



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citibank, N.A.
Charter Number: 1461

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Office of the Comptroller of the Currency

Large Bank Supervision
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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 **Citibank, N.A. (Citibank)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

Citibank’s lending performance is excellent. The distribution of loans to geographies of different income levels is excellent and the distribution of loans to borrowers of different income levels is good. The bank’s community development lending had a positive impact on the Lending Test. Rating areas where community development lending performance had a significantly positive or positive impact on overall Lending Test performance represent 96% of bank deposits. In relation to the bank’s deposit market share, lending activity levels supported the bank’s overall excellent Lending Test performance as Citibank’s activity was generally commensurate with its presence in the market.

Citibank’s overall investment performance is excellent. Rating areas where investment performance is excellent represent 88% of bank deposits. In the larger assessment areas, the company took a leadership role in developing and participating in investments that were complex and involved multiple partners with both public and private funding. Most investments served significant community development needs. The bank originated more than \$3.8 billion in community development investments and grants within its various assessment areas and broader regional areas that include its assessment areas during the rating period.

Citibank’s overall performance under the Service Test is good. The branch network is accessible to geographies and individuals of different income levels in the bank’s assessment areas. A good level of community development services was found in a majority of the rating areas. The preponderance of community development services focused on financial education; homeownership preservation; affordable housing; and homebuyer programs. Citibank displayed innovativeness through its Office of Homeownership Preservation’s 25-City Tour Program. The program provides technical assistance and resources to train housing counselors and other third parties engaged in foreclosure prevention and intervention work to better assist distressed borrowers.

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.

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

Activities that revitalize or stabilize-

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

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include 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 refinancing, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine

the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

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

original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Description of Institution

Citibank, National Association (Citibank) is a national bank with its main office in Las Vegas, Nevada and headquarters in New York, New York. Citibank is a direct subsidiary of Citicorp, which is a direct subsidiary of Citigroup Inc. (Citi). Citicorp and Citi are both headquartered in New York, New York. Citi, a leading global financial services company, has approximately 200 million customer accounts and does business in more than 140 countries. Citi provides consumers, corporations, governments and institutions with a broad range of financial products and services, including consumer banking and credit, corporate and investment banking, securities brokerage, transaction services and wealth management. As of June 30, 2009, Citi was the nation's fourth largest bank holding company, by total domestic deposits¹. As of March 31, 2010, Citi reported total assets of more than \$2.0 trillion².

Citibank is an interstate bank operating more than 1,000 branches and more than 3,100 ATMs in 16 U.S. states and territories: California; Connecticut; Delaware; Washington, District of Columbia; Florida; Illinois; Maryland; Massachusetts; Nevada; New Jersey; New York; Pennsylvania; Texas; Virginia; Guam; and Puerto Rico. Within its U.S. footprint, the bank has delineated 62 separate assessment areas, using counties as the smallest whole political subdivision. These assessment areas include two multistate metropolitan divisions (MDs) where the bank operates branches in at least two states.

Total deposits were more than \$765.4 billion as of March 31, 2010. For analysis purposes, we considered only domestic deposits totaling \$250.1 billion which is 32.7% of total deposits. We applied this percentage to total Tier 1 capital and used \$32.4 billion as the capital figure in our analysis of community development loans and investments. We excluded deposits held in foreign offices, as well as the capital used to support those deposits, because the deposits are housed in several non-U.S. branches, are not FDIC-insured, and do not represent Citibank's domestic presence.

Significant merger activity relating to Citibank occurred during the evaluation period. On October 1, 2006, the following affiliated entities merged with Citibank: Citibank, Federal Savings Bank in Reston, Virginia, a large bank; Citibank (Delaware) in New Castle, Delaware, a wholesale bank; Citibank Texas, National Association in Dallas, Texas, a large bank; and Citibank (West), FSB in San Francisco, California, a large bank. Additionally, on October 1, 2006, Citibank acquired Citicorp Trust, National Association in Los Angeles, California, a trust company with no FDIC insured deposits.

On March 1, 2007, Citibank acquired ABN AMRO Mortgage Group (AAMG), a national originator and servicer of prime residential mortgage loans. Citibank purchased approximately \$9 billion in net assets and AAMG's approximately \$224 billion mortgage servicing portfolio. AAMG merged into CitiMortgage, Inc. (CMI) on September 1, 2007. Finally, Citibank acquired the affordable housing group from Capmark Financial Group Inc. on February 7, 2007.

Citibank primarily operates through three divisions, the Institutional Clients Group (ICG), the Consumer Group (Consumer) and the Corporate Center (Corporate Center). ICG includes departments such as the Municipal Securities Division, Citi Community Capital, Global Transaction Services, Equities, Fixed Income, and Investment Banking. Consumer includes departments such as Retail Banking, Commercial Banking, CitiMortgage Inc (CMI), and Citi Cards. The Corporate Center includes, among other things, the Citi Foundation and Global Community Relations. ICG, Consumer and Corporate Center conduct

¹ Deposits reported on FDIC "Summary of Deposits" survey as of June 30, 2009.

² Assets reported on "Citi First Quarter 2010 Earnings' Financial Supplement," released April 19, 2010.

activities using bank and nonbank subsidiaries both nationally and through overseas branches and subsidiaries, representative offices and subsidiary foreign banks.

We considered loans, investments and grants from the following affiliates and subsidiaries: Citibank (South Dakota), N.A. (CBSD), a credit card-issuing bank; Department Stores National Bank, a credit card-issuing bank; and CMI, a residential mortgage-issuing bank. Citibank has no subsidiaries or affiliates that negatively impacted the bank's capacity to lend or invest in its communities. The bank requested that home mortgage loans originated or purchased by CitiFinancial Credit Company (CFC) and CFC's affiliates listed in Appendix A, be considered in this evaluation. All applicable loans originated or purchased by CFC or CFC's affiliates within Citibank's assessment areas are included in the review.

CitiFinancial Services, Inc. (a Massachusetts corporation), a bank affiliate, is subject to the Commonwealth of Massachusetts' Mortgage Lender Community Investment regulation (209 CMR 54.00). Therefore, in Citibank's assessment areas in Massachusetts, the bank has excluded the loans originated or purchased by CitiFinancial Services, Inc., as prescribed in 12 C.F.R. Part 25.22(c)(2)(i), "No affiliate may claim a loan origination or loan purchase if another institution claims the same loan origination or purchase."

Citibank's CRA exam period of January 1, 2006 through March 31, 2010, includes a period of economic volatility, triggered by a liquidity crisis in the United States banking system. This resulted in the bailout of many banks by the national government, including Citibank, and downturns in stock markets around the world. Throughout the United States, the housing market suffered, resulting in an increase in evictions and foreclosures and prolonged vacancies. This time period has been described as the worst financial crisis since the Great Depression and resulted in tremendous declines in consumer wealth, substantial financial commitments by governments, and a significant decline in economic activity. The bank has worked not to let these factors impede its ability to help meet the credit needs in its communities, but the economic climate is a significant performance context issue for this and other banks.

The beginning of the exam period was a time of growth in the U.S. economy. In 2006, the Gross Domestic Product (GDP) grew at 2.7% and in 2007, it grew at 2.1%. During the second half of the exam period, the overall U.S. economy suffered through a recession. In 2008, the GDP fell to 0.4% and in 2009; the GDP was negative 2.4%. The economic instability is further demonstrated by the substantial increase in the U.S. unemployment rate from 4.6% in 2006 to 9.3% in 2009. The S&P 500 index ended 2006 at a level of about 1,400 and 2007 at a level of about 1,500. In 2008, the index fell 40% reaching about 900 by the end of the year. In early 2009, the index fell further, reaching a low of about 680, for an overall decline of 55% from the end of 2007. Since then, the stock market has partly recovered, with the S&P 500 rising to about 1,180 as of March 31, 2010. The challenges faced by the economy had an impact on all banks in general and on Citibank in particular. In 2008 and 2009, the impact of the distressed economy along with the increased unemployment rates caused the volume of mortgage applications and originations to drop significantly compared to prior years.

Citibank received an Outstanding rating in its previous CRA examination dated June 5, 2006.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Due to the consolidation of Citibank charters and other corporate activity of Citibank and its affiliates in 2006, the evaluation periods covered by this evaluation vary by assessment area. The evaluation considers home mortgage loan products (home purchase, home improvement, home refinance, and multifamily, where applicable), small business lending, retail services, and qualified community development lending, investments and services.

The evaluation period for the New York-White Plains-Wayne, NY-NJ MD, New York State, Puerto Rico and Guam is from January 1, 2006 to December 31, 2009. Community Development activities for these assessment areas will be assessed from June 6, 2006 to March 31, 2010. In general, the remainder of the assessment areas will be reviewed using the dates October 1, 2006 to December 31, 2009 and community development activities will be assessed using the dates October 1, 2006 to March 31, 2010. Evaluation dates for individual assessment areas are noted in Appendix A and on Table 1 of each assessment areas' PE Tables in Appendix D.

Data Integrity

Prior to the start of this evaluation, we tested the accuracy of the bank's HMDA and CRA lending data. We also reviewed the appropriateness of community development activities provided for consideration in our evaluation. This included the testing of community development loans, investments and services for accuracy and to determine if they qualify as community development. We determined that the data reported publicly and the additional data provided for this evaluation are accurate.

Selection of Areas for Full-Scope Review

For each Multistate Metropolitan Statistical Area (MMSA) with underlying MDs in which the bank has branches in more than one state and each state in which Citibank has an office, one assessment area was selected for a full-scope review. The area selected was typically the MSA or MD that contained the largest percentage of bank deposits within the rating area. Refer to the "Description of Institution's Operations" section under each rating area for details regarding how the areas were selected. In addition, each MMSA without underlying MDs in which the bank has branches in more than one state received a full-scope review as required by the regulation.

Ratings

The bank's overall rating is a blend of the MMSA ratings and state ratings. Four primary rating areas carried the greatest weight in our conclusions due to these areas representing the bank's most significant markets in terms of deposit concentrations. In order of significance, these areas were New York-White Plains-Wayne, NY-NJ MD; State of California with Los Angeles-Long Beach-Glendale, CA MD having the greatest influence over the state rating; the State of New York represented by the Nassau-Suffolk NY MD; and the State of Illinois with the Chicago-Naperville-Joliet, IL MD as the largest MD in the state. These four areas contain 62.3% of the bank's total deposits.

The MMSA ratings and state ratings are based primarily on those areas that received full-scope reviews, but the bank's performance in areas receiving limited-scope reviews is also considered. Refer to the

“Scope” section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Community Contacts

OCC Community Affairs Officers updated or completed contacts specifically related to this evaluation in key assessment areas during the first quarter of 2010. Additionally, we reviewed information from contacts made during 2009 and 2010 with community groups, local government leaders, realtors, or business leaders within the bank’s various assessment areas. These interviews were made with low-income housing specialists, community action groups, small business development organizations, and social service groups. Relevant comments were included as appropriate in our performance context considerations. Information from community contacts for the Primary Rating Areas is summarized, as needed, in the Community Profiles found in Appendix C.

Other Information

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

Inside/Outside Ratio – We considered the volume of loans made inside Citibank’s assessment areas a generally positive factor in our evaluation of lending performance. We analyzed the volume of bank loan originations and purchases within the bank’s assessment areas versus those made outside the bank’s assessment areas at both the state and bank level. Our conclusions in this area were based solely on bank originations and purchases and did not include any affiliate data.

At the bank level, 40.9% of all mortgage, and 95.8% of all small business loans were made within Citibank’s assessment areas. Overall, we considered this performance to be adequate and excellent, respectively. We noted three states and Puerto Rico where the home mortgage product’s in/out ratio was less than 50.0%. Mitigating factors were present in these rating areas that aided in explaining the low ratios. Additionally, these rating areas account for less than 5.5% of the bank’s total deposits; therefore, their performance had a minimal impact on our conclusions and ratings. This performance was considered in our analysis of loan geographic distribution for these rating areas and discussed in the narrative section for the impacted states.

Flexible Loan Programs - Citibank’s use of flexible loan programs positively impacted its Lending Test performance. The Bank participated in or offered several nationwide, regional, or local programs, which addressed affordable housing needs by providing flexibility to borrowers with low- or moderate-incomes or to borrowers purchasing in low- or moderate-income areas.

Examples of nationwide products include: FHA loans, U.S. Department of Veterans Affairs (VA) loans, U.S. Department of Agriculture Rural Housing Services loans, Small Business Administration (SBA) loans, the Home Run and Closing Advantage programs. The Bank offered the CitiMortgage Closing Advantage program to borrowers located in the Bank’s assessment areas. Depending on eligibility criteria, the Bank provided up to \$3,000 to assist low- and moderate-income borrowers or borrowers purchasing a home in a low- or moderate-income community in meeting their financial obligations for closing costs. Nationally, this program assisted over 2,700 borrowers.

Another example of a flexible lending program is the Bank's partnership with the Neighborhood Assistance Corporation of America (NACA), a non-profit, community advocacy and home ownership organization. This program was designed for borrowers who have been given homebuyer education and counseling by the NACA. Nationally, this flexible lending program provided loans to nearly three thousand borrowers.

In addition to nationwide programs, the Bank offered flexible loan programs specific to certain rating areas. These programs were considered, as appropriate, within the applicable rating areas.

Description of factors considered in our analysis under each performance test

Lending Test

For the various loan products considered under the Lending Test, we gave greater weight to home mortgage loans in developing our conclusions. This weighting results from residential mortgage loans being the primary CRA relevant loan product for the bank. Within the mortgage loan category home purchase and refinance lending received similar consideration. We also considered to a lesser extent, the bank's small loans to businesses. The evaluation included multifamily housing loans in markets with at least ten loans. Citibank makes very few small farm loans. As a result, we did not analyze this product.

We gave equal weighting to the geographic and borrower distribution components of the Lending Test. The volume of community development loans and the degree of responsiveness of those loans to the needs in the community were considered positively in the lending evaluation. The lack of community development lending did not negatively impact Lending Test ratings. In situations where the bank's community development lending positively impacted the rating, it is described in the conclusions for the rating area.

In all markets, we did not analyze or draw conclusions on a particular loan product if less than ten loans were made during the evaluation period. Generally, we found that analysis on fewer than ten loans did not provide meaningful conclusions.

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

The time period covered by this evaluation was challenging in terms of events and circumstances affecting the national economy. The first two years of the evaluation period saw continuing increases in housing costs in some sections of the country, including a number of the bank's assessment areas. These increases had an impact on affordability in housing costs, especially for low- and moderate-income individuals wanting to purchase a home. By late 2007, deterioration in housing prices had begun as the economy moved towards recession. Lay-offs or threats of lay-offs contributed to mortgage delinquencies and the rise in foreclosures across the country. The housing market suffered, resulting in an increase in evictions and foreclosures and prolonged vacancies. These circumstances made it more difficult to attract qualified loan applicants. The impact of these economic changes combined with a tightening of mortgage underwriting standards saw the volume of home mortgage loan applications and originations drop significantly in 2008 and 2009 compared to prior years.

Investment Test

Primary consideration was given to the volume of investments and grants made during the current evaluation period. We also evaluated how responsive the investments were to identified community development needs. Secondary consideration was given to investments that were made in prior evaluation periods that remain outstanding. Investments made in Citibank's broader regional areas that include the bank's assessment areas were also considered.

Service Test

Primary consideration was given to Citibank's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in low- and moderate-income geographies, but also considered branches in middle- and upper-income areas that are nearby low- and moderate-income areas. We analyzed the distribution of deposit-taking ATMs by income level of census tract and gave positive consideration where the ATMs enhanced the access to banking services for low- and moderate-income individuals or geographies. During the evaluation period, Citibank acquired access and branding rights to ATM's in 7-11 stores. Citibank customers can use these ATMs free-of-charge for cash withdrawals. These ATMs are referenced as "non-proprietary ATMs" throughout this evaluation.

In addition to ATMs, Citibank offers other alternate delivery options for customers to use for banking services. These services include 24 hour on-line banking and banking by phone. These services are offered to all bank customers and are available throughout all Citibank markets. These options give customers flexibility in choosing services that fit their needs. The bank provided demographic information to show that these systems improved the delivery of services to low- or moderate-income individuals or areas. As a result, we were able to consider these systems in our conclusions.

Where Citibank opened or closed branches within an assessment area, the overall impact of the changes was evaluated. The accessibility of bank branches also considered the range of services and products offered in the branches and the extent they varied by branch. We specifically focused on differences in branch hours and services in low- or moderate-income geographies compared to those in middle- or upper-income geographies.

The bank's record of providing community development services was evaluated in assessment areas that received full-scope reviews. Our primary consideration in these reviews was the responsiveness to the needs of the community. Services that reflected ongoing relationships with organizations involved in community development received the most consideration in our analysis.

The bank offers several community development services that benefit multiple assessment areas, or in some cases, provide nationwide benefit. These services are targeted to low- and moderate-income individuals and families. Some examples of these services include:

- Citibank is an active participant in executing the mission of the Banking on Our Future program. This is a global delivery system for financial education for youth ages 9 through 18 at no cost to school districts, with a focus on under-served, urban, low- and moderate-income communities. The program consists of five modules: (1) Basic Banking and Financial Services, (2) Checking and Savings Accounts, (3) the Power of Credit, (4) Basic Investments, and (5) Dignity. The program is sponsored by Operation Hope Inc (HOPE), a non-profit, public benefit organization, founded immediately following the civil unrest of April 29, 1992 in Los Angeles. HOPE is

America's leading provider of economic tools and services. HOPE is an effective facilitator, lender, advocate and educator. The bank is active in this program in seven assessment areas.

- The Office of Home Preservation (OHP) was founded in 2007. OHP works directly with borrowers, but focuses on providing information, resources, tools and capacity building to community development organizations and housing counseling agencies engaged in the foreclosure prevention/intervention arena. The mission of the OHP is to increase direct and indirect contact with Citibank borrowers in distress and to help keep them in their homes whenever possible. Citibank engaged in a 25 city tour of which 16 cities were in CBNA assessment areas, as a way of increasing the capacity of organizations who were responding to the increasing volume of requests for help from distressed borrowers. In order to ensure that counselors have the knowledge and information necessary to help Citibank borrowers, the OHP created a foreclosure prevention training curriculum targeted to counselors so that they would have overall knowledge of foreclosure prevention strategies, and specifically of Citibank's criteria to find affordable solutions for borrowers to stay in their homes. This seminar focuses on issues such as demonstrating hardship, assembling necessary documents, avoiding scams, timelines and definition of options.

In 2007 and 2008, the OHP sponsored counselor sessions with local community development and housing counseling agencies in 25 cities. All HUD-certified agencies within each city were invited to attend the training sessions.

In 2009 OHP partnered with NeighborhoodWorks America (NWA) to provide training and information to its participants attending the NeighborWorks Training Institute (NTI), each in a different part of the country. During the NTI training the OHP presented the Citibank Foreclosure Prevention Counselors seminar targeting housing counselors and those wanting to learn how to provide foreclosure prevention information.

Fair Lending or Other Illegal Credit Practices Review

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

Primary Rating Areas

- **New York-White Plains-Wayne NY-NJ Multistate Metropolitan Division**
- **State of California**
- **State of New York**
- **State of Illinois**

New York-White Plains-Wayne, NY-NJ Multistate Metropolitan Division

CRA rating for the MD¹:	<u>Outstanding</u>
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the assessment area.
- Excellent distribution of loans among geographies and adequate distribution among borrowers of different income levels in the assessment area.
- Community development lending had a significant positive impact on lending performance in the assessment area.
- Investment volume that reflects an excellent level of responsiveness to the needs of the assessment area.
- Provision of combined retail banking and community development services that shows good responsiveness to banking and community development service needs in the assessment area.

Description of Institution's Operations in New York-White Plains-Wayne, NY-NJ MD

The New York-White Plains-Wayne MD consists of all of the counties in the metropolitan division except for Putnam County. As of June 30, 2009, the bank had \$52.9 billion of deposits in this geographic area. In terms of deposit market share, Citibank ranks third with an 8.2% share compared to a 39.4% share held by the largest deposit holder, 8.9% held by the second and 7.0% share held by the fourth largest deposit holder. There are 176 FDIC insured depository institutions in the assessment area, providing strong competition for the bank. Within this assessment area, the bank operates 172 branches and 1,226 deposit-taking ATMs. This assessment area contains 38.8% of the banks' overall deposits.

A sufficient number of multifamily loans were made by the bank in the New York-White Plains-Wayne MD for a meaningful analysis.

Refer to the market profile for the New York-White Plains-Wayne, NY-NJ Multistate in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

LENDING TEST

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

Lending Test performance in the New York-White Plains-Wayne Multistate is rated Outstanding.

