loans to borrowers of different income levels is excellent. The percentage of home purchase loans to low-income borrowers is below the percentage of low-income families in the AA. Market share analysis indicates that the bank's performance to low-income families exceeds its overall market share. Whitney originated 11.3% and 12.8% of its home purchase loans to low-income borrowers for 2003 and 2004-2006, respectively. This is lower than the proportion of low-income families in the AA which is 20.2% for 2003 and 20.4% for the years 2004-2006. Performance to low-income borrowers is good considering approximately 13% of all households lived below the poverty level during the evaluation period. Low-income borrowers, especially those living below the poverty level, would experience some difficulty in obtaining home purchase loans. The percentage of home purchase loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share to moderate-income families also significantly exceeds its overall market share.

The distribution of home improvement loans to borrowers of different income levels is good. The percentage of home improvement loans to low-income borrowers is well below the percentage of low-income families in the AA. Market share analysis indicates that the bank's performance to low-income families is also well below its overall market share. Performance is good when considering the percentage of families living below the poverty level. Whitney originated 10% and 4% of its home improvement loans to low-income borrowers for 2003 and the years 2004-2006, respectively. This is significantly lower than the proportion of low-income families in the AA during the evaluation period. The percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share to moderate-income families is below its overall market share.

The distribution of refinance loans to borrowers of different income levels is good. The percentage of refinance loans to low-income borrowers is below the percentage of low-income families in the AA. Market share analysis indicates that the bank's performance for low-income families exceeds its overall market share. Performance is good when considering the percentage of families living below the poverty level. Whitney originated 4.1% 7.6% of its refinance loans to low-income borrowers for 2003 and the years 2004-2006, respectively. This is significantly lower than the proportion of low-income families in the AA during the evaluation period. The percentage of refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share to moderate-income families also exceeds its overall deposit market share.

Small Loans to Businesses

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.

The distribution of small loans to businesses is good. The percentage of small loans made to small businesses is near to the percentage of small businesses with annual revenues of \$1 million or less in the Pensacola AA. The bank's market share of loans to businesses with revenues of \$1 million or less significantly exceeds its overall market share.

Community Development Lending

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

Whitney's level of CD lending in the Pensacola AA is strong and had a positive impact on the Lending Test rating. Whitney originated 30 CD loans totaling \$3.0 million. All but one of these loans is related to affordable housing, which community contacts identified as a critical need in the AA.

In an effort to further the goals of the City of Pensacola's Urban In-Fill Housing Program, the Whitney CDC made several loans to a non-profit agency that builds affordable homes in low-income geographies. The objective of the program is to revitalize Pensacola's inner city neighborhoods through homeownership and by promoting the development of housing for low- and moderate-income families. Whitney currently has 8 loans totaling \$407,000 to this agency.

Product Innovation and Flexibility

The use of innovative and flexible loan products enhances the bank's performance under the Lending Test, and positively impacted the rating. Specifically, the bank offers residential loan programs that benefit low- and moderate-income individuals and geographies.

Florida Housing & Finance Agency (FLAHFC)

Florida Housing and Finance Agency bonds are used to provide affordable housing by providing low interest rates and down payment and closing cost assistance to prospective homeowners in the Gulf Opportunity Zone (GO Zone). Whitney originated 104 loans totaling \$8.2 million to borrowers whose income was at or below 80% of AA median income.

Reverse Mortgages

Refer to the Lending Test, State of Louisiana, Innovative and Flexible Lending Practices section of this evaluation report for a complete description of this loan program.

Whitney originated 2 loans totaling \$203,000 in the Pensacola AA to applicants whose income was below 80% of area median income.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Fort Walton, Sarasota, Tampa, and Florida non-MSA AAs is not consistent with the bank's overall "High Satisfactory" lending test performance in Florida. While the limited-scope AAs represent 71.7% of the deposits in the state, performance in these AAs is weak and the low level of performance did have a material impact on the Lending Test rating in the state of Florida. Performance in the Fort Walton and Florida non-MSA AAs is adequate. Performance in the Sarasota and Tampa AAs is poor. The weaker level of performance in these markets is primarily due to the limited presence of the bank in these markets as reflected by market share. The rating also took into consideration the fact that Whitney only recently entered the Sarasota and Tampa AAs through bank acquisitions.

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

Conclusions for Areas Receiving Full-Scope Reviews

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.

The bank's performance under the Investment Test in Florida is rated "Needs to Improve". Based on a full-scope review, the bank's performance in the Pensacola AA is poor given the bank's capacity, length of the evaluation period, the ample opportunities for qualified investments in the AA, and even when consideration is given to the context in which the bank was operating. Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose community development, as defined in the CRA regulation. Qualified investments in the Pensacola AA are generally responsive to the AA need for financial support of agencies that provide community services for low- and moderate-income individuals and families. However, the bank's investments are not considered innovative or complex. Third party investors routinely structure and originate the types of qualified investments that Whitney purchases in the Pensacola AA.

During the current evaluation period, Whitney made 17 investments totaling \$35,000. These investments are donations to organizations whose primary purpose meets the definition of community development. Approximately 65% of donation dollars helped to provide a variety of community services targeted to low- and moderate-income individuals and families. There were no prior period investments.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Fort Walton, Sarasota, Tampa, and Florida non-MSA AAs is not inconsistent with the bank's overall "Needs to Improve" performance in Florida. It should be noted however that Whitney has operated in most of the limited-scope AAs for only a small portion of the evaluation period and it entered these markets through the acquisition of banks that were previously considered "small banks" as described in the CRA regulation.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

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.

Whitney's service delivery systems are reasonably accessible to essentially all geographies and individuals of different income levels throughout the Pensacola AA. Whitney operates nine branches in the AA. There are no branches located in low-income census tracts where 2% of the population resides. The bank does have one office, which represents 11% of the branches in the AA, in a moderate-income geography and adjacent to a low-income census tract. This compares to 22% of the population which resides in moderate-income census tracts. We also considered in our evaluation that several other branch locations are also proximate to moderate-income geographies. Two branches located in upper-income tracts and two in middle-income tracts are adjacent to moderate-income geographies.

Whitney operates 10 ATMs throughout the Pensacola AA. None are located in low-income census tracts, but two, or 20%, are located in moderate-income geographies. One of those accepts deposits. All Whitney ATMs have bilingual (English and Spanish) screens.

Whitney's record of opening and closing branches has generally not adversely affected the accessibility of bank delivery systems to low- and moderate-income areas in the Pensacola AA. One branch located in a moderate-income census tract was closed in 2005. No new branches were established during the evaluation period.

Whitney's hours, services, and products offered do not vary in a way that inconveniences any portion of the AA, including low- and moderate-income census tracts and individuals. Banking hours are consistent throughout the AA. Branch lobbies are generally open from 9 a.m. to 4:30 p.m. Monday through Thursday, and until 5 p.m. on Friday. Several branches are open from 9 a.m. to 3 p.m. on Saturday. All drive-up facilities offer extended hours.

A wide variety of deposit and loan products, as well as business services, are available at all branch locations. In addition to the products and services normally offered by a bank of Whitney's size, several deposit or loan products are particularly responsive to the needs of low- or moderate-income individuals and small businesses. Products of relevance to this evaluation period are offered bank-wide, available in all AAs, and are described in detail under the Service Test for the state of Louisiana. These products are not only targeted to low- and moderate-income individuals or small businesses, but provide basic low cost banking products throughout the AA.

Community Development Services

Whitney provides an adequate level of CD services in the Pensacola AA. These services are centered in providing affordable housing to low- and moderate-income families. Services include working directly with state housing authorities to facilitate the lending process, as well as making presentations at affordable housing fairs. The level of CD services in the Pensacola AA received positive consideration in evaluating performance for the state of Florida.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Fort Walton, Sarasota, Tampa, and Florida non-MSA AAs is not inconsistent with the bank's overall "Low Satisfactory" performance under the Service Test in Florida.

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

State of Texas

CRA Rating for Texas: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: High Satisfactory

The major factors that support this rating include:

- Whitney demonstrated good responsiveness to credit needs within the Houston AA.
- Whitney's overall CRA reportable loan volume in Texas is good, particularly for small loans to businesses and home improvement loans.
- Whitney's overall geographic distribution of loans is good, and the distribution of loans to borrowers of different income levels is adequate.
- CD lending performance is excellent and has a positive impact on the Lending Test rating.
- The level of qualified investments in the Houston AA is good.
- Service delivery systems are accessible to geographies and individuals of different income levels in the Houston AA.
- The level of community development services is good. These services support and address identified needs in the community.

Description of Institution's Operations in Texas

Whitney has one assessment area (AA) in the state of Texas. The Houston AA includes Austin, Fort Bend and Harris County. The bank operates 13 branches and 18 ATMs in this AA. Approximately 6.1% of the bank's total deposits were attributed to this AA. Additionally, the bank originated 7.2%, by number and 9.4% by dollar volume, of its total reported loans in this AA.

Whitney's deposit market share rank in the state of Texas is 58th with a market share of 0.18% out of a total of 1,354 financial institutions operating in the state. Whitney's presence in the Houston AA is slightly better as their deposit market share rank in the AA is 20th. Deposit market share in the Houston AA is 1.06% out of a total of 198 deposit taking institutions. Local banking competition is very aggressive and includes dominant affiliates of large national banking companies, several regional institutions, and numerous community banks, credit unions and non-bank financial service providers. The top five competitors in the Houston AA include: Bank of America, N.A., JP Morgan Chase Bank, N.A., Washington Mutual Bank, Wells Fargo Bank, N.A., and Woodforest National Bank, most of which are considerably larger in asset size than Whitney and directly compete with the bank within this market.

Whitney is a predominantly a commercial lender in the Houston market. Approximately 84.3% of CRA reportable loans in this market are small loans to businesses and 15.4% are home mortgage loans. The bank originates commercial loans of all types and sizes including commercial and industrial, commercial mortgage, business credit cards, and construction and land development loans. Home mortgage products include home purchase, home improvement, and refinance loans.

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

Scope of Evaluation in Texas

Whitney has one AA in the state of Texas. Therefore, the Houston AA was selected for full-scope review, and the bank's rating in Texas is based on this AA, because this is the only area where Whitney has branches in the state.

Small business lending performance was given the greatest consideration when assessing the lending test rating since it is the bank's primary business line, followed by home mortgage loans. We gave more weight to home purchase loans since the bank's originations for this product represent a higher proportion of total home mortgage loans than home refinance and home improvement loans.

The geographic distribution of multi-family loans and the distribution of small loans to farms by geography and income level of the borrower are not relevant due to the small volume of these types of loans originated or purchased during the evaluation period. Therefore, an analysis of the geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms has been eliminated from the Public Evaluation.

We noted during the review of seven community contacts made in the AA that many opportunities exist in the bank's market to participate in community development lending, investment, and service activities. The primary needs identified by the community contacts are affordable housing, financial literacy education, and support for community organizations that target their services to low- and moderate-income individuals and families.

Refer to the table in Appendix A for more information regarding the scope of this evaluation.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Whitney's rating was based primarily on good lending performance in making small loans to small businesses. Strong community development lending targeted towards affordable housing also positively influenced the rating.

Lending Activity

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

Whitney's lending activity demonstrates good responsiveness to the credit needs of its AA considering its size, resources, deposit market share, and primary business focus. Small business lending and home mortgage lending is essential to the local economy. In the Houston AA, approximately 84.3% of the number, and 80.1% of the dollar volume of Whitney's CRA reported loans were small loans to businesses. Approximately 15.4% of the number, and 19.6% of the dollar amount, were home mortgage loans. Among home mortgage loans originated in the Houston AA, approximately 40.9% were for home purchase, 31.2% were for refinance, and 27.1% for home improvement purposes.

Whitney's market share rank for small loans to businesses and home improvement loans compares favorably to its deposit market share rank of 1.06% in the Houston AA. For small loans to businesses, the bank ranks 19th with a market share of 0.65%. Overall, Whitney ranks 146th in home mortgage loan originations, with a 0.06% market share. However, in the case of home improvement loans, the bank ranks 41st, with a market share of 0.34% in the Houston AA. Overall lending volume is considered good, given the large number of non-bank financial institutions which make both home mortgages and small loans to businesses in the Houston AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of Whitney's CRA reportable loans is good. The geographic distribution of home mortgage loans is good. The geographic distribution of small loans to businesses is good.

For home mortgage loans, the analysis focuses on low- and moderate-income geographies separately, comparing the bank's percentage of the number of home mortgage loans originated and purchased in low- and moderate-income geographies to the percentage of owner-occupied housing units in each of these income geographies. The other measure of performance is a comparison of the bank's market share of loans in low- and moderate-income geographies to its overall market share of home mortgage loans.

In the case of loans to small businesses, the analysis focuses on low- and moderate-income geographies, and compares the percentage distribution of the number of loans to small businesses (businesses with annual revenue less than or equal to \$1 million) originated or purchased by the bank to the percentage of businesses in either low- or moderate- income geographies. The other measure of performance is the comparison of the bank's market share of loans to small businesses in low- and moderate income geographies compared to its overall market share for loans to all businesses.

Home Mortgage Loans

Refer to Tables 2 – 5 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases in the Houston AA.

The geographic distribution of home purchase loans is adequate. The percentage of loans made in low-income geographies meets the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is below the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies exceeds its overall market share. In moderate-income geographies the bank's market share meets its overall market share.

The geographic distribution of home improvement loans is excellent. The percentage of loans made in low-income geographies substantially exceeds the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies meets the percentage of owner-occupied units in these geographies. The bank's market share in low- and moderate-income geographies exceeds its overall market share.

The geographic distribution of refinance loans is adequate. Performance during the evaluation period was good; however, the bank's performance in 2003 was particularly poor. This poor level of performance had a negative impact on overall performance conclusions. The percentage of loans made in low-income geographies significantly exceeds the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is below the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies significantly exceeds its overall market share. In moderate-income geographies the bank's market share meets its overall market share.

A geographic analysis of multi-family loans was not meaningful therefore these loans are not considered in the evaluation of the bank’s home mortgage loan performance.

Small Loans to Businesses

Refer to Table 6 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination and purchase of small loans to businesses in the Houston AA.

The geographic distribution of small loans to businesses is good. The percentage of loans made in low-income geographies meets the percentage of businesses located in these geographies. The bank’s market share in low-income geographies exceeds its overall market share. The percentage of loans made in moderate-income geographies is somewhat below the percentage of businesses located in these geographies. The bank’s market share in moderate-income geographies meets its overall market share.

Small Loans to Farms

A geographic analysis of small loans to farms was not meaningful therefore small farm loans are not considered in the evaluation of the bank’s performance.

Lending Gap Analysis

Reports and maps detailing Whitney’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 gaps were identified.

Inside/Outside Ratio

At the state level, Whitney has a good record of lending inside its assessment areas. We performed an analysis of the bank’s record of making home mortgage loans and small loans to businesses in Texas. The information we reviewed included CRA reportable loan originations and purchases. CD loans made by the CDC were not included in the In/Out ratio. A significant majority of home mortgage loans and loans to small businesses were originated and purchased in the state of Texas. By product, the bank originated the following percentages of CRA reportable loans inside the Houston AA.

Loan Type	% Inside
Home Purchase	79%
Refinance	86%
Home Improvement	96%
Small Loans to Businesses	88%
Overall	87%

This performance was positively factored in the overall analysis of the geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

Whitney's distribution of loans to borrowers of different income levels is adequate. The bank achieved adequate penetration to low- and moderate-income borrowers with its home mortgage lending. The distribution of loans to businesses with annual revenue of \$1 million or less is also adequate.

For home mortgage loans, the analysis focuses on low- and moderate-income borrowers separately, comparing the bank's percentage of the overall number of loans, by product, to the percentage of AA families that are in either the low- or moderate- income category. The other measure of performance for borrower distribution is a comparison of the bank's market share of home mortgage loans originated and purchased in the AA to the bank's market share of home mortgage loans, by product type, to each income level of borrower in the AA.

In the case of loans to small businesses, the analysis focuses on the percentage of businesses within the AA that have revenues of \$1 million or less compared to the percentage of reported loans to small businesses purchased or originated by Whitney. The other measure of performance is a comparison of the bank's market share of loans to small businesses, with annual revenues of \$1 million or less, to the bank's overall market share for loans to businesses.

We placed more emphasis on the demographic indicator than the market share analysis when deriving conclusions for borrower distribution of mortgage loans. This was done because it is typically more difficult for low-income borrowers to obtain home mortgage loans due to the high poverty rate and the moderate cost of housing in relation to the median family income in the Houston AA. In the AA, the HUD adjusted median family income is \$60,900 and the median housing value is \$109,963. We equally weighted the two performance measurements (demographic data and market share) to derive an overall conclusion as to the bank's performance in making loans to businesses of different sizes during the 2003 portion of the evaluation period. Loan performance during 2003 was compared to 1990 census data, which was the census available in 2003. We placed more emphasis on the demographic performance measurement analysis during the 2004 – 2006 portion of the evaluation period since the current year 2000 U. S. census data is relevant to this time period.

Home Mortgage Loans

Refer to Tables 8 – 10 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases in the Houston AA.

The distribution of home purchase loans to borrowers of different income levels is poor considering the demographic indicators. The percentage of home purchase loans to low-income borrowers is substantially below the percentage of low-income families in the AA. Market share analysis indicates that the bank's performance for low-income families exceeds its overall market share. Whitney originated 3.7% and 3.1% of its home purchase loans to low-income borrowers in 2003 and the years 2004-2006, respectively. This is substantially below the proportion of low-income families in the AA which is 24.1% for 2003 and 23.2% for 2004-2006. Approximately 13% of the households lived below the poverty level during the evaluation period. Low-income borrowers, especially those living below the poverty level, would have difficulty in obtaining home purchase loans. The percentage of home purchase loans made to moderate-income borrowers is below the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share for moderate-income families is near to its overall market share.

The distribution of home improvement loans to borrowers of different income levels is excellent. The percentage of home improvement loans made to low-income borrowers is near to the percentage of low-income families in the AA. Market share analysis indicates that the bank's performance for low-income families substantially exceeds its overall market share. Whitney originated 16.7% and 21.9% of its home improvement loans to low-income borrowers in 2003 and 2004-2006, respectively. The percentage of home improvement loans made to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share for moderate-income families also exceeds its overall market share.

The distribution of refinance loans made to borrowers of different income levels is adequate. The percentage of refinance loans made to low-income borrowers is substantially below the percentage of low-income families in the AA. Market share analysis indicates that the bank's performance for low-income families is also substantially below its overall market share. Performance is adequate considering the percentage of families living below the poverty level. Whitney originated 6.4% and 4.9% of its refinance loans to low-income borrowers for 2004 and 2004-2006, respectively. This is substantially below the proportion of low-income families in the AA during the evaluation period. The percentage of refinance loans to moderate-income borrowers is somewhat below the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share for moderate-income families is near to its overall market share.

Small Loans to Businesses

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

The distribution of small loans to businesses is adequate. The percentage of small loans made to small businesses is somewhat below the percentage of small businesses with annual revenues of \$1 million or less in the Houston AA. The bank's market share of loans to businesses with revenues of \$1 million or less exceeds its overall market share. Performance is good in 2003 and adequate in 2004-2006, but adequate overall considering performance context. Whitney originated 54.8% of its loans to small businesses where 61.9% of the businesses in the AA have annual revenues of \$1 million or less.

Community Development Lending

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

CD lending had a positive impact on Lending Test conclusions. Whitney's level of CD lending is excellent and positively contributes to the overall good level of lending in the Houston AA. During the evaluation period, Whitney originated 111 CD loans totaling \$53.1 million.

Bank management and community contacts identified affordable housing as a critical need in the Houston AA. Whitney demonstrated an excellent level of responsiveness to the need for affordable housing through the extension of construction financing to non-profits and builders who specialize in the development and rehabilitation of affordable single-family residences. For example, Whitney bank and the CDC made 93 loans totaling \$12.8 million to builders and non-profit entities to construct or rehabilitate affordable 1-4 family and multi-family residences.

Other significant CD loans include a \$10 million participation in a \$51.1 million loan facility to acquire land and redevelop a shopping center in a moderate-income census tract in Houston, Texas. The borrowing entity is partly owned by the Houston Redevelopment Authority. The project is part of a redevelopment plan for midtown Houston. This project will revitalize a low-to moderate-income area and create new jobs.

Other projects support non-profit providers of community services targeted to low- and moderate-income individuals and families.

Product Innovation and Flexibility

The bank offers residential loan programs that benefit low- and moderate-income individuals and geographies. However, due to low volume, the use of flexible and innovative loan products does not materially enhance the bank's performance under the Lending Test in the state of Texas.

Whitney Neighborhood Housing Program

This program is designed to assist low- and moderate-income buyers who cannot qualify for traditional financing. Please refer to the *Lending Test, State of Louisiana, Innovative and Flexible Lending Practices* section within this evaluation report for the details of this loan program.

Whitney originated 2 loans totaling \$128,000 in the Houston AA during the January 1, 2003 through December 31, 2006 evaluation period.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the Investment Test in the state of Texas is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Houston AA is good, given the level of opportunities and the context in which the bank was operating. Normal business activities were interrupted at the headquarters location, which directs investment activity, during the latter part of the evaluation period as a result of Hurricane Katrina. In addition to the investments in the AA, consideration was also given to the benefit to the Houston AA from the bank's regional investment in an SBIC, as discussed in the state of Louisiana portion of this evaluation report.

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose community development, as defined in the CRA regulation. Overall, qualified investments in the Houston AA are responsive to assessment area needs, addressing the needs for housing affordable to low- and moderate-income families and economic development needs. However, the bank's investments are not considered innovative or complex. Third party investors routinely structure and originate the types of qualified investments that Whitney purchases in the Houston AA.

In the current period, Whitney had 53 qualified investments in the Houston AA totaling \$990,000. Investment in a Low-Income Housing Tax Credit (LIHTC) fund that helped to provide 368 units of rental housing affordable to low- and moderate individuals and families represented 78% of all investments made in the Houston AA. The remaining current period investments include donations to organization in the Houston AA whose primary purpose meets the definition of community development. About 80% of donation dollars were to organizations that help to meet community service needs by providing services such as daycare, after school care, and financial literacy programs directed to low- and moderate-income persons and families.

Prior period investments, which are not given as much consideration as current period investments, were originated during the previous examination evaluation periods and remain on the books of the bank. The bank had one prior period investment totaling \$330,000. This is the bank's initial investment in the LIHTC fund discussed above, and it continues to help provide affordable rental housing in the Houston AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

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

Whitney's branches are accessible to geographies and individuals of different income levels. Whitney operates 13 branches in the Houston AA. The percentage of branches in low-income geographies exceeds the percentage of the population residing in those census tracts. The percentage of branches located in moderate-income geographies is somewhat lower than the percentage of the population residing in those census tracts. However, we considered in our evaluation that two branches located in upper-income census tracts also adjoin moderate-income tracts. Overall, five of the AA's thirteen branches are either in a moderate-income tract or adjoin a moderate-income census tract. Also, bank branches tend to be located on major thoroughfares which are accessible to the general public.

Whitney's record of opening and closing branches in the Houston AA has increased its penetration into upper-income areas but has not adversely affected low- or moderate-income areas. Four branches were opened during our evaluation period, all in upper-income geographies. Two other branches, also located in upper-income census tracts, were closed during the same period.

Whitney operates 18 ATMs throughout the Houston AA. One is located in a low-income census tract, and four others, including two deposit accepting ATMs, are located in a moderate-income geography. All external ATMs are available 24 hours a day, seven days a week. However, several ATMs are located inside office buildings and are subject to the hours of operation of the building in which they are located. All Whitney ATMs have bilingual (English and Spanish) screens.

Banking hours, services, and products offered do not vary in a way that inconveniences any portion of the assessment area, including low- and moderate-income geographies or individuals. Banking hours are consistent throughout the AA. Hours are generally 9 a.m. to 4 p.m. Monday through Thursday and until 6 p.m. on Fridays. All drive-up facilities are open on Saturday mornings. Drive-up facilities have extended hours, usually from 7 a.m. or 7:30 a.m. to 6 p.m. on weekdays.

A wide variety of deposit and loan products, as well as business services, are available at all branch locations. In addition to the products and services normally offered by a bank of Whitney's size, several deposit or loan products are particularly responsive to the needs of low- or moderate-income individuals and small businesses. Products of relevance to this evaluation period are offered bank-wide, available in all AAs, and are described in detail under the Service Test for the state of Louisiana. These products are not only targeted to low- and moderate-income individuals or small businesses, but provide basic low cost banking products throughout the AA.

Community Development Services

Whitney provides a good level of community development services in the Houston AA, which was positively considered in evaluating performance. Bank officers are particularly active in homebuyer education and counseling for LMI with several Houston based organizations such as Fifth Ward CDC, Housing Opportunities of Houston and Kingdom Come CDC. Officers also participate in events that promote small business development as well as affordable housing for low- to moderate-income families. For example, Whitney bank officers serve as members of the Women's Business Enterprise Alliance and the Women's Resource Center of Greater Houston, two organizations that strive to increase business opportunities for women-owned and minority-owned businesses in the AA. The bank's Community Affairs personnel continue to assist housing development groups in the Houston AA in completing applications for affordable housing or local development grants from the Federal Home Loan Bank of Dallas.

State of Alabama

CRA Rating for Alabama: Satisfactory

The lending test is rated: **Outstanding**

The investment test is rated: **Low Satisfactory**

The service test is rated: **Low Satisfactory**

The major factors that support this rating include:

- Whitney demonstrated excellent responsiveness to credit needs of its AAs.
- Whitney's overall CRA reportable loan volume in Alabama is excellent, particularly loans to small businesses and home improvement loans.
- Whitney's overall geographic distribution of lending is good.
- Whitney's distribution of lending to borrowers of different incomes and to businesses with revenues less than \$1 million is good.
- The bank originated an excellent level of community development loans during the review period, which had a positive impact on the Lending Test rating.
- The use of innovative and flexible loan products enhances the bank's performance under the lending test.
- The level of qualified investments in the State of Alabama is adequate.
- Service delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its AAs.
- The bank provides a good level of CD services that support and address identified needs in the community.

Description of Institution's Operations in Alabama

Whitney operates 19 branches and 18 ATMs within three AAs in the state of Alabama. The Alabama AAs include two metropolitan areas: Mobile and Montgomery; and the non-metropolitan area of Baldwin and Butler County. Approximately 5.3% of the bank's total deposits were attributed to these AAs, and the bank originated 10.7%, by number and dollar volume, of its total reported loans in these AAs.

The bank's primary market in the state of Alabama is Mobile. The Mobile AA represents 36.8% of the Alabama branch network, 50.9% of the Alabama deposit base, and 63.6% of the bank's total reported loans in the state of Alabama. The other two AAs combined comprise 63.2% of the branch network in the state of Alabama, 49.1% of the bank's deposit base, and 36.4% of the total reportable loan volume for this evaluation period.

Whitney's deposit market share rank in the state of Alabama is 11th, with a market share of 1.2% out of a total of 334 financial institutions operating in the state. State banking competition is aggressive, and includes dominant affiliates of large national banking companies, regional institutions, and numerous community banks, credit unions, and non-bank financial service providers. The top five competitors in this market include: Amsouth Bank, Colonial Bank, Compass Bank, Regions Bank, and Wachovia Bank, N.A.

Whitney's CRA reportable loan volume by number is comprised of 58.8% small loans to businesses and 39.5% HMDA purpose loans. The bank makes commercial loans of all types and sizes including commercial and industrial, commercial mortgage, business credit cards, and construction and land development loans. Examples of consumer purpose loan products include residential mortgages of all types, residential construction loans, personal loans (including lines of credit), and auto loans.

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

Scope of Evaluation in Alabama

We evaluated the bank's performance in the state of Alabama by performing a full-scope review of the Mobile AA and limited scope reviews of the Montgomery and Alabama non-metropolitan AAs. We selected the Mobile AA for a full-scope review because the bank maintains a significant share of its business within the AA: approximately 50.9% of the deposits in Alabama and 63.8% of its CRA reportable loan originations during the evaluation period. Additionally, the Mobile AA is where the highest concentration of branches is located.

The bank's overall rating is based primarily on the area that received a full-scope review. Small business lending performance was given the greatest weight under the lending test since it is the bank's primary business line, followed by home mortgage loans. Home purchase and refinance loans most heavily influenced lending performance, since the bank's originations and purchases for these products represent a higher proportion of total home mortgage loans.

The geographic distribution of multi-family loans and the distribution of small loans to farms by geography and income level of the borrower are not relevant due to the small volume of these types of loans originated or purchased during the evaluation period. Therefore, an analysis of the geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms has been eliminated from the Public Evaluation.

We noted during the review of one community contact made in the AA that opportunities exist in the bank's markets to participate in community development lending, investment, and service activities. The contact identified affordable housing and support for organizations that provide community services as needs in the bank's AAs.

Refer to the table in Appendix A for more information regarding the scope of this examination.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Alabama is rated "Outstanding". Based on a full-scope review, the bank's performance in the Mobile AA is excellent.

Whitney's rating was based primarily on its good lending performance in making small loans to businesses and excellent community development lending targeted towards affordable housing that had a positive impact on the Lending Test rating.

Lending Activity

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

Whitney's lending activity demonstrates excellent responsiveness to the credit needs of its AA considering its size, resources, deposit market share, and primary business focus. Whitney's deposit market share of 5.8% ranks the bank 6th among 29 financial institutions with offices in the Mobile AA. The top five institutions with a greater market share include Amsouth Bank, Bank Trust, Compass Bank, Regions Bank, and Wachovia Bank, N.A.

In the Mobile AA, approximately 63.2% of the number, and 70.5% of the dollar amount of Whitney's reported loans were small loans to businesses. Approximately 36.3% of the number, and 28.6% of the dollar amount, were home mortgage loans. Among the home mortgage loans originated in the Mobile AA, approximately 48.8% were refinance loans, 39.8% were for home purchase, and 10.6% were home improvement loans.

Overall reportable loan volume is excellent in the Mobile AA. In particular, business lending activity is strong. Whitney reported 1,975 business loans totaling \$369 million over the evaluation period. Whitney originated 3.7% of all reported 2005 small loans to businesses in the Mobile AA, ranking 9th among 49 lenders in the AA. Whitney's lending performance to businesses with annual revenues of \$1 million or less is much stronger. Whitney originated 12.1% of all reported 2005 small loans to businesses in the Mobile AA, ranking 4th among all banks. In addition, Whitney's lending volume in home mortgage products is excellent. Whitney ranks 29th in home mortgage loan originations, with a 1.0% market share, and in particular, 8th in home improvement lending, with a 3.4% market share. Whitney's loan volume in other home mortgage products is not as strong when compared to its deposit market share. Overall, reportable loan volume is excellent given the large number of non-bank financial providers making both home mortgages and small loans to businesses in the Mobile AA.

Distribution of Loans by Income Level of the Geography

Whitney's geographic distribution of lending is good. The geographic distribution of home mortgage loans is adequate and the geographic distribution of small loans to businesses is good.

For home mortgage loans, the analysis focuses on low- and moderate-income geographies separately, comparing the bank's percentage of the number of home mortgage loans originated and purchased in low- and moderate-income geographies to the percentage of owner-occupied housing units in each of these income level geographies. The other measure of performance is a comparison of the bank's overall market share of loans in low- and moderate-income geographies to its market share of home mortgage loans.

In the case of loans to small businesses, the analysis also focused on low- and moderate-income geographies separately, and compares the percentage distribution of the number of loans to small businesses (businesses with annual revenue less than or equal to \$1 million) originated and purchased by the bank to the percentage of businesses in either low- or moderate- income geographies. The other measure of performance is the comparison of the bank's market share of loans to small businesses in low- and moderate income geographies compared to its overall market share for loans to businesses.

Home Mortgage Loans

Refer to Tables 2 – 5 in the state of Alabama section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases in the Mobile AA.

The geographic distribution of home purchase loans is good. The percentage of loans in low-income geographies exceeds the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is lower than the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies substantially exceeds its overall market share. In moderate-income geographies, the bank's market share exceeds its overall market share.

The geographic distribution of home improvement loans is adequate. The percentage of loans in low-income geographies is lower than the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is also lower than the percentage of owner-occupied units in these geographies. The bank's market share in low- and moderate-income geographies is below its overall market share.

The geographic distribution of refinance loans is adequate. The percentage of loans in low-income geographies is below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is below the percentage of owner-occupied units in these geographies. The bank's market share in low-income geographies is well below its overall market share. In moderate-income geographies the bank's market share is below its overall market share.

A geographic analysis of multi-family loans was not meaningful; therefore, these loans are not considered in the evaluation of the bank’s home mortgage loan performance.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is good. The percentage of loans made in low-income geographies near to the percentage of businesses located in these geographies. The bank’s market share in low-income geographies exceeds its overall market share. The percentage of loans made in moderate-income geographies is below the percentage of businesses located in these geographies. The bank’s market share of loans made in moderate-income geographies meets its overall market share.

Small Loans to Farms

A geographic analysis of small loans to farms was not meaningful therefore small farm loans are not considered in the evaluation of the bank’s performance.

Lending Gap Analysis

Reports and maps detailing Whitney’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 gaps were identified.

Inside/Outside Ratio

At the state level, Whitney has an excellent record of lending inside its assessment areas. We performed an analysis of the bank’s record of making home mortgage loans and small loans to businesses in Alabama. The information we reviewed included CRA reportable loan originations and purchases. CD loans made by the CDC were not included in the In/Out ratio. A substantial majority of home mortgage loans, and loans to small businesses, were originated and purchased in the state of Alabama. By product, the bank originated the following percentages of CRA reportable loans inside its AAs.

Loan Type	% Inside
Home Purchase	95%
Refinance	94%
Home Improvement	97%
Small Loans to Businesses	94%
Overall	95%

This performance was positively factored in the overall analysis of the geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

The distribution of Whitney's CRA reportable loans to borrowers of different incomes is good. Whitney achieved adequate penetration to low- and moderate-income borrowers with its home mortgage lending. The distribution of loans to businesses with annual revenues of \$1 million or less is also good.

For home mortgage loans, the analysis focuses on low- and moderate-income borrowers separately, comparing the percentage of the number of loans, by product, to the percentage of AA families that are in either the low- or moderate- income category. The other measure of performance for borrower distribution is a comparison of the bank's market share of home mortgage loans originated and purchased in an AA to the bank's market share of home mortgage loans, by product type, to each income level of borrower in the AA.

In the case of small loans to businesses, the analysis focuses on the percentage of businesses within the AA that have revenues of \$1 million or less compared to the percentage of reported loans to small businesses purchased or originated by Whitney. The other measure of performance is a comparison of the bank's market share of loans to small businesses with annual revenues of \$1 million or less to the bank's overall market share for loans to all businesses.

We placed more emphasis on the demographic indicator than the market share analysis when deriving conclusions for borrower distribution of mortgage loans. This was done to acknowledge that typically it is much more difficult for low-income borrowers to obtain home mortgage loans due to the cost of housing compared to the median family income. In the Mobile AA, the HUD adjusted median family income is \$49,500 and the median housing value is \$83,140. We equally weighted the two performance measurements (demographic data and market share) to derive an overall conclusion as to the bank's performance in making loans to businesses of different sizes during the 2003 portion of the evaluation period. Loan performance during 2003 was compared to 1990 census data, which was the census available in 2003. We placed more emphasis on the demographic performance measurement analysis during the 2004 – 2006 portion of the evaluation period since the current year 2000 U. S. census data is relevant to this time period.

Home Mortgage Loans

Refer to Tables 8 – 10 in the state of Alabama 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 in the Mobile AA.

The distribution of home purchase loans made to borrowers of different income levels is excellent. The percentage of home purchase loans made to low-income borrowers meets the percentage of low-income families in the AA. Market share analysis indicates that the bank's performance for low-income families substantially exceeds its overall market share. Whitney originated 17% and 19.4% of its home purchase loans to low-income borrowers in 2003 and 2004-2006, respectively. Performance is considered excellent considering that the proportion of low-income families in the AA is 22.2% for 2003 and 23.7% for the years 2004-2006. Additionally, approximately 18% of the households live below the poverty level. Low-income borrowers, especially those living below the poverty level, typically experience difficulty in obtaining home purchase loans yet Whitney reported an excellent level of performance. The percentage of home purchase loans made to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share for moderate-income families also significantly exceeds its overall market share.

The distribution of home improvement loans made to borrowers of different income levels is adequate. The percentage of home improvement loans made to low-income borrowers is well below the percentage of low-income families in the AA. Whitney originated 2.9% and 2.8% of its home improvement loans to low-income borrowers in 2003 and the years 2004-2006, respectively. The percentage of home improvement loans made to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share for moderate-income families is well below its overall market share.

The distribution of refinance loans made to borrowers of different income levels is adequate. The percentage of refinance loans made to low-income borrowers is well below the percentage of low-income families in the AA. Market share analysis indicates that the bank's performance for low-income families significantly exceeds its overall market share. Whitney originated 4.8% and 8.7% of its refinance loans to low-income borrowers for 2003 and the years 2004-2006, respectively. The percentage of refinance loans made to moderate-income borrowers is below the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share for moderate-income families is well below its overall market share.

Small Loans to Businesses

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

The distribution of small loans to businesses is good. The percentage of small loans made to small businesses is near to the percentage of small businesses with annual revenues of \$1 million or less in the Mobile AA. The bank's market share of small loans to businesses with annual revenue of \$1 million or less significantly exceeds its overall market share.

Community Development Lending

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

Whitney's level of CD lending in the Mobile AA is excellent and had a positive impact on the Lending Test rating. Whitney originated four CD loans totaling \$3.3 million. All but one of these loans is related to affordable housing, which the community contact identified as a need in the AA.

The CDC has made a significant commitment to a non-profit agency that is working on a project to rebuild and revitalize the low- and moderate-income Hillsdale neighborhood in Mobile, Alabama by eliminating substandard housing, creating socio-economic diversity, and encouraging home ownership. The project provides for the construction of up to 300 new affordable single-family homes, with a starting price of \$80,000. The CDC originated two loans to this non-profit agency totaling \$2 million. In addition, Whitney Holding Corporation has provided the CDC with a \$1 million line of credit targeted to this specific project.