Lending Activity

Refer to Table 1 Lending Volume in the New York-White Plains-Wayne, NY-NJ Multistate section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity is excellent, especially considering the strong competition in the market for all types of loans. The bank originated a large volume of loans and the bank's market share rank among lenders compares favorably to the bank's deposit market share rank. The bank ranked third in the origination of small loans to businesses and fourth in the origination of home purchase, home improvement, and refinance loans.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the New York-White Plains-Wayne, NY-NJ Multistate section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is excellent. The distribution of home purchase, home improvement, home refinance, and multifamily loans is excellent. The bank's percentage of lending for each of the home mortgage products exceeded the percentage of owner-occupied housing in both low-income and moderate-income geographies. The distribution of small loans to businesses is good. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The bank made an excellent percentage of its loans within its assessment area compared to outside its assessment area in the MD. Overall, the bank made 98.6% of its loans within its New York-White Plains-Wayne, NY-NJ MD assessment area.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the New York-White Plains-Wayne, NY-NJ Multistate section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is adequate. The distribution of home mortgage loans is adequate, considering the impact that the economic downturn had on housing, the high cost of housing, the fact that the majority (62%) of housing is rental, and the high household poverty level of 17% in the assessment area. Recent data from the National Association of Realtors shows that the median sales price of an existing single family home in the assessment area is \$394 thousand. The updated median family income for the assessment area indicates that a low-income individual earns less than \$32 thousand a year and a moderate-income person earns less than \$52 thousand a year making homeownership very difficult for most low- and moderate-income borrowers. After considering these factors, home purchase, home improvement, and home refinance lending is adequate. The distribution of loans to businesses of different revenue sizes is good. The economic

downturn had a negative effect on small businesses causing many businesses to close in all areas as well as the low- and moderate-income areas.

Community Development Lending

Refer to Table 1 Lending Volume in the New York-White Plains-Wayne (NY-NJ) section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development lending had a significant positive impact on lending performance in the assessment area. The bank originated 307 community development loans totaling approximately \$1.3 billion during this evaluation period. This volume represents 10.2% of the amount of Tier 1 Capital allocated to the assessment area. A majority of the bank's community development loans helped address an identified critical need for affordable housing. One example of the bank's responsiveness to community needs includes a \$358 million loan to provide affordable housing to low- or moderate-income individuals by acquiring, developing, rehabilitating, owning, and/or operating 14,465 units in 155 buildings in 13 locations in Manhattan, Brooklyn, the Bronx, and Staten Island. The bank led a 30 person team to organize the complex transaction in a short period of time. The team included Citibank, New York City Housing Authority, New York City Housing Development Corporation U.S. Department of Housing and Urban Development and a host of law firms and consultants. The investment was made in the form of three separate bond offerings: 2010 Series B (\$150 million); 2011 Series A (\$140 million); and 2012 Series A (\$68 million). The bond issues were reclassified and carried as a loan on Citibank's books because Citi Community Capital provided construction and rehabilitation debt in the form of a tax-exempt bond purchase.

Other Loan Data

Citibank issued 36 standby letters of credit totaling \$476.4 million that have a qualified community development purpose. All of these letters of credit helped community development organizations in projects that provided much needed affordable housing. Refer to Table 1 Other in the New York-White Plains-Wayne, NY-NJ Multistate section of Appendix D for facts and data on these letters of credit.

Product Innovation and Flexibility

The Bank's use of flexible loan programs, which addressed affordable housing needs, had a positive impact on its Lending Test performance in the rating area.

INVESTMENT TEST

Citibank's overall Investment Test performance in this MMSA is rated Outstanding. Citibank's responsiveness to the identified needs of the assessment area is excellent, especially in the area of affordable housing. There was no limited-scope assessment areas included in this MMSA.

Refer to Table 14 in the New York-White Plains-Wayne, NY-NJ Multistate section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Citibank originated 809 investments in the MMSA totaling approximately \$846.9 million. In addition, we considered the ongoing impact that investments made prior to the

current evaluation period had within the assessment area. The remaining balance on 52 prior period investments as of March 31, 2010 was approximately \$307.2 million.

The bank's responsiveness to the community development needs in the assessment area is excellent, especially as they related to affordable housing. One example that demonstrated responsiveness and complexity is the New York City Housing Authority (NYCHA) investment. NYCHA's goal was to identify a single partner to assist with the lending and investing of a \$900 million project to rehabilitate 21 public housing developments for over 46,000 residents in over 20,000 units. As part of the investment component in this project, Citibank is the sole investor contributing \$210 million to a newly formed tax credit Limited Liability Company created to purchase the Low Income Housing Tax Credit (LIHTC) Portfolio owned by NYCHA. This was the largest mixed-finance transaction ever and required a team of over 30 people to close the deal by a very tight deadline. Additionally, the structure of the deal helps provide relief for NYCHA's operating budget which was in a significant deficit due to the elimination of city and state subsidies. Because of the budget deficit, funds were diverted from other programs to maintain the entire NYCHA housing portfolio consisting of approximately 180,000 units. As a result of this deal, NYCHA was able to qualify for federal funds due to a one-time opportunity available through the American Recovery and Reinvestment Act, thus allowing much needed budgetary relief.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance within the MMSA is rated High Satisfactory. A full-scope review of the New York-White Plains-Wayne assessment area revealed an overall good level of performance.

Retail Banking Services

The distribution of bank branches within the assessment area is good as Citibank's retail delivery systems are accessible to geographies and individuals of different income levels. The distribution of branches in both the low- and moderate-income geographies is below the population residing in these geographies with the distributions poor and good respectively. However, when giving consideration to branches in middle- and upper-income geographies (47) that are in close proximity or "near to" low- and moderate-income geographies, accessibility significantly improves for low- and moderate-income geographies and is good.

Citibank's record of opening and closing branch offices improved the accessibility of delivery systems in the assessment area. Three branches opened in moderate-income geographies. No offices were closed.

Citibank's ATM network does not enhance access for low- and moderate-income geographies or individuals. The percentage of full-service ATMs in low- and moderate-income geographies is below the percentage of the population residing in those geographies.

Citibank's branch hours do not vary in a way that inconveniences certain portions of the assessment area, particularly low-income geographies. Branch hours are convenient, with evening and Saturday banking hours offered at various locations, including offices located in low- and moderate-income geographies.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. Both systems augment access to banking services for low- and moderate-income individuals. The bank tracked the level of usage of these alternative delivery systems by households located in low-, moderate-, middle- and upper-income geographies. The percentage of CitiPhone users located in low-income geographies is equal to the percentage of households residing in the geography, and is below the percentage of households in moderate-income geographies. Citibank Online users located in low- and moderate-income geographies are below the percentage of the assessment area's households residing in the geographies.

Community Development Services

The bank provided an excellent level of community development services to the assessment area. Employees provided a total of 5,303 hours for community development services that benefited numerous organizations and 6,245 low- and moderate-income individuals. More importantly, numerous employees served in leadership roles with the organizations. Citibank offers a financial education curriculum in multiple languages and has employees with those language skills to deliver the classes. The bank also conducted homeownership and foreclosure prevention programs.

One example of the bank's responsiveness to identified community development needs was the Financial Literacy Project for Newly Arrived Immigrants and Refugees in partnership with the International Institute of New Jersey. Bank employees developed a seven-module curriculum in English and Spanish, as well as a post-test to assess participant's knowledge and to determine follow-up needs. Over 70 low-income clients participated.

An example of the bank's leadership was demonstrated by an employee's role as Chairman of the Board of the Neighborhood Restore Housing Development Fund, whose mission is to eliminate troubled housing and to revitalize distressed communities in NYC by taking ownership of tax delinquent properties, stabilizing tenancy and then transferring the property to responsible developers to be rehabilitated. This employee provided guidance and advice to the organization on overall operational and financial issues to ensure that the organization was supporting the City of New York in maintaining, preserving and developing affordable housing for low- and moderate-income families.

Refer to Table 15 in the New York-White Plains-Wayne, NY-NJ Multistate 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.

State of California

CRA rating for California:	<u>Outstanding</u>
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the rating area.
- Excellent distribution of loans among geographies and adequate distribution among borrowers of different income levels.
- Community development lending had a significant positive impact on lending performance in the rating area.
- Investment volume that reflects an excellent level of responsiveness to the needs of the rating area.
- Provision of combined retail banking and community development services that shows good responsiveness to the banking and community development service needs of the rating area.

Description of Institution's Operations in California

Citibank operates 377 branches and 706 deposit-taking ATMs in the State of California. Statewide, the bank holds \$34.1 billion of deposits, which represents 24.9% of the bank's total deposits. In terms of deposit market share, Citibank ranks third with a 7.5% share compared to a 23.7% share held by the largest deposit holder, 15.9% held by the second and 7.2% share held by the fourth largest deposit holder. Within California, 34.4% of the bank's deposits are concentrated in the Los Angeles-Long Beach-Glendale MD; therefore, this area was selected for a full-scope review. The remaining 23 assessment areas were analyzed using limited-scope procedures. A sufficient number of multifamily loans were made by the bank in the Los Angeles-Long Beach-Glendale MD for analysis and consideration under the Lending Test.

Refer to the market profile for the State of California in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in California is rated Outstanding. Based on a full-scope review, the bank's performance in the Los Angeles-Long Beach-Glendale, CA MD assessment area is excellent. Performance in the limited-scope areas did not impact the Lending Test rating in the state.

Lending Activity

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

Lending activity is excellent. We based our conclusion primarily on the large volume of loans the bank originates. The bank's market share for its loan products compares favorably to its deposit market share in many of the assessment areas in the state and, especially, in the full-scope assessment area. The bank ranked in the top four for all lenders in all loan categories evaluated in the full-scope area, even with strong competition from national lenders.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of California section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans in the full-scope assessment area is excellent. The distribution of home purchase, home improvement, home refinance, and multifamily loans is excellent. The bank's percentage of lending for each of the home mortgage products exceeded the percentage of owner-occupied housing in both low- and moderate-income geographies. The distribution of small loans to businesses is good.

We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The bank made an excellent percentage of its loans within its assessment areas compared to outside its assessment areas. Overall, the bank made 98% of its loans in California within its assessment areas. This ranged from 97% for home purchase to 99% for small business.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of California section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is adequate. The distribution of home mortgage loans is adequate, considering the impact that the economic downturn had on housing, the high cost of housing, and high household poverty level of 15% in the assessment area. Recent data from the National Association of Realtors shows that the median sales price of an existing single family home in the assessment area is \$340 thousand. The updated median family income for the assessment area indicates that a low-income individual earns less than \$31 thousand a year and a moderate-income person earns less than \$49 thousand a year. These income levels make homeownership very difficult for most low- and moderate-income borrowers. After considering these factors, home purchase, home improvement, and home refinance lending is adequate. We also considered the slow down in small business expansion, downsizing and closures due to the impact of the economic downturn. The distribution of loans to businesses of different revenue sizes is adequate, when considering these factors.

Community Development Lending

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

Community development lending had a significant positive impact on lending performance in the Los Angeles-Long Beach-Glendale assessment area. The bank originated 132 community development loans totaling \$342.6 million during this evaluation period. This volume represents 12.1% of Tier 1 Capital allocated to the assessment area. The substantial majority of the bank's community development loans helped to address the critical need in affordable housing. One example of the responsiveness includes a loan for approximately \$18.8 million to construct a 97-unit apartment complex for individuals with mental or physical disabilities. The facility is located in a low-income census tract of Los Angeles County. Additionally, Citibank provided a \$55 million loan to a Los Angeles based lender that extends credit to affordable housing developers. The use of these funds was innovative because the primary purpose of this facility was to make loans to developers of affordable housing projects to bridge the period of time between acquisition and construction closing. This unique structure was the first of its kind in the Los Angeles market.

Other Loan Data

Citibank issued two standby letters of credit totaling \$29.8 million that have a qualified community development purpose in two separate limited-scope assessment areas. Refer to Table 1 Other in the State of California section of Appendix D for facts and data on these letters of credit.

Product Innovation and Flexibility

The Bank's use of flexible loan programs had a positive impact on its Lending Test performance in the rating area, primarily due to programs that addressed affordable housing needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bakersfield, Oakland-Fremont-Hayward, Oxnard-Thousand Oaks-Ventura, Riverside-San Bernardino-Ontario, Sacramento-Arden-Arcade-Roseville, San Francisco-San Mateo-Redwood City, San Jose-Sunnyvale-Santa Clara, Santa Ana-Anaheim-Irvine and Santa Cruz-Watsonville assessment areas is not inconsistent with the bank's overall Outstanding performance under the Lending Test in the State of California. Lending performance in the Fresno, Hanford-Corcoran, Madera-Chowchilla, Merced, Modesto, Salinas, San Diego-Carlsbad-San Marcos, San Luis Obispo-Paso Robles, Santa Rosa-Petaluma, Stockton, Vallejo-Fairfield, and Visalia-Porterville is weaker than the bank's overall Outstanding performance in the state but good. We noted that geographic distribution of lending performance was weaker in these assessment areas. We also noted weaker performance, which is adequate, in the Napa and Santa Barbara assessment areas primarily because of weaker geographic and borrower distribution. Weaker performance in these assessment areas did not have a negative impact on the overall lending performance in the State of California. Refer to the Tables 1 through 12 in the State of California section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Citibank's overall Investment Test performance in this state is rated Outstanding. Based on a full-scope review, performance in the Los Angeles-Long Beach-Glendale MD is excellent. Citibank's responsiveness to the identified needs of the assessment area is excellent, especially in the area of affordable housing. Other critical needs receiving assistance include assistance for small businesses, financial education and foreclosure prevention. Performance in the limited-scope assessment areas supported the overall rating for the State of California.

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

During the evaluation period, Citibank originated 305 investments in the MD totaling approximately \$284.2 million. The bank's responsiveness to the community development needs in the assessment area is excellent, especially as they related to affordable housing. One example that demonstrates this is the Rosslyn Lofts Project. In October 2007, Citibank purchased \$28.5 million of bonds secured by The Rosslyn Lofts project through a private placement. The primary purpose of this purchase was to finance the acquisition and rehabilitation of this 297-unit multifamily rental housing development. The Rosslyn Lofts are located in a low-income census tract in downtown Los Angeles in a former hotel built in 1913 known originally as the "Rosslyn Million Dollar Fireproof Hotel." The architecturally beautiful property will provide much needed affordable housing and help in the revitalization of one of Los Angeles' most important historical and cultural centers. The four percent LIHTC qualified rehabilitation will feature 259 studio apartments restricted to individuals earning at 35% and 60% of average median income (AMI) as well as 38 market rate apartments.

Citibank also retains 32 prior period investments in the statewide area totaling approximately \$73 million. However, these investments did not have a significant impact on the Investment Test for the State of California.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bakersfield, Fresno, Hanford-Corcoran, Madera-Chowchilla, Merced, Modesto, Napa, Oakland-Fremont-Hayward, Oxnard-Thousand Oaks-Venture, Riverside-San Bernardino-Ontario, Sacramento-Arden-Arcade-Roseville, Salinas, San Diego-Carlsbad-San Marcos, San Francisco-San Mateo-Redwood, San Jose-Sunnyvale-Santa Clara, San Louis Obispo-Paso Robles, Santa Ana-Anaheim-Irvine, Santa Barbara-Santa Maria-Goleta, Santa Cruz-Watsonville, Santa Rosa-Petaluma, Stockton, Vallejo-Fairfield, and Visalia-Porterville assessment areas are not inconsistent with the performance noted in the State of California. Overall, the bank's performance in the limited-scope areas supported the overall rating for the State of California. Refer to Table 14 in the State of California section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in California is rated High Satisfactory. A full-scope review of Los Angeles-Long Beach-Glendale assessment area reveals a good level of performance. Performance in the limited-scope assessment areas did not impact the Service Test rating for California.

Retail Banking Services

The distribution of bank branches within the full-scope area is good. The bank's retail delivery systems are accessible to geographies and individuals of different income levels. The distribution of branches in low- and moderate-income geographies is below the population residing in these geographies and is adequate and good respectively. However, when giving consideration to middle- and upper-income branch locations (18) that are in close proximity to low- and moderate-income geographies, accessibility significantly improves and is good.

Citibank's record of opening and closing branch offices has not affected the accessibility of delivery systems in the assessment area. During the evaluation period, one branch office opened and one closed, both were in upper-income geographies.

Citibank's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service and Citi-branded, non-proprietary ATMs in the assessment area.

Citibank's branch hours do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies. Branch hours are convenient, with evening hours offered one night a week, in addition to Saturday banking hours.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low- and moderate-income geographies was equal to the percentage of households residing in these geographies. Citibank Online users located in low- and moderate-income geographies were below the percentage of the assessment area's households residing in these geographies.

Community Development Services

The bank provided an excellent level of community development services within this assessment area. Citibank employees provided community development services for a total of 1,044 hours, which benefited 29 organizations and 5,876 low- and moderate-income individuals. Employees served in leadership roles in providing CD services focusing on affordable housing for low- and moderate-income families and community services for low- and moderate-income individuals. Both are identified needs within the community. The bank's niche is providing a financial education curriculum or training in multiple languages along with bi-lingual employees to deliver the lessons.

One example of the bank's responsiveness involved its partnership with Junior Achievement of Southern California where 21 employees taught low- and moderate-income high school students a curricula including credit, budgeting, the role of banks and financial markets, how to read balance sheets and income statements, and the interplay of money, banking and economic institutions in a community.

The bank demonstrated both its leadership and innovativeness with its participation with the United Way of Greater Los Angeles. United Way hosted the local working group of the Alliance for Economic Inclusion, an FDIC-initiative that establishes coalitions with financial institutions and non-profit organizations. A Citibank employee, serving as Board Chair, initiated new programs, including the

development of the Asset Building Specialist Certification Program, the only one in the country. This initiative can be replicated in other markets.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, Service Test performance in Fresno; San Diego-Carlsbad-San Marcos; San Jose-Sunnyvale-Santa Clara; Santa Ana-Anaheim-Irvine; San Francisco-San Mateo-Redwood City; and Stockton assessment areas are not inconsistent with the good performance in the State. The bank's performance in Hanford-Corcoran; Madera-Chowchilla; Merced; Oakland-Fremont-Hayward; Riverside-San Bernardino-Ontario; San Luis-Obispo-Paso Robles; Santa Cruz-Watsonville; Santa Rosa-Petaluma; and Visalia-Porterville was stronger than its performance in the rating area, and is considered excellent. This was mainly due to branches in the assessment area being readily available to moderate-income geographies. The bank's performance in Bakersfield; Modesto; Napa; Oxnard-Thousand Oaks-Ventura; Sacramento-Arden Arcade-Roseville; Salinas; Santa Barbara-Santa Maria-Goleta; and Vallejo-Fairfield assessment areas are weaker than the performance in the full-scope area, primarily due to branch distribution. Performance in these assessment areas are considered poor, except for the Salinas assessment area which is considered adequate. Performance in the limited-scope areas did not impact the State of California Service Test rating, which was primarily based on the bank's performance in the full-scope assessment area.

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

State of New York¹

CRA Rating for New York:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>High Satisfactory</u>
The Service Test is rated:	<u>Outstanding</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the assessment area.
- Excellent distribution of loans by income level of geography and good distribution among borrowers of different income levels.
- Investment volume that reflects a good level of responsiveness to the needs of the assessment area.
- Excellent Service Test performance was due to an excellent branch distribution and an adequate record of opening and closing offices, along with good branch hours and a good level of community development services.

Description of Institution's Operations in New York

Citibank has delineated one assessment area within the state. The bank also has another assessment area that is part of the New York-White Plains-Wayne MD. This MD is a separate rating area from the state. Please see the New York-White Plains-Wayne MD rating area for a description of the bank's operations in that area. Excluding the multistate area, the bank operates 77 branches and 240 deposit-taking ATMs in New York. Citibank holds \$10.6 billion of deposits in this portion of the state, which represents 7.8% of the bank's total deposits. Ranked by deposits, the Nassau-Suffolk MD is the third largest assessment area of the bank. In terms of deposit market share, Citibank ranks third with an 11.9% share compared to a 21.2% share held by the largest deposit holder, 13.4% held by the second and 9.6% share held by the fourth largest deposit holder.

A sufficient number of multifamily loans were made by the bank in the Nassau-Suffolk MD. However, because multifamily loans are not a primary loan product for the bank, this activity received limited consideration. Refer to the market profile for the State of New York in Appendix C for detailed demographics and other performance context information for this full-scope assessment area.

LENDING TEST

Lending Test performance in New York State is rated High Satisfactory. The bank's lending performance in the Nassau-Suffolk MD is good.

¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Lending Activity

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

Lending activity is excellent. Although the market shares for loan products are below the bank's deposit market share, the bank generated a large volume of small business, home purchase, and refinanced loans in light of the large number of competitors for loans. Moreover, loan rankings were high (top five) in all loan categories and comparable to the deposit market rank.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of New York section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is excellent. We placed more weight on performance in lending in moderate-income geographies since the opportunities to lend in low-income geographies were limited for home mortgage and small loans to businesses. The distribution of home mortgage loans is excellent. The bank's percentage of home purchase and home refinance lending exceeded the percentage of owner-occupied housing in low- and moderate-income geographies. The percentage of home improvement lending exceeded the percentage of owner-occupied housing in moderate-income geographies and was significantly below the demographics in low-income geographies. The distribution of multifamily lending and small loans to businesses is good. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The bank made a good percentage of its loans within its assessment area compared to outside its assessment area. Overall, the bank made 80.8% of its loans in New York within its assessment area. This ranged from 66.5% for home improvement to 92.5% for small business.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of New York section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is good. The distribution of home mortgage loans is good, considering the impact that the economic downturn had on housing and the high cost of housing. Recent data from the National Association of Realtors shows that the median sales price of an existing single family home in the assessment area is \$395 thousand. The updated median family income for the assessment area indicates that a low-income individual earns less than \$51 thousand a year making homeownership difficult for most low-income borrowers. After considering these factors, home purchase, home improvement, and home refinance lending is good. Lending to moderate-income borrowers was excellent for home-improvement and home refinance and adequate for home purchase. Lending for all three mortgage products was significantly below the percentage of low-income families. The distribution of loans to businesses of different revenue sizes was good giving

consideration to the impact the economic downturn had lending to small businesses. These businesses experienced increased closures, higher vacancy rates and foreclosures of commercial real property.

Community Development Lending

Refer to Table 1 Lending Volume in the State of New York section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development had a neutral impact on performance in the full-scope assessment area. Citibank made 16 loans totaling approximately \$31 million in the Nassau-Suffolk assessment area.

Product Innovation and Flexibility

The Bank's use of flexible loan programs, which addressed affordable housing needs, had a positive impact on its Lending Test performance in the rating area.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Citibank's overall Investment Test performance in this state is rated High Satisfactory. Based on a full-scope review, performance in the Nassau-Suffolk MSA is good. Citibank's responsiveness to the identified needs of the assessment area is good, with most investments concentrated in affordable housing. There was no limited-scope assessment areas included in this MSA.

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

During the evaluation period, Citibank originated 140 investments in the MSA totaling approximately \$86.6 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on a prior period investment as of March 31, 2010 was approximately \$5.9 million. The bank's responsiveness to the community development needs in the assessment area is good, with most investments concentrated in affordable housing. One example that demonstrates this is the Paumanack Village II investment. In December 2008, Citibank purchased \$12.5 million of tax-exempt bonds secured by the Paumanack Village II project. The proceeds from this investment, together with LIHTC equity, paid off an existing HUD Section 202 mortgage and financed the rehabilitation of an existing 126-unit garden-style apartment complex built in 1979. All of the building's 122 one-bedroom, 3 two-bedroom, and 1 three-bedroom units are reserved for families earning between 50% and 60% of AMI.

Citibank also retains 18 prior period investments in the statewide area with a balance of approximately \$25 million. However, these investments did not have a significant impact on the Investment Test for the State of New York.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in New York is rated Outstanding. A full-scope review of the Nassau-Suffolk assessment area reveals an excellent level of performance.

Retail Banking Services

A good distribution of bank branches is elevated to an excellent level after considering the branches in middle- and upper-income geographies (11) that are in close proximity to moderate-income geographies. The distribution of branches is adequate for low-income areas and excellent for moderate-income areas. More weight was placed on the branches located in the moderate-income geographies given that only 1% of the assessment area population lives in the low-income census tracts. The distribution of branches in moderate-income geographies is less than the percentage of the population residing in those areas and no branch offices are located in low-income geographies.

Citibank's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems. During the evaluation period, three branch offices opened, two in middle-income geographies and one in an upper-income geography. No branch offices were closed.

Citibank's ATM network does not significantly enhance access to banking services for low- and moderate-income geographies and individuals. Full-service ATMs in moderate-income geographies are below the population residing in these geographies. Citibank branded, non-proprietary ATMs enhanced overall delivery services in moderate-income geographies increasing slightly above the percentage of the population residing in these geographies. There are no full-service or Citibank branded, non-proprietary ATMs in low-income geographies.

Citibank's branch hours do not vary in a way that inconveniences certain portions of the assessment area, particularly moderate-income geographies. Branch hours are convenient, with evening hours offered one night a week, in addition to Saturday hours at some branch locations.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low- and moderate-income geographies is equal to the percentage of households residing in these geographies. Citibank Online users located in low- and moderate-income geographies are below the percentage of the assessment area's households residing in those geographies.

Community Development Services

The bank provided a good level of community development services within this rating area. Employees provided community development services for a total of 331 hours, which benefited 24 organizations and 1,296 low- and moderate-income individuals. This includes involvement in leadership roles for affordable housing or economic development organizations. Employees provided community development services to a broad range of organizations, with the focus on both affordable housing for low- and moderate-income families and economic development, which are identified needs within the area.

One example of the bank's responsiveness was through its partnership with the MCL Foundation, an organization that raises funds to advance the development of innovative library-based programs that focus on families, children, small businesses, entrepreneurs, literacy, and information technologies. An

employee provided ten program participants, which consisted of small businesses and entrepreneurs, with a workshop entitled “Making Your Business Bankable - Credit 101.”

An example of the bank’s leadership was demonstrated through the Long Island Housing Task Force, which is an initiative created by the bank to address high foreclosures and delinquencies for low- and moderate-income families on Long Island. The bank’s leadership role in the creation of this task force brought together non-profit partners who serve low- and moderate-income families and helped them develop a strategic plan to work together to assess their community needs and to target activities that would be most valued by low- and moderate-income families facing foreclosure. The goal of this group was to create a sustainable interactive model to prevent foreclosure now and in the future, and to repair damage to low-income communities.

Also, the bank displayed innovativeness through its Office of Homeownership Preservation’s 25-City Tour Program. The mission of this program was to reach out to housing counselors, and other third parties engaged in foreclosure prevention/intervention work in the hardest hit cities. Information, resources, tools and technical assistance on loss mitigation best business practices and programs is provided to facilitate homeownership preservation.

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

State of Illinois

CRA Rating for Illinois:	<u>Outstanding</u>
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the rating area.
- Excellent distribution of loans by income level of geographies and good distribution among borrowers of different income levels.
- Community development lending had a significant positive impact on lending performance.
- Investment volume that reflects an excellent level of responsiveness to the needs of the rating area.
- Good Service Test performance is the result of good branch distribution and hours further enhanced by an excellent record of opening and closing branches and good community development services.

Description of Institution's Operations in Illinois

Citibank operates 73 branches and 303 deposit-taking ATMs in Illinois. The bank has delineated two assessment areas within the state, both in MSAs. As of June 30, 2009, the bank held 2.7% of the market share within the state or \$9.9 billion in deposits. This rating area contains 7.3% of the bank's total deposits. Primary competitors within the state have deposit market shares of 16% and 9.4%, respectively. Within Illinois, 98% of the bank's deposits are concentrated in the Chicago-Naperville-Joliet assessment area; therefore, it was selected for a full-scope review. The second assessment area was analyzed using limited-scope procedures.

A sufficient number of multifamily loans were made by the bank in the Chicago-Naperville-Joliet MD for a meaningful analysis.

Refer to the market profiles for the State of Illinois in Appendix C for detailed demographics and other performance context information for assessment area that received a full-scope review.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Illinois is rated Outstanding. Based on a full-scope review, the bank's performance in the Chicago-Naperville-Joliet, IL assessment area is excellent. The bank's performance in the limited-scope area, Lake County-Kenosha County, supported the Lending Test rating for the state.

Lending Activity

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

Lending activity is excellent. We based our conclusion primarily on the large volume of loans the bank originates. The bank's market share for its loan products compares favorably to its deposit market share in the full-scope assessment area. The bank ranked in the top four among lenders in all loan categories, even with strong competition from national lenders.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of Illinois section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans by income level of geography is excellent. The distribution of home purchase, home improvement, and home refinance loans is excellent. The bank's percentage of lending for all three home mortgage products exceeded the percentage of owner-occupied housing in both low-income and moderate-income geographies. The distribution of multifamily lending and small loans to businesses is good. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The percentage of loans made inside the bank's various assessment areas in Illinois is excellent at 95.0%. Performance ranged from 87.5% for home improvement lending to 99.0% for small business lending.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of Illinois section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is good. The distribution of home mortgage loans is good, considering the impact that the economic downturn had on housing, the high cost of housing, and high household poverty level (10%) in the assessment area. Recent data from the National Association of Realtors shows that the median sales price of an existing single family home in the assessment area was \$204 thousand. The updated median family income for the assessment area indicates that a low-income individual earns less than \$37 thousand a year making homeownership very difficult for most low-income borrowers. After considering these factors, home purchase, home improvement, and home refinance lending is good. The percentage of lending to moderate-income borrowers for all three home mortgage products exceeds the percentage of moderate income families. The percentage of lending to low-income borrowers for home improvement loans is below the percentage of low-income families and significantly below for home purchase and home refinance loans. The distribution of loans to businesses of different revenue sizes is good.

Community Development Lending

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

Community development lending had a significant positive impact on lending performance in the Chicago-Naperville-Joliet assessment area. The bank originated 101 community development loans totaling approximately \$251.8 million during this evaluation period. This volume represents 10.9% of Tier 1 Capital allocated to the assessment area. The substantial majority of the bank's community development loans addressed critical needs in affordable housing. One example of the responsiveness includes a loan of \$50 million to an organization that approves loans financing affordable housing projects in the assessment area.

Product Innovation and Flexibility

The Bank's use of flexible loan programs had a positive impact on its Lending Test performance in the rating area, primarily due to programs that addressed affordable housing needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Lake County-Kenosha County assessment area is not inconsistent with the bank's overall Outstanding performance under the Lending Test in the State of Illinois. Refer to the Tables 1 through 12 in the State of Illinois section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Citibank's overall Investment Test performance in this state is rated Outstanding. Based on a full-scope review, performance in the Chicago-Naperville-Joliet MD is excellent. During the evaluation period, Citibank originated 220 investments in the MD totaling approximately \$215.1 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on 11 prior period investments as of March 31, 2010 was approximately \$11.2 million. Citibank's responsiveness to the identified needs of the assessment area is good, with most investments concentrated in affordable housing. Additionally, a significant amount of grants and contributions were made to address other community needs such as financial education, job training and assistance to small businesses. Performance in the limited-scope assessment areas was not inconsistent with the Investment Test rating for the State of Illinois.

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

One example that demonstrates the bank's responsiveness is the Central Station project. In March 2008, Citibank made a direct purchase of \$9.5 million in bonds issued to refinance existing debt for the Central Station project. The Central Station project is a mixed income property located in the South Loop area of Chicago which consists of two buildings; a 40-story tower containing 411 units, 21% of which are restricted to tenants earning at or below 50% of AMI, and an 11-story building containing 91 units, 100% of which are restricted to seniors earning at or below 55% of AMI.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Lake County-Kenosha County assessment area is not inconsistent with the performance noted in the State of Illinois. Refer to Table 14 in the State of Illinois section of Appendix D for the facts and data that support this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in Illinois is rated High Satisfactory. A full-scope review of the Chicago-Naperville-Joliet assessment area revealed an overall good level of performance. Performance in the limited-scope assessment area did not impact the Service Test rating for Illinois.

Retail Banking Services

The distribution of bank branches within the full-scope area is good. Citibank's retail delivery systems are accessible to geographies and individuals of different income levels. The distribution of branches in both low- and moderate-income geographies is below the percentage of the population living in such geographies, but is adequate and good respectively. When giving consideration to middle- and upper-income branch locations (10) that are in close proximity to low- and moderate-income geographies, accessibility improves to good.

Citibank's record of opening and closing branch offices improved the accessibility of delivery systems. During the evaluation period, thirteen branches opened, one in a low-income geography, one in a moderate-income geography, three in middle-income geographies and eight in upper-income geographies. No offices were closed.

Citibank's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals. The bank's full-service ATMs are below the population residing in low-income geographies, but exceed the population residing in moderate-income geographies. Bank branded, non-proprietary ATMs modestly bolster the delivery of services to low- and moderate-income geographies. The non-proprietary ATMs do not accept deposits.

Branch hours are good and do not vary in a way that adversely impacts low- and moderate-income areas. Branch hours are convenient, with evening hours offered one night a week, in addition to Saturday banking hours.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low- and moderate-income geographies is above the percentage of the assessment area's households residing in those geographies. The percentage of Citibank Online users located in low- and moderate-income geographies is below the percentage of the assessment area's households residing in those geographies.

Community Development Services

The bank provided a good level of community development services that were responsive to the identified needs, including affordable housing, foreclosure prevention, and financial education. Employees provided a total of 573 hours, which benefited 20 organizations and 4,717 low- and moderate-income individuals. The bank's participation was often in the role of conducting seminars for homeownership, as well as preparation assistance for income tax and education financial aid.

One example of the bank's responsiveness to identified community development needs was through its partnership with the Center for Economic Progress (CEP). Employees staffed CEP volunteer income tax assistance sites, providing assistance to 351 low- and moderate-income individuals. As a complementary service, employees taught 38 low-income families and senior high school aged children how to fill out the Free Application for Federal Student Aid (FAFSA). For low- and moderate-income families, access to financial aid through federal and state grants, scholarships and federally subsidized loans is crucial to provide the resources to allow them to go to college, and ultimately increase their earnings potential.

An example of the bank's leadership was demonstrated by an employee's role as Chair of the Operations Committee of the Neighborhood Housing Services (NHS) of Chicago, where she utilized her financial services expertise to review loan packages, monitor and assess homebuyer education workshops and provide input related to market trends to support NHS operations.

The bank displayed innovativeness through its Office of Homeownership Preservation's 25-City Tour Program. The mission of this program was to reach out to housing counselors and other third parties engaged in foreclosure prevention/intervention to provide information, resources, tools and technical assistance on loss mitigation best business practices and programs to facilitate homeownership preservation.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Lake County-Kenosha County assessment area is weaker than the bank's performance in the full-scope assessment area. The bank's performance was poor primarily due to a weak distribution of branches. Performance in the limited-scope areas did not impact the State of Illinois Service Test rating.

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

Other Rating Areas

- **Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate Metropolitan Division**
- **State of Connecticut**
- **State of Delaware**
- **State of Florida**
- **Territory of Guam**
- **State of Maryland**
- **State of Massachusetts**
- **State of Nevada**
- **State of New Jersey**
- **State of Pennsylvania**
- **Commonwealth of Puerto Rico**
- **State of Texas**

Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate Metropolitan Division

CRA rating for the MD¹:	<u>Outstanding</u>
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the assessment area.
- Excellent distribution of loans by income level of geography and good distribution among borrowers of different income levels.
- Community development lending had a significant positive impact on lending performance in the assessment area.
- Investment volume that reflects an excellent level of responsiveness to the needs of the assessment area.
- Good Service Test performance is the result of good branch distribution and hours further enhanced by an excellent record of opening and closing branches and good community development services.

Description of Institution’s Operations in the Washington-Arlington-Alexandria, DC-VA-MD-WV MD

The bank’s assessment area consists of ten of the 20 counties in the metropolitan division including the District of Columbia, Charles and Prince George’s counties in Maryland, Arlington, Fairfax, Loudoun, Prince William, Alexandria City, Fairfax City and Falls Church City counties in Virginia. As of June 30, 2009, the bank had \$3.1 billion of deposits in this geographic area or 2.3% of the bank’s total domestic deposits. In terms of deposit market share, Citibank ranks ninth with a 2.5% share compared to a 24.1% share held by the largest deposit holder, 3.5% held by the eighth and 1.7% share held by the tenth largest deposit holder. Within this assessment area the bank operates 30 branches and 87 deposit-taking ATMs. Due to the bank’s modest presence in this assessment area, the bank’s performance here had a limited impact on the bank’s overall CRA rating.

A sufficient number of multifamily loans were made by the bank in the Washington-Arlington-Alexandria DC VA MD.

LENDING TEST

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

Lending Test performance in the Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate is rated Outstanding.

Lending Activity

Refer to Table 1 Lending Volume in the Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity is excellent, especially considering the strong competition in the market for all types of loans. The bank originated a large volume of loans and the lending ranks (top seven in home loans and number three in the origination of small loans to businesses) compare favorably to the bank's deposit rank.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The distribution of loans by income level of geography is excellent. The distribution for home purchase, home improvement and home refinance were all excellent. The percentage of lending in low- and moderate-income geographies exceeded the percentage of owner-occupied housing for all three home mortgage products. The distribution for multifamily loans is excellent and the distribution for small loans to businesses is good. We did not identify any conspicuous or unexplained gaps in lending patterns

Inside/Outside Ratio

The bank made an excellent percentage of its loans within its assessment area compared to outside its assessment area in the MD. Overall, the bank made 88% of its loans within its Washington-Arlington-Alexandria MD. This ranged from 73% for home purchase to 97% for small loans to businesses.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is good, giving more consideration to the bank's performance in lending to moderate-income borrowers. This emphasis results from the high cost of housing and the fact that 7% of households live below the poverty level and would have difficulty affording a home purchase. Recent data from the National Association of Realtors shows that the median sales price of an existing single family home in the assessment area is \$331 thousand. The updated median family income for the assessment area indicates that a low-income individual earns less than \$50 thousand a year making homeownership difficult for most low-income borrowers. The percentage of lending to moderate-income borrowers, for all three home mortgage products, exceeded the percentage of moderate-income families. Lending to low-income borrowers for home improvement and home refinance was below the percentage of low-income families and significantly below for home

purchase loans. The distribution of loans to businesses of different revenue sizes is good giving consideration of the negative effect that the economic downturn had on small businesses.

Community Development Lending

Refer to Table 1 Lending Volume in the Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development lending had a significant positive impact on lending performance. The bank originated seven community development loans totaling approximately \$90.5 million during this evaluation period. This volume represents 12.1% of Tier 1 Capital allocated to the assessment area. All of the bank's community development loans helped address identified critical needs of neighborhood revitalization and affordable housing. One example of the responsiveness includes a loan of approximately \$34.6 million to finance the construction of 61 single family town homes, all of which were developed for affordable housing as part of the areas revitalization strategy. In addition to the \$34.6 million loan, Citibank purchased \$11 million of tax-exempt bonds issued by the District of Columbia Housing Finance Agency. The complex financing structure relied on issuing tax-exempt bonds that were cash collateralized by grant funds. Additional sources of funding included \$1.2 million provided by the District of Columbia and \$8.4 million of equity through the syndication of Low-Income Housing Tax Credits.

Product Innovation and Flexibility

The Bank's use of flexible loan programs, which addressed affordable housing needs, had a positive impact on its Lending Test performance.

INVESTMENT TEST

Citibank's overall Investment Test performance in this assessment area is rated Outstanding. Citibank's responsiveness to the identified needs of the assessment area is excellent, especially in the area of affordable housing. Other critical needs addressed by the bank's investments include assistance for small businesses, financial education and foreclosure prevention.

Refer to Table 14 in the Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Citibank originated 143 investments in the assessment area totaling approximately \$82.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on 7 prior period investments as of March 31, 2010 was approximately \$2.6 million. The bank's responsiveness to the community development needs in the assessment area is excellent, especially as they related to affordable housing. One example that demonstrates this is the Fairmont (DCHFA) project. The Fairmont Apartments are located in Columbia Heights which by the late 1990s had experienced a steep decline. The area has since experienced a revitalization effort and is now one of Washington's most ethnically and economically diverse neighborhoods. In September 2008, the District of Columbia Housing Finance Agency issued over \$3.2 million in bonds to fund the cost and acquisition of The

Fairmont Apartments which consists of 205 affordable housing rental units. All the units are available to households with incomes at or below 60% of the area median income.

SERVICE TEST

The bank's performance within the multistate metropolitan division is rated High Satisfactory. A full-scope review the Washington-Arlington-Alexandria, DC-VA-MD-WV assessment area revealed a good level of performance.

Retail Banking Services

The distribution of bank branches within the full-scope area is good as the bank's retail delivery systems are accessible to geographies and individuals of different income levels. The distribution of branches in low-income geographies significantly exceeds the population living in such geographies and is excellent. The distribution in moderate-income geographies is poor. Some consideration is given to the branches in middle- and upper-income geographies (6) that are in close proximity or "near to" low- and moderate-income geographies, and overall the accessibility to bank branches is good.

Citibank's record of opening and closing branch offices improved the accessibility of delivery systems in the assessment area. During the evaluation period, four branches opened, one in each of the income geographies; low-, moderate-, middle-, and upper-income geographies. One branch office was closed in a moderate-income geography.