Product Innovation and Flexibility

The use of innovative and flexible loan products enhances the bank's performance under the Lending Test, and had a positive impact on the Lending Test rating. Specifically, the bank offers residential loan programs that benefit low- and moderate-income individuals and geographies.

Prichard Housing Program

This is an affordable housing program offered through the Prichard Housing Authority. The program is offered to first time homebuyers who have enrolled in the Prichard Lease Purchase/Educational Training Program, and requires that the client rent the property prior to purchase. The program's philosophy is that this process teaches the client how to be a homeowner. Whitney participated in this program by providing below market rates to Prichard's clients. The applicant receives a forgivable grant from Prichard Housing Authority in conjunction with Whitney's financing. Typically, the grant is equal to 25% of the purchase price of the home. This loan program includes the same flexible characteristics as the Whitney Neighborhood Housing Program, plus the Whitney loan is leveraged with government grant money so the borrower does not pay for closing costs out of pocket. Also, the program is flexible in that it allows the prospective homeowner to rent the home for up to three years before purchasing the property. Whitney originated 22 loans totaling \$1.1 million in the Mobile AA during the evaluation period.

Whitney Neighborhood Housing Program

Refer to the Lending Test, State of Louisiana, Innovative and Flexible Lending Practices section of this evaluation report for a complete description of this loan program.

Whitney originated 78 loans totaling \$4.0 million in the Mobile AA between January 1, 2003 and December 31, 2006.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Montgomery and Alabama non-MSA AAs is not inconsistent with the bank's overall "Outstanding" performance under the lending test in Alabama.

Refer to the Tables 1 through 11 in the state of Alabama section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the Investment Test in Alabama is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Mobile AA is adequate given the bank's capacity, moderate level of qualified investment opportunities in the AA, and the context in which the bank was operating. Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose community development, as defined in the CRA regulation. Qualified investments in the Mobile AA are generally responsive to AA needs, addressing the need for affordable housing and community services for low- and moderate-income individuals. However, the bank's investments are not considered innovative or complex. Third party investors routinely structure and originate the types of qualified investments that Whitney purchases in the Mobile AA.

During the current evaluation period, Whitney made 20 investments in the Mobile AA totaling \$130,000. These investments are donations to organizations whose primary purpose meets the definition of community development. Approximately 89% of donation dollars helped to provide a variety of community services targeted to low- and moderate-income individuals and families.

Prior period investments, which are not given as much consideration as current period investments, were originated during the previous examination evaluation periods and remain on the books of the bank. Whitney has one prior period investment in the Mobile AA totaling \$133,000. This investment is in a Low Income Housing Tax Credit (LIHTC) fund that continues to help provide 72 units of affordable rental housing targeted to low- and moderate-income individuals and families in the Mobile AA.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Montgomery and Alabama non-MSA AAs is not inconsistent with the bank's overall "Low Satisfactory" rating in Alabama. Better than 90% of investment activity in the limited scope AAs is prior period investments, which do not receive as much consideration as current period investments. Performance in the limited-scope AAs did not impact the overall Investment Test rating in the state of Alabama.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

Refer to Table 15 in the state of Alabama 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.

Whitney's service delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the Mobile AA. Whitney operates seven branches and seven ATMs in the AA. While no offices are located in low- or moderate-income geographies, we considered in our evaluation that several branch locations are adjacent to low- and moderate-income geographies. For example, the Royal Street branch, located in a middle-income census tract, is virtually surrounded by several low- and moderate-income geographies in central Mobile. Two other branches located in middle-income geographies are adjacent to moderate income census tracts. The Dauphin Street branch, located in an upper-income tract, is adjacent to a low-income census tract. An ATM is located at every branch office. No branches were opened or closed in the Mobile AA during the evaluation period. All Whitney ATMs have bilingual (English and Spanish) screens.

Whitney's hours, services, and products offered do not vary in a way that inconveniences any portion of the AA, including low- and moderate-income geographies and individuals. Banking hours are consistent throughout the AA. Lobby and drive-up hours are generally 9 a.m. to 5 p.m. Monday through Thursday, with extended lobby hours until 6 p.m. on Fridays.

A wide variety of deposit and loan products as well as business services are available at all branch locations. In addition to the products and services normally offered by a bank of Whitney's size, several deposit or loan products are particularly responsive to the needs of low- or moderate-income individuals and small businesses. Products of relevance to this evaluation period are offered bank-wide, available in all AAs, and are described in detail under the Service Test for the state of Louisiana. These products are not only targeted to low- and moderate-income individuals or small businesses, but provide basic low cost banking products throughout the AA.

Community Development Services

Whitney provides a good level of CD services in the Mobile AA, centered in financial services provided to non-profit organizations for the advancement of affordable housing and economic development. Services include the development and promotion of affordable housing initiatives, homebuyer education for LMI individuals, providing expertise in finance and lending to various economic development groups. For example, bank officers offered their services to Elijah House, Lighthouse CDC, and Prichard Housing Authority. The level of CD services received positive consideration in evaluating performance.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Montgomery and Alabama non-MSA AAs is not inconsistent with the bank's overall "Low Satisfactory" performance under the Service Test in Alabama.

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

State of Mississippi

CRA Rating for Mississippi: 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:

- Whitney demonstrated adequate responsiveness to the credit needs of its AA.
- Whitney's overall CRA reportable loan volume in Mississippi is adequate.
- Whitney's overall geographic distribution of lending is good.
- The bank's overall lending to borrowers of different incomes and loans to small businesses with revenues less than \$1 million is good.
- Whitney's use of innovative and flexible loan products enhances the bank's performance under the lending test.
- The level of qualified investments in Mississippi is excellent.
- Service delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its AA.
- The bank provides an adequate level of CD services that support and address identified needs in the community.

Description of Institution's Operations in Mississippi

Whitney only has one assessment area (AA) within the State of Mississippi. Therefore, the Gulfport-Biloxi AA was selected for full-scope review because this is the only area where Whitney has branches in the state. The bank operates seven branches and ten ATMs in the Gulfport-Biloxi AA. Approximately 3.2% of the bank's total deposits were attributed to this AA. Additionally, the bank originated 2.5%, by number, and 1.6%, by dollar volume, of its total reported loans in this AA.

Whitney has a deposit market share of 0.68% and ranks 23rd out of a total of 221 deposit taking institutions in the state of Mississippi. Whitney's presence in the Gulfport-Biloxi AA is much higher, as their market share rank in the AA is 4th, with a deposit market share rank of 10.8% out of a total of 14 deposit taking institutions. State banking competition is aggressive and includes dominant affiliates of large national banking companies, several midsize banks, numerous community banks, credit unions, and non-bank financial service providers. The top five competitors in this market include: Amsouth Bank, Bancorpsouth Bank, Hancock Bank, Regions Bank, and Trustmark National Bank, many of which are larger in asset size than Whitney and compete directly with the bank within this market.

The bank's CRA reportable loans are comprised of 58.7% HMDA reportable loans and 40.8% small loans to businesses. This loan mix is different from other Whitney markets where small loans to businesses comprise the majority of CRA reportable loans. Home mortgage products include home purchase, home improvement, and refinance loans. The bank makes commercial loans of all types and sizes including commercial and industrial, commercial mortgage, business credit cards, and construction and land development loans.

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

Scope of Evaluation in Mississippi

Whitney has one AA in the state of Mississippi. Therefore, the Gulfport-Biloxi AA was selected for full-scope review, and the bank's rating in Mississippi is based on this AA, because this is the only area where Whitney has branches in the state.

Home mortgage lending performance was given the most consideration in the determination of the rating under the lending test since it is the bank's primary business line in the AA, followed by small loans to businesses. We gave more consideration to home refinance loans since the bank's originations for this product represent a higher proportion of total home mortgage loans than home purchase or home improvement loans.

The geographic distribution of multi-family loans and the distribution of small loans to farms by geography and income level of the borrower are not relevant due to the small volume of these types of loans originated or purchased during the evaluation period. Therefore, an analysis of the geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms has been eliminated from the Public Evaluation.

We noted during the review of one community contact in the AA that opportunities exist in the bank's market to participate in community development lending, investment, and service activities. The contact identified support for community organizations that target their services to low- and moderate-income individuals and families as a critical need in the AA.

Refer to the table in Appendix A for more information regarding the scope of this evaluation.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Mississippi is rated "High Satisfactory". Based on the bank's performance in the Gulfport-Biloxi AA, which received a full-scope review, the bank's performance is good.

Lending Activity

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

Whitney's lending activity demonstrates adequate responsiveness to the credit needs of its AA considering its size, resources, deposit market share and primary business focus. In the Gulfport-Biloxi AA, approximately 58.7% by number and 52.5% by dollar volume of Whitney's CRA reportable loans were home mortgage loans. Among home mortgage loans originated in the Gulfport-Biloxi AA, 41.8% were refinance loans, 30.2% were home purchase loans, and 27.8% were home improvement loans. Approximately 40.8% by number and 45.6% by dollar volume of CRA reportable loans were small loans to businesses.

Overall, Whitney ranks 29th in home mortgage lending originations with a 1.0% market share which is proportional to the bank's market share for refinance mortgages. Whitney ranks 32nd for home purchase loans with a market share of 0.86%. However, in the case of home improvement loans, the bank ranks 3rd with a market share of 5.0% in the Gulfport-Biloxi AA. For small loans to businesses, the bank ranks 12th with a market share of 1.9%. Overall lending volume is considered adequate given the large number of non-bank financial institutions making both home mortgages and small loans to businesses in the Gulfport-Biloxi AA.

Distribution of Loans by Income Level of the Geography

The geographic distribution of Whitney's CRA reportable loans is good. The geographic distribution of home mortgage loans is good and the geographic distribution of small loans to businesses is good.

For home mortgage loans the analysis focuses on low- and moderate-income geographies separately, comparing the bank's percentage of the number of home mortgage loans originated and purchased in low- and moderate-income geographies to the percentage of owner-occupied units in each income level of geography. The other measure of performance is a comparison of the bank's overall market share of loans in low- and moderate-income geographies to its market share of home mortgage loans.

In the case of loans to small businesses, the analysis focuses on low- and moderate-income geographies separately, and compares the percentage distribution of the number of small loans to small businesses (with annual revenue less than or equal to \$1 million) originated and purchased by the bank to the percentage of small businesses in those geographies. The other measure of performance is the comparison of the bank's market share of loans to small businesses in low- and moderate- income geographies to its overall market share for loans to businesses.

Home Mortgage Loans

Refer to Tables 2 – 5 in the state of Mississippi section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases in the Gulfport-Biloxi AA.

The geographic distribution of home purchase loans is excellent. Performance is excellent in 2004-2006 and poor in 2003. There are no low-income geographies in the Gulfport-Biloxi AA. The percentage of loans in moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income geographies is well below its overall market share.

The geographic distribution of home improvement loans is excellent. The percentage of loans in moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income geographies also exceeds its overall market share.

The geographic distribution of refinance loans is adequate. The percentage of loans in moderate-income geographies is below the percentage of owner-occupied units in these geographies. The bank's market share in moderate-income geographies is below its overall market share.

A geographic analysis of multi-family loans was not meaningful therefore these loans are not considered in the evaluation of the bank's home mortgage loan performance.

Small Loans to Businesses

Refer to Table 6 in the state of Mississippi section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses in the Gulfport-Biloxi AA.

The geographic distribution of small loans to businesses is good. The percentage of loans made in moderate-income geographies meets the percentage of businesses located in these geographies. The bank's market share in moderate-income geographies exceeds its overall market share.

Small Loans to Farms

A geographic analysis of small loans to farms was not meaningful therefore small farm loans are not considered in the evaluation of the bank's performance.

Lending Gap Analysis

Reports and maps detailing Whitney’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 gaps were identified.

Inside/Outside Ratio

At the state level, Whitney has a good record of lending inside its assessment areas. We performed an analysis of the bank’s record of making home mortgage loans and small loans to businesses in Mississippi. The information we reviewed included reportable loan originations and purchases. CD loans made by the CDC were not included in the In/Out ratio. A significant majority of home mortgage loans and loans to small businesses were originated and purchased in the state of Mississippi. By product, the bank originated the following percentages of CRA loans inside the Gulfport-Biloxi AA.

Loan Type	% Inside
Home Purchase	73%
Refinance	87%
Home Improvement	93%
Small Loans to Businesses	77%
Overall	83%

This performance was positively factored in the overall analysis of the geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

Whitney's distribution of loans to borrowers of different income levels is good. The bank achieved good penetration to low- and moderate-income borrowers with its home mortgage lending. The distribution of small loans to businesses with revenues of \$1 million or less is excellent.

For home mortgage loans, the analysis focuses on low- and moderate-income borrowers separately, comparing the bank's percentage of the number of loans, by product, to the percentage of AA families that are in either the low- or moderate- income category. The other measure of performance for borrower distribution is a comparison of the bank's market share of home mortgage loans originated and purchased in the AA to the bank's market share of home mortgage loans, by product type, to each income level of borrower in the AA.

In the case of loans to small businesses, the analysis focuses on the percentage of businesses within the AA that have revenues of \$1 million or less and the percentage of reported loans to small businesses that were purchased or originated by Whitney. The other measure of performance is a comparison of the bank's market share of loans to small businesses with annual revenues of \$1 million or less to the bank's overall market share in making loans to all businesses.

We placed more emphasis on the demographic indicator than the market share analysis when deriving conclusions for borrower distribution of mortgage loans. This was done because of the relatively high cost of housing in the Gulfport-Biloxi AA compared to the median family income level. In the AA, the HUD adjusted median family income is \$46,800 and the median housing value is \$87,278. Typically, it is much more difficult for low-income borrowers to obtain home mortgage loans due to the high poverty and the cost of housing in the AA. We equally weighted the two performance measurements (demographic data and market share) to derive an overall conclusion as to the bank's performance in making loans to businesses of different sizes during the 2003 portion of the evaluation period. Loan performance during 2003 was compared to 1990 census data, which was the census available in 2003. We placed more emphasis on the demographic performance measurement analysis during the 2004 – 2006 portion of the evaluation period since the current year 2000 U. S. census data is relevant to this time period.

Home Mortgage Loans

Refer to Tables 8 – 10 in the state of Mississippi section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchase in the Gulfport-Biloxi AA.

The distribution of home purchase loans to borrowers of different income levels is good. The percentage of home purchase loans to low-income borrowers is substantially below the percentage of low-income families in the AA. Market share analysis indicates that the bank's performance to low-income families exceeds its overall market share. Performance is good overall considering the percentage of families living below the poverty level. Whitney originated 21.7% and 5.1% of its home purchase loans to low-income borrowers in 2003 and 2004-2006, respectively. This is lower than the proportion of low-income families in the AA which is 20.5% for 2003 and 19.6% for 2004-2006. Additionally, approximately 14% of the households in the AA are below the poverty level. Low-income borrowers, especially those living below the poverty level, would have difficulty obtaining home purchase loans. The percentage of home purchase loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share to moderate-income families substantially exceeds its overall market share.

The distribution of home improvement loans to borrowers of different income levels is good. The percentage of home improvement loans to low-income borrowers is below the percentage of low-income families in the AA. Market share analysis indicates that the bank's performance to low-income families is also below its overall market share. Whitney originated 19.1% and 11.8% of its home improvement loans to low-income borrowers for 2003 and 2004-2006. This is lower than the proportion of low-income families in the AA but performance is good overall considering the percentage of families living below the poverty level. The percentage of home improvement loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA. Market share data reflects that the bank's market share to moderate-income families is well below its overall market share.

The distribution of refinance loans to borrowers of different income levels is excellent. The percentage of refinance loans to low-income borrowers is below the percentage of low-income families in the AA. The percentage of refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. Market share analysis indicates that the bank's performance to low- and moderate-income families substantially exceeds its overall market share.

Small Loans to Businesses

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

The distribution of small loans to businesses is excellent. The percentage of small loans made to small businesses exceeds the percentage of small businesses with annual revenues of \$1 million or less in the Gulfport-Biloxi AA. The bank's market share of loans to businesses with revenues of \$1 million or less exceeds its overall market share.

Community Development Lending

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

CD lending in the Gulfport-Biloxi AA had a neutral impact on the Lending Test rating. Whitney originated five CD loans totaling \$480,000 during the evaluation period, all related to affordable housing.

Product Innovation and Flexibility

Whitney's use of innovative and flexible loan products enhances the bank's performance under the Lending Test in the state of Mississippi. The bank offers residential loan programs that benefit low- and moderate-income individuals and geographies.

Mississippi Home Corporation (MHC)

Mississippi Home Corporation uses the proceeds from the sale of mortgage revenue bonds to reduce homeownership costs throughout the state. The program is available statewide through participating lenders. Down payment and closing cost assistance is available to qualified borrowers. Customers can choose FHA, VA, Rural Development or Fannie Mae Community Development Lending products. Whitney originated one loan in the amount of \$82,000 during the evaluation period in the Gulfport-Biloxi AA.

Reverse Mortgages

Refer to the *Lending Test, in the State of Louisiana, Innovative and Flexible Lending Practices* section of this evaluation report for a detailed description of this loan program.

Whitney originated 16 loans totaling \$1.4 million in the Gulfport-Biloxi AA from January 1, 2003 through December 31, 2005 to applicants at or below 80% of the AA median income.

Whitney Neighborhood Housing Program

Refer to the Lending Test, in the State of Louisiana, Innovative and Flexible Lending Practices section of this evaluation report for a detailed description of this loan program.

Whitney originated eight loans totaling \$386,000 in the Gulfport-Biloxi AA between January 1, 2003 and December 31, 2006.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the Investment Test in the state of Mississippi is rated "Outstanding". Based on a full-scope review, the bank's performance in the Gulfport-Biloxi AA is excellent, given the impact and responsiveness of the bank's statewide investment and the context in which the bank was operating. Hurricane Katrina had a debilitating economic impact on the AA, flooding or destroying much of the city of Gulfport and neighboring Biloxi. Hurricane force winds and storm surges, reportedly exceeding 30 feet in some sections, destroyed 90% of the buildings along the coastline. Several of the floating casinos, which are major employers in the AA, were torn off their supports and thrown inland, contributing to the damage. Additionally, normal banking business activities were interrupted at the headquarters location, which directed investment activity during the latter part of the evaluation period. As such, in our evaluation, substantial consideration was given to the benefit and responsiveness provided to the AA from the bank's investment in the State of Mississippi General Obligation Gulf Tax Credit Bonds.

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose community development, as defined in the CRA regulation. Overall qualified investments in the Gulfport-Biloxi AA are highly responsive to assessment area needs, primarily addressing the critical need to revitalize and stabilize disaster areas. However, the bank's investments are not considered innovative or complex. Third party investors routinely structure and originate the types of qualified investments that Whitney purchases in the Gulfport-Biloxi AA.

During the evaluation period, the bank invested \$25 million in the State of Mississippi General Obligation Gulf Tax Credit Bonds, otherwise known as GO Bonds. As in Louisiana, the purpose of these bonds is to provide funds for debt service so that the affected coastal counties and their entities impacted by Hurricane Katrina can make timely payment of principal and/or interest on outstanding debt issued prior to the hurricane. The Gulfport-Biloxi AA consists of three disaster area coastal counties, two of which (Hancock and Harrison) received the greatest amount of damage in terms of homes, jobs, and infrastructure. These counties will primarily receive the most benefit from the bank's bond investment. Benefits will also accrue to other portions of the state of Mississippi that are outside of the bank's assessment area. Consideration is being given to the impact of outside AA investments because the bank has adequately met community development needs in the assessment area.