Citibank's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals. Full-service ATMs located in low-income geographies exceed the population residing in these geographies and are below the percentage of the population in moderate-income geographies. Non-proprietary ATMs are below the population residing in low- and moderate-income assessment areas.

Citibank's branch hours do not vary in a way that inconveniences certain portions of the assessment area, particularly low-income geographies. All branches offer extended hours one day a week and have Saturday hours. Two of the five branch offices in low-income geography do not offer Saturday hours.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low- and moderate-income is above the percentage of households residing in these geographies. Citibank Online users located in low- and moderate-income geographies were below the percentage of the households residing in these geographies.

Community Development Services

The bank provided a good level of community development services within this rating area. Employees provided a range of bank services for 14 different organizations, with a significant focus on community services for low- and moderate-income individuals, which helped to meet the identified need within this community. This included employees that served in leadership roles for affordable housing or economic development organizations that assist low- and moderate-income families.

Refer to Table 15 in the Washington-Arlington-Alexandria, DC-VA-MD-WV Multistate 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.

State of Connecticut

CRA Rating for Connecticut:	<u>Outstanding</u>
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the rating area.
- Excellent distribution of loans by income level of geography and good distribution among borrowers of different income levels.
- Community development lending had a significant positive impact on lending performance.
- Investment volume that reflects an excellent level of responsiveness to the needs of the rating area.
- Adequate Service Test performance is the result of adequate branch distribution and good branch hours enhanced by an excellent record of opening and closing branches and good community development services.

Description of Institution's Operations in Connecticut

Citibank operates 20 branches and 61 deposit-taking ATMs in Connecticut. The bank has two assessment areas within the state. As of June 30, 2009, the bank held \$1.8 billion of deposits representing a 3.8% market share (ranked eighth) in the rating area and 1.3% of the bank's total deposits. Primary competitors within the rating area include Peoples United Bank and Webster Bank National Association with deposit market shares of 14.6% and 13.7 %, respectively. Within Connecticut, 97.3% of the bank's deposits are concentrated in the Bridgeport-Stamford-Norwalk MSA; therefore, this area was selected for a full-scope review. The remaining MSA, New Haven-Milford, was analyzed using limited-scope procedures. The bank's performance in this state had a limited impact on its overall CRA rating due to the bank's relatively small presence.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Connecticut is rated Outstanding. Based on a full-scope review, the bank's performance in the Bridgeport-Stamford-Norwalk, CT assessment area is excellent. Performance in the limited-scope area supported the state's Lending Test rating.

Lending Activity

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

Lending activity is excellent. We based our conclusion primarily on the large volume of loans the bank originates. The bank's market share for its loan products compares favorably to its deposit market share in both of the assessment areas in the state. The bank ranked in the top six for lenders in all loan categories evaluated in the full-scope area, even with strong competition from national lenders.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of Connecticut section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is excellent. The distribution for home purchase, home improvement and home refinance is excellent. The percentage of lending in low- and moderate-income geographies exceeded the percentage of owner-occupied housing for all three home mortgage products. The distribution of small loans to businesses is good. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The bank made a majority of its loans within the two assessment areas in Connecticut. On average, 65% of all loans were located within the Citibank assessment areas in the State of Connecticut. This ranged from 47% for home improvement lending to 78% for small business lending. This demonstrates good performance.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of Connecticut section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is good. Lending performance for all three home mortgage products is good considering the high cost of housing and 7% household poverty level. Recent data from the National Association of Realtors shows that the median sales price of an existing single family home in the assessment area is \$419 thousand. The updated median family income for the assessment area indicates that a low-income individual earns less than \$51 thousand a year making homeownership difficult for most low-income borrowers. The percentage of lending to moderate-income borrowers, for all three home mortgage products, exceeded the percentage of moderate-income families. Lending performance to low-income borrowers for home improvement and home refinance was below the percentage of low-income families and significantly below for home purchase loans. The distribution of loans to businesses of different revenue sizes was adequate.

Community Development Lending

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

Community development lending had a significant positive impact on lending performance in the Bridgeport-Stamford-Norwalk assessment area. The bank originated five community development loans totaling approximately \$53.4 million during this evaluation period. This volume represents 12.8%

of Tier 1 Capital allocated to the assessment area. The substantial majority of the bank's community development loans helped to address the critical need in affordable housing. One example of the responsiveness includes the purchase of \$35 million in Connecticut Housing Finance Authority Bonds. This bond purchase was reclassified as loans on Citibank's books and records, the proceeds of which were to finance low-interest single family mortgages on 300 housing properties located within different areas in Fairfield County.

Product Innovation and Flexibility

The Bank's use of flexible loan programs had a positive impact on its Lending Test performance in the rating area, primarily due to programs that addressed affordable housing needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the New Haven-Milford assessment area is not inconsistent with the bank's overall Outstanding performance under the Lending Test in Connecticut. Refer to the Tables 1 through 12 in the State of Connecticut section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Citibank's overall Investment Test performance in this state is rated Outstanding. Based on a full-scope review, performance in the Bridgeport-Stamford-Norwalk MSA is excellent. Citibank's responsiveness to the identified needs of the assessment area is excellent, especially in the area of affordable housing. Other critical needs receiving assistance include assistance for small businesses, job training and financial education. Performance in the limited-scope assessment area did not impact the Investment Test rating for the State of Connecticut.

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

During the evaluation period, Citibank originated 79 investments in the MSA totaling approximately \$54.4 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on 5 prior period investments as of March 31, 2010 was approximately \$1.6 million. The bank's responsiveness to the community development needs in the assessment area is excellent, especially as they related to affordable housing. One example that demonstrates this is the Fair Street investment. In March 2010, Citibank, as a limited partner of NEF National Community Investment Fund LP, invested \$3.2 million in Fair Street Apartments LP in order to gain a limited partnership interest in the subject property. NEF was formed to invest primarily in low-income residential projects that qualify for Low-Income Housing Tax Credits in accordance with Section 42 of the Internal Revenue (IRS) Code through the acquisition of interests in local partnerships. Fair Street Apartments is a proposed 57-unit rental building located in a moderate-income census tract in Norwalk, Connecticut. The property will consist of 38 one-bedroom and 19 two-bedroom units. Six units are set aside with preference for homeless veterans who receive rental assistance from the HUD-Veterans Affairs Supportive Housing program.

Citibank also retains three prior period investments in the statewide area with a book value of approximately \$1.5 million. However, these investments did not have a significant impact on the Investment Test for the State of Connecticut.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the New Haven-Milford assessment area is not inconsistent with the performance noted in the State of Connecticut. Refer to Table 14 in the State of Connecticut section of Appendix D for the facts and data that support this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Connecticut is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Bridgeport-Stanford-Norwalk assessment area is adequate. Performance in the limited-scope area did not impact the State of Connecticut Service Test rating.

Retail Banking Services

A poor distribution of bank branches is elevated to an adequate level after considering the branches in middle- and upper-income geographies (2) that are in close proximity to moderate-income geographies. The distribution of branches in low- and moderate-income geographies is significantly below the percentage of the population residing in those areas and is adequate and poor respectively.

Citibank's record of opening and closing branch offices has improved the accessibility of delivery systems. During this evaluation period, five branches were opened, one in a low-income geography, one in a moderate-income geography, and three in middle-income geographies. No offices were closed.

Citibank's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals. Full-service ATMs in low- and moderate-income geographies is significantly below the percentage of the assessment area's population residing in those geographies. However, non-proprietary ATMs enhance the overall delivery of services in moderate-income geographies.

Citibank's branch hours do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and individuals. All branches offer extended hours one day per week and have Saturday hours, including branches in low- and moderate-income geographies.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low-income geographies was below the percentage of households residing in low-income geographies, and equal to households in moderate-income geographies. Citibank Online users located in low- and moderate-income geographies are below the percentage of households residing in the geographies.

Community Development Services

The bank provided a good level of community development services within this assessment area. Employees provided community development services to 11 different organizations, with a focus on financial education that targets low- and moderate-income individuals. Two employees served on Boards, one in a leadership role, for affordable housing and community development organizations that assist low- and moderate-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the Service Test in the New Haven-Milford assessment area was not inconsistent with the bank's performance in the State of Connecticut. Citibank closed three branch offices in the New Haven-Milford assessment area, one in a moderate-income geography, one in a middle-income geography and one in an upper income geography. Performance in the limited-scope area did not impact the State of Connecticut Service Test rating, which was primarily based on the bank's performance in the full-scope assessment area.

Refer to Table 15 in the State of Connecticut 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.

State of Delaware

CRA Rating for Delaware:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Low Satisfactory</u>
The Service Test is rated:	<u>Needs to Improve</u>

The major factors that support this rating include:

- Lending activity is excellent considering the strong competition in the market.
- Good distribution of loans among geographies and among borrowers of different income levels in the assessment area.
- Investment volume that reflects an adequate level of responsiveness to the needs of the assessment area.
- Poor overall Service Test performance is due to poor branch distribution with adequate hours of operation and a good level of community development services.

Description of Institution's Operations in Delaware

Citibank has one delineated assessment area in Delaware, Wilmington. As of June 30, 2009, the bank held \$1.3 billion of deposits representing a 0.8% market share in the state and 1.0% of the bank's total deposits. Primary competitors within the state include Wilmington Trust Co. and Wachovia Bank with deposit market shares of 3.9% and 2.2%, respectively. Within this assessment area, Citibank operates one branch and one ATM location with three deposit-taking ATMs. Ranked by deposits, the assessment area is the 18th largest rating area for the bank. The bank's performance in this state had a minimal impact on its overall CRA rating.

LENDING TEST

The bank's performance under the Lending Test in Delaware is rated High Satisfactory. The bank's performance in the Wilmington assessment area is good.

Lending Activity

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

Lending activity is excellent, especially considering the strong competition in the market for all types of loans. The bank originated a good volume of loans and the lending ranks for all loan categories exceed the Bank's deposit market rank.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of Delaware section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is good. The distribution for home mortgage loans is excellent. We gave greater consideration to performance in moderate-income geographies since there are limited opportunities to lend in low-income geographies. Only 1.5% of the assessment area's owner-occupied housing is located in low-income geographies. The percentage of lending in low- and moderate-income geographies for home purchase and home refinance loans exceeded the percentage of owner-occupied housing. Lending for home improvement loans exceeded the demographics in moderate-income geographies and was below in low-income geographies. The distribution for small loans to businesses is adequate. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The bank made a majority of loans within its assessment areas in Delaware. On average, 73% of all loans were within the assessment area. This ranged from a low of 67% for home improvement to 85% for home purchase loans.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of Delaware section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is good. The distribution for home purchase and refinance loans is excellent and good for home improvement loans. We considered the affordability of housing in the assessment area for low-income borrowers and the fact that 8% of households in the assessment area live below the poverty level. The median housing value is \$138,361 based on the 2000 census. The updated median family income for the assessment area indicates that a low-income individual earns less than \$40 thousand a year making homeownership somewhat difficult for most low-income borrowers. The percentage of lending to moderate-income borrowers, for all three home mortgage products, exceeded the percentage of moderate-income families. Lending distribution to low-income borrowers for home improvement loans was considered good, adequate for home refinance loans and poor for home purchase loans. The distribution of loans to businesses of different revenue sizes is good.

Community Development Lending

Refer to Table 1 Lending Volume in the State of Delaware section of Appendix D for the facts and data used to evaluate the bank's level of community development lending

Community development had a neutral impact on performance in the full-scope area. Citibank made four loans totaling approximately \$861 thousand in the Wilmington assessment area.

Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on performance in the full-scope area. The bank provided information on flexible loan programs in the full-scope assessment area, but the volume of loans was limited.

INVESTMENT TEST

Citibank's overall Investment Test performance in this state is rated Low Satisfactory. Based on a full-scope review, performance in the Wilmington, DE-MD-NJ MD is adequate. Citibank's responsiveness to the identified needs of the assessment area is adequate, with most investments concentrated in affordable housing.

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

During the evaluation period Citibank originated 20 investments in the MD totaling approximately \$5.8 million. The bank's responsiveness to the community development needs in the assessment area is adequate, with most investments concentrated in affordable housing. One example that demonstrates this is the Delaware Equity Fund. Citigroup contributed almost \$5.5 million in the form of equity investment to Delaware Equity Fund for Housing Limited Partnership VII. The Fund was formed for the purpose of investing in various limited partnerships organized to acquire, develop, own and operate low-income residential rental properties. The Fund owns interests in three Operating Partnerships that own and manage 245 units of affordable housing in Wilmington, Delaware with rent restricted to accommodate low- and moderate-income families.

Citibank also made nine prior period investments in the statewide area with outstanding balances of \$6.2 million as of March 31, 2010. However, these investments did not have a significant impact on the Investment Test for the State of Delaware.

SERVICE TEST

The bank's performance in Delaware is rated Needs to Improve. A full-scope review of the Wilmington assessment area revealed a poor level of performance.

Retail Banking Services

The accessibility to Citibank's one branch from geographies and individuals of different income levels is poor. The one branch is located in an upper-income area with difficult access from the area's low- and moderate-income areas.

Citibank's record of opening and closing branch offices generally has not adversely affected the accessibility of delivery systems. Citibank's single retail branch office in the state was opened during this evaluation period.

Citibank's ATM network does not augment the delivery of banking services to low- and moderate-income geographies or individuals. No full-service ATMs are located in low- and moderate-income geographies and the percentage of cash-dispensing ATMs located in low- and moderate-income geographies is below the percentage of the population residing in these geographies.

Citibank's hours and services do not vary in a way that inconveniences certain portions of the assessment area. The branch is open weekdays from 9:00 AM to 4:00 PM, and offers an additional two hours of service on Thursday evenings, and Saturday hours from 9:00 AM to 3:00 PM.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low- and moderate-income geographies is above the percentage of households residing in those geographies. Citibank Online users located in low- and moderate-income geographies are below the percentage of the assessment area's households residing in the geographies.

Community Development Services

The bank provided a good level of community development services. Employees provided community services, two of which were in leadership roles, to eight different organizations. These services focused on financial education and non-profit capacity building, and were responsive to the needs identified in the community.

Refer to Table 15 in the State of Delaware 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.

State of Florida

CRA Rating for Florida:	<u>Outstanding</u>
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the rating area.
- Excellent distribution of loans by income level of geographies and adequate distribution among borrowers of different income levels.
- Community development lending had a significant positive impact on lending performance.
- Excellent responsiveness to the assessment area's investment needs based on the volume of qualified investments originated during the evaluation period.
- Good branch distribution was the primary reason behind the Service Test conclusion. In addition, Citibank had an excellent record of opening and closing branches and an adequate level of community development services.

Description of Institution's Operations in Florida

Citibank operates 51 branches and 144 deposit-taking ATMs in Florida. There are four assessment areas within the state, all of which are in MSAs. Statewide, the bank holds \$8.9 million of deposits which represents 6.5% of the bank's total deposits. In terms of deposit market share, Citibank ranks seventh with a 2.2% share compared to an 18.2% share held by the largest deposit holder and 16% held by the second largest deposit holder. Within Florida, 70.8% of the bank's deposits are concentrated in the Miami-Miami Beach-Kendall assessment area; therefore, it was selected for a full-scope review. The Fort Lauderdale-Pompano Beach-Deerfield Beach assessment area has the second largest concentration of deposits at 16.0%. This assessment area, along with the remaining assessment areas, was analyzed using limited-scope procedures.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Florida is rated Outstanding. Based on a full-scope review, the bank's performance in the Miami-Miami Beach-Kendall assessment area is excellent.

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.

Lending activity is excellent. We based our conclusion primarily on the large volume of loans the bank originates. The bank's market share for its loan products compares favorably to its deposit market share in all of the assessment areas in the state. The bank ranked in the top six for all lenders in all loan categories evaluated in the full-scope area, even with strong competition from national lenders.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is excellent. The distribution for home purchase, home improvement and home refinance is excellent. The percentage of lending in low- and moderate-income geographies exceeded the percentage of owner-occupied housing for all three home mortgage products. The distribution for small loans to businesses is good. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The bank made a majority of loans within its assessment areas in Florida. The overall average of loans made inside the Florida assessment areas is 64.5%. This ranges from a low of 38.6% for home improvement to 88.6% for small business loans. The lower percentages of mortgages within the bank's assessment areas are due to the bank's efforts to market its mortgage products across the state as well as a large number of mortgages originated from a Citigroup employee site in Tampa which is outside of the four assessment areas for the state.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is adequate. The distribution of home mortgage loans is adequate, considering the severe impact that the economic downturn had on housing and the high foreclosure rate, the volatility in the cost of housing, and high household poverty level (18%) in the assessment area. Recent data from the National Association of Realtors shows that the median sales price of an existing single family home in the assessment area is \$214 thousand. The updated median family income for the assessment area indicates that a low-income individual earns less than \$25 thousand a year and a moderate-income person earns less than \$41 thousand a year. While median sales prices have declined due to the housing crisis, high property taxes and insurance add another layer of difficulty for low-income borrowers. Home purchases are challenging for low-income borrowers unless they have access to subsidies which are scarce. Homeownership is very difficult for most low- and moderate-income borrowers. After considering these factors, home purchase, home improvement, and home refinance lending is adequate. The distribution of loans to businesses of different revenue sizes is good.

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.

Community development lending had a significant positive impact on lending performance in the Miami-Miami Beach-Kendall assessment area. The bank originated 25 community development loans totaling approximately \$186.1 million during this evaluation period. This volume represents 12.3% of Tier 1 Capital allocated to the assessment area. The substantial majority of the bank's community development loans addressed critical needs in affordable housing. One example of the responsiveness includes a \$117.5 million loan to provide liquidity to the state's Florida Housing Guaranty Program. The loan proceeds were allocated to 12 properties in Miami-Dade County, all of which are leased to low- and moderate-income families.

Other Loan Data

Citibank issued four standby letters of credit totaling \$40.1 million that have a qualified community development purpose in two separate limited-scope assessment areas. Refer to Table 1 Other in the Florida section of Appendix D for facts and data on these letters of credit.

Product Innovation and Flexibility

The Bank's use of flexible loan programs had a positive impact on its Lending Test performance in the rating area. In addition to nationwide programs, the Bank's participation in Florida's "Keys to Home" program resulted in over 80 loans totaling over \$8 million addressing affordable housing needs for low- and moderate income borrowers in this area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Fort Lauderdale-Pompano Beach-Deerfield Beach, Jacksonville, and West Palm Beach-Boca Raton-Boynton Beach, assessment areas is not inconsistent with the bank's overall Outstanding performance in the State of Florida. Refer to the Tables 1 through 12 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

Citibank's overall Investment Test performance in this state is rated Outstanding. Based on a full-scope review, the investment volume in the Miami-Miami Beach-Kendall MD is excellent. Citibank's responsiveness to the identified needs of the assessment area is adequate, with most investments concentrated in affordable housing and lesser amounts given to small business assistance. Performance in the limited-scope assessment areas supported the Investment Test rating for the State of Florida.

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.

During the evaluation period, Citibank originated 86 investments in the MD totaling approximately \$86.4 million. In addition, we considered the ongoing impact that investments made prior to the current

evaluation period had within the assessment area. The remaining balance on four prior period investments as of March 31, 2010 was approximately \$3.5 million. The bank's responsiveness to the community development needs in the assessment area is adequate, with most investments concentrated in affordable housing and lesser amounts provided for small business assistance. One example that demonstrates this is the Friendship Tower investment. Citibank made an equity investment of \$67.1 million in a fund formed to invest primarily in leveraged low-income multifamily residential complexes that qualify for LIHTCs. One project used the proceeds to finance approximately \$25.5 million for the construction of Friendship Tower Apartments, a 92-unit LIHTC eligible elderly multifamily rent-restricted property. Of the 92 units, 23 will be set aside at 30% of AMI and the remaining 69 units at 60% of AMI, providing much needed high quality affordable housing to low- and moderate-income individuals and families of Miami.

Citibank also retains one prior period investment in the statewide area for approximately \$1.6 million. However, this investment did not have a significant impact on the Investment Test for the State of Florida.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Fort Lauderdale-Pompano Beach-Deerfield Beach, Jacksonville, and West Palm Beach-Boca Raton-Boynton Beach assessment areas is not inconsistent with the performance noted in the State of Florida. Refer to Table 14 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in Florida is rated High Satisfactory. A full-scope review of the Miami-Miami Beach-Kendall assessment area revealed a good level of performance. Performance in the limited-scope assessment areas did not significantly impact the Service Test rating for Florida.