In the current evaluation period, the bank made 26 direct investments in the Gulfport-Biloxi AA totaling \$122,000. These investments are donations to organizations whose primary purpose meets the definition of community development. Approximately 86% of donation dollars helped to provide a variety of community services to low- and moderate-income individuals and families.

Prior period investments, which are not given as much consideration as current period investments, were originated during previous examination evaluation periods and remain on the books of the bank. The bank has one prior period investment in the Gulfport-Biloxi AA totaling \$1.1 million. This investment is in a Low-Income Housing Tax Credit fund that continues to help provide 63 units of affordable rental housing for low- and moderate-income individuals and families in the Gulfport-Biloxi AA. Affordable housing is an important need in the assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Retail Banking Services

Refer to Table 15 in the state of Mississippi 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.

Whitney's branches are reasonably accessible to the bank's geographies and individuals of different income levels in its AA. Adjustments to U. S. census data reflects that in the 2000 census, there are no low-income census tracts in the AA compared to three low-income geographies in the 1990 census data. Whitney operates seven branches in the Gulfport-Biloxi AA. While there are no offices in the moderate-income census tracts, it should be noted that just 11% of the population lives in a moderate-income geography in the AA. Also, we considered in our evaluation that a majority of branches in the AA are accessible to moderate-income areas. Of the six branches located in middle-income census tracts, three adjoin moderate-income tracts. The one branch that is located in an upper-income census tract also adjoins a moderate-income tract.

Whitney's record of opening and closing branches has not adversely affected the accessibility of delivery systems in the Gulfport-Biloxi AA. One branch was closed in a middle-income geography in 2004. No other branches have been opened or closed in the Gulfport-Biloxi AA during the evaluation period. The bank continues to operate a full-service branch and deposit accepting ATM in the same census tract as the branch that was closed.

Whitney operates 10 ATMs throughout the Gulfport-Biloxi AA. Three, or 30%, are located in middle-income census tracts. This exceeds the percentage of the population living in those tracts. All ATMs are available 24 hours a day, seven days a week.

Banking hours, services, and products offered do not vary in a way that inconveniences any portion of the assessment area, including low- and moderate-income geographies or individuals. Banking hours are consistent throughout the AA. Lobby and drive-up hours are generally 9 a.m. to 4 p.m. Monday through Thursday, with extended hours until 5:30 p.m. on Friday.

A wide variety of deposit and loan products, as well as business services, are available at all branch locations. In addition to the products and services normally offered by a bank of Whitney's size, several deposit or loan products are particularly responsive to the needs of low- or moderate-income individuals and small businesses. Products of relevance to this evaluation period are offered bank-wide, available in all AAs, and are described in detail under the Service Test for the state of Louisiana. These products are not only targeted to low- and moderate-income individuals or small businesses, but provide basic low cost banking products throughout the AA.

Community Development Services

Whitney is involved in providing a number of CD services in the Gulfport-Biloxi AA, several of which are focused on post-Hurricane Katrina redevelopment efforts. They are primarily focused on affordable housing and small business development efforts related to the revitalization and stabilization of targeted areas in the AA. The Whitney CDC has also been active in working with local builders and non-profit organizations in arranging financing for affordable housing projects in the area. Services include presentations made at affordable housing fairs and consulting with community development groups to create and sustain affordable housing programs. Bank officers also provide financial expertise to economic development groups such as Harrison County Long Term Recovery, Mississippi Gulf Coast Economic Development and the Mississippi Gulf Coast Housing Coalition. This level of CD services received positive consideration in evaluating performance.

Appendix A: Scope of Examination

Time Period Reviewed	Lending Test (excludes CD loans): 01/01/03 to 12/31/06 Investment and Service Tests and CD Loans: 01/07/03 to 02/07/07	
Financial Institution	Products Reviewed	
Whitney National Bank (Whitney) New Orleans, Louisiana	Home mortgage loans, small loans to businesses	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Whitney Community Development Corporation	Holding Company Subsidiary	Community Development Loans
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
New Orleans AA Baton Rouge AA Houma AA Lafayette AA Lake Charles AA LA Non-MA AA Florida Pensacola AA Ft. Walton AA FL Non-MA AA Sarasota AA Tampa AA Texas Houston AA Alabama Mobile AA Montgomery AA AL Non-MA AA Mississippi Gulfport-Biloxi AA	Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Full-Scope Full-Scope Limited-Scope Limited-Scope Full-Scope	None

Appendix B: Summary of State Ratings

RATINGS		WHITNEY NATIONAL BANK		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
BANK NAME	Outstanding	Outstanding	Outstanding	Outstanding
State:				
LOUISIANA	Outstanding	Outstanding	Outstanding	Outstanding
FLORIDA	High Satisfactory	Needs Improvement	Low Satisfactory	Satisfactory
TEXAS	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
ALABAMA	Outstanding	Low Satisfactory	Low Satisfactory	Satisfactory
MISSISSIPPI	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory

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

Appendix C: Market Profiles for Full-Scope Areas

State of Louisiana

New Orleans AA

Demographic Information for Full-Scope Area: (New Orleans Assessment Area)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	377	15.38	23.08	34.48	26.53	0.53
Population by Geography	1,273,466	10.76	20.91	38.01	30.33	0.01
Owner-Occupied Housing by Geography	295,043	4.59	15.61	42.19	37.61	0.00
Businesses by Geography	89,623	8.15	20.16	35.49	36.20	0.00
Farms by Geography	1,259	4.61	14.46	46.15	34.79	0.00
Family Distribution by Income Level	326,291	23.88	16.32	18.88	40.92	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	131,160	18.52	29.06	36.91	15.51	0.00
Median Family Income HUD Adjusted Median Family Income for 2006 Households Below the Poverty Level	= \$42,770 = \$52,300 = 17%	Median Housing Value Unemployment Rate			113,569 3.14%	

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

Source: 2000 U.S. Census and 2006 HUD updated MFI.

In the state of Louisiana, the bank's primary market is the New Orleans AA, which is comprised of seven Parishes in the New Orleans-Metairie-Kenner MSA, including Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, and St. Tammany Parishes. There are 377 census tracts in the AA of which 58 (15.4%) are low-income, 87 (23.1%) are moderate-income, 130 (34.5%) are middle-income, and 100 (26.5%) are upper-income. Two census tracts have not been assigned an income classification.

The New Orleans AA represents 45.2% of the bank's branch network in the state, 70.4% of the bank's Louisiana deposit base, and 62.6% of total reportable loans during the evaluation period. Whitney ranks as the 3rd largest commercial bank in the New Orleans AA with a 9.3% deposit market share. Whitney operates 38 full service branches and 69 ATMs in the New Orleans AA.

Population

The population living in the New Orleans AA was 1,273,466 in 2000 according to U. S. Census Bureau data. Of this total population, 23.9% were low-income families, 16.3% were moderate-income families, 18.9% were middle-income families, and 40.9% were upper income families. Approximately 14.8% of the families in the population had income below the poverty level. In the City of New Orleans, principally Orleans Parish, the level of poverty is significantly higher at 23.7%. The total number of families in Orleans Parish was 113,948 in 2000 with 62.7% in low-income, 40.7% in moderate-income, 23.1% in middle-income and 10.3% in upper-income geographies.

Dwellings

In 2000, the housing stock in the New Orleans AA was 533,097 units; with 10.6% in low-income geographies, 21.2% in moderate-income geographies, 38% in middle-income geographies, and 30.2% in upper-income geographies.

Median Housing Value

In 2000, the median housing value in the New Orleans AA was \$113,569, compared to \$173,100 in 2006. Of the housing units available in 2000, 55.4% were owner-occupied, 35.5% of the units were occupied-rental units, and 9.2% of the units were vacant. The percentage of owner-occupied units located in the low-, moderate-middle-, and upper-income geographies was: 4.6%, 15.6%, 42.2%, and 37.6%, respectively.

Economic Conditions

Probably the single event that had the greatest economic impact on the AA was Hurricane Katrina in August 2005. Economic conditions are improving, but slowly. In the aftermath of the storm, the New Orleans AA economy is struggling and the City of New Orleans continues to suffer below average per capita income, high poverty, a lack of affordable housing, escalating crime rates, job losses in virtually every employment sector, and a loss of health care professionals, teachers, and police personnel.

The New Orleans AA population decreased 52.1% between 2003 and 2006. Between December 2003 and December 2006, the New Orleans AA experienced a 28.8% reduction in the civilian workforce and reported an average unemployment rate of 5.9% (8.2% at year-end 2005), over the same time period. The City of New Orleans is experiencing much difficulty attracting the middle class back to the area, which is the tax base for the city. Jobs are returning to the area, but most are lower-paying jobs.

The main obstacle to economic recovery is the rising cost of housing. The extensive damage caused by the hurricane reduced the stock of owner-occupied housing units in the metro area by an estimated 20%, and concurrently displaced 30% of the population. Additionally, the growth of fair market rents for multifamily dwellings increased roughly 40%. This led to an undersupplied market and subsequently, to rising housing prices. The higher cost of housing has also been exacerbated by an increase in homeowner insurance rates.

Another obstacle to recovery is the slow flow of public funds into the community to finance the rebuilding efforts. The Road Home Program has been slow to issue checks to residents. Approximately \$2.3 billion in recovery funds have been disbursed to local homeowners. This represents 1/3 of the total calculated benefits. Additionally, only 2/3 of the applications for benefits have been processed. Thus, injection of capital into the community to spur construction, population growth and demand for consumer-related industries has been slow.

The redevelopment of the AAs infrastructure has been slow as well. Although the federal government earmarked approximately \$300 million in emergency funds for the city's recovery, nearly half has been spent on clean-up efforts and the remainder is being held by the Louisiana Recovery Authority, pending release for future public works projects. The lack of infrastructure redevelopment remains a significant deterrent to recovery of the metropolitan area.

Community Contacts

We conducted three community contact interviews and reviewed the summaries of two other recent contact interviews conducted in the New Orleans AA. Organizations contacted included affordable housing group and community development organizations. The contacts indicated that there is a high level of community development need in the AA, especially post-Hurricane Katrina. Banks have been responsive in meeting community credit needs. The primary needs identified by the community contacts are affordable housing and rehabilitation loans, small business financing, and technical assistance.

State of Florida

Pensacola AA

Demographic Information for Full-Scope Area: (Pensacola Assessment Area)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	77	3.90	28.57	48.05	19.48	0.00
Population by Geography	412,153	2.03	22.09	53.96	21.92	0.00
Owner-Occupied Housing by Geography	109,888	1.32	16.18	56.87	25.63	0.00
Businesses by Geography	31,831	3.78	23.66	49.76	22.80	0.00
Farms by Geography	1,007	1.09	15.59	60.28	23.04	0.00
Family Distribution by Income Level	108,105	20.39	17.84	22.05	39.73	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	41,320	3.63	27.08	54.96	14.33	0.00
Median Family Income HUD Adjusted Median Family Income for 2006 Households Below the Poverty Level	= \$43,355 = \$51,900 = 13%	Median Housing Value Unemployment Rate			90,973 2.75%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census and 2006 HUD updated MFI.

In the state of Florida, the bank's primary market is the Pensacola AA, which is comprised of two counties in the Pensacola-Ferry Pass-Brent MSA, including Escambia and Santa Rosa County. There are 77 census tracts in the AA of which 3 (3.9%) are low-income, 22 (28.6%) are moderate-income, 37 (48.1%) are middle-income, and 15 (19.5%) are upper-income.

The Pensacola AA represents 33.3% of the bank's branch network in the state, 28.3% of the Florida deposit base, and 60.4% of total reportable loans during the evaluation period. Whitney's ranks as the 6th largest commercial bank in the Pensacola AA with a 7.1% deposit market share. The top five competitors in this market include: Amsouth Bank, Bank of America, N.A., SunTrust Bank, Wachovia Bank, N.A., and Washington Mutual Bank. Whitney operates 9 full service branches and 10 ATMs in the Pensacola AA.

Population

The population living in the Pensacola AA was 412,153 in 2000 according to U. S. Census Bureau data. Of this total, 20.4% were low-income families, 17.8% were moderate-income families, 22.1% were middle-income families, and 39.7% were upper-income families. Approximately 10.8% of the families in the population had income below the poverty level. In Escambia County, which represents the largest portion of the AA, 12.1% of the population had income below the poverty level. The total number of families in Escambia County was 74,528 in 2000 with 22.1% in low-income, 18.2% in moderate-income, 22.0% in middle-income and 37.7% in upper-income geographies.

Dwellings

In 2000, the housing stock in the Pensacola AA was 173,766 units; with 2.2% in low-income geographies, 19.4% in moderate-income geographies, 56.4% in middle-income geographies, and 22.1% in upper-income geographies.

Median Housing Value

In 2000, the median housing value in the Pensacola AA was \$90,973, compared to \$166,000 in 2006. Of the available housing units in 2000, 63.2% were owner-occupied, 25.9% of the units were occupied-rentals, and 10.9% of the units were vacant. The percentage of owner-occupied units located in low-, moderate-, middle-, middle-, and upper-income geographies was: 1.3%, 16.2%, 56.9%, and 25.6%, respectively.

Economic Conditions

The Pensacola economy has stabilized and is expanding at a moderate pace. During the period 2003 – 2006, the Pensacola AA experienced an 8.8% change in total employment. The unemployment rate averaged 4.1% over the same time period. Population in the metropolitan area increased 2.5%. Economic strengths in the area include large military and civilian government presence which helps to stabilize the metropolitan area's economy, low cost of living, and improving migration and population trends. Economic weaknesses include below average per capita income, less affluent retiree migrants in comparison to other Florida metropolitan areas, and soaring house price appreciation which erodes housing affordability.

The construction industry is experiencing an adjustment due to an oversupply in the housing market and a recession in the housing industry. In contrast, the service industries are expanding, especially healthcare and professional services. The tourism industry is growing at a moderate pace due primarily to Pensacola's location on the Gulf coastline. State and local government and military personnel are the leading industries in the areas. The top ten employers include: Pensacola Naval Air Station, Sacred Heart Health System, Baptist Health Care, Whiting Field Naval Air Station, Corry Station Naval Technical Training Center, University of West Florida, Solutia, Inc., Lakeview Center, Gulf Power Company, and West Florida Hospital.

Community Contacts

We conducted two community contact interviews in the Pensacola AA. Organizations contacted included an affordable housing CDC and a community development organization. The contacts identified the need for "workforce" affordable housing, due to escalating land and construction costs, and financial support for community organizations that provide services to low- and moderate-income families and individuals as primary needs in the AA.

State of Texas

Houston AA

Demographic Information for Full-Scope Area: (Houston Assessment Area)						
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	42.65	0.00
Businesses by Geography	296,663	5.53	26.07	26.22	41.92	0.25
Farms by Geography	4,836	3.35	19.21	35.03	42.31	0.10
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 2006 Households Below the Poverty Level	= \$51,431 = \$60,900 = 13%	Median Housing Value Unemployment Rate			109,963 3.06%	

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

Source: 2000 U.S. Census and 2006 HUD updated MFI.

Whitney has one assessment in the state of Texas. The Houston AA is comprised of three counties in the Houston-Sugarland-Baytown MSA, including Austin, Fort Bend, and Harris County. There are 707 census tracts in the AA of which 64 (9.1%) are low-income, 227 (32.1%) are moderate-income, 199 (28.2%) are middle-income, and 210 (29.7%) are upper-income. Seven census tracts have not been assigned an income classification.

The Houston AA represents 8.7% of the bank's branch network, 6.1% of the deposit base, and 9.4% of total reportable loans during the evaluation period. Whitney has a very small presence in this market, reporting a 1% deposit market share. Whitney operates 13 full service branches and 18 ATMs in the Houston AA.

Population

The population living in the Houston AA was 3,755,030 in 2000 according to U. S. Census Bureau data. Of this total population, 23.2% were low-income families, 17.4% were moderate-income families, 18.6% were middle-income families, and 40.8% were upper-income families. Approximately 11.4% of the families in the population had income below the poverty level. In Harris County, which represents the largest portion of the assessment area, the level of poverty is slightly higher at 12.1%. The total number of families in Harris County was 840,630 in 2000 with 24.4% in low-income, 17.9% in moderate-income, 18.7% in middle-income, and 39.0% in upper-income geographies.

Dwellings

In 2000, the housing stock in the Houston AA was 1,414,121 units; with 7.2% in low-income geographies, 29.8% in moderate-income geographies, 30.4% in middle-income geographies, and 32.6% in upper-income geographies.

Median Housing Value

In 2000, the median housing value in the Houston AA was \$109,963, compared to \$149,100 in 2006. Of the housing units available in 2000, 53.5% were owner-occupied, 39.6% of the units were occupied-rental units, and 6.9% of the units were vacant. The percentage of owner-occupied units located in the low-, moderate-, middle-, and upper-income geographies were: 3.5%, 23.5%, 30.4%, and 42.7%, respectively.

Economic Conditions

The Houston AA economy is growing at a strong pace, however hiring has slowed in response to the volatility in the energy industry. The key drivers of the Houston AA economy are the significant trade and export links, global leadership in oil and gas technology; affordable housing and low business cost, strong hiring in education/health services and an expanding public sector. Steady population growth continues to spur growth in consumer services and in the construction industry. Conversely, the fact that the Houston AA competes with the other important regional centers for expansion and growth and the metropolitan area is highly dependent on the volatile energy industry weakens the economy of this market.

The top employers in the Houston AA (employ 10,000 or more) include: Shell Oil Company, ExxonMobil Corporation, Administaff, Continental Airlines, Inc., Halliburton Company, McDonald's Corporation, University of Texas M.D. Anderson Cancer Center, Wal-Mart Stores, Inc., Dow Chemical Company, and Memorial Hermann Healthcare System.

Per capita income in the Houston AA of \$39,199 is above the state and national averages, \$32,460 and \$34,471, respectively.

Whitney is predominately a commercial lender in the Houston AA which correlates to the strong and sustained growth in the commercial real estate industry over the past four years. The market is experiencing falling vacancy rates for office, warehouse, and apartments.

Community Contacts

We received the summaries of seven recent community contact interviews conducted in the Houston AA. The contacts were of the opinion that there are a wide range of opportunities for community development lending, investments, and services throughout the assessment area. Community development opportunities include working with and providing financing to the numerous organizations whose mission is to provide affordable housing and/or community services for low- and moderate-income persons, as well as organizations with a mission of economic development.

Types of community development investments available in the Houston AA include, but are not limited to, participation in numerous local Community Development Corporations (CDCs) and Community Development Financial Institutions (CDFI's) and opportunities to contribute to qualified non-profit organizations whose missions are focused on providing affordable housing, community services for low- and moderate-income persons and economic development. The City of Houston has approximately 41 Community Development Areas and 22 Tax Increment

Reinvestment Zones that are targeted for redevelopment. Homeownership Zones have been designated in sections of the Third and Fourth Wards to help develop affordable housing. However, the shortage of housing subsidies has increased the challenge to provide affordable housing in the assessment area. There are also opportunities for the purchase of mortgage-backed securities.