Retail Banking Services

Citibank's retail delivery systems are accessible to geographies and individuals of different income levels. The percentage of bank branches in moderate-income geographies is significantly less than the percentage of the population residing in those areas. The bank maintains only one branch in a low-income geography, but the percentage of the assessment area's population in low-income areas is nominal. With consideration of middle- and upper-income branches (3) that are in close proximity to low- and moderate-income geographies, accessibility improved in low- and moderate-income geographies and is considered good.

Citibank's record of opening and closing branch offices improved the accessibility of banking services in the assessment area. Four branches opened during the evaluation period and one was located in a moderate-income geography. No offices were closed.

Citibank's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals. The percentage of full-service ATMs in low- and moderate-income

geographies was near to the percentage of the assessment area's population residing in those geographies. The distribution of non-proprietary ATMs in low- and moderate-income geographies was consistent with full-service ATMs.

Citibank's branch hours generally do not adversely affect portions of the assessment area, particularly low- and moderate-income geographies. Branch hours in low- and moderate-income areas on average were less than those in middle- and upper-income geographies. The branch in the low-income geography did not offer evening or weekend hours because it is in a commercial business district. Branches in the moderate-income geographies offered additional hours on Friday evening. However, two of the four branches in the moderate-income geography do not offer Saturday hours due to lack of business and security concerns over the weekend.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low-income geographies is equal to the percentage of households residing in the geography, and is above households in moderate-income geographies. Citibank Online users located in low- and moderate-income geographies are below the percentage of the assessment area's households residing in the geographies.

Community Development Services

The bank provided an adequate level of CD services to this rating area. A considerable portion of the bank's services focused on home buying education and homeownership preservation. Employees provided service to seven different organizations, including two employees that served in leadership roles for those organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, Service Test performance in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is not inconsistent with the performance noted in the Miami-Miami Beach-Kendall MD. The bank's performance under the Service Test in the West Palm Beach-Boca Raton-Boynton Beach and Jacksonville assessment areas were weaker than the performance in the State of Florida due to a lower distribution of branches in low- and moderate-income geographies compared to respective population demographics. Citibank opened four branch offices in the West Palm Beach-Boca Raton-Boynton Beach assessment area. One branch was located in a moderate-income tract; one in a middle-income geography and two in upper-income geographies. Performances in these assessment areas are considered adequate and poor respectively. Performance in the limited-scope areas did not significantly impact the State of Florida Service Test rating.

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.

Territory of Guam

CRA Rating for Guam:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Low Satisfactory</u>
The Service Test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the assessment area.
- Poor distribution of loans among geographies and good distribution among borrowers of different income levels in the assessment area.
- Community development lending had a significant positive impact on lending performance in the assessment area.
- Investment volume that reflects an adequate level of responsiveness to the needs of the assessment area.
- Adequate overall Service Test performance was primarily due to adequate branch distribution along with good hours of service and an adequate level of community development services.

Description of Institution’s Operations in Guam

Citibank has a limited presence in Guam with only one full-service branch and 11 deposit-taking ATMs. Economic conditions in Guam play a significant role in the bank’s business strategy in the assessment area. The international economic downturn has affected tourism, one of the main sources of revenue for the island. While the bank has limited its commercial lending (i.e., small business lending) because of the economy, the projected increase of U.S. troops over the next four years will provide the basis for growth.

According to the June 30, 2009 FDIC Summary of Deposits, Citibank ranks fourth in deposit market share at 10.3%. Bank of Guam (BOG) ranks first in the market with a deposit market share of 34.6%, and First Hawaiian Bank (FHB) ranks second with a deposit market share of 23.6%. There are seven FDIC-insured depository institutions in the Guam assessment area. The bank’s performance in this territory had a minimal impact on the overall CRA rating for the bank.

LENDING TEST

The bank’s performance under the Lending Test in Guam is rated High Satisfactory. The bank’s performance in the assessment area is good.

The geographic distribution of loans and distribution of loans to borrowers of different income levels is based on home purchase and home refinance lending. Home improvement loans are not offered in Guam.

A geographic distribution analysis for small loans to businesses was not performed because no demographic data was available for business loans. The distribution of loans to businesses of different revenue sizes was not conducted because Citibank does not collect revenue as part of their underwriting process, particularly for business credit cards. A significant majority (84%) of small loans to businesses reported had no revenue information. Banks are not required to report revenue information if they do not collect it. Since this manner of reporting is allowed under the regulation, an analysis of making loans to businesses of different sizes was not conducted because we could not draw a reliable conclusion.

Lending Activity

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

Lending activity is excellent. The bank demonstrated excellent performance in the small business loan market with a ranking of three, in a market in which the top two lenders account for nearly 80% of the loan market.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the Territory of Guam section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of home mortgage loans is poor. More weight was given to lending in moderate-income geographies because the opportunities to lend in low-income geographies are very limited. Less than 0.1% of owner-occupied housing is available in low-income geographies.

The distribution for home purchase and home refinance loans is poor. No home purchase loans were made in moderate-income geographies. One loan was made in low-income geographies, which exceeded the percentage of owner-occupied units. No home refinance loans were made in low-income or moderate-income geographies. We did not identify any conspicuous or unexplained gaps in lending patterns in the assessment area.

Inside/Outside Ratio

The percentage of loans made inside the assessment area in Guam is excellent. The bank made all of its mortgage loans in the assessment area and the vast majority of its small business loans. The overall average was 97.2%. Performance ranged from 94.4% for small business lending to 100% for home purchase and refinancing loans.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the Territory of Guam section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The median sales price for a single family home in Guam is based on the Guam Comprehensive Housing Study of 2009, which was published by the Guam Housing and Urban Renewal Authority (GHURA). This study does not provide a specific median sales price for a single family home or

condominium but indicates that the median sales price for a single family home in 1999 was \$150 thousand and approximately \$220 thousand in 2008. The same study shows that the median sales price for a condominium in 1999 was \$120 thousand and approximately \$150 thousand in 2008. The study indicates that during 2006-2008, which includes most of the evaluation period, the median sales prices for both single family and condominiums were on the high end. This is the most current data available.

The distribution of home mortgage loans to borrowers of different income levels is good. The distribution for home purchase loans is good and adequate for home refinance, considering the very high household poverty level of 22% and cost of housing based on the study discussed above. The updated median family income for the assessment area indicates that a low-income individual earns less than \$26 thousand a year and a moderate-income person earns less than \$41 thousand a year, making homeownership very difficult for most low- and moderate-income borrowers.

Community Development Lending

Refer to Table 1 Lending Volume in the Guam section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development lending had a significant positive impact on lending performance in the Guam assessment area. The bank originated one community development loan totaling approximately \$13.3 million during this evaluation period. This volume represents 26.2% of Tier 1 Capital allocated to the assessment area. The bank's community development loan helped address a critical need in affordable housing. The loan of \$13.3 million was used to finance the final phase of a three phase project to develop and rehabilitate a 96-unit single family affordable housing complex.

Product Innovation and Flexibility

The Bank's use of flexible loan programs had a positive impact on its Lending Test performance in the rating area, primarily due to programs that addressed affordable housing needs.

INVESTMENT TEST

Citibank's overall Investment Test performance in this state is rated Low Satisfactory. Based on a full-scope review, the investment volume in the Guam Non-MSA is adequate. Citibank's responsiveness to the identified needs of the assessment area is good, with most investments concentrated in affordable housing.

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

During the evaluation period, Citibank made 13 investments in the Guam Non-MSA totaling approximately \$815 thousand. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on a prior period investment as of March 31, 2010 was approximately \$1.5 million.

The bank's responsiveness to the community development needs in the assessment area is good, with most investments concentrated in affordable housing. One example that demonstrates this is the Ironwood Glen Apartments investment. In June 2007, Citibank made a \$600 thousand LIHTC

investment for the final stage of a three-phase development and rehabilitation project. The project was a 96-unit affordable housing complex called Ironwood Glen Guam located in the northern portion of Machano in Dededo. The property contains 71 three-bedroom and 25 four-bedroom apartments. Eighty-two percent of the units will be income and rent restricted to tenants earning no greater than 50% of the AMI, 16% restricted at 60% AMI, and the remaining 2% at market rates with no restrictions.

Additionally, the project will receive Section 8 rental subsidy. At the end of the 15-year LIHTC restriction term, eligible tenants will be given a right-of-first-offer to purchase their units. The owner will further assist tenants in arranging mortgage financing and the sell-off is limited to a three-year period.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in the Island of Guam is rated Low Satisfactory. A full-scope review of the Guam assessment area revealed an adequate level of performance.

Retail Banking Services

The distribution of bank branches within the assessment area is adequate. Citibank's retail delivery systems are reasonably accessible to geographies and individuals of different income levels in the Guam assessment area. There are no branch offices in low- or moderate-income geographies. However, this was significantly mitigated after considering the small size of the island and the limited opportunities for a branch network on Guam.

Citibank's branch openings and closings have not affected the accessibility of services to low- and moderate-income geographies. No branch offices have opened or closed in this assessment area.

Citibank's ATM network offers an adequate alternate delivery service to moderate-income geographies and individuals. Full-service ATMs in moderate-income geographies exceeded the population residing the geographies. All Citibank ATMs in Guam are bilingual (English and Japanese) to cater to both the local market as well as Japanese tourists arriving in Guam.

Citibank's hours and services offered do not vary in a way that would be inconvenient for residents. Branch hours are convenient and expanded hours are offered one night a week.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. However, there is no data on the effectiveness of these alternative delivery systems, and no significant weight was given to these systems.

Community Development Services

Citibank provided an adequate level of community development services. Two employees, one in a leadership role, provided two services that helped to meet the financial education and affordable housing needs on this assessment area. The bank's services reflected ongoing relationships with organizations involved in community development.

Refer to Table 15 in the Territory of Guam 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.

State of Maryland

CRA Rating for Maryland¹:	<u>Outstanding</u>
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the rating area.
- Excellent distribution of loans by income level of geographies and good distribution among borrowers of different income levels.
- Community development lending had a positive impact on lending performance.
- Investment volume that reflects an excellent level of responsiveness to the needs of the rating area.
- Good branch distribution and a good record of opening and closing offices were the primary reasons for the High Satisfactory Service Test rating.

Description of Institution's Operations in Maryland

Citibank has delineated two assessment areas within the state, both are in MDs. In addition to these two assessment areas, the bank has designated several counties in Maryland as part of the Washington-Arlington-Alexandria, DC-VA-MD-WV MD assessment area. These counties were not factored in to the evaluation of the performance in Maryland. Citibank operates 13 branches and 29 deposit-taking ATMs in Maryland. Statewide, the bank holds \$1.3 million of deposits which represents 1.0% of the bank's total deposits. In terms of deposit market share for these assessment areas, Citibank ranks ninth with a 2% share compared to a 23.5% share held by the largest deposit holder and 14.7% held by the second largest deposit holder. Within Maryland, 84.2% of the bank's deposits are concentrated in the Bethesda-Frederick-Rockville assessment area; therefore, it was selected for a full-scope review. The Baltimore-Towson assessment area has 15.8% of the state's deposits and was analyzed using limited-scope procedures. The bank's performance in this state had a minimal impact on the bank's overall CRA rating due to its small relative presence here.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The bank's performance under the Lending Test in Maryland is rated Outstanding. Based on a full-scope review, the bank's performance in the Bethesda assessment area is excellent. Performance in the limited-scope area supported the Lending Test rating in the state.

Lending Activity

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

Lending activity is excellent. We based our conclusion primarily on the large volume of loans the bank originates. The bank's market share for its loan products compares favorably to its deposit market share in all of the assessment areas in the state. The bank ranked in the top six for all lenders in all loan categories evaluated in the full-scope area, even with strong competition from national lenders.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of Maryland section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is excellent. We placed more weight on distribution in moderate-income geographies for home mortgage and small loans to businesses since there were limited opportunities to lend in low-income geographies. The distribution of home purchase, home improvement and home refinance is excellent. The bank's percentage of lending for each of the home mortgage products exceeded the percentage of owner-occupied housing in both low-income and moderate-income geographies. The distribution of small loans to businesses is excellent. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The majority of loans are made within the various assessment areas in Maryland which demonstrates adequate performance. An average of 65% of all loans was made in the various assessment areas. This ranged from a low of 44% for home improvement to 84% for small business lending.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of Maryland section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is good. The distribution of home mortgage loans is good. We considered the affordability of housing in the assessment area for low-income borrowers. The median sales price of an existing single family home is \$230 thousand based on the 2000 census. The updated median family income for the assessment area indicates that a low-income individual earns less than \$54 thousand a year making homeownership difficult for most low-income borrowers. The distribution of lending to moderate-income borrowers for all three home mortgage products is excellent. The distribution of lending to low-income borrowers is considered good for home refinance loans and adequate for home purchase and home improvement loans. The distribution of loans to businesses of different revenue sizes is good.

Community Development Lending

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

Community development lending had a positive impact on performance in the Bethesda-Frederick-Gaithersburg assessment area. The bank originated four community development loans totaling approximately \$14.8 million. This equals 5.7% of Tier 1 Capital allocated to the Bethesda-Frederick-Rockville assessment area. The loans were highly responsive to community needs, focusing on affordable housing. One example is a \$6 million loan to a senior citizens housing complex with all 120 units reserved for low- or moderate-income tenants. This loan helped to extend the income and rent restrictions on this property, continuing to make it affordable to low- and moderate-income tenants.

Product Innovation and Flexibility

The Bank's use of flexible loan programs, which addressed affordable housing needs, had a positive impact on its Lending Test performance in the rating area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Baltimore-Towson assessment areas is not inconsistent with the bank's overall Outstanding performance under the Lending Test in the State of Maryland. Refer to the Tables 1 through 12 in the State of Maryland section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Citibank's overall Investment Test performance in this state is rated Outstanding. Based on a full-scope review, the investment volume in the Bethesda-Fredrick-Gaithersburg MD is excellent. Citibank's responsiveness to the identified needs of the assessment area is good, with most investments concentrated in affordable housing. Performance in the limited-scope assessment areas supported the Investment Test rating for the State of Maryland.

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

During the evaluation period, Citibank originated 29 investments in the MD totaling approximately \$19.5 million. The bank's responsiveness to affordable housing is exemplified through Citibank's purchases of securities backed by single family mortgages. In February 2010, Citibank made four purchases totaling approximately \$18.3 million of pools of single family mortgages. The pools of mortgages were located in the assessment area and the average monthly income of the underlying homebuyer was approximately 55% of the average monthly income for the assessment area.

Citibank also retained one prior period investment in the statewide area for approximately \$17 thousand. However, this investment did not have a significant impact on the Investment Test for the State of Maryland.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Baltimore-Towson assessment area is not inconsistent with the performance noted in the State of Maryland. Refer to Table 14 in the State of Maryland section of Appendix D for the facts and data that support this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in Maryland is rated High Satisfactory. A full-scope review of the bank's performance in the Bethesda-Frederick-Rockville revealed a good level of performance. Performance in the limited-scope assessment areas did not impact the Service Test rating for Maryland.

Retail Banking Services

The distribution of bank branches within the full-scope area is good, as the bank's retail delivery systems are accessible to geographies and individuals of different income levels. The distribution of branches in moderate-income geographies is slightly below the population living in such geographies and is excellent. There are no branches located in low-income geographies, but less than 1% of the area's population resides in low-income census tracts. When giving consideration to middle- and upper-income branches (2) that are in close proximity to low- and moderate-income geographies, accessibility improves and strengthens the good rating.

Citibank's record of opening and closing branch offices has not affected the accessibility of delivery systems. No branch offices were opened or closed during this review period.

Citibank's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals. Full-service ATMs in low- and moderate-income geographies was below the percentage of the assessment area's population residing in those geographies. Citibank branded, non-proprietary ATMs enhance the overall delivery of services in both low- and moderate-income geographies.

Citibank's branch hours do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies. All branches offer extended hours one day per week and have Saturday hours, including branches in low- and moderate-income geographies.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low-income geographies was equal to the percentage of households residing in those geographies, while the percentage of CitiPhone users was below the percentage of households. Citibank Online users located in low-income geographies was equal to the percentage of households and below the percentage of households residing in moderate-income geographies.

Community Development Services

The bank provided a poor level of CD services to this rating area. Three employees, one in a leadership role, provided three services that focused on non-profit capacity building. Other identified needs in this community include affordable housing, small business assistance, financial education, foreclosure prevention, and college preparation.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the Service Test in the Baltimore-Towson assessment area is weaker than the bank's performance in the full-scope area due to branch distribution. Performance in this assessment area is considered adequate. Citibank opened three branch offices in the Baltimore-Towson assessment area, two were in middle-income geographies and one was in an upper-income geography. Performance in the limited-scope area did not impact the State of Maryland Service Test rating, which was primarily based on the bank's performance in the full-scope assessment area.

Refer to Table 15 in the State of Maryland 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.

State of Massachusetts

CRA Rating for Massachusetts:	<u>Outstanding</u>
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>High Satisfactory</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the rating area.
- Excellent distribution of loans by income level of geographies and adequate distribution among borrowers of different income levels.
- Community development lending had a positive impact on lending performance.
- Investment volume that reflects a good level of responsiveness to the needs of the rating area.
- Good branch distribution was the primary reason behind the Service Test conclusion. In addition, Citibank had good hours of operation, an excellent record of opening and closing branches, and a good level of community development services.

Description of Institution's Operations in Massachusetts

Citibank has delineated three assessment areas within the state, all are within MSAs. Citibank operates 31 branches and 76 deposit-taking ATMs in the state and as of June 30, 2009 held 0.9% of the market share with \$1.6 billion in deposits. This volume of deposits represents 1.2% of the bank's total deposits. Primary competitors within the state include Bank of America NA and RBS Citizens National Association with deposit market shares of 20% and 12%, respectively. Within Massachusetts, 62.7% of deposits are concentrated in the Boston-Quincy assessment area. Therefore, this assessment area was selected for a full-scope review. The remaining assessment areas were analyzed using limited-scope procedures. The bank's performance in this state had a minimal impact on its overall CRA rating.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Massachusetts is rated Outstanding. Based on a full-scope review, the bank's performance in the Boston-Quincy assessment area is excellent. Performance in the limited-scope assessment areas did not impact on the overall lending performance in the state.

Lending Activity

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

Lending activity is excellent. We based our conclusion primarily on the large volume of loans the bank originates. The bank's market share for its loan products compares favorably to its deposit market share in all of the assessment areas in the state. The bank ranked in the top nine for all lenders in all loan categories evaluated in the full-scope area, even with strong competition from national lenders.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is excellent. We gave more weight to lending in moderate-income geographies for home mortgage loans because there were fewer opportunities to lend in low-income geographies. The distribution of home purchase and home refinance loans is excellent and the distribution of home improvement loans is good. The bank's percentage of lending for home purchase and home refinance exceeded the percentage of owner-occupied housing in both low-income and moderate-income geographies. Home improvement lending was near to the demographics in moderate-income geographies and exceeded in low-income geographies. The distribution of small loans to businesses is good. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The volume of loans that the bank made inside assessment areas in the State of Massachusetts is good. The overall average of loans made inside Massachusetts assessment areas was 74.3%. This ranged from 56.7% for home improvement lending to 90.6% for small business lending.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of Massachusetts section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is adequate. The distribution of home mortgage loans is adequate. We considered the affordability of housing for a low-income borrower, the impact that the economic downturn had on housing, and high household poverty level of 11%. The median cost of housing in the assessment area is \$225 thousand. The updated median family income for the assessment area indicates that a low-income individual earns less than \$42 thousand a year making homeownership very difficult for most low-income borrowers. After considering these factors, home purchase, home improvement, and home refinance lending is adequate. Consideration was also given to the impact that the economic crisis had on small businesses. The distribution of loans to businesses of different revenue sizes is good, when considering these factors.

Community Development Lending

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

Community development lending had a positive impact on performance in the Boston-Quincy assessment area. The bank originated 18 community development loans totaling approximately \$20.2 million. This equals 8.2% of Tier 1 Capital allocated to this assessment area. The loans were highly

responsive to community needs, focusing on affordable housing. One example is a \$6.1 million loan to construct a 48-unit age-restricted affordable senior housing complex.

Product Innovation and Flexibility

The Bank's use of flexible loan programs had a positive impact on its Lending Test performance in the rating area, primarily due to programs that addressed affordable housing needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Cambridge-Newton-Framingham and Peabody assessment areas is weaker than the bank's overall Outstanding performance in the State of Massachusetts. Performance in the Cambridge-Newton-Framingham assessment area is good with weaker geographic distribution of loans. Community development lending had a neutral impact on lending performance. In the Peabody assessment area, performance is adequate, the geographic and borrower distribution was weaker and community development lending had a neutral impact on lending performance. The weaker performance in these assessment areas did not have a negative impact on the overall excellent performance in the State of Massachusetts. Refer to the Tables 1 through 12 in the State of Massachusetts section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Citibank's overall Investment Test performance in this state is rated High Satisfactory. Based on a full-scope review, performance in the Boston-Quincy MD is excellent. Citibank's responsiveness to the identified needs of the assessment area is excellent, with most investments concentrated in affordable housing. Additionally, a significant amount of grants and contributions were made to address other community needs such as financial education and assistance to small businesses. Performance in the limited-scope assessment areas negatively impacted the Investment Test rating for the State of Massachusetts.