State of Alabama

Mobile MA AA

Demographic Information for Full-Scope Area: (Mobile Assessment Area)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	114	14.91	17.54	44.74	22.81	0.00
Population by Geography	399,843	9.29	14.08	48.87	27.77	0.00
Owner-Occupied Housing by Geography	103,402	4.91	11.89	51.55	31.65	0.00
Businesses by Geography	22,415	7.86	11.40	50.97	29.78	0.00
Farms by Geography	464	4.31	8.62	56.25	30.82	0.00
Family Distribution by Income Level	107,338	23.72	15.73	19.92	40.63	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	42,343	16.62	19.98	49.03	14.37	0.00
Median Family Income HUD Adjusted Median Family Income for 2006 Households Below the Poverty Level	= \$40,388 = \$49,500 = 18%	Median Housing Value Unemployment Rate				83,140 3.39%

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

Source: 2000 U.S. Census and 2006 HUD updated MFI.

In the state of Alabama, the bank's primary market is the Mobile MSA. There are 114 census tracts in the AA of which 17 (14.9%) are low-income, 20 (17.5%) are moderate-income, 51 (44.7%) are middle-income, and 26 (22.8%) are upper-income.

The Mobile AA represents 36.8% of the Alabama branch network, 50.9% of the Alabama deposit base, and 63.6% of the banks total reported loans in the state of Alabama. Whitney's deposit market share of 5.8% ranks the bank the 6th largest financial institutions with offices in the Mobile AA. The top five competitors with a greater market share include Amsouth Bank, Bank Trust, Compass Bank, Regions Bank, and Wachovia Bank, N.A. Whitney operates seven full-service branches and ATMs in the Mobile AA.

Population

The population living in the Mobile AA was 399,843 in 2000 according to U. S. Census Bureau data. Of this total, population, 21.9% were low-income families, 17.2% were moderate-income families, 19.9% were middle-income families, and 40.6% were upper-income families. Approximately 15.9% of the families in the population had income below the poverty level.

Dwellings

In 2000, the housing stock in the Mobile AA was 165,101 units; with 9.2% in low-income geographies, 14.2% in moderate-income geographies, 49.1% in middle-income geographies, and 27.5% in upper-income geographies.

Median Housing Value

In 2000, the median housing value in the Mobile AA was \$83,140, compared to \$137,000 in 2006. Of the units available in 2000, 62.6% were owner-occupied, 28.3% of the units were occupied-rental units, and 9.0% of the units were vacant. The percentage of owner-occupied units located in the low-, moderate-, middle-, and upper-income geographies were: 4.9%, 11.9%, 51.6%, and 31.7%, respectively.

Economic Conditions

Economic strengths in the Mobile AA include high industrial diversity; favorable business costs; a bustling sea trade industry; and a low cost of living. Significant economic weaknesses include: high consumer debt burden; low per capital income; low educational attainment levels; and a volatile employment base.

Mobile's economy is expanding but at a decelerating pace. Among services, only the leisure/hospitality industry is showing signs of slowing down. Excessive tightness in the labor market may be inhibiting further expansion in the leisure/hospitality industry as workers become harder to find. Economists are projecting above average growth prospects in the Mobile AA over the next 5-10 years due to the Choctaw Point container terminal project, which will position the port among the nation's top 10 in terms of cargo handled and create several thousand trade-related jobs.

State and local government are the leading industries in the AA. Top employers (employ 1,000 or more employees) include the University of South Alabama & USA Health System; Mobile Infirmary Medical Center; Wal-Mart Stores, Inc.; Providence Hospital; Springfield Memorial Hospital; ST Mobile Aerospace Engineering; and Win Dixie Food Stores.

Per capita income in the Mobile AA is growing but lags behind the state level of \$28,054, and the national income level of \$33,090.

Growth in the housing market from 2003 – 2006 was strong as a result of in-migration and the relocation of individuals displaced by Hurricane Katrina. Currently, however, the construction industry is leveling off in the face of waning demand for homebuilding and dwindling hurricane rebuilding. Housing prices are below the national average but are still rising.

State of Mississippi

Gulfport-Biloxi AA

Demographic Information for Full-Scope Area: (Gulfport-Biloxi Assessment Area)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	41	0.00	17.07	63.41	17.07	2.44
Population by Geography	213,124	0.00	10.96	73.46	15.56	0.02
Owner-Occupied Housing by Geography	55,437	0.00	6.72	75.30	17.97	0.02
Businesses by Geography	15,684	0.00	16.01	66.84	13.72	3.43
Farms by Geography	251	0.00	9.16	78.09	12.75	0.00
Family Distribution by Income Level	56,733	19.64	17.20	22.58	40.58	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	20,897	0.00	14.95	74.08	10.97	0.00
Median Family Income HUD Adjusted Median Family Income for 2006 Households Below the Poverty Level	= \$41,026 = \$46,800 = 14%	Median Housing Value Unemployment Rate			87,278 2.82%	

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

Source: 2000 U.S. Census, and 2006 HUD updated MFI.

Whitney has one assessment in the state of Mississippi. The Gulfport-Biloxi AA is comprised of two counties in the Gulfport-Biloxi MSA, including Hancock and Harrison County. There are 41 census tracts in the AA, of which 7 (17.1%) are moderate-income, 26 (63.4%) are middle-income, and 7 (17.1%) are upper-income. There are no low-income census tracts in the Gulfport-Biloxi AA. It should be noted that in the 1990 U. S. census, there were three low-income census tracts in the AA. One census tract has not been assigned an income classification. The bank's main office in the Gulfport-Biloxi AA is located in this unassigned census tract.

The Gulfport-Biloxi AA represents 4.7% of the bank's branch network, 3.2% of the deposit base, and 2.5% of total reportable loans during the evaluation period. Whitney has an adequate presence in the Gulfport-Biloxi AA reporting ranking 4th with a 10.8% deposit market share. Other direct competitors include Amsouth Bank, Bancorpsouth Bank, Hancock Bank, Regions Bank, and Trustmark National Bank. Whitney operates 7 full-service branches and 10 ATMs in the Gulfport-Biloxi AA.

Population

The population living in the Gulfport-Biloxi AA was 213,124 in 2000 according to U. S. Census Bureau data. Of this total population, 19.6% were low-income families, 17.2% were moderate-income families, 22.6% were middle-income families, and 40.6% were upper-income families. Approximately 11.2% of the families in the population had income below the poverty level. In Harrison County (which represents the largest proportion of the AA), 20.0% of the population were low-income families and 17.5% of the population were middle-income families.

Dwellings

In 2000, the housing stock in the Gulfport-Biloxi AA was 92,331 units; with 10.3% in moderate-income geographies, 72.6% in middle-income geographies, and 17.1% in upper-income geographies.

Median Housing Value

In 2000, the median housing value in the Gulfport-Biloxi AA was \$82,278, compared to \$145,800 in 2006. Of the available housing units in 2000, 60% of the units were owner-occupied, 28.1% of the units were occupied-rental units, and 11.9% of the units were vacant. The percentage of owner-occupied units located in the moderate-, middle-, and upper-income census tracts were: 6.7%, 75.3%, and 18%, respectively.

Economic Conditions

Hurricane Katrina had a significant impact on the Mississippi Gulf Coast, flooding or destroying much of the city of Gulfport and neighboring Biloxi. Hurricane force winds and storm surges reportedly exceeding 30 feet in some sections destroyed 90% of the buildings along the coastline. Several of the floating casinos were torn off their supports and thrown inland contributing to the damage. While the Gulfport-Biloxi AA was impacted by Hurricane Katrina, the economy is expanding but at an uneven pace. Such service sectors as retail trade and education/health are supporting growth. The manufacturing sector has been steadily improving since 2004 adding several hundred jobs. However, the unemployment continues to exceed 6%, is above the U.S. average, and is indicative of a mismatch in skills between available jobs and the AAs labor force. Gulfport is a major regional gaming hub, as such, the leisure/hospitality sector accounts for an unusually high percentage (26.1%) of the employment base. Of all the casinos that were damaged in the storm, six have reopened.

The primary stabilizing influence on the economy is the presence of Keesler Air Force Base. Keesler AFB employs over 15,000 and is the Electronics Training Center for the U. S. Air Force, training 40,000 students annually. The 81st Training Wing is host to 2nd Air Force, the 403rd Wing (Air Force Reserve) and home of the 2nd largest Air Force medical facility, Keesler Medical Center. Other significant employers in the AA (2000 or more employees) include Northrop Grumman Corporation, Grand Casinos, Inc. Stennis Space Center, Naval Construction Battalion Center, Beau Rivage Casino, Naval Station Pascagoula, Wal-Mart Stores, Inc., Memorial Hospital at Gulfport, and Singing River Hospital.

The housing supply is adequate and new construction is strong. Housing affordability is high but declining as house prices outpace income growth in the AA. The per capital income for Gulfport is \$24,971, compared to \$22,511 for the state of Mississippi, and \$30,804 nationally. The housing market is highly dependent on population trends which are dependent on the military bases due to the movement of units in and out of the base.

Community Contacts

We noted during the review of one community contact in the AA that opportunities exist in the bank's market to participate in community development lending, investment, and service activities. The contact identified support for community organizations that target their services to low- and moderate-income individuals and families as a critical need in the AA.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of

the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

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

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

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

Table 1. Lending Volume (2003 – 2006)

LENDING VOLUME		Geography: ALL AREAS – 2003-2006						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2006					
MA/Assessment Area (2006):	% 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)		
State of Louisiana													
Full Scope: New Orleans	45.30	8,049	995,196	12,524	2,003,484	25	2,740	155	273,347	20,753	3,274,767	70.43	
Limited Scope: Baton Rouge AA	10.03	1,961	225,204	2,534	399,244	4	685	94	58,748	4,593	683,881	9.65	
Houma AA	5.27	1,064	75,665	1,325	215,808	17	1,289	7	586	2,413	293,348	6.10	
LA Non MA AA	3.47	628	33,228	940	129,189	14	2,083	8	34,292	1,590	198,792	4.69	
Lafayette AA	4.53	789	77,133	1,266	248,627	7	1,128	11	1,054	2,073	327,942	5.13	
Lake Charles AA	3.75	621	45,437	1,069	124,058	2	123	24	31,429	1,716	201,047	4.00	
State of Texas													
Full Scope: Houston AA	7.15	487	122,626	2,665	500,126	11	1,753	111	53,083	3,274	677,588	100.00	
State of Mississippi													
Full Scope: Gulfport-Biloxi	2.45	655	59,658	455	51,764	6	2,190	5	480	1,121	114,092	100.00	
State of Florida													
Full Scope: Pensacola AA	4.42	984	144,110	1,009	180,500	2	82	30	3,005	2,025	327,697	28.28	
Limited Scope: FL Non MA AA	0.90	270	121,729	143	22,096	1	185	0	0	414	144,010	7.69	
Ft. Walton AA	1.34	288	92,736	323	55,326	0	0	2	5,000	613	153,062	19.51	
Sarasota AA	0.08	32	8,406	3	1,157	0	0	0	0	35	9,563	31.81	
Tampa AA	0.58	66	22,407	200	34,169	0	0	0	0	266	56,576	12.73	
State of Alabama													
Full Scope: Mobile AA	6.83	1,133	149,642	1,975	368,583	16	4,444	4	3,322	3,128	525,991	50.86	
Limited Scope: AL Non MA AA	1.73	482	81,880	290	55,994	13	2,078	7	1,910	792	141,862	27.32	
Montgomery AA	2.19	320	30,968	617	65,839	54	5,208	11	1,869	1,002	103,884	21.83	

* Loan Data as of December 31, 2006. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2003 to December 31, 2006.

*** Deposit Data as of June 30, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans (2003)

Geographic Distribution: HOME PURCHASE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: ALL AREAS - 2003										Evaluation Period:				
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	Overall	Low	Mod	Mid	Upp	
State of Louisiana																
Full Scope: New Orleans AA	698	47.91	4.47	2.01	15.71	9.60	42.32	40.54	37.51	47.85	2.63	1.22	2.00	2.70	2.88	
Limited Scope: Baton Rouge AA	141	9.68	5.57	2.84	14.10	6.38	44.56	31.21	35.77	59.57	0.97	1.21	0.64	0.63	1.44	
Houma AA	61	4.19	0.78	1.64	14.52	4.92	69.72	55.74	14.98	37.70	2.26	4.76	1.10	2.02	3.16	
LA Non MA AA	30	2.06	3.22	0.00	18.99	3.33	39.00	40.00	38.79	56.67	2.41	0.00	0.64	2.97	2.53	
Lafayette AA	68	4.67	0.74	1.47	10.70	5.88	27.31	14.71	61.25	77.94	1.47	16.67	1.58	1.00	1.58	
Lake Charles AA	30	2.06	1.38	0.00	18.74	6.67	44.72	26.67	35.16	66.67	1.08	0.00	0.56	0.74	1.49	
State of Texas																
Full Scope: Houston AA	29	1.99	3.87	0.00	25.73	10.34	30.52	27.59	39.88	62.07	0.00	0.00	0.00	0.00	0.00	
State of Mississippi																
Full Scope: Gulfport-Biloxi AA	48	3.29	0.00	0.00	6.72	2.08	77.42	77.08	15.86	20.83	0.96	0.00	0.51	1.00	0.93	
State of Florida																
Full Scope: Pensacola AA	160	10.98	1.32	0.63	16.18	8.75	56.87	57.50	25.63	33.13	1.13	1.28	1.06	1.09	1.22	
Limited Scope: Ft. Walton AA	13	0.89	0.00	0.00	1.32	0.00	70.74	69.23	27.94	30.77	0.20	0.00	0.00	0.20	0.20	
State of Alabama																
Full Scope: Mobile AA	150	10.30	3.69	2.67	10.60	7.33	54.31	34.00	31.39	56.00	1.06	3.88	1.94	0.91	1.08	

* Based on 2003 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2003 Peer Mortgage Data (Western – TX)

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

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

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

Limited Scope: AL Non MA AA	5	0.34	0.00	0.00	43.04	60.00	49.12	40.00	7.83	0.00	3.60	0.00	5.56	3.70	0.00
Montgomery AA	24	1.65	5.20	0.00	17.57	12.50	44.06	33.33	33.17	54.17	0.38	0.00	0.54	0.34	0.40

Table 3. Geographic Distribution of Home Improvement Loans (2003)

Geographic Distribution: HOME IMPROVEMENT JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: ALL AREAS - 2003										Evaluation Period:				
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	
State of Louisiana																
Full Scope: New Orleans AA	639	49.12	4.47	3.91	15.71	12.05	42.32	39.59	37.51	44.44	14.93	12.95	12.34	13.31	18.17	
Limited Scope: Baton Rouge AA	156	11.99	5.57	3.85	14.10	11.54	44.56	44.23	35.77	40.38	9.65	8.22	8.78	8.87	11.23	
Houma AA	120	9.22	0.78	2.50	14.52	18.33	69.72	63.33	14.98	15.83	12.75	42.86	21.78	11.18	12.42	
LA Non MA AA	72	5.53	3.22	5.56	18.99	13.89	39.00	31.94	38.79	48.61	12.70	26.67	10.42	11.44	13.73	
Lafayette AA	53	4.07	0.74	0.00	10.70	15.09	27.31	26.42	61.25	58.49	6.83	0.00	10.13	6.90	6.31	
Lake Charles AA	58	4.46	1.38	0.00	18.74	22.41	44.72	41.38	35.16	36.21	7.44	0.00	8.90	6.38	8.43	
State of Texas																
Full Scope: Houston AA	47	3.61	3.87	2.13	25.73	44.68	30.52	25.53	39.88	27.66	0.00	0.00	0.00	0.00	0.00	
State of Mississippi																
Full Scope: Gulfport-Biloxi AA	51	3.92	0.00	0.00	6.72	13.73	77.42	74.51	15.86	11.76	5.71	0.00	10.61	5.43	4.72	
State of Florida																
Full Scope: Pensacola AA	33	2.54	1.32	0.00	16.18	27.27	56.87	51.52	25.63	21.21	3.91	0.00	8.57	3.66	2.58	
Limited Scope: Ft. Walton AA	3	0.23	0.00	0.00	1.32	0.00	70.74	33.33	27.94	66.67	1.44	0.00	0.00	0.76	2.70	
State of Alabama																

* Based on 2003 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2003 Peer Mortgage Data (Western – TX)

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

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

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

Full Scope: Mobile AA	36	2.77	3.69	0.00	10.60	5.56	54.31	47.22	31.39	47.22	3.73	0.00	2.27	3.20	5.56
Limited Scope: AL Non MA AA	7	0.54	0.00	0.00	43.04	57.14	49.12	14.29	7.83	28.57	8.97	0.00	13.79	2.63	18.18
Montgomery AA	26	2.00	5.20	0.00	17.57	23.08	44.06	65.38	33.17	11.54	7.54	0.00	10.71	11.64	2.19

Table 4. Geographic Distribution of Home Mortgage Refinance Loans (2003)

Geographic Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2003 TO DECEMBER 31, 2003			Geography: ALL AREAS - 2003								Evaluation Period:				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
State of Louisiana															
Full Scope: New Orleans AA	2,051	49.65	4.47	1.17	15.71	6.97	42.32	33.25	37.51	58.61	3.21	1.33	2.14	2.79	3.88
Limited Scope: Baton Rouge AA	492	11.91	5.57	1.02	14.10	4.88	44.56	36.79	35.77	57.32	1.83	0.98	1.10	1.58	2.23
Houma AA	240	5.81	0.78	0.00	14.52	9.58	69.72	63.75	14.98	26.67	3.61	0.00	3.92	3.59	3.61
LA Non MA AA	121	2.93	3.22	1.65	18.99	20.66	39.00	28.10	38.79	49.59	4.12	5.13	7.51	3.62	3.69
Lafayette AA	169	4.09	0.74	0.00	10.70	7.10	27.31	10.65	61.25	82.25	1.87	0.00	2.56	0.98	2.06
Lake Charles AA	135	3.27	1.38	0.00	18.74	11.11	44.72	36.30	35.16	52.59	2.33	0.00	2.42	2.29	2.36
State of Texas															
Full Scope: Houston AA	48	1.16	3.87	0.00	25.73	10.42	30.52	18.75	39.88	70.83	0.00	0.00	0.00	0.00	0.00
State of Mississippi															
Full Scope: Gulfport-Biloxi AA	156	3.78	0.00	0.00	6.72	6.41	77.42	72.44	15.86	21.15	1.62	0.00	2.63	1.58	1.61
State of Florida															
Full Scope: Pensacola AA	182	4.41	1.32	0.00	16.18	13.19	56.87	43.96	25.63	42.86	0.83	0.00	1.23	0.63	1.09
Limited Scope: Ft. Walton AA	33	0.80	0.00	0.00	1.32	0.00	70.74	81.82	27.94	18.18	0.33	0.00	0.00	0.42	0.18
State of Alabama															

* Based on 2003 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2003 Peer Mortgage Data (Western – TX)

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

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

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

Full Scope: Mobile AA	351	8.50	3.69	0.57	10.60	3.70	54.31	37.32	31.39	58.40	1.29	0.69	0.88	1.09	1.53
AL Non MA AA	44	1.07	0.00	0.00	43.04	38.64	49.12	45.45	7.83	15.91	12.57	0.00	13.49	12.27	11.48
Montgomery AA	109	2.64	5.20	0.92	17.57	7.34	44.06	60.55	33.17	31.19	0.96	0.68	0.79	1.54	0.57

Table 5. Geographic Distribution of Multifamily Loans (2003)

Geographic Distribution: MULTIFAMILY JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: ALL AREAS – 2003										Evaluation Period:				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans**** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
State of Louisiana																
Full Scope: New Orleans AA	11	52.38	16.39	18.18	25.57	9.09	34.23	36.36	23.80	36.36	6.59	5.71	2.08	8.16	11.43	
Limited Scope: Baton Rouge AA	0	0.00	18.26	0.00	18.74	0.00	29.60	0.00	33.40	0.00	0.00	0.00	0.00	0.00	0.00	
Houma AA	0	0.00	1.72	0.00	8.01	0.00	61.93	0.00	28.34	0.00	0.00	0.00	0.00	0.00	0.00	
LA Non MA AA	1	4.76	1.83	0.00	25.40	0.00	42.24	0.00	30.53	100.00	12.50	0.00	0.00	0.00	100.00	
Lafayette AA	0	0.00	0.18	0.00	10.32	0.00	37.15	0.00	52.36	0.00	0.00	0.00	0.00	0.00	0.00	
Lake Charles AA	1	4.76	1.23	0.00	41.78	0.00	25.34	100.00	31.64	0.00	6.67	0.00	0.00	16.67	0.00	
State of Texas																
Full Scope: Houston AA	1	4.76	10.24	0.00	36.30	100.00	31.19	0.00	22.27	0.00	0.00	0.00	0.00	0.00	0.00	
State of Mississippi																
Full Scope: Gulfport-Biloxi AA	1	4.76	0.00	0.00	19.09	0.00	64.87	100.00	16.04	0.00	6.25	0.00	0.00	8.33	0.00	
State of Florida																
Full Scope: Pensacola AA	1	4.76	3.92	0.00	17.60	0.00	60.48	100.00	18.00	0.00	4.35	0.00	0.00	11.11	0.00	
Limited Scope: Ft. Walton AA	0	0.00	0.00	0.00	3.92	0.00	82.90	0.00	13.18	0.00	0.00	0.00	0.00	0.00	0.00	
State of Alabama																
Full Scope: Mobile AA	5	23.81	4.33	20.00	15.95	0.00	29.07	40.00	50.65	40.00	20.83	50.00	0.00	22.22	20.00	

* Based on 2003 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2003 Peer Mortgage Data (Western – TX)

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

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

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

Limited Scope:	0	0.00	0.00	0.00	45.10	0.00	53.09	0.00	1.80	0.00	0.00	0.00	0.00	0.00	0.00
AL Non MA AA															
Montgomery AA	0	0.00	18.05	0.00	13.79	0.00	31.02	0.00	37.15	0.00	0.00	0.00	0.00	0.00	0.00

Table 6. Geographic Distribution of Small Loans to Businesses (2003)

Geographic Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003												Geography: ALL AREAS - 2003					Evaluation Period:				
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						
State of Louisiana																					
Full Scope: New Orleans AA	3,523	49.62	8.05	7.64	19.82	17.80	36.28	31.79	35.85	42.78	10.53	13.25	11.36	9.80	11.51						
Limited Scope: Baton Rouge AA	626	8.82	7.44	4.63	18.04	13.10	39.06	37.54	35.47	44.73	4.03	4.45	4.29	3.97	4.40						
Houma AA	312	4.39	2.05	0.00	13.37	16.99	68.86	60.26	15.28	22.76	6.52	0.00	9.94	6.06	8.64						
LA Non MA AA	246	3.46	3.48	0.41	18.73	10.57	42.75	42.68	35.04	46.34	7.11	2.50	5.05	7.47	9.21						
Lafayette AA	318	4.48	0.29	0.00	9.37	6.92	33.10	29.56	57.23	63.52	4.34	0.00	4.18	4.91	4.62						
Lake Charles AA	265	3.73	1.13	1.13	34.35	27.92	39.59	33.96	24.93	36.98	5.53	6.38	5.27	5.43	6.81						
State of Texas																					
Full Scope: Houston AA	612	8.62	5.84	5.07	27.94	20.75	25.83	14.87	40.08	59.31	0.60	0.60	0.48	0.33	0.91						
State of Mississippi																					
Full Scope: Gulfport-Biloxi AA	114	1.61	0.00	0.00	17.21	21.05	66.74	65.79	11.87	13.16	1.76	0.00	2.30	1.71	1.64						
State of Florida																					
Full Scope: Pensacola AA	274	3.86	3.31	5.11	24.15	39.05	53.77	29.93	18.77	25.91	2.23	3.14	3.69	1.48	2.37						
Ft. Walton AA	30	0.42	0.00	0.00	6.31	6.67	69.56	70.00	24.13	23.33	0.49	0.00	0.34	0.53	0.53						
State of Alabama																					
Full Scope: Mobile AA	622	8.76	5.44	8.20	12.79	11.25	49.13	37.30	32.65	43.25	3.54	6.09	4.05	2.98	4.32						
Limited: AL Non MA	10	0.14	0.00	0.00	43.15	40.00	30.56	40.00	26.29	20.00	2.77	0.00	3.48	2.74	2.50						
Montgomery AA	148	2.08	18.60	11.49	13.96	11.49	33.55	33.78	33.89	43.24	1.65	1.21	1.75	1.89	1.73						

* Based on 2003 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2003).

Table 7. Geographic Distribution of Small Loans to Farms (2003)

Geographic Distribution: SMALL LOANS TO FARMS JANUARY 1, 2003 TO DECEMBER 31, 2003			Geography: ALL AREAS - 2003								Evaluation Period:				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	Overall	Low	Mod	Mid	Upp
State of Louisiana															
Full Scope: New Orleans AA	6	13.64	4.08	0.00	14.44	33.33	46.15	66.67	35.32	0.00	2.41	0.00	6.90	2.53	0.00
Limited Scope: Baton Rouge AA	1	2.27	3.85	0.00	10.91	0.00	43.34	100.00	41.89	0.00	1.35	0.00	0.00	3.13	0.00
Houma AA	5	11.36	1.39	0.00	16.32	60.00	65.97	20.00	15.97	20.00	10.87	0.00	25.00	3.70	20.00
LA Non MA AA	4	9.09	2.88	0.00	20.19	0.00	35.10	75.00	41.83	25.00	4.17	0.00	0.00	8.33	2.50
Lafayette AA	2	4.55	0.00	0.00	5.84	0.00	37.01	0.00	57.14	100.00	3.77	0.00	0.00	0.00	5.13
Lake Charles AA	1	2.27	0.40	0.00	18.47	0.00	50.60	100.00	30.52	0.00	0.84	0.00	0.00	1.12	0.00
State of Texas															
Full Scope: Houston AA	2	4.55	3.17	0.00	21.81	0.00	34.50	100.00	40.49	0.00	0.40	0.00	0.00	1.25	0.00
State of Mississippi															
Full Scope: Gulfport-Biloxi AA	3	6.82	0.00	0.00	8.70	0.00	81.74	100.00	9.13	0.00	5.88	0.00	0.00	9.09	0.00
State of Florida															
Full Scope: Pensacola AA	0	0.00	1.22	0.00	14.89	0.00	64.67	0.00	19.22	0.00	0.00	0.00	0.00	0.00	0.00
Limited Scope: Ft. Walton AA	0	0.00	0.00	0.00	1.98	0.00	80.63	0.00	17.39	0.00	0.00	0.00	0.00	0.00	0.00
State of Alabama															
Full Scope: Mobile AA	2	4.55	2.26	0.00	7.17	0.00	61.62	50.00	28.95	50.00	1.16	0.00	0.00	0.98	1.85
Limited Scope: AL Non MA AA	1	2.27	0.00	0.00	33.33	0.00	61.90	100.00	4.76	0.00	1.92	0.00	0.00	2.63	0.00
Montgomery AA	17	38.64	4.97	23.53	14.91	52.94	45.65	5.88	34.47	17.65	13.18	50.00	50.00	1.47	9.38

* Based on 2003 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans (2003)

Borrower Distribution: HOME PURCHASE JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: ALL AREAS - 2003										Evaluation Period:				
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***1	% BANK Loans**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
State of Louisiana																
Full Scope: New Orleans AA	698	47.91	23.75	5.57	16.20	18.91	18.82	26.54	41.22	48.97	3.13	2.79	2.96	3.13	3.24	
Limited Scope: Baton Rouge AA	141	9.68	22.73	12.86	16.52	15.00	19.48	20.00	41.28	52.14	1.22	1.39	0.72	0.91	1.74	
Houma AA	61	4.19	22.80	3.39	15.98	13.56	20.81	35.59	40.41	47.46	2.46	0.73	1.45	3.00	3.19	
LA Non MA AA	30	2.06	24.79	3.45	14.20	3.45	17.43	24.14	43.58	68.97	2.89	1.82	0.60	2.65	3.87	
Lafayette AA	68	4.67	18.30	6.15	13.75	15.38	18.01	15.38	49.95	63.08	1.71	1.63	1.39	1.11	2.12	
Lake Charles AA	30	2.06	22.42	6.67	16.46	10.00	19.54	23.33	41.57	60.00	1.21	0.78	0.55	0.97	1.87	
State of Texas																
Full Scope: Houston AA	29	1.99	24.07	3.70	17.82	3.70	18.70	18.52	39.40	74.07	0.00	0.00	0.00	0.00	0.00	
State of Mississippi																
Full Scope: Gulfport-Biloxi AA	48	3.29	20.46	21.74	17.78	15.22	22.74	13.04	39.01	50.00	1.06	3.53	0.74	0.50	1.19	
State of Florida																
Full Scope: Pensacola AA	160	10.98	20.21	11.25	17.71	15.63	22.02	25.00	40.06	48.13	1.29	2.22	1.09	1.28	1.25	
Limited Scope: Ft. Walton AA	13	0.89	15.15	0.00	19.09	8.33	24.17	8.33	41.59	83.33	0.21	0.00	0.12	0.09	0.30	
State of Alabama																
Full Scope: Mobile AA	150	10.30	22.23	17.02	16.37	11.35	20.96	12.77	40.44	58.87	1.14	2.70	0.68	0.65	1.31	

* Based on 2003 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2003 Peer Mortgage Data (Western – TX)

** As a percentage of loans with borrower income information available. No information was available for 2.5% of loans originated and purchased by bank.

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

**** 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.

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

Limited Scope: AL Non MA AA	5	0.34	27.67	20.00	18.39	0.00	19.68	60.00	34.26	20.00	4.20	10.00	0.00	9.09	1.69
Montgomery AA	24	1.65	22.67	12.50	16.96	12.50	20.61	16.67	39.76	58.33	0.48	0.50	0.23	0.33	0.72

Table 9. Borrower Distribution of Home Improvement Loans (2003)

Borrower Distribution: HOME IMPROVEMENT JANUARY 1, 2003 TO DECEMBER 31, 2003		Geography: ALL AREAS - 2003										Evaluation Period:				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total*	% Families***	% BANK Loans****	% Families ²	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
State of Louisiana																
Full Scope: New Orleans AA	639	49.12	23.75	9.52	16.20	17.64	18.82	23.28	41.22	49.56	13.94	12.39	12.84	12.99	15.31	
Limited Scope: Baton Rouge AA	156	11.99	22.73	16.31	16.52	12.77	19.48	25.53	41.28	45.39	9.04	12.85	5.34	8.53	10.31	
Houma AA	120	9.22	22.80	13.86	15.98	20.79	20.81	23.76	40.41	41.58	11.37	10.69	12.28	10.86	11.51	
LA Non MA AA	72	5.53	24.79	12.70	14.20	20.63	17.43	7.94	43.58	58.73	11.56	13.33	14.13	5.26	12.42	
Lafayette AA	53	4.07	18.30	8.51	13.75	8.51	18.01	19.15	49.95	63.83	6.43	7.27	3.28	5.39	7.75	
Lake Charles AA	58	4.46	22.42	6.12	16.46	16.33	19.54	30.61	41.57	46.94	6.64	2.94	5.33	8.24	7.57	
State of Texas																
Full Scope: Houston AA	47	3.61	24.07	16.67	17.82	33.33	18.70	13.89	39.40	36.11	0.00	0.00	0.00	0.00	0.00	
State of Mississippi																
Full Scope: Gulfport-Biloxi AA	51	3.92	20.46	19.05	17.78	7.14	22.74	35.71	39.01	38.10	4.87	7.62	1.58	7.08	4.51	
State of Florida																
Full Scope: Pensacola AA	33	2.54	20.21	10.00	17.71	16.67	22.02	26.67	40.06	46.67	3.81	6.98	4.13	3.57	3.50	
Limited Scope: Ft. Walton AA	3	0.23	15.15	0.00	19.09	0.00	24.17	0.00	41.59	100.00	1.60	0.00	0.00	0.00	3.33	
State of Alabama																
Full Scope: Mobile	36	2.77	22.23	2.94	16.37	20.59	20.96	32.35	40.44	44.12	3.65	0.77	3.32	5.76	3.75	
Limited: AL Non MA	7	0.54	27.67	0.00	18.39	28.57	19.68	14.29	34.26	57.14	8.97	0.00	9.52	4.55	18.18	
Montgomery AA	26	2.00	22.67	23.08	16.96	15.38	20.61	19.23	39.76	42.31	7.83	12.24	7.02	7.04	7.10	

* Based on 2003 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2003 Peer Mortgage Data (Western – TX)

** As a percentage of loans with borrower income information available. No information was available for 11.9% of loans originated and purchased by bank.

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

**** 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.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans (2003)

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2003		Geography: ALL AREAS - 2003										Evaluation Period: JANUARY 1, 2003 TO				
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 ³	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
State of Louisiana																
Full Scope: New Orleans AA	2,051	49.65	23.75	3.82	16.20	15.49	18.82	22.63	41.22	58.05	3.71	2.49	3.62	3.51	3.95	
Limited Scope: Baton Rouge AA	492	11.91	22.73	4.59	16.52	10.26	19.48	25.33	41.28	59.83	2.04	1.36	1.22	1.96	2.46	
Houma AA	240	5.81	22.80	5.83	15.98	13.33	20.81	27.50	40.41	53.33	3.96	3.46	3.34	4.28	4.06	
LA Non MA AA	121	2.93	24.79	2.50	14.20	10.83	17.43	19.17	43.58	67.50	5.20	3.23	5.02	4.55	5.58	
Lafayette AA	169	4.09	18.30	9.09	13.75	11.52	18.01	18.18	49.95	61.21	2.26	4.87	2.11	1.99	2.20	
Lake Charles AA	135	3.27	22.42	5.93	16.46	12.59	19.54	22.22	41.57	59.26	2.59	2.52	2.48	2.43	2.68	
State of Texas																
Full Scope: Houston AA	48	1.16	24.07	6.38	17.82	10.64	18.70	8.51	39.40	74.47	0.00	0.00	0.00	0.00	0.00	
State of Mississippi																
Full Scope: Gulfport-Biloxi AA	156	3.78	20.46	9.33	17.78	18.67	22.74	20.00	39.01	52.00	1.99	2.86	2.10	1.62	2.03	
State of Florida																
Full Scope: Pensacola AA	182	4.41	20.21	4.14	17.71	17.16	22.02	21.89	40.06	56.80	1.07	0.75	1.19	0.98	1.11	
Limited Scope: Ft. Walton AA	33	0.80	15.15	0.00	19.09	9.68	24.17	32.26	41.59	58.06	0.44	0.00	0.31	0.67	0.43	
State of Alabama																
Full Scope: Mobile AA	351	8.50	22.23	4.80	16.37	10.51	20.96	18.92	40.44	65.77	1.50	1.21	0.96	1.15	1.87	
Limited Scope: AL Non MA AA	44	1.07	27.67	9.09	18.39	13.64	19.68	20.45	34.26	56.82	15.38	36.36	15.38	13.85	14.62	
Montgomery AA	109	2.64	22.67	8.00	16.96	20.00	20.61	18.00	39.76	54.00	1.22	1.38	1.37	0.92	1.28	

* Based on 2003 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2003 Peer Mortgage Data (Western – TX)

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

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

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

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

Table11. Borrower Distribution of Small Loans to Businesses (2003)

Borrower Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2003 TO DECEMBER 31, 2003					Geography: ALL AREAS - 2003			Evaluation Period:	
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
State of Louisiana									
New Orleans AA	3,523	49.56	60.82	48.79	62.39	20.89	16.72	10.53	14.36
Baton Rouge AA	626	8.81	57.38	54.31	64.22	19.49	16.29	4.03	5.64
Houma AA	313	4.40	58.04	55.91	54.95	26.20	18.85	6.52	11.04
LA Non MA AA	246	3.46	57.62	56.91	67.48	18.70	13.82	7.11	9.95
Lafayette AA	318	4.47	60.22	50.00	58.18	21.07	20.75	4.34	6.04
Lake Charles AA	265	3.73	56.62	73.58	67.92	20.00	12.08	5.53	8.22
State of Texas									
Houston AA	613	8.62	61.90	54.81	59.22	20.88	19.90	0.60	0.87
State of Mississippi									
Gulfport-Biloxi AA	120	1.69	61.90	75.00	65.00	19.17	15.83	1.76	2.71
State of Florida									
Pensacola AA	274	3.85	65.87	47.45	54.38	24.45	21.17	2.23	2.41
Limited Scope: Ft. Walton AA	30	0.42	63.44	30.00	53.33	30.00	16.67	0.49	0.37
State of Alabama									
Full Scope: Mobile AA	622	8.75	63.32	51.29	59.49	21.70	18.81	3.54	3.85
Limited Scope: AL Non MA	10	0.14	64.61	60.00	70.00	10.00	20.00	2.77	4.14
Montgomery AA	148	2.08	61.08	45.27	68.92	21.62	9.46	1.65	1.66

* Based on 2003 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** 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 14.14% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms (2003)

Borrower Distribution: SMALL LOANS TO FARMS JANUARY 1, 2003 TO DECEMBER 31, 2003					Geography: ALL AREAS - 2003			Evaluation Period:	
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
State of Louisiana									
Full Scope: New Orleans AA	6	13.64	88.15	100.00	83.33	16.67	0.00	2.41	2.61
Limited Scope: Baton Rouge AA	1	2.27	88.76	100.00	100.00	0.00	0.00	1.35	1.67
Houma AA	5	11.36	92.36	80.00	80.00	0.00	20.00	10.87	9.52
LA Non MA AA	4	9.09	83.65	25.00	50.00	25.00	25.00	4.17	1.22
Lafayette AA	2	4.55	91.88	100.00	50.00	50.00	0.00	3.77	4.44
Lake Charles AA	1	2.27	88.76	100.00	100.00	0.00	0.00	0.84	0.88
State of Texas									
Full Scope: Houston AA	2	4.55	86.81	100.00	50.00	50.00	0.00	0.40	0.45
State of Mississippi									
Full Scope: Gulfport-Biloxi AA	3	6.82	91.30	100.00	0.00	33.33	66.67	5.88	6.82
State of Florida									
Full Scope: Pensacola AA	0	0.00	89.67	0.00	0.00	0.00	0.00	0.00	0.00
Limited Scope: Ft. Walton AA	0	0.00	89.72	0.00	0.00	0.00	0.00	0.00	0.00
State of Alabama									
Full Scope: Mobile AA	2	4.55	84.33	50.00	50.00	50.00	0.00	1.16	0.66

* Based on 2003 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2003).