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

During the evaluation period Citibank originated 97 investments in the MD totaling approximately \$66.1 million. The bank's responsiveness to the community development needs in the assessment area is excellent, with most investments concentrated in affordable housing. One example that demonstrates this is the Barnes School project. Citigroup's equity investment of approximately \$14.8 million was used to finance the Barnes School project. This project involves the rehabilitation of a three-story vacant former school building into 74 studio and one-bedroom apartments for low- and moderate-income seniors. The school's auditorium will be retained for community meetings and performances. The East Boston Neighborhood Health Center will operate a 6,000 square foot adult day care center in the building that will serve Barnes residents as well as other low-income elderly. The property is located approximately 2 miles from downtown Boston and convenient to retail, transportation, and social services. The adult day center will provide recreation, physical therapy, various kinds of counseling, and limited medical care. Fifty-five of the units are being developed under the HUD Section

202 Seniors Housing program and will receive 202 capital funds and rental assistance. The other 19 apartments are non-202 tax credit units without any rental assistance. As a condition of the tax credit award, eight apartments are restricted at 30% of AMI. All of the 55 units supported by the 202 program are limited to 50% of AMI. As a requirement of subordinate financing advanced by the City of Boston, the owner must endeavor to rent eight apartments to households that meet a broad definition of homeless.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Cambridge-Newton-Framingham and Peabody assessment areas was significantly weaker than the bank's overall performance in the rating area and is considered poor. This performance is due to a lower level of investments. Performance in the limited-scope areas was significant enough to have an impact on the overall rating for the State of Massachusetts. Refer to Table 14 in the State of Massachusetts section of Appendix D for the facts and data that support this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in Massachusetts is rated High Satisfactory. A full-scope review of the Boston-Quincy assessment area revealed an overall good level of performance. Performance in the limited-scope assessment areas did not impact the Service Test rating for this assessment area.

Retail Banking Services

The distribution of bank branches within the full-scope area is good, as Citibank's retail delivery systems are accessible to geographies and individuals of different income levels. The percentage of branches in low-income geographies exceeds the population residing in those geographies and is excellent. The number of branches in moderate-income geographies is below the percentage of the population in moderate-income geographies, but is adequate. When giving consideration to middle- and upper-income branch offices (4) that are in close proximity to low- and moderate-income geographies, accessibility is good overall.

Citibank's record of opening and closing branch offices improved the accessibility of delivery systems to the Boston-Quincy assessment area. During the evaluation period, fifteen branches opened, four in low-income geographies, four in moderate-income geographies, three in middle-income geographies and seven in upper-income geographies. No offices were closed.

Citibank's ATM network offers a good alternative delivery system to low- and moderate-income geographies. Full-service ATMs in low-income geographies exceed the population residing in these geographies and are below the population residing in moderate-income geographies. Citibank branded, non-proprietary ATMs enhance the overall delivery of services in low-income geographies, but are below the population residing in moderate-income geographies.

Citibank's branch hours vary in a way that inconveniences certain portions of the assessment area, particularly low-income geographies. Branch hours in low-income assessment areas on average were less than those in moderate-, middle-, and upper-income geographies. The majority of branches offered Saturday hours, except two of the three branches in low-income geographies.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low-income geographies was equal to the percentage of the population living in those areas and below the percentage of the population in moderate-income geographies. Citibank Online users located in low-income geographies was equal to the percentage of households in those areas and was above the percentage of households in moderate-income geographies.

Community Development Services

The bank provided a good level of community development services. Employees provided a broad range of community development services to 17 different organizations, with a significant focus on both affordable housing and financial education for low- and moderate-income individuals, both identified needs within this community. Two employees served in leadership roles for community organizations that assist low- and moderate-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the Service Test in the Cambridge-Newton-Framingham assessment area was not inconsistent with the bank's performance in the State. Performance in the Peabody assessment area was weaker than the performance in the full-scope assessment area due to a lack of branch offices in low- or moderate-income geographies.

Refer to Table 15 in the State of Massachusetts 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.

State of Nevada

CRA Rating for Nevada:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the assessment area.
- Adequate distribution of loans among geographies and borrowers of different income levels in the assessment area.
- Community development lending had a significant positive impact on lending performance in the assessment area.
- Investment volume that reflects an excellent level of responsiveness to the needs of the assessment area.
- Good branch distribution and branch hours, along with an adequate level of community development services, resulted in good overall Service Test performance.

Description of Institution's Operations in Nevada

Citibank operates 15 branches and 39 deposit-taking ATMs in Nevada. The bank has one assessment area which is in an MSA. As of June 30, 2009, the bank held 0.8% of the market share. The bank's primary competitors are Chase and Bank of America with deposit market shares of 11% and 5%, respectively. The bank holds over \$100 billion of deposits of which \$99 billion are main office deposits. The bank's performance in this state had a minimal impact on its overall CRA rating.

LENDING TEST

The bank's performance under the Lending Test in Nevada is rated High Satisfactory. The bank's performance in the Las Vegas-Paradise assessment area is good.

Lending Activity

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

Lending activity is excellent, especially considering the strong competition in the market for all types of loans. The bank originated a large volume of loans and the lending ranks for all loan categories (top six) exceed the Bank's deposit market rank.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of Nevada section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is adequate. We gave greater consideration to performance in moderate-income geographies for home mortgage and lending to small businesses since there are fewer opportunities to lend in low-income geographies. The distribution for home purchase, and home refinance loans is adequate and poor for home improvement loans. The distribution for small loans to businesses is adequate. We did not identify any conspicuous or unexplained gaps in lending patterns

Inside/Outside Ratio

The bank made a substantial majority of loans within its Nevada assessment area. The overall average of loans made inside its Las Vegas assessment area was 79.9%. This ranged from 73.2% for home purchase loans to 86.6% for small business lending.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of Nevada section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is adequate. The distribution of home mortgage loans is adequate considering the impact that the economic downturn had on housing and the high foreclosure rate, cost of housing, and a household poverty level of 10% in the assessment area. Recent data from the National Association of Realtors shows that the median sales price of an existing single family home in the assessment area is \$142 thousand. The updated median family income for the assessment area indicates that a low-income individual earns less than \$32 thousand a year. While median sales prices have declined due to the housing crisis, homeownership remains very difficult for most low-income borrowers. After considering these factors, home purchase and home refinance distribution is adequate and home improvement is good. We also considered the impact that the economy had on small businesses and the decline in tourism and hospitality services. The distribution of loans to businesses of different revenue sizes is adequate, when considering these factors.

Community Development Lending

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

Community development lending had a significant positive impact on lending performance in the Las Vegas-Paradise assessment area. The bank originated 13 community development loans totaling approximately \$34.3 million during the evaluation period. This volume represents 12.8% of Tier 1 Capital allocated to the assessment area. The substantial majority of the bank's community development loans addressed critical needs in affordable housing. One example of the responsiveness includes a loan of \$7.7 million to finance the acquisition, construction, rehabilitation, development, and operation of a 75-unit affordable senior apartment complex. This loan helped to complete the project, which was in danger of running out of funds.

Other Loan Data

Citibank issued two standby letters of credit totaling \$12.8 million that have a qualified community development purpose. Both of these letters of credit helped community development organizations in projects that provided much needed affordable housing. Refer to Table 1 Other in the State of Nevada section of Appendix D for facts and data on these letters of credit.

Product Innovation and Flexibility

The Bank's use of flexible loan programs, which addressed affordable housing needs, had a positive impact on its Lending Test performance in the rating area.

INVESTMENT TEST

Citibank's overall Investment Test performance in this state is rated Outstanding. Based on a full-scope review, performance in the Las Vegas-Paradise MSA is excellent. Citibank's responsiveness to the identified needs of the assessment area is excellent, with most investments concentrated in affordable housing. Additionally, a significant amount of grants and contributions were made to address other community needs such as financial education and assistance to small businesses.

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

During the evaluation period, Citibank originated 72 investments in the MSA totaling approximately \$56.3 million. The bank's responsiveness to the community development needs in the assessment area is excellent, with most investments concentrated in affordable housing. One example that demonstrates this is the Harmon Pines project. Citibank made an equity investment of \$90 million in MMA Financial Institutional Tax Credits XXXII, LP and approximately \$10.8 million was used to finance the new construction of Harmon Pines, a LIHTC project located in a residential/commercial neighborhood three miles from the Las Vegas Strip. The property consists of 105 senior units in one three-story elevator building with 70% of the units set aside for tenants age 55 and older who earn no more than 30% and 40% of AML. As a result of Citibank's investment in Harmon Pines, low- and moderate-income elderly individuals in Las Vegas have high quality and affordable housing alternatives.

Citibank also made two prior period investments in the statewide area for approximately \$3.6 million. However, these investments did not have a significant impact on the Investment Test for the State of Nevada.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in Nevada is rated High Satisfactory. A full-scope review of Las Vegas-Paradise assessment area revealed a good level of performance.

Retail Banking Services

The distribution of bank branches within the full-scope area is good, as Citibank's retail delivery systems are accessible to geographies and individuals of different income levels. The distribution of branches in moderate-income geographies approximates the percentage of the population living in such

geographies and is excellent. There are no branch offices in low-income geographies, but only 2% of the assessment area's population lives in those areas. When giving consideration to middle- and upper-income branches that are in close proximity to moderate-income geographies, accessibility improves further.

Citibank's record of opening and closing branch offices has not adversely affected accessibility of delivery systems. Two branch offices were opened during this evaluation period, none were in low- or moderate-income geographies. No offices were closed.

Citibank's ATM network offers a good alternative delivery system for low- and moderate-income geographies and individuals. Full-service ATMs in moderate-income geographies are below the percentage of the population residing in those geographies. There are no full-service ATMs in low-income geographies. Citibank branded, non-proprietary ATMs enhance the overall delivery of services in low- and moderate-income geographies, exceeding the percentage of the population residing in those areas.

Citibank's branch hours did not vary in a way that inconveniences portions of the assessment area, particularly low-income geographies. All branch offices offered the same hours of operation, in addition to evening hours on Friday. All branch offices offered Saturday hours, except one of the four branches in a moderate-income geography.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low-income geographies is equal to the percentage of the population residing in those geographies, and the percentage of users in moderate-income geographies is higher than the population. Citibank Online users located in low- and moderate-income geographies are below the percentage of the assessment area's households residing in those geographies.

Community Development Services

The bank provided an adequate level of community development services. Twelve bank employees, none in a leadership role, provided CD services to three organizations that focus on financial education. This is an identified need in the community. Also, Citibank's Office of Homeownership Preservation's 25-city tour was innovative in supporting foreclosure prevention efforts by local non-profits and is considered significant since Nevada's foreclosure rate ranks first in the country.

Refer to Table 15 in the State of Nevada 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.

State of New Jersey

CRA Rating for New Jersey¹:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Low Satisfactory</u>
The Service Test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the rating area.
- Excellent distribution of loans by income level of geographies and good distribution among borrowers of different income levels.
- Although the investment volume reflected a poor level of performance in the Newark-Union MSA, the investment volumes in the limited-scope assessment areas provided a significantly positive impact to the overall investment test rating.
- Adequate overall Service Test performance was primarily due to adequate branch distribution which offset an excellent record of opening and closing branches and a good level of community development services.

Description of Institution's Operations in New Jersey

Citibank has delineated four assessment areas within the state. The bank has one assessment area within the New York-White Plains-Wayne MD which was evaluated as a multistate rating area earlier in this report. Excluding the multistate area, the bank operates 21 branches and 66 deposit-taking ATMs in the state. Citibank holds \$2.3 billion of deposits in the non-multistate portion of the State, which represents 1.7% of the bank's total deposits. As of June 30, 2009, the bank held 1.6% of the market share in the state. Primary competitors within the state include Wachovia and Bank of America with deposit market shares of 14% and 9%, respectively. Within New Jersey, 85.9% of Citibank's deposits are concentrated in the Newark-Union assessment area. Therefore, this assessment area was selected for a full-scope review. The remaining assessment areas were analyzed using limited-scope procedures. The bank's performance in this state had a minimal impact on its overall CRA rating.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The bank's performance under the Lending Test in New Jersey is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Newark-Union, NJ MSA is good. Performance in the limited-scope assessment areas supported that conclusion.

Lending Activity

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

Lending activity is excellent. We based our conclusion primarily on the large volume of loans the bank originates. The bank's market share for its loan products compares favorably to its deposit market share in all of the assessment areas in the state. The bank ranked in the top six for all lenders in all loan categories evaluated in the full-scope area, even with strong competition from national lenders.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of New Jersey section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is excellent. The distribution of home purchase, home improvement, home refinance, and multifamily loans is excellent. The bank's percentage of lending for each of the home mortgage products exceeded the percentage of owner-occupied housing in both low-income and moderate-income geographies. The distribution of small loans to businesses is good. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The volume of loans that the bank made inside assessment areas in the State of New Jersey is good. The overall average of loans made inside the New Jersey assessment areas was 73.9%. This ranged from 61.4% for home improvement lending to 81.1% for small business lending.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of New Jersey section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is good. The distribution of home mortgage loans is good, considering the impact that the economic downturn had on housing, the cost of housing in general, and the high household poverty level (10%). The median sales price of an existing single family home in the assessment area is \$207 thousand. The updated median family income for the assessment area indicates that a low-income individual earns less than \$44 thousand a year making homeownership difficult for most low-income borrowers. After considering these factors, home improvement and home refinance distribution is good, and home purchase is adequate. Consideration was also given to the impact that the economic crisis had on small businesses. The assessment area experienced business closures because of a decline in consumer spending and high unemployment. The distribution of loans to businesses of different revenue sizes is adequate, when considering these factors.

Community Development Lending

Refer to Table 1 Lending Volume in the State of New Jersey section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development lending had a neutral impact on performance in the full-scope assessment area. Citibank made three loans totaling approximately \$5.8 million in the Newark-Union assessment area.

Other Loan Data

Citibank issued one standby letters of credit totaling \$58 thousand that has a qualified community development purpose. Refer to Table 1 Other in the State of New Jersey section of Appendix D for facts and data on this letters of credit.

Product Innovation and Flexibility

The Bank's use of flexible loan programs had a positive impact on its Lending Test performance in the rating area, primarily due to programs that addressed affordable housing needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Camden, Edison-New Brunswick and Trenton-Ewing assessment areas is not inconsistent with the bank's overall High Satisfactory performance under the Lending Test in the State of New Jersey. Refer to Tables 1 through 12 in the State of New Jersey section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Citibank's Investment Test performance in this state is rated Low Satisfactory. Although the performance in the Newark-Union MSA is poor, the positive impact of the limited-scope areas mitigated the otherwise poor performance in the Newark-Union MSA. The investments made in this MSA are not commensurate with the bank's capacity creating weak performance. The bank's investments primarily addressed the need for affordable housing. A significant amount of grants and contributions were made to address community needs such as financial education and job training.

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

During the evaluation period, Citibank originated 68 investments in the MSA totaling approximately \$9.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the assessment area. The remaining balance on two prior period investments as of March 31, 2010 was approximately \$600 thousand. The bank's responsiveness to the community development needs in the assessment area is adequate, with most investments concentrated in affordable housing. One example that demonstrates this is the Essex Valley Supportive Housing project, in which Citibank contributed \$2 million. The project entails the acquisition and adaptive re-use of a portion of an existing hospital office building into a 24-unit supportive housing community to serve

low- and moderate-income single, homeless adults with a mental illness and/or other disabilities. A portion of the building will also be leased to East Orange General Hospital (EOGH). Tenants earning at 40% of AMI will be referred directly from EOGH's Behavioral Health program, which is currently in its fifteenth year and serves approximately 900 active mental health clients. The Hospital will also offer the residents an array of supportive services catered to transition previously homeless adults into permanent and independent housing. This project is one of the thirteen LIHTC developments receiving funding through Citibank's investment in Enterprise Housing Partners.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Edison-New Brunswick and Trenton-Ewing assessment areas was stronger than the bank's overall performance noted in the rating area. These stronger performances are due to a higher level of investment in these assessment areas. Performance in Camden is weaker than the bank's overall performance in the rating area and is considered very poor. The weaker performance is due to a lower level of investments in the assessment area. The limited-scope assessment areas are not weighted as heavily in the overall conclusion for this rating area but they did have a significant impact. Refer to Table 14 in the State of New Jersey section of Appendix D for the facts and data that support this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in New Jersey is rated Low Satisfactory. A full-scope review of the bank's performance in the Newark-Union assessment area revealed an adequate level of performance. Performance in the limited-scope assessment areas did not impact the Service Test rating for New Jersey.

Retail Banking Services

The distribution of bank branches within the full-scope area is adequate. Citibank's retail delivery systems are reasonably accessible to geographies and individuals of different income levels. The distribution of branches in low-income geographies exceeds the population living in such geographies and is excellent. No branch offices are located in moderate-income geographies and those areas contain 24% of the assessment area's population. One branch located in a middle-income geography is convenient to a moderate-income geography which strengthens the overall branch distribution rating of adequate.

Citibank's record of opening and closing branch offices improved the accessibility of delivery systems. During the evaluation period, nine branch offices opened, one in a low-income geography, three in middle-income geographies and five in upper geographies. Three branches were closed; however, none were located in low- and moderate-income geographies.

Citibank's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals. The bank operates 33 full-service ATMs with 13 in low-income geographies exceeding the population residing in these geographies. No ATMs are located in moderate-income geographies. Non-proprietary ATMs are located in low- and moderate-income geographies, but below the population residing in these geographies.

Citibank's branch hours vary in a way that inconveniences certain portions of the assessment area, particularly low-income geographies. Branch hours in low-income assessment areas on average were less than those in middle- and upper-income geographies since no evening hours are offered in low-income geographies. All branches offered Saturday hours.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. Citibank Online users located in low- and moderate-income geographies are below the percentage of the households residing in those geographies. The percentage of CitiPhone users located in low- and moderate-income geographies is above households residing in these geographies.

Community Development Services

The bank provided a good level of community development services. Employees provided services to eight different organizations, with the focus on financial education for low- and moderate-income individuals. Three employees served in leadership roles for community organizations that assist low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the Service Test in the Edison-New Brunswick is not inconsistent with the bank's performance in the assessment area. Performance in the Camden and Trenton-Ewing assessment areas were weaker than the performance in the State of New Jersey due to a lower distribution of branch offices in low- and moderate-income geographies compared to respective population demographics. The performance in these assessment areas are considered poor. In total, six branch offices were opened in the limited-scope assessment areas with one in a moderate-income geography located in the Edison-New Brunswick assessment area. No branch offices were closed in any of the limited-scope assessment areas. Performance in the limited-scope areas did not impact the New Jersey Service Test rating, which was primarily based on the bank's performance in the full-scope assessment area.

Refer to Table 15 in the State of New Jersey 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.

State of Pennsylvania

CRA Rating for Pennsylvania:	<u>Satisfactory</u>
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the assessment area.
- Good distribution of loans among geographies and borrowers of different income levels in the assessment area.
- Community development lending had a positive impact on lending performance in the assessment area.
- Investment volume that reflects an excellent level of responsiveness to the needs of the assessment area.
- Good branch distribution was the primary reason behind the Service Test conclusion. In addition, Citibank had good hours of operation, an excellent record of opening and closing branches, and a good level of community development services.

Description of Institution's Operations in Pennsylvania

Citibank has one assessment area within the state, Philadelphia MD. The bank operates 21 branches and 56 deposit-taking ATMs in the assessment area. As of June 30, 2009, the bank held 1.6% of the market share of deposits in the state or \$1.9 billion in deposits. Primary competitors within the state include Wachovia Bank, N.A., Ally Bank and Citizen's Bank of PA with deposit market shares of 20%, 14% and 12%, respectively. The bank's deposits in Pennsylvania represent 1.4% of the bank's total deposits. Citibank entered the Philadelphia assessment area through de novo branch expansion in September 2006. The bank's performance in this state had a minimal impact on its overall CRA rating.