**** 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 15.91% of small loans to farms originated and purchased by the bank.

Limited Scope:	1	2.27	88.10	100.00	100.00	0.00	0.00	1.92	1.96
AL Non MA AA									
Montgomery AA	17	38.64	87.58	23.53	70.59	29.41	0.00	13.18	3.60

Table 2. Geographic Distribution of Home Purchase Loans (2004 - 2006)

Geographic Distribution: HOME PURCHASE DECEMBER 31, 2006			Geography: ALL AREAS – 2004 - 2006								Evaluation Period: JANUARY 1, 2004 TO				
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	Overall	Low	Mod	Mid	Upp
State of Louisiana															
Full Scope: New Orleans AA	1,927	42.77	4.59	2.91	15.61	10.69	42.19	38.92	37.61	47.48	2.09	1.34	1.72	2.01	2.36
Limited Scope: Baton Rouge AA	517	11.48	4.47	1.55	15.20	7.93	42.00	40.04	38.34	50.48	0.69	0.26	0.62	0.59	0.84
Houma AA	159	3.53	0.78	1.26	14.52	10.69	69.72	51.57	14.98	36.48	1.60	0.00	1.67	1.01	3.19
LA Non MA AA	81	1.80	2.72	0.00	16.07	27.16	38.20	40.86	43.01	41.98	1.41	0.00	3.08	1.35	1.12
Lafayette AA	181	4.02	3.23	1.10	12.70	5.52	42.62	43.09	41.44	50.28	1.03	1.23	0.40	1.06	1.11
Lake Charles AA	112	2.49	1.38	0.00	18.74	19.64	44.72	25.89	35.16	54.46	0.84	0.00	1.27	0.44	1.10
State of Texas															
Full Scope: Houston AA	170	3.77	3.53	3.53	23.46	11.18	30.35	13.53	42.65	71.76	0.04	0.05	0.04	0.02	0.05
State of Mississippi															
Full Scope: Gulfport-Biloxi AA	150	3.33	0.00	0.00	6.72	8.67	73.51	60.00	17.97	31.33	0.87	0.00	0.30	0.70	1.54
State of Florida															
Full Scope: Pensacola AA	332	7.37	1.32	1.20	16.18	12.35	56.87	56.93	25.63	29.52	0.63	0.84	0.75	0.55	0.80
Limited Scope: FL Non MA AA	152	3.37	0.00	0.00	0.00	0.00	73.31	8.55	26.69	91.45	2.27	0.00	0.00	1.34	2.54
Ft. Walton AA	112	2.49	0.00	0.00	5.54	1.79	74.19	49.11	20.28	49.11	0.72	0.00	0.00	0.50	1.70
Sarasota AA	23	0.51	0.00	0.00	24.87	4.35	54.29	73.91	20.84	21.74	0.00	0.00	0.00	0.00	0.00
Tampa AA	32	0.71	0.37	0.00	21.98	25.00	53.95	43.75	23.70	31.25	0.02	0.00	0.03	0.01	0.03
State of Alabama															
Full Scope: Mobile AA	301	6.68	4.91	5.98	11.89	6.64	51.55	46.84	31.65	40.53	0.85	6.54	1.07	0.81	0.73

* Based on 2005 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2005 Peer Mortgage Data (Western – TX)

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

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

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

Limited Scope: AL Non MA AA	214	4.75	0.00	0.00	7.15	4.21	47.38	22.90	45.46	72.90	0.82	0.00	0.62	0.88	0.80
Montgomery AA	42	0.93	4.54	0.00	18.26	11.90	44.06	57.14	33.17	30.95	0.12	0.00	0.24	0.14	0.09

Table 3. Geographic Distribution of Home Improvement Loans (2004 - 2006)

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2006		Geography: ALL AREAS – 2004-2006										Evaluation Period: JANUARY 1, 2004 TO				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
State of Louisiana																
Full Scope: New Orleans AA	1,314	46.04	4.59	5.25	15.61	11.64	42.19	39.96	37.61	43.15	14.24	14.86	10.07	12.83	17.66	
Limited Scope: Baton Rouge	276	9.67	4.47	1.09	15.20	15.58	42.00	43.48	38.34	39.86	4.60	0.00	5.41	4.07	5.28	
Houma AA	256	8.97	0.78	0.00	14.52	16.02	69.72	65.23	14.98	18.75	9.39	0.00	10.48	8.32	13.48	
LA Non MA AA	180	6.31	2.72	1.11	16.07	15.00	38.20	35.00	43.01	48.89	11.39	7.69	8.99	11.62	12.21	
Lafayette AA	150	5.26	3.23	2.00	12.70	6.00	42.62	33.33	41.44	58.67	5.60	0.00	2.22	5.62	6.89	
Lake Charles AA	176	6.17	1.38	0.57	18.74	10.80	44.72	38.64	35.16	50.00	9.67	6.67	7.55	9.45	10.91	
State of Texas																
Full Scope: Houston AA	85	2.98	3.53	9.41	23.46	22.35	30.35	32.94	42.65	35.29	0.34	0.40	0.38	0.43	0.26	
State of Mississippi																
Full Scope: Gulfport-Biloxi AA	131	4.59	0.00	0.00	6.72	8.40	75.31	74.81	17.97	16.79	5.03	0.00	6.56	4.35	7.19	
State of Florida																
Full Scope: Pensacola AA	58	2.03	1.32	1.72	16.18	13.79	56.87	50.00	25.63	34.48	1.53	0.00	0.52	1.68	1.63	
Limited Scope: FL Non MA AA	9	0.32	0.00	0.00	0.00	0.00	73.31	11.11	26.69	88.89	2.55	0.00	0.00	0.00	5.68	
Ft. Walton AA	26	0.91	0.00	0.00	5.54	3.85	74.19	50.00	20.28	46.15	1.51	0.00	0.00	1.43	2.27	
Sarasota AA	2	0.07	0.00	0.00	24.87	0.00	54.29	50.00	20.84	50.00	0.00	0.00	0.00	0.00	0.00	
Tampa AA	10	0.35	0.37	0.00	21.98	40.00	53.95	40.00	23.70	20.00	0.03	0.00	0.09	0.03	0.00	
State of Alabama																
Full Scope: Mobile AA	84	2.94	4.91	3.57	11.89	7.14	51.55	42.86	31.65	46.43	3.34	2.00	1.61	2.41	5.92	

* Based on 2005 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2005 Peer Mortgage Data (Western – TX)

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

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

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

Limited Scope:	60	2.10	0.00	0.00	7.15	18.33	47.38	53.33	45.46	28.33	3.56	0.00	2.63	3.86	3.42
AL Non MA AA															
Montgomery AA	37	1.30	4.52	0.00	18.26	21.62	44.06	48.65	33.17	29.73	1.73	0.00	2.00	1.86	1.62

Table 4. Geographic Distribution of Home Mortgage Refinance Loans (2004 - 2006)

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2006			Geography: ALL AREAS – 2004-2006								Evaluation Period: JANUARY 1, 2004 TO				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
State of Louisiana															
Full Scope: New Orleans AA	1,395	39.59	4.59	1.79	15.61	10.47	42.19	34.41	37.61	53.33	1.93	0.89	1.00	1.47	2.93
Limited Scope: Baton Rouge	374	10.61	4.47	1.60	15.20	9.89	42.00	42.51	38.34	45.99	0.99	0.00	0.66	1.09	1.07
Houma AA	228	6.47	0.78	0.88	14.52	6.14	69.72	64.47	14.98	28.51	2.09	8.33	0.59	2.06	2.74
LA Non AA	141	4.00	2.72	0.71	16.07	12.06	38.20	34.75	43.01	52.48	2.78	4.35	4.08	2.78	2.43
Lafayette AA	166	4.71	3.23	0.60	12.70	6.63	42.62	38.55	41.44	54.22	1.64	0.00	1.08	1.41	2.05
Lake Charles AA	108	3.06	1.38	1.85	18.74	9.26	44.72	35.19	35.16	53.70	1.21	0.00	0.98	1.31	1.24
State of Texas															
Full Scope: Houston AA	104	2.95	3.53	5.77	23.46	17.31	30.35	16.35	42.65	60.58	0.08	0.22	0.07	0.03	0.12
State of Mississippi															
Full Scope: Gulfport-Biloxi	118	3.35	0.00	0.00	6.72	4.24	75.31	80.51	17.97	15.25	1.02	0.00	0.53	1.09	0.92
State of Florida															
Full Scope: Pensacola AA	218	6.19	1.32	0.46	16.18	10.55	56.87	45.41	25.63	43.58	0.55	0.00	0.47	0.37	0.98
Limited Scope: FL Non MA	109	3.09	0.00	0.00	0.00	0.00	73.31	8.26	26.69	91.74	2.20	0.00	0.00	1.12	2.60
Ft. Walton AA	99	2.81	0.00	0.00	5.54	3.03	74.19	53.54	20.28	43.43	0.56	0.00	0.00	0.43	1.12
Sarasota AA	7	0.20	0.00	0.00	24.87	0.00	54.29	100.00	20.84	0.00	0.00	0.00	0.00	0.00	0.00
Tampa AA	20	0.57	0.37	0.00	21.98	25.00	53.95	40.00	23.70	35.00	0.02	0.00	0.02	0.01	0.04
State of Alabama															

* Based on 2005 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2005 Peer Mortgage Data (Western – TX)

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

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

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

Full Scope: Mobile AA	203	5.76	4.91	2.96	11.89	6.90	51.55	50.25	31.65	39.90	0.92	0.00	0.62	0.92	1.06
Limited Scope: AL Non MA	152	4.31	0.00	0.00	7.15	20.39	47.38	32.24	45.46	47.37	0.93	0.00	4.10	1.25	0.64
Montgomery AA	82	2.33	4.52	0.00	18.26	14.63	44.06	64.63	33.17	20.73	0.43	0.00	0.47	0.59	0.27

Table 5. Geographic Distribution of Multifamily Loans (2004 - 2006)

Geographic Distribution: MULTIFAMILY DECEMBER 31, 2006			Geography: ALL AREAS – 2004-2006								Evaluation Period: JANUARY 1, 2004 TO				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
State of Louisiana															
Full Scope: New Orleans AA	12	35.29	16.46	0.00	27.19	58.33	32.55	16.67	23.81	25.00	4.83	0.00	5.45	5.13	6.67
Limited Scope: Baton Rouge	5	14.71	15.97	40.00	21.03	0.00	25.85	40.00	37.15	20.00	1.59	0.00	0.00	0.00	7.69
Houma AA	0	0.00	1.72	0.00	8.01	0.00	61.93	0.00	28.34	0.00	0.00	0.00	0.00	0.00	0.00
LA Non MA AA	2	5.88	1.77	0.00	24.63	50.00	42.10	0.00	31.50	50.00	14.29	0.00	0.00	0.00	25.00
Lafayette AA	2	5.88	3.97	0.00	7.84	0.00	50.03	100.00	38.16	0.00	0.00	0.00	0.00	0.00	0.00
Lake Charles AA	1	2.94	1.23	0.00	41.78	0.00	25.34	100.00	31.64	0.00	0.00	0.00	0.00	0.00	0.00
State of Texas															
Full Scope: Houston AA	3	8.82	10.36	33.33	35.68	66.67	30.88	0.00	23.08	0.00	0.76	0.00	1.83	0.00	0.00
State of Mississippi															
Full Scope: Gulfport-Biloxi AA	0	0.00	0.00	0.00	19.09	0.00	58.96	0.00	21.96	0.00	0.00	0.00	0.00	0.00	0.00
State of Florida															
Full Scope: Pensacola AA	0	0.00	3.92	0.00	17.60	0.00	60.48	0.00	18.00	0.00	0.00	0.00	0.00	0.00	0.00
Limited Scope: FL Non MA	0	0.00	0.00	0.00	0.00	0.00	3.87	0.00	96.13	0.00	0.00	0.00	0.00	0.00	0.00
Ft. Walton AA	2	5.88	0.00	0.00	4.51	0.00	82.95	100.00	12.54	0.00	11.11	0.00	0.00	16.67	0.00
Sarasota AA	0	0.00	0.00	0.00	32.22	0.00	48.72	0.00	19.06	0.00	0.00	0.00	0.00	0.00	0.00
Tampa AA	4	11.76	0.96	0.00	15.37	75.00	58.62	25.00	25.05	0.00	0.00	0.00	0.00	0.00	0.00
State of Alabama															
Full Scope: Mobile AA	3	8.82	6.92	0.00	14.06	33.33	46.74	33.33	32.28	33.33	10.53	0.00	16.67	10.00	0.00

* Based on 2005 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2005 Peer Mortgage Data (Western – TX)

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

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

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

Limited Scope: AL Non MA AA	0	0.00	0.00	0.00	2.48	0.00	8.75	0.00	88.78	0.00	0.00	0.00	0.00	0.00	0.00
Montgomery AA	0	0.00	17.75	0.00	14.08	0.00	31.02	0.00	37.15	0.00	0.00	0.00	0.00	0.00	0.00

Table 6. Geographic Distribution of Small Loans to Businesses (2004 - 2006)

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2006			Geography: ALL AREAS – 2004-2006								Evaluation Period: JANUARY 1, 2004 TO				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp
State of Louisiana															
Full Scope: New Orleans AA	8,998	44.55	8.15	7.49	20.16	17.30	35.49	32.48	36.20	42.72	10.28	14.19	11.39	10.04	10.33
Limited Scope: Baton Rouge AA	1,908	9.45	6.34	3.25	18.37	16.04	35.85	41.04	39.43	39.68	4.52	4.45	6.06	4.99	4.06
Houma AA	1,003	4.97	1.32	0.30	12.57	18.94	69.86	56.13	15.81	24.63	7.79	4.35	11.54	6.95	9.22
LA Non MA AA	694	3.44	2.65	0.00	14.11	11.96	45.52	40.06	37.72	47.98	6.66	0.00	5.08	7.14	7.75
Lafayette AA	948	4.69	3.26	1.48	8.35	8.12	44.33	41.77	44.06	48.63	4.25	1.80	6.31	4.49	4.20
Lake Charles AA	804	3.98	1.22	0.50	32.58	36.44	40.44	28.86	25.76	34.20	6.18	2.56	8.77	4.68	6.49
State of Texas															
Full Scope: Houston AA	2,045	10.12	5.53	5.23	26.07	21.91	26.22	16.33	41.92	56.53	0.65	0.88	0.60	0.44	0.82
State of Mississippi															
Full Scope: Gulfport-Biloxi AA	322	1.59	0.00	0.00	16.01	13.04	66.84	70.81	13.72	16.15	1.85	0.00	1.95	1.87	1.90
State of Florida															
Full Scope: Pensacola AA	735	3.64	3.78	4.35	23.66	36.73	49.76	38.37	22.80	20.54	1.94	2.29	3.52	1.55	1.44
FL Non MA AA	143	0.71	0.00	0.00	0.00	0.00	40.14	20.98	59.86	79.02	2.11	0.00	0.00	1.70	2.39
Ft. Walton AA	293	1.45	0.00	0.00	10.04	4.44	68.09	62.80	21.87	32.76	2.01	0.00	0.83	1.97	2.76
Sarasota AA	3	0.01	0.00	0.00	22.12	0.00	55.66	66.67	22.23	33.33	0.01	0.00	0.00	0.02	0.00
Tampa AA	200	0.99	0.48	0.00	22.83	16.00	52.54	53.00	24.15	31.00	0.19	0.00	0.23	0.18	0.20
State of Alabama															
Full Scope: Mobile AA	1,353	6.70	7.86	7.61	11.40	8.20	50.97	43.02	29.78	41.17	3.73	4.60	3.54	3.51	4.11
Limited Scope: AL Non MA	280	1.39	0.00	0.00	7.46	2.50	39.03	26.07	53.51	71.43	1.35	0.00	1.95	1.23	1.55

* Based on 2005 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2005).

Montgomery AA	469	2.32	15.81	6.82	14.64	10.66	34.31	38.17	35.23	44.35	1.90	0.98	1.99	2.13	2.10
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Table 7. Geographic Distribution of Small Loans to Farms (2004 - 2006)

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2006		Geography: ALL AREAS – 2004-2006										Evaluation Period: JANUARY 1, 2004 TO				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	Overall	Low	Mod	Mid	Upp	
State of Louisiana																
Full Scope: New Orleans AA	19	14.84	4.61	0.00	14.46	21.05	46.15	36.84	34.79	42.11	2.48	0.00	5.56	1.28	3.51	
Limited Scope: Baton Rouge AA	3	2.34	3.31	0.00	10.65	0.00	37.55	0.00	48.49	100.00	3.03	0.00	0.00	0.00	6.25	
Houma AA	12	9.38	0.65	0.00	14.94	33.33	66.56	58.33	17.53	8.33	3.64	0.00	0.00	2.63	12.50	
LA Non MA AA	10	7.81	0.76	0.00	14.83	0.00	39.16	100.00	45.25	0.00	3.51	0.00	0.00	8.00	0.00	
Lafayette AA	5	3.91	0.91	0.00	12.69	40.00	45.02	20.00	41.39	40.00	3.85	0.00	11.11	0.00	5.00	
Lake Charles AA	1	0.78	0.70	0.00	17.89	0.00	46.32	100.00	35.09	0.00	0.00	0.00	0.00	0.00	0.00	
State of Texas																
Full Scope: Houston AA	9	7.03	3.35	0.00	19.21	11.11	35.03	22.22	42.31	66.67	0.45	0.00	0.00	0.47	0.67	
State of Mississippi																
Full Scope: Gulfport-Biloxi AA	3	2.34	0.00	0.00	9.16	0.00	78.09	100.00	12.75	0.00	7.14	0.00	0.00	9.52	0.00	
State of Florida																
Full Scope: Pensacola AA	2	1.56	1.09	0.00	15.59	0.00	60.28	50.00	23.04	50.00	1.49	0.00	0.00	0.00	10.00	
Limited Scope: FL Non MA AA	1	0.78	0.00	0.00	0.00	0.00	58.00	100.00	42.00	0.00	4.76	0.00	0.00	6.25	0.00	
Ft. Walton AA	0	0.00	0.00	0.00	8.15	0.00	76.30	0.00	15.56	0.00	0.00	0.00	0.00	0.00	0.00	
Sarasota AA	0	0.00	0.00	0.00	13.54	0.00	63.27	0.00	23.19	0.00	0.00	0.00	0.00	0.00	0.00	
Tampa AA	0	0.00	0.33	0.00	27.03	0.00	51.38	0.00	21.26	0.00	0.00	0.00	0.00	0.00	0.00	
State of Alabama																
Full Scope: Mobile AA	14	10.94	4.31	0.00	8.62	0.00	56.25	85.71	30.82	14.29	2.91	0.00	0.00	5.26	0.00	

* Based on 2005 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2005).