LENDING TEST

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

Lending Activity

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

Lending activity is excellent. The primary factors supporting this conclusion are lending market shares that significantly exceed the deposit market share for all loan categories, and top eight rankings for all lending products as compared to a number ten deposit rank.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of Pennsylvania section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is good. The distribution for home mortgage loans is good. The distribution for home purchase and home refinance loans is good and excellent for home improvement and multifamily loans. The distribution for small loans to businesses is good. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The bank made an adequate volume of loans within the Pennsylvania assessment area. The overall average of loans made inside the Pennsylvania assessment areas was 68.4%. This ranged from a low of 40.1% for home refinance lending to 94.8% for small business lending. The lower percentages of mortgages within the Philadelphia market can be attributed to the de novo expansion of Citibank in the area. From 2006 to the end of the evaluation period, the year-to-year percentages improved for each of the mortgage products.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of Pennsylvania section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is good. The distribution of home mortgage loans is good. We considered the affordability of housing in the assessment area for low-income borrowers and the high household poverty level of 12%. The median sales price of an existing single family home in the assessment area is \$125 thousand based on the 2000 census. The updated median family income for the assessment area indicates that a low-income individual earns less than \$38 thousand a year making homeownership difficult for most low-income borrowers. The distribution of lending to moderate-income borrowers for all three home mortgage products is excellent. The distribution of lending for home purchase and home refinance loans is good and excellent for home improvement loans. The distribution of loans to businesses of different revenue sizes is good.

Community Development Lending

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

Community development lending had a positive impact on performance in the Philadelphia assessment area. The bank originated 23 community development loans totaling approximately \$22.5 million. This equals 4.8% of Tier 1 Capital allocated to the Philadelphia assessment area. The loans were highly responsive to community needs, focusing on affordable housing. One example is a \$1.5 million loan to facilitate the first of a three phase construction project to replace 319 dilapidated public housing units. The first phase consisted of replacing 151 units with 73 newly constructed units, 71 of which are reserved for low-income persons and families.

Product Innovation and Flexibility

The Bank's use of flexible loan programs, which addressed affordable housing needs, had a positive impact on its Lending Test performance in the rating area.

INVESTMENT TEST

Citibank's Investment Test performance in the state is rated Outstanding. Based on a full-scope review, the investment volume in the Philadelphia MD is excellent. Citibank's responsiveness to the identified needs of the assessment area is good, with most investments concentrated in affordable housing. Additionally, a significant amount of grants and contributions were made to address other community needs such as financial education and assistance to small businesses.

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

During the evaluation period, Citibank originated 70 investments in the MD totaling approximately \$40 million. The bank's responsiveness to the community development needs in the assessment area is good, with most investments concentrated in affordable housing. One example that demonstrates this is the MLK Revitalization project. In 2007, Citibank invested \$5.7 million to finance the new construction of Martin Luther King (MLK) Plaza Phase II located among eleven scattered sites within the Hawthorne neighborhood of South Philadelphia, Pennsylvania. The objective of the property is to serve families earning a broad range of incomes and avoid a concentration of very low-income families who are typically found in public housing developments. All of the 46 units will be leased to households earning within the 0%-40%, 40%-50%, and 50%-60% of AMI ranges. Because public housing tenants pay 30% of their AMI in rent, this leasing strategy will allow the property to be less dependent on annual public housing operating subsidies.

SERVICE TEST

The bank's performance in Pennsylvania is rated High Satisfactory. A full-scope review of the Philadelphia assessment area revealed a good level of performance.

Retail Banking Services

The distribution of bank branches within the assessment area is good, as Citibank's retail delivery systems are accessible to geographies and individuals of different income levels. The distribution of branches in both low- and moderate-income geographies is significantly below the percentage of the population living in those areas. When giving consideration to branches in middle- and upper-income geographies (4) that are in close proximity to low- and moderate-income geographies, accessibility improves in both low- and moderate-income geographies and is good.

Citibank's record of opening and closing branch offices improved the accessibility of delivery systems. During the evaluation period, 20 branches opened, one in a low-income geography, two in moderate-income geographies, four in middle-income geographies and 13 in upper-income geographies. No offices were closed during the evaluation period. The branch openings were part of a de novo branch expansion strategy in the Philadelphia assessment area.

Citibank's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals. The bank's full-service ATMs are below the population residing in low- and moderate-income geographies. Citibank branded, non-proprietary ATMs enhance access from low- and moderate-income geographies.

Citibank's branch hours do not vary in a way that inconveniences certain portions of the assessment area, particularly low-income geographies. Branch hours are convenient. Expanded morning, evening and Saturday banking hours are offered at various locations, including offices located in low- and moderate-income geographies.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low- and moderate-income geographies is above the percentage of households residing those areas. Citibank Online users located in low- and moderate-income geographies are below the percentage of the assessment area's households residing in those geographies.

Community Development Services

The bank provided a good level of community development services. Employees provided services to 10 different organizations, with a significant focus on non-profit capacity building, an identified need with this assessment area. Three employees served in leadership roles for community development organizations.

Refer to Table 15 in the State of Pennsylvania 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.

Commonwealth of Puerto Rico

CRA Rating for Puerto Rico:	<u>Satisfactory</u>
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>Needs to Improve</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the assessment area.
- Good distribution of loans among geographies and adequate distribution among borrowers of different income levels in the assessment area.
- Community development lending had a significant positive impact on lending performance in the assessment area.
- Investment volume that reflects an excellent level of responsiveness to the needs of the assessment area.
- Provision of combined retail banking and community development services that shows poor responsiveness to banking and community needs.

Description of Institution's Operations in Puerto Rico

Citibank operates four commercial branches and has no deposit-taking ATMs in Puerto Rico. Citibank changed its business model in Puerto Rico since the previous examination. At the last CRA evaluation, the bank designated the majority of the San Juan-Caguas-Guaynabo MSA as its CRA assessment area. Citibank was operating 12 full-service, retail bank branches in the MSA at that time. On November 30, 2007, Citibank sold all of its retail branches to Banco Popular de Puerto Rico. Beginning on November 23, 2007, Citibank's Institutional Clients Group (ICG) began operating branches, under the Citibank N.A. charter, in order to serve their corporate clients in Puerto Rico. Citibank adjusted the San Juan assessment area to six municipalities; Aguas Buenas, Bayamón, Caguas, Cataño, Guaynabo, and San Juan Municipios in response to its reduced branch distribution. The bank is committed to continuing its community development lending, investments and services despite having no retail presence on the island.

Countrywide, the bank holds \$3.2 billion of deposits or 1.2% of the bank's total deposits. Of that amount, nearly \$1.8 billion are International Banking Entity (IBE) deposits. The "International Banking Center Regulatory Act" was passed in 1989 in Puerto Rico in an effort to attract foreign capital to directly and indirectly create jobs and to foster the expansion and growth of the financial service sector. Known as Act No. 52, it promulgated the creation of IBEs, which are exempt from income tax imposed by the Puerto Rico Internal Revenue Code of 1994. Deposits received by IBEs can only come from non-residents. Non-resident is defined in the Act as an individual or entity not established in Puerto Rico or whose primary place of business is outside of Puerto Rico. Because these deposits do not reflect traditional Citibank customer relationships in Puerto Rico, they were not included in Puerto Rico's deposits for our analysis purposes. This leaves an adjusted total of \$1.4 billion dollars in deposits or 1.0% of the bank's total deposits.

The bank's performance in the Commonwealth had a minimal impact on its overall CRA rating.

LENDING TEST

The bank's performance under the Lending Test in Puerto Rico is rated Outstanding. Based on a full-scope review, the bank's performance in the San Juan assessment area is Excellent. Citibank ranks seventh in deposit market share out of eleven depository institutions, with a 5.8% market share. The three top ranked banks in the San Juan assessment area hold 60.2% of the deposit market share.

The distribution of loans to businesses of different revenue sizes was not conducted because Citibank does not collect revenue as part of their underwriting process, particularly for business credit cards. A majority (55%) of small loans to businesses reported had no revenue information. Banks are not required to report revenue information if they do not collect it, because this manner of reporting is allowed under the regulation an analysis of making loans to businesses of different sizes was not conducted. This omission was not a negative factor in our analysis of the distribution of lending by borrower income.

Lending Activity

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

Lending activity is excellent performance overall: The bank demonstrated excellent performance in small business loans with a five ranking in a market dominated by a local lender, with more than 60% of the market share alone. The bank demonstrated excellent performance in home improvement loans with a nine ranking in a market dominated by the top five local lenders, which account for more than 82% of the local home improvement market. The bank demonstrated good performance in refinanced loans with a number sixteen rank in a market dominated by the top five lenders (all local), which accounted for nearly 62% of the refinanced loan market. The bank demonstrated adequate performance with a thirty ranking in the home purchase loan market, which is dominated by a group of local lenders who account for more than 60% of the market share.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the Commonwealth of Puerto Rico section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is good. We gave greater consideration to performance in moderate-income geographies for home mortgage loans and lending to small businesses because there are fewer opportunities to lend in low-income geographies. The distribution for home refinance and home improvement loans is good and adequate for home purchase. The distribution for small loans to businesses is adequate. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The volume of loans made inside the San Juan assessment area in Puerto Rico is adequate when considering that Citibank changed its business model during the evaluation period and ceased all retail

activity on November 23, 2007 when it sold its retail operations to Banco Popular de Puerto Rico. The bank replaced its twelve retail branches with four branches that were opened under the Citibank N.A charter, with the purpose of providing services to its corporate clients. The bank adjusted its assessment areas from four that included the entire San Juan MSA to one that contains six municipalities. The overall average of loans made inside the San Juan assessment area is 36.7%. This ranged from a low of 26.4% for home improvement to 50.0% for home refinance loans.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the Commonwealth of Puerto Rico section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is adequate. The distribution of home mortgage loans is adequate. We considered that housing is unattainable for most low- and moderate-income borrowers, 38% of the households in the assessment area live below the poverty level. The income for a low-income individual is less than \$12 thousand a year and less than \$20 thousand for a moderate-income person based on the updated median family income for the assessment area. The median cost of housing in the assessment area is \$105 thousand based on the 2000 census. After considering these factors, the distribution for home purchase and home refinance is adequate and home improvement is good.

Community Development Lending

Refer to Table 1 Lending Volume in the Puerto Rico section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Community development lending had a significant positive impact on lending performance in the San Juan-Caguas-Guaynabo assessment area. The bank originated two community development loans totaling approximately \$108.1 million during this evaluation period. This volume represents 32.7% of Tier 1 Capital allocated to the assessment area. Both of the bank's community development loans addressed critical needs in affordable housing. One of these loans was an \$80 million facility to finance multifamily affordable housing loans in Puerto Rico.

Product Innovation and Flexibility

This performance criterion had a neutral impact on our Lending Test conclusion for the assessment area. The bank did not provide us with specific information on any flexible mortgage products applicable to this rating area.

INVESTMENT TEST

Citibank's Investment Test performance is Outstanding in this rating area. Based on a full-scope review, investment volume in the San Juan-Caguas-Guaynabo MSA is excellent. Citibank's responsiveness to the identified needs of the assessment area is excellent, with most investments concentrated in affordable housing.

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

During the evaluation period, Citibank originated 40 investments in the MSA totaling approximately \$123.1 million. The bank's responsiveness to community development needs in the assessment area is excellent, with most investments concentrated in affordable housing. One example that demonstrates this is Puerto Rico Housing Finance Authority project. In 2008, Citibank provided approximately \$99 million in liquidity to the affordable housing bond market and supported the Puerto Rico Public Housing Administration, a governmental instrumentality of the Commonwealth of Puerto Rico. The Bonds were initially issued to facilitate the acquisition, rehabilitation, renovation, and modernization of various public affordable housing projects throughout the Commonwealth. The projects consist of approximately 4,132 public housing units located at 33 existing properties, the majority of which are parts of larger housing facilities and complexes that will continue to operate as public housing units.

Citibank also made five current period investments for \$41.7 million and five prior period investments for approximately \$18 million which had Commonwealth wide benefit and the potential to benefit the assessment area.

SERVICE TEST

The bank's performance in the Commonwealth of Puerto Rico is rated Needs to Improve. A full-scope review of the San Juan-Caguas-Guaynabo assessment area revealed an overall poor level of performance.

Retail Banking Services

As of the evaluation date, Citibank's retail delivery systems were unreasonably inaccessible to geographies and individuals of different income levels and considered poor. This rating is because the bank no longer maintains a retail banking presence in the Commonwealth, due to the sale of Citibank's branches to Banco Popular de Puerto Rico in the fourth quarter of 2007. The bank opened four commercial branches which are located in moderate- (1), middle- (1) and upper-income (2) geographies on the island. These branches were established to accommodate large corporate bank customers.

For the first half of the evaluation period, a good distribution of bank branches was elevated to an excellent level after considering the branches in middle- and upper-income geographies that were in close proximity to moderate-income geographies. The bank had one branch in a low-income geography and one branch in a moderate-income geography. When giving consideration to middle- and upper-income branch locations that were in close proximity to low- and moderate-income geographies, accessibility of Citibank branches to both geographies improved.

Citibank's record of opening and closing branch offices generally did not adversely affect accessibility in low- and moderate-income geographies and individuals because these branches were sold to and retained by Banco Popular. Customers maintained access to banking services even though ownership of the bank had changed. During the evaluation period, twelve branches closed. Of these branches, one was in a low-income geography; one in a moderate-income geography.

Community Development Services

The bank provided a poor level of community development services to this rating area. Two employees, neither in a leadership role, provided a single financial education session that benefited 41 low- or

moderate-income individuals. Other identified needs in this community include affordable housing, small business assistance and non-profit capacity building.

Refer to Table 15 in the Commonwealth of Puerto Rico 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.

State of Texas

CRA Rating for Texas:	<u>Outstanding</u>
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Lending levels that represent excellent responsiveness to the credit needs of the rating area.
- Adequate distribution of loans by income level of geographies and good distribution among borrowers of different income levels.
- Community development lending had a significant positive impact on lending performance.
- Investment volume that reflects an excellent level of responsiveness to the needs of the rating area.
- Adequate branch distribution was the key contributor to the Service Test rating, along with good branch hours and a good level of community development services.

Description of Institution's Operations in Texas

Citibank operates 103 branches and 139 deposit-taking ATMs in Texas. The bank has 13 assessment areas in the state. These assessment areas include: two MDs, 10 MSAs, and one non-metropolitan area. Statewide, the bank holds \$3.7 billion of deposits which represents 2.6% of the bank's total deposits. In terms of deposit market share, Citibank ranks eighteenth with a 0.8% share compared to a 17.8% share held by the largest deposit holder and 16.2% held by the second largest deposit holder. Within Texas, 27.9% of the bank's deposits are concentrated in the Dallas-Plano-Irving MD assessment area; therefore, it was selected for a full-scope review. The remaining assessment areas were analyzed using limited-scope procedures.

A sufficient number of multifamily loans were made by the bank in the Dallas-Plano-Irving MD for a meaningful analysis.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Texas is rated Outstanding. Based on full-scope reviews, the bank's performance in the Dallas-Plano-Irving assessment area is excellent. Performance in the limited-scope assessment areas did not impact the Lending Test performance in the state.

Lending Activity

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 lending activity.

Lending activity is excellent. We based our conclusion primarily on the large volume of loans the bank originates. The bank's market share for its loan products compares very favorably to its deposit market share in many of the assessment areas in the state and, especially, in the full-scope assessment area. The small business products rank third in the full-scope area. The bank competes with large credit card banks for small business loans. The bank's HMDA products rank in the top eight for each loan type, even with strong competition from national mortgage lenders.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 7 in the State of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The geographic distribution of loans is adequate. We placed more weight on performance in lending in moderate-income geographies because there are fewer opportunities to lend in low-income geographies for home mortgage loans and small loans to businesses. There are relatively fewer owner-occupied housing units within the low-income census tracts. We also considered the excellent market share performance for HMDA products when determining the adequate rating. The distribution of home mortgage loans is adequate. Home purchase and home refinance lending distribution is adequate and the distribution for home improvement and multifamily loans is excellent. The distribution of small loans to businesses is adequate. We did not identify any conspicuous or unexplained gaps in lending patterns.

Inside/Outside Ratio

The bank made a good volume of its loans inside the various Texas assessment areas. Overall, the bank made 79.5% of its loans. This ranged from 77.1% for small business lending to 84.7% for home purchase loans.

Distribution of Loans by Income Level of the Borrower

Refer to Tables 8 through 12 in the State of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is good. The distribution of home mortgage loans is good, considering the impact that the economic downturn had on housing, the cost of housing and the high household poverty level (10%). The median sales price of an existing single family home in the assessment area is \$122 thousand based on 2000 census data. The updated median family income for the assessment area indicates that a low-income individual earns less than \$34 thousand a year making homeownership difficult for most low-income borrowers. After considering these factors, the distribution of home purchase and home refinance lending is good and home improvement is excellent. The distribution of loans to businesses of different revenue sizes is good. While the economic downturn did not affect Texas until later in 2008, its impact to small businesses was considered when determining the rating. The excellent market share performance for all products adds strength to the good conclusion.

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.

Community development lending had a significant positive impact on lending performance in the Dallas-Plano-Irving assessment area. The bank originated 13 community development loans totaling approximately \$90.3 million during this evaluation period. This volume represents 50.8% of Tier 1 Capital allocated to the assessment area. The substantial majority of the bank's community development loans addressed critical needs in affordable housing. One example of the responsiveness includes a loan of \$9.1 million to rehabilitate an existing complex to provide 302 one-, two-, and three-bedroom units, 95% of which are reserved for affordable housing.

Other Loan Data

Citibank issued three standby letters of credit totaling \$35.5 million that has a qualified community development purpose. Refer to Table 1 Other in the State of Texas section of Appendix D for facts and data on this letters of credit.

Product Innovation and Flexibility

The Bank's use of flexible loan programs had a positive impact on its Lending Test performance in the rating area, primarily due to programs that addressed affordable housing needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Fort Worth-Arlington, and San Antonio assessment areas is not inconsistent with the bank's overall Outstanding performance in the State of Texas.

Lending performance in the Abilene, Austin-Round Rock, College Station, Houston-Sugar Land-Baytown, Killeen-Temple-Fort Hood, Midland, Odessa, San Angelo, Texas nonMSA, and Wichita Falls assessment areas is weaker than the bank's overall Outstanding performance in the state primarily because geographic distribution performance was weaker in these assessment areas. Borrower distribution performance was weaker in the Midland assessment area, and community development lending had a neutral impact on lending performance in the Wichita Falls assessment area. The stronger and weaker performance discussed for the assessment areas above did not significantly impact the bank's overall good performance in the state. Refer to the Tables 1 through 12 in the State of Texas section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Citibank's overall Investment Test performance in this state is rated Outstanding. Based on a full-scope review, performance in the Dallas-Plano-Irving MD is excellent. Citibank's responsiveness to the identified needs of the assessment area is excellent, with most investments concentrated in affordable housing. Additionally, a significant amount of grants and contributions were made to address other community needs such as financial education, assistance to small businesses and assistance for special

needs. Performance in the limited-scope assessment areas did not have a significant impact on the Investment Test rating for the State of Texas.

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

During the evaluation period, Citibank originated 170 investments in the MD totaling approximately \$96.8 million. The bank's responsiveness to the community development needs in the assessment area is excellent, with most investments concentrated in affordable housing. One example that demonstrates this is the Evergreen at Rockwell investment. In 2007, Citibank made an investment of approximately \$11.6 million in a project involving the Evergreen at Rockwall Senior Apartments; a 141-unit affordable senior community situated 22 miles east of downtown Dallas. The five newly constructed two-story buildings with elevator service are restricted to qualified tenants age 55 and older at 30% and 60% of AMI. Unit mix includes 69 single-bedroom/one-bath apartments and 72 two-bedroom/single-bath apartments.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Austin-Round Rock, College Station, Fort Worth-Arlington, Houston-Sugar Land-Baytown, Midland, Odessa, San Antonio, and Wichita Falls assessment areas is not inconsistent with the bank's overall performance noted in the State of Texas. In the Abilene, Killeen-Temple-Fort Hood, San Angelo, and Texas Non MSA Counties assessment areas, the bank's investment performance was significantly weaker than the bank's overall performance in the rating area and is considered very poor. This performance is due to a lower level of investments in those assessment areas. However, the performance in the limited-scope areas was not significant enough to have an impact on the overall rating for the State of Texas. Refer to Table 14 in the State of Texas section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance in Texas is rated Low Satisfactory. A full-scope review in Dallas-Plano-Irving assessment area revealed an overall adequate level of performance. Performance in the limited-scope assessment areas did not impact the Service Test performance in the state.

Retail Banking Services

The distribution of bank branches within the full-scope area is adequate, as the bank's retail delivery systems are reasonably accessible to geographies and individuals of different income levels. The distribution of branches in both low- and moderate-income geographies is far below the population living in such geographies and considered adequate and poor respectively. However, the consideration of middle- and upper-income branch locations (6) that are in close proximity to moderate-income geographies, the accessibility of Citibank branches to moderate-income geographies significantly improves and is adequate.