Limited Scope: AL Non MA AA	12	9.38	0.00	0.00	5.07	66.67	54.35	25.00	40.58	8.33	2.61	0.00	14.29	1.67	0.00
Montgomery AA	37	28.91	3.96	27.03	13.46	40.54	46.17	8.11	36.41	24.32	10.00	42.86	28.57	1.69	7.14

Table 8. Borrower Distribution of Home Purchase Loans (2004 - 2006)

Borrower Distribution: HOME PURCHASE 2004 TO DECEMBER 31, 2006		Geography: ALL AREAS – 2004-2006										Evaluation Period: JANUARY 1,				
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 ⁴	% BANK Loans***	% Families ⁴	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
State of Louisiana																
Full Scope: New Orleans AA	1,927	42.77	23.88	5.22	16.32	16.37	18.88	23.08	40.92	55.33	2.46	2.64	2.24	2.13	2.67	
Limited Scope: Baton Rouge	517	11.48	21.93	7.20	16.05	19.20	19.16	17.40	42.85	56.20	0.84	0.50	0.58	0.39	1.25	
Houma AA	159	3.53	22.82	5.88	16.00	17.65	20.83	22.22	40.36	54.25	1.99	1.34	2.01	1.33	2.51	
LA Non MA AA	81	1.80	24.04	1.37	13.67	17.81	16.83	27.40	45.46	53.42	1.91	1.45	3.24	1.22	1.94	
Lafayette AA	181	4.02	21.48	12.57	15.76	17.37	19.09	16.77	43.67	53.29	1.23	1.55	1.27	0.68	1.46	
Lake Charles AA	112	2.49	22.54	6.73	16.53	14.42	19.57	25.00	41.35	53.85	1.01	0.84	0.45	0.84	1.42	
State of Texas																
Full Scope: Houston AA	170	3.77	23.15	3.14	17.43	8.18	18.63	11.95	40.79	76.73	0.04	0.06	0.03	0.02	0.06	
State of Mississippi																
Full Scope: Gulfport-Biloxi AA	150	3.33	19.64	5.11	17.20	16.79	22.58	19.71	40.58	58.39	1.02	1.03	1.53	0.57	1.10	
State of Florida																
Full Scope: Pensacola AA	332	7.37	20.39	12.77	17.84	26.17	22.05	15.58	39.73	45.48	0.73	2.34	1.08	0.63	0.58	
Limited Scope: FL Non MA	152	3.37	19.21	0.72	18.37	2.90	20.95	5.07	41.47	91.30	2.45	0.00	3.23	2.35	2.45	
Ft. Walton AA	112	2.49	17.10	0.99	20.02	6.93	24.36	5.94	38.52	86.14	0.77	0.00	0.26	0.22	1.12	
Sarasota AA	23	0.51	19.73	14.29	20.16	14.29	23.28	35.71	36.83	35.71	0.00	0.00	0.00	0.00	0.00	
Tampa AA	32	0.71	18.69	0.00	19.93	7.41	22.78	29.63	38.60	62.96	0.02	0.00	0.00	0.02	0.02	

* Based on 2005 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2005 Peer Mortgage Data (Western – TX)

** As a percentage of loans with borrower income information available. No information was available for 5.9% of loans originated and purchased by bank.

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

**** 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.

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

State of Alabama																
Full Scope: Mobile AA	301	6.68	23.72	19.37	15.73	23.59	19.92	13.73	40.63	43.31	0.99	2.03	1.15	0.60	1.01	
Limited Scope: AL Non MA	214	4.75	14.67	6.00	13.70	10.00	20.51	13.50	51.11	70.50	0.96	2.53	0.89	1.06	0.90	
Montgomery AA	42	0.93	22.30	17.07	16.71	24.39	20.45	14.63	40.53	43.90	0.13	0.13	0.06	0.05	0.22	

Table 9. Borrower Distribution of Home Improvement Loans (2004 - 2006)

Borrower Distribution: HOME IMPROVEMENT TO DECEMBER 31, 2006																
Geography: ALL AREAS – 2004-2006																
Evaluation Period: JANUARY 1, 2004																
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁵	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
State of Louisiana																
Full Scope: New Orleans	1,315	46.06	23.88	10.54	16.32	14.51	18.88	23.36	40.92	51.59	8.91	8.00	8.17	6.49	10.87	
Limited Scope: Baton Rouge	276	9.67	21.93	11.93	16.05	16.05	19.16	24.28	42.85	47.74	4.14	3.50	4.18	3.51	4.67	
Houma AA	256	8.97	22.82	16.27	16.00	15.79	20.83	21.53	40.36	46.41	7.57	10.00	7.04	4.82	8.10	
LA Non MA AA	180	6.30	24.04	8.23	13.67	13.92	16.83	19.62	45.46	58.23	10.65	7.55	15.38	10.34	10.07	
Lafayette AA	150	5.25	21.48	10.32	15.76	17.46	19.09	15.87	43.67	56.35	4.97	2.06	6.04	2.84	6.41	
Lake Charles AA	176	6.16	22.54	13.08	16.53	21.54	19.57	25.38	41.35	40.00	6.59	5.10	6.02	8.44	6.36	
State of Texas																
Full Scope: Houston AA	85	2.98	23.15	21.88	17.43	18.75	18.63	10.94	40.79	48.44	0.25	0.67	0.40	0.05	0.22	
State of Mississippi																
Full Scope: Gulfport AA	131	4.59	19.64	11.83	17.20	15.05	22.58	24.73	40.58	48.39	3.84	2.17	0.80	5.52	4.63	
State of Florida																
Full Scope: Pensacola	58	2.03	20.39	4.00	17.84	20.00	22.05	30.00	39.73	46.00	1.28	0.00	0.85	1.48	1.45	
Limited Scope: FL Non	9	0.32	19.21	12.50	18.37	0.00	20.95	25.00	41.47	62.50	2.60	12.50	0.00	4.76	1.61	
Ft. Walton AA	26	0.91	17.10	4.55	20.02	4.55	24.36	31.82	38.52	59.09	1.23	1.59	0.66	1.42	1.30	

* Based on 2005 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2005 Peer Mortgage Data (Western – TX)

** As a percentage of loans with borrower income information available. No information was available for 24.4% of loans originated and purchased by bank.

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

**** 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.

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

Sarasota AA	2	0.07	19.73	0.00	20.16	0.00	23.28	50.00	36.83	50.00	0.00	0.00	0.00	0.00	0.00
Tampa AA	10	0.35	18.69	33.33	19.93	16.67	22.78	33.33	38.60	16.67	0.02	0.24	0.00	0.00	0.00
State of Alabama															
Full Scope: Mobile AA	84	2.94	23.72	2.82	15.73	19.72	19.92	22.54	40.63	54.93	2.68	0.00	1.45	2.70	4.31
Limited: Non MA	60	2.10	14.67	15.79	13.70	14.04	20.51	15.79	51.11	54.39	3.46	1.85	2.63	3.67	3.97
Montgomery AA	37	1.30	22.30	30.56	16.71	22.22	20.45	22.22	40.53	25.00	1.60	2.90	2.98	0.69	0.56

Table 10. Borrower Distribution of Home Mortgage Refinance Loans (2004 - 2006)

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2006		Geography: ALL AREAS – 2004-2006										Evaluation Period: JANUARY 1, 2004 TO				
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****	% Families6	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
State of Louisiana																
Full Scope: New Orleans	1,396	39.60	23.88	6.22	16.32	15.21	18.88	22.77	40.92	55.81	2.28	1.47	1.83	2.01	2.72	
Limited: Baton Rouge	374	10.61	21.93	7.28	16.05	17.37	19.16	26.05	42.85	49.30	1.18	0.58	1.13	1.15	1.33	
Houma AA	228	6.47	22.82	8.97	16.00	12.56	20.83	25.11	40.36	53.36	2.30	3.33	1.46	1.91	2.62	
LA Non MA AA	141	4.00	24.04	6.67	13.67	12.59	16.83	11.85	45.46	68.89	3.17	7.04	2.73	2.11	3.29	
Lafayette AA	166	4.71	21.48	8.81	15.76	16.98	19.09	22.01	43.67	52.20	1.88	0.43	1.70	1.58	2.33	
Lake Charles AA	108	3.06	22.54	8.49	16.53	10.38	19.57	24.53	41.35	56.60	1.36	2.03	0.54	1.34	1.53	
State of Texas																
Full Scope: Houston	104	2.95	23.15	4.90	17.43	14.71	18.63	11.76	40.79	68.63	0.10	0.03	0.05	0.06	0.14	
State of Mississippi																
Full Scope: Gulfport AA	118	3.35	19.64	10.09	17.20	17.43	22.58	23.85	40.58	48.62	1.01	1.79	1.88	0.76	0.77	
State of Florida																
Full Scope: Pensacola	218	6.18	20.39	7.62	17.84	19.05	22.05	15.71	39.73	57.62	0.65	1.16	0.75	0.56	0.61	
Limited: Non MA AA	109	3.09	19.21	4.40	18.37	4.40	20.95	8.79	41.47	82.42	2.34	6.67	2.11	1.79	2.34	
Ft. Walton AA	99	2.81	17.10	3.41	20.02	4.55	24.36	18.18	38.52	73.86	0.55	0.00	0.15	0.26	0.97	
Sarasota AA	7	0.20	19.73	0.00	20.16	0.00	23.28	80.00	36.83	20.00	0.00	0.00	0.00	0.00	0.00	
Tampa AA	20	0.57	18.69	0.00	19.93	11.76	22.78	11.76	38.60	76.47	0.02	0.00	0.00	0.00	0.04	
State of Alabama																
Full Scope: Mobile AA	203	5.76	23.72	8.70	15.73	12.50	19.92	19.02	40.63	59.78	1.04	1.26	0.61	0.83	1.32	

* Based on 2005 Peer Mortgage Data (Eastern – AL, FL, LA & MS); 2005 Peer Mortgage Data (Western – TX)

** As a percentage of loans with borrower income information available. No information was available for 5.0% of loans originated and purchased by bank.

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

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

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

Limited Scope: Non MA	152	4.31	14.67	4.05	13.70	14.86	20.51	16.89	51.11	64.19	1.09	0.92	1.02	0.93	1.15
Montgomery AA	82	2.33	22.30	7.69	16.71	29.49	20.45	30.77	40.53	32.05	0.48	0.00	0.53	0.62	0.50

Table11. Borrower Distribution of Small Loans to Businesses (2004 - 2006)

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2006		Geography: ALL AREAS – 2004-2006				Evaluation Period: JANUARY 1, 2004 TO			
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
State of Louisiana									
Full Scope: New Orleans AA	9,001	44.49	62.12	51.31	59.98	21.52	18.50	10.28	12.21
Limited Scope: Baton Rouge	1,908	9.43	58.17	50.89	61.58	19.50	18.92	4.52	5.17
Houma AA	1,012	5.00	59.31	47.33	60.77	21.15	18.08	7.79	7.76
LA Non MA AA	694	3.43	55.13	55.76	66.14	17.44	16.43	6.66	6.91
Lafayette AA	948	4.69	61.22	48.00	58.12	18.78	23.10	4.25	4.60
Lake Charles AA	804	3.97	57.23	63.18	70.15	19.15	10.70	6.18	8.40
State of Texas									
Full Scope: Houston AA	2,052	10.14	64.28	51.71	54.19	22.12	23.68	0.65	0.73
State of Mississippi									
Full Scope: Gulfport-Biloxi AA	335	1.66	54.29	70.15	69.85	17.61	12.54	1.85	2.68
State of Florida									
Full Scope: Pensacola AA	735	3.63	65.56	50.34	50.75	26.12	23.13	1.94	2.01
Limited Scope: FL Non MA	143	0.71	64.66	53.85	62.24	18.18	19.58	2.11	2.22
Ft. Walton AA	293	1.45	63.50	54.61	56.66	21.84	21.50	2.01	2.62
Sarasota AA	3	0.01	63.46	33.33	33.33	0.00	66.67	0.01	0.02
Tampa AA	200	0.99	64.53	57.50	62.00	19.00	19.00	0.19	0.26
State of Alabama									
Full Scope: Mobile AA	1,353	6.69	60.25	53.44	53.22	22.84	23.95	3.73	3.88

* Based on 2005 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2005).

**** 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 11.58% of small loans to businesses originated and purchased by the bank.

Limited Scope: Non MA AA	280	1.38	58.81	65.36	52.14	25.36	22.50	1.35	1.79
Montgomery AA	469	2.32	57.34	56.08	69.30	19.62	11.09	1.90	2.46

Table12. Borrower Distribution of Small Loans to Farms (2004 - 2006)

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2006		Geography: ALL AREAS – 2004-2006				Evaluation Period: JANUARY 1, 2004 TO			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
State of Louisiana									
Full Scope: New Orleans AA	19	14.84	88.48	73.68	63.16	31.58	5.26	2.48	2.13
Limited Scope: Baton Rouge	3	2.34	87.77	100.00	33.33	33.33	33.33	3.03	3.33
Houma AA	12	9.38	89.94	83.33	75.00	25.00	0.00	3.64	2.22
LA Non MA AA	10	7.81	79.47	10.00	40.00	30.00	30.00	3.51	1.02
Lafayette AA	5	3.91	89.12	80.00	40.00	40.00	20.00	3.85	2.44
Lake Charles AA	1	0.78	87.37	100.00	100.00	0.00	0.00	0.00	0.00
State of Texas									
Full Scope: Houston AA	9	7.03	85.36	88.89	22.22	55.56	22.22	0.45	0.56
State of Mississippi									
Full Scope: Gulfport-Biloxi AA	3	2.34	88.84	100.00	0.00	0.00	100.00	7.14	9.09
State of Florida									
Full Scope: Pensacola AA	2	1.56	88.68	100.00	100.00	0.00	0.00	1.49	2.00
Limited Scope: FL Non MA AA	1	0.78	86.00	100.00	0.00	100.00	0.00	4.76	5.88
Ft. Walton AA	0	0.00	91.36	0.00	0.00	0.00	0.00	0.00	0.00
Sarasota AA	0	0.00	82.84	0.00	0.00	0.00	0.00	0.00	0.00
Tampa AA	0	0.00	90.60	0.00	0.00	0.00	0.00	0.00	0.00
State of Alabama									
Full Scope: Mobile AA	14	10.94	84.27	28.57	7.14	42.86	50.00	2.91	1.18

* Based on 2005 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2005).

**** 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 11.72% of small loans to farms originated and purchased by the bank.

Limited Scope: AL Non MA AA	12	9.38	85.99	33.33	50.00	16.67	33.33	2.61	1.04
Montgomery AA	37	28.91	87.60	35.14	64.86	32.43	2.70	10.00	4.21

Table 14. Qualified Investments (2003 – 2006)

QUALIFIED INVESTMENTS									
Geography: ALL AREAS - 2003-2006					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2006				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Gulf Coast Region	0	0	1	4,500	1	4,500	7.01	0	0
State of Louisiana	0	0	1	25,000	1	25,000	38.94	0	0
Full Scope: New Orleans AA	2	644	184	2,260	186	2,904	4.52	0	0
Limited Scope: Baton Rouge AA	2	1,236	34	227	36	1,463	2.28	0	0
Houma AA	2	754	11	35	13	789	1.23	0	0
LA Non MA AA	0	0	14	11	14	11	0.02	0	0
Lafayette AA	0	0	34	132	34	132	0.21	0	0
Lake Charles AA	0	0	40	99	40	99	0.15	0	0
State of Texas									
Full Scope: Houston AA	1	330	53	990	54	1,320	2.06	0	0
State of Mississippi	0	0	1	25,000	1	25,000	38.94	0	0
Full Scope: Gulfport-Biloxi AA	1	1,056	26	122	27	1,178	1.83	0	0
State of Florida									
Full Scope: Pensacola AA	0	0	17	35	17	35	0.05	0	0
Limited Scope: FL Non MA AA	0	0	0	0	0	0	0.00	0	0
Ft. Walton AA	0	0	7	8	7	8	0.01	0	0
Sarasota AA	0	0	1	10	1	10	0.02	0	0
Tampa AA	0	0	1	1	1	1	0.00	0	0
State of Alabama									
Full Scope: Mobile AA	1	133	20	130	21	263	0.41	0	0
Limited Scope: AL Non MA AA	0	0	6	23	6	23	0.04	0	0

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

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

Montgomery AA	1	1,425	9	46	10	1,471	2.29	0	0
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Table 15. Distribution of Branch Delivery System and Branch Openings/Closings (2003 – 2006)

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: ALL AREAS – 2003-2006 Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2006																	
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
State of Louisiana																	
Full Scope: New Orleans AA	70.43	38	25.33	10.53	15.79	23.68	50.00	0	0	0	0	0	0	10.76	20.91	38.01	30.33
Limited Scope: Baton Rouge AA	9.65	15	10.00	0.00	20.00	26.67	53.33	1	1	0	0	-1	+1	8.87	19.12	38.44	33.58
Houma AA	6.10	9	6.00	0.00	11.12	66.66	22.22	0	0	0	0	0	0	1.28	15.59	68.29	14.53
LA Non MA AA	4.69	8	5.33	0.00	25.00	25.00	50.00	0	0	0	0	0	0	3.89	17.67	39.39	39.05
Lafayette AA	5.13	7	4.67	0.00	14.28	42.86	42.86	1	0	0	0	0	+1	5.14	13.48	43.93	37.45
Lake Charles AA	4.00	7	4.67	0.00	0.00	57.14	42.86	0	1	0	0	-1	0	2.14	24.44	41.75	31.66
State of Texas																	
Full Scope: Houston AA	100.00	13	8.66	7.69	23.08	0.00	69.23	4	2	0	0	0	+2	7.56	31.49	29.32	31.57
State of Mississippi																	
Full Scope: Gulfport-Biloxi AA	100.00	7	4.67	0.00	0.00	85.71	14.29	0	1	0	0	-1	0	0.00	10.96	73.46	15.56
State of Florida																	
Full Scope: Pensacola AA	28.28	9	6.00	0.00	11.12	44.44	44.44	0	1	0	-1	0	0	2.03	22.09	53.96	21.92
Limited Scope: FL Non MA AA	7.69	4	2.67	0.00	0.00	0.00	100.0	0	0	0	0	0	0	0.00	0.00	76.02	23.98
Ft. Walton AA	19.51	4	2.67	0.00	0.00	50.00	50.00	0	2	0	0	-1	-1	0.00	10.26	73.30	16.44
Sarasota AA	31.81	5	3.33	0.00	0.00	80.00	20.00	0	0	0	0	0	0	0.00	31.52	49.77	18.70
Tampa AA	12.73	5	3.33	0.00	40.00	20.00	40.00	1	0	0	0	0	+1	0.84	23.95	52.91	22.30
State of Alabama																	
Full Scope: Mobile AA	50.9	7	4.67	0.00	0.00	71.43	28.57	0	0	0	0	0	0	9.29	14.08	48.87	27.77
Limited Scope: AL Non MA AA	27.3	7	4.67	0.00	14.28	42.86	42.86	0	0	0	0	0	0	0.00	8.27	46.10	45.63
Montgomery AA	21.8	5	3.33	0.00	40.00	0.00	60.00	0	0	0	0	0	0	8.57	20.06	42.83	28.54