Citibank's record of opening and closing branch offices has not affected the accessibility of delivery systems. One branch office opened in an upper-income geography. No offices were closed.

Citibank's ATM network offers a good alternative delivery system to low- or moderate-income geographies and individuals. There are 39 full-service ATMs, three in low-income geographies exceeding the percentage of the population residing in those geographies. The six full-service ATMs in moderate-income geographies are below the percentage of the assessment area's population in those areas. Citibank branded, non-proprietary ATMs do not strengthen the bank's distribution network.

Citibank's branch hours do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and individuals. All branch offices offered the same hours of operation 9:00 AM to 4:00 PM weekdays. Branch hours are extended one hour on Friday evenings. All branch offices offered Saturday hours, except for some located in middle- and upper-income geographies.

Traditional branch services are augmented by a number of alternative delivery systems, including Citibank Online and CitiPhone Banking. The percentage of CitiPhone users located in low- and moderate-income geographies was above the percentage of the assessment area's households residing in those geographies. Citibank Online users located in low- and moderate-income geographies were below the percentage of the assessment area's households residing in those geographies.

Community Development Services

The bank provided a good level of CD services within this rating area. Employees provided a broad range of CD services to 17 different organizations, with a significant focus on both affordable housing and financial education for low- or moderate-income individuals, both identified needs within this community. Two employees served in leadership roles for community organizations that assist low- and moderate-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the service test in the Abilene; College Station-Bryan; Fort Worth-Arlington, Killeen-Temple-Fort Hood, Midland, Odessa, San Antonio, Texas non-MSA, and Wichita Falls assessment areas is stronger than the bank's performance in the State of Texas. Each of these assessment areas is considered excellent except for Midland, Odessa, and San Antonio which is considered good. The bank's performance in the Austin-Round Rock and San Angelo are not inconsistent with the performance in the State of Texas. Performance in the Houston-Sugar Land-Baytown assessment area is weaker than the bank's performance in the State of Texas, primarily due to branch distribution. Performance in this assessment area is considered poor. In total, nine branch offices opened in limited-scope assessment areas and 13 offices closed. One of the 13 offices closed was in a moderate-income geography. Performance in the limited-scope assessment areas was not sufficiently different from the performance in the full-scope assessment area to impact the overall rating for the State of Texas.

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.

Appendix A: Scope of Examination

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

Financial Institution		Products Reviewed			
Citibank, N.A. Las Vegas, Nevada		HMDA, Small Business, Small Farm Loans Community Development Loans, Investments, Services			
Activities and Time Periods Reviewed					
Multistate MSAs and States Reviewed	Lending Test (HMDA and Small Business)	Community Development Lending	Investment Test	Service Test Branch Distribution	Service Test Community Development Services
New York-White Plains-Wayne, NY-NJ MD	1/1/06 – 12/31/09	6/6/06 – 3/31/10	6/6/06 – 3/31/10	6/6/06 – 12/31/09	6/6/06 – 3/31/10
Washington-Arlington-Alexandria, DC-VA-MD-WV MD	10/1/06 – 12/31/09	10/1/06 – 3/31/10	10/1/06 – 3/31/10	10/1/06 – 12/31/09	10/1/06 – 3/31/10
California	10/1/06 – 12/31/09	10/1/06 – 3/31/10	10/1/06 – 3/31/10	10/1/06 – 12/31/09	10/1/06 – 3/31/10
Connecticut	10/1/06 – 12/31/09	10/1/06 – 3/31/10	10/1/06 – 3/31/10	10/1/06 – 12/31/09	10/1/06 – 3/31/10
Delaware	10/1/06 – 12/31/09	10/1/06 – 3/31/10	10/1/06 – 3/31/10	10/1/06 – 12/31/09	10/1/06 – 3/31/10
Florida	10/1/06 – 12/31/09	10/1/06 – 3/31/10	10/1/06 – 3/31/10	10/1/06 – 12/31/09	10/1/06 – 3/31/10
Territory of Guam	1/1/06 – 12/31/09	6/6/06 – 3/31/10	6/6/06 – 3/31/10	6/6/06 – 12/31/09	6/6/06 – 3/31/10
Illinois	10/1/06 – 12/31/09	10/1/06 – 3/31/10	10/1/06 – 3/31/10	10/1/06 – 12/31/09	10/1/06 – 3/31/10
Maryland	10/1/06 – 12/31/09	10/1/06 – 3/31/10	10/1/06 – 3/31/10	10/1/06 – 12/31/09	10/1/06 – 3/31/10
Massachusetts	10/1/06 – 12/31/09*	10/1/06 – 3/31/10*	10/1/06 – 3/31/10*	10/1/06 – 12/31/09*	10/1/06 – 3/31/10*
Nevada	10/1/06 – 12/31/09	10/1/06 – 3/31/10	10/1/06 – 3/31/10	10/1/06 – 12/31/09	10/1/06 – 3/31/10
New Jersey	10/1/06 – 12/31/09*	10/1/06 – 3/31/10*	10/1/06 – 3/31/10*	10/1/06 – 12/31/09*	10/1/06 – 3/31/10*
New York	1/1/06 – 12/31/09	6/6/06 – 3/31/10	6/6/06 – 3/31/10	6/6/06 – 12/31/09	6/6/06 – 3/31/10
Pennsylvania	10/1/06 – 12/31/09	10/1/06 – 3/31/10	10/1/06 – 3/31/10	10/1/06 – 12/31/09	10/1/06 – 3/31/10
Commonwealth of Puerto Rico	1/1/06 – 12/31/09	6/6/06 – 3/31/10	6/6/06 – 3/31/10	6/6/06 – 12/31/09	6/6/06 – 3/31/10
Texas	10/1/06 – 12/31/09	10/1/06 – 3/31/10	10/1/06 – 3/31/10	10/1/06 – 12/31/09	10/1/06 – 3/31/10
Affiliate(s)		Relationship		Products Reviewed	
ABN Amro Mortgage Group Inc Associates International Holding Corp. CFMC Citi Residential Lending, Inc. Citicorp North America, Inc. (CNAI)		Affiliate Affiliate Affiliate Affiliate Affiliate		Home Mortgage Loans Home Mortgage Loans Home Mortgage Loans Home Mortgage Loans Home Mortgage Loans, Community Development Loans, and Investments	

Citicorp USA, Inc (CUSA)	Subsidiary	Home Mortgage Loans, Community Development Loans, and Investments
CitiFinancial (formerly Associates International Holding Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Company (a Delaware Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Company (a Colorado Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Company, LLC (a Delaware Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Company, LLC (an Iowa Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Inc. (a Hawaii Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Mortgage Corp.	Affiliate	Home Mortgage Loans
CitiFinancial Mortgage Corp. California	Affiliate	Home Mortgage Loans
CitiFinancial Mortgage Corp. Florida	Affiliate	Home Mortgage Loans
CitiFinancial MTG CO (FL, LLC)	Affiliate	Home Mortgage Loans
CitiFinancial MTG CO, LLC	Affiliate	Home Mortgage Loans
CitiFinancial of Virginia, Inc. (a Virginia Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Plus (formerly CitiFinancial Services of Puerto Rico, Inc.)	Affiliate	Home Mortgage Loans
CitiFinancial Services of Puerto Rico	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a California Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a Delaware Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a Georgia Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a Kentucky Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a Massachusetts Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a Minnesota Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a Missouri Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a Pennsylvania Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a Ohio Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial Services, Inc. (a Oklahoma Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial, Inc. (a Maryland Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial, Inc. (a South Carolina Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial, Inc. (a Tennessee Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial, Inc. (a Texas Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial, Inc. (a West Virginia Corporation)	Affiliate	Home Mortgage Loans

CitiFinancial, Inc. (an Iowa Corporation)	Affiliate	Home Mortgage Loans
CitiFinancial, Inc. (an Ohio Corporation)	Affiliate	Home Mortgage Loans
CitiMortgage, Inc.	Subsidiary	Home Mortgage Loans
Commercial Banking Group	Department of Citibank, NA	Small Business Lending
Citibank (South Dakota), National Association	Affiliate	Small Business Lending
Citi Community Capital	Department of Citibank, NA	Community Development Loans and Investments
Non-profit Financial Services Group	Department of Citibank, NA	Community Development Loans
Citi Real Estate Finance	Department of Citibank, NA	Community Development Loans
Citi Foundation	Affiliate	Community Development Grants
Global Community Relations	Department of Citigroup	Community Development Grants

* Massachusetts and New Jersey have multiple assessment areas with different evaluation periods. The date listed above is for the full-scope assessment areas.

List of Assessment Areas and Type of Examination			
Assessment Area	MSA#/ MD#	Type of Exam	Other Information (Reflects counties in non-MSA areas and/or counties in MSAs or MDs where whole MSAs or MDs were not selected)
Multistate MSAs			
New York-White Plains-Wayne, NY-NJ MD	#35644	Full-scope	Bronx, Kings, New York, Queens, Richmond, Rockland, Westchester Counties NY; Bergen, Hudson, Passaic Counties NJ
Washington-Arlington-Alexandria, DC-VA-MD-WV MD	#47894	Full-scope	District of Columbia; Charles, Prince George's Counties MD; Arlington, Fairfax, Loudoun, Prince William, Alexandria city, Fairfax city, Falls Church City Counties VA
California			
Bakersfield, CA MSA	#12540	Limited-scope	
Fresno, CA MSA	#23420	Limited-scope	
Hanford-Corcoran, CA MSA	#25260	Limited-scope	
Los Angeles-Long Beach-Glendale, CA MD	#31084	Full-scope	
Madera-Chowchilla, CA MSA	#31460	Limited-scope	
Merced, CA MSA	#32900	Limited-scope	
Modesto, CA MSA	#33700	Limited-scope	
Napa, CA MSA	#34900	Limited-scope	
Oakland-Fremont-Hayward, CA MD	#36084	Limited-scope	
Oxnard-Thousand Oaks-Ventura, CA MSA	#37100	Limited-scope	
Riverside-San Bernardino-Ontario, CA MSA	#30140	Limited-scope	
Sacramento-Arden Arcade-Roseville, CA MSA	#40900	Limited-scope	Placer, Sacramento, Yolo Counties
Salinas, CA MSA	#41500	Limited-scope	
San Diego-Carlsbad-San Marcos, CA MSA	#41740	Limited-scope	
San Francisco-San Mateo-Redwood City, CA MD	#41884	Limited-scope	
San Jose-Sunnyvale-Santa Clara, CA MSA	#41940	Limited-scope	Santa Clara County
San Luis Obispo-Paso Robles, CA MSA	#42020	Limited-scope	
Santa Ana-Anaheim-Irvine, CA MD	#42044	Limited-scope	
Santa Barbara-Santa Maria-Goleta, CA MSA	#42060	Limited-scope	
Santa Cruz-Watsonville, CA MSA	#42100	Limited-scope	
Santa Rosa-Petaluma, CA MSA	#42220	Limited-scope	
Stockton, CA MSA	#44700	Limited-scope	
Vallejo-Fairfield, CA MSA	#46700	Limited-scope	
Visalia-Porterville, CA MSA	#47300	Limited-scope	
Connecticut			
Bridgeport-Stamford-Norwalk CT MSA	#14860	Full-scope	
New Haven-Milford CT MSA	#35300	Limited-scope	
Delaware			
Wilmington, DE-MD-NJ MD	#48864	Full-scope	New Castle County
Florida			

Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	#22744	Limited-scope	
Jacksonville, FL MSA	#27260	Limited-scope	Duval County
Miami-Miami Beach-Kendall, FL MD	#33124	Full-Scope	
West Palm Beach-Boca Raton-Boynton Beach FL MD	#48424	Limited-scope	
Territory of Guam			
Guam – non MSA	#99999	Full-scope	
Illinois			
Chicago-Naperville-Joliet IL MD	#16974	Full-scope	Cook, DuPage, Kane, Kendall, McHenry, Will Counties
Lake County-Kenosha County IL MD	#29404	Limited-scope	Lake County
Maryland			
Baltimore-Towson MD MSA	#12580	Limited-scope	Anne Arundel, Baltimore, Baltimore City Counties
Bethesda-Frederick-Rockville MD MD	#13644	Full-scope	Montgomery County
Massachusetts			
Boston-Quincy MA MD	#14484	Full-scope	
Cambridge-Newton-Framingham MA MD	#15764	Limited-scope	
Peabody MA MD	#37764	Limited-scope	
Nevada			
Las Vegas-Paradise NV MSA	#29820	Full-scope	
New Jersey			
Camden NJ MD	#15804	Limited-scope	Camden County
Edison-New Brunswick NJ MD	#20764	Limited-scope	
Newark-Union NJ-PA MD	#35084	Full-scope	Essex, Morris, Union Counties
Trenton-Ewing NJ MSA	#45940	Limited-scope	
New York			
Nassau-Suffolk NY MD	#35004	Full-scope	
Pennsylvania			
Philadelphia PA MD	#37964	Full-scope	
Commonwealth of Puerto Rico			
San Juan-Caguas-Guaynabo PR MSA	#41980	Full-scope	Aguas Buenas, Bayamon, Caguas, Catano, Guaynabo, San Juan Municipios
Texas			
Abilene TX MSA	#10180	Limited-scope	Jones, Taylor Counties
Austin-Round Rock TX MSA	#12420	Limited-scope	Hays, Travis, Williamson Counties
College Station-Bryan TX MSA	#17780	Limited-scope	Brazos, Burleson Counties
Dallas-Plano-Irving TX MD	#19124	Full-scope	Collin, Dallas, Denton, Hunt, Rockwall Counties
Fort Worth-Arlington TX MD	#23104	Limited-scope	Parker, Tarrant, Wise Counties
Houston-Sugar Land-Baytown TX MSA	#26420	Limited-scope	Brazoria, Fort Bend, Harris, Montgomery Counties
Killeen-Temple-Fort Hood TX MSA	#28660	Limited-scope	Lampasas County
Midland TX MSA	#33260	Limited-scope	
Odessa TX MSA	#36220	Limited-scope	
San Angelo TX MSA	#41660	Limited-scope	Tom Green County
San Antonio TX MSA	#41700	Limited-scope	Bexar County
Wichita Falls TX MSA	#48660	Limited-scope	

Texas non-MSA

Limited-scope Brown, Coleman, Comanche, Cooke,
Eastland, Erath, Haskell, Jack,
McCulloch, Montague, Palo Pinto,
Runnels, Young Counties

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS Citibank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Citibank, N.A.	Outstanding	Outstanding	High Satisfactory	Outstanding
Multistate Metropolitan Area or State:				
New York-White Plains-Wayne, NY-NJ MD	Outstanding	Outstanding	High Satisfactory	Outstanding
Washington-Arlington-Alexandria, DC-VA-MD-WV MD	Outstanding	Outstanding	High Satisfactory	Outstanding
California	Outstanding	Outstanding	High Satisfactory	Outstanding
Connecticut	Outstanding	Outstanding	Low Satisfactory	Outstanding
Delaware	High Satisfactory	Low Satisfactory	Needs to Improve	Satisfactory
Florida	Outstanding	Outstanding	Outstanding	Outstanding
Territory of Guam	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Illinois	Outstanding	Outstanding	High Satisfactory	Outstanding
Maryland	Outstanding	Outstanding	High Satisfactory	Outstanding
Massachusetts	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Nevada	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
New Jersey	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
New York	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Pennsylvania	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Commonwealth of Puerto Rico	Outstanding	Outstanding	Needs to Improve	Satisfactory
Texas	Outstanding	Outstanding	Low Satisfactory	Outstanding

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

Appendix C: Market Profiles for Primary Rating Areas

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Market Profiles for Areas Receiving Full-Scope Reviews in Primary Rating Areas

<i>NEW YORK-WHITE PLAINS-WAYNE NY-NJ MULTISTATE METROPOLITAN DIVISION</i>	C-2
<i>STATE OF CALIFORNIA</i>	C-4
<i>STATE OF NEW YORK</i>	C-6
<i>STATE OF ILLINOIS</i>	C-8

New York-White Plains-Wayne Multistate Metropolitan Division

New York-Wayne-White Plains NY-NJ

Demographic Information for Full-scope Area: New York-Wayne-White Plains NY-NJ						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,902	11.72	24.74	28.67	32.63	2.24
Population by Geography	11,200,632	12.50	26.28	26.38	34.68	0.16
Owner-Occupied Housing by Geography	1,565,425	2.03	11.98	26.93	59.05	0.00
Business by Geography	953,633	6.79	18.01	21.68	52.56	0.96
Farms by Geography	6,678	2.62	7.79	17.60	71.83	0.16
Family Distribution by Income Level	2,680,133	25.94	15.46	16.78	41.82	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	1,109,567	22.28	36.82	25.32	15.57	0.00
Median Family Income		49,461	Median Housing Value	436,900		
HUD Adjusted Median Family Income for 2009		64,800	Unemployment Rate (BLS-March 2010)	9.6%		
Households Below Poverty Level		17%				

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

Source: 2000 US Census and 2009 HUD updated MFI, Bureau of Labor Statistics, National Association of Realtors-1st Quarter 2010

Citibank has defined this assessment area (AA) to include 10 counties in the New York-White Plains-Wayne, NY-NJ MD. This includes the New Jersey counties of Bergen, Hudson and Passaic, and the New York counties of Bronx, Kings, New York, Queens, Richmond, Rockland and Westchester. The 2009 HUD adjusted median family income for this assessment area is approximately \$65 thousand, increasing from the 2006 level of approximately \$59 thousand. However, there are significant disparities in the income levels of the five counties or boroughs. New York County (Manhattan) is among the richest counties in the U.S. The other boroughs, especially Queens and Staten Island, have large middle-class populations. Also the poverty level of the assessment area (17%) is quite high, with the highest rates found within Bronx (27.1%) and Kings (21.9%) counties.

Citibank has approximately \$53 billion in deposits are within this assessment area, representing 38.8% of the bank's total domestic deposits. The number of domestic offices within this assessment area is 172, or 17% of the bank's total domestic offices. Citibank's primary competitors in this assessment area are JPMorgan Chase, Bank of America and HSBC. As of June 30, 2009, Citibank ranked third in deposit market share with 8.2% behind JPMorgan Chase with a 39.4% market share and Bank of America with a 8.9% market share. Bank of New York Mellon is ranked fourth with 7.0% market share and HSBC ranked fifth with a 5.8% market share.

New York City, consisting of Bronx, Kings, New York, Queens, and Richmond Counties, is the most significant economic contributor to the assessment area. New York City is home to a diversified mix of businesses, with many national and international corporations headquartered there. Historically, the downtown area has been dominated by the financial services industry. Industries operating in the midtown area include advertising, publishing, and garment production. The retail sector is a major employer along with health and social care. In addition, light manufacturing and wholesale trades provide a significant level of job opportunities in Bronx County. Some of the assessment area's largest employers are New York Presbyterian Healthcare Systems, Citigroup, JPMorgan Chase, Verizon, and Federated Department Stores.

The New York City economy has struggled following the recession that began in late 2008. The unemployment rate for the Metropolitan Statistical Area has more than doubled since 2006 and now stands at 9.7%, compared to 8.8% for New York State. Wall Street is a significant contributor to employment in the area and suffered significant layoffs following the financial crisis.

Housing prices have dropped significantly over the past several years. The median single family housing value for the assessment area in 2009 was approximately \$437 thousand which is down from approximately \$494 thousand in 2008 and approximately \$540 thousand in 2007. The high cost of living associated with this area makes home ownership difficult, especially for low- and moderate-income populations. Of the approximately 1.5 million owner-occupied housing units, just 2% are in low-income areas and 12% are in moderate-income areas.

The opportunities for community development participation within the assessment area are quite broad. There are numerous community development and governmental organizations representing affordable housing, economic development, and services to low- and moderate-income families. Through their contacts and experience in the market, Citibank has identified the following needs within the assessment area: lack of affordable housing for purchase or rent and the impact of foreclosures on low- and moderate-income families; financial education and counseling; non-profit capacity building; better education and college access among low- and moderate-income children; and entrepreneurship and small business development, especially for low- and moderate-income and immigrant populations.

During this evaluation, we met with representatives from two community-based affordable housing organizations operating in the assessment area. In addition, OCC representatives met with various community development organizations during the assessment period for a total of 22 contacts. The contacts were with organizations supporting affordable housing, economic development, small business development, and services targeted toward low- and moderate-income families. These organizations confirmed the community needs identified by the bank, and added the need for additional grants, affordable multifamily housing financed through tax credits, and assistance for special-needs populations.

State of California

Los Angeles-Long Beach-Glendale MD

Demographic Information for Full-scope Area: Los Angeles						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,054	8.71	28.29	27.99	34.23	0.78
Population by Geography	9,519,338	8.00	29.44	30.88	31.58	0.10
Owner-Occupied Housing by Geography	1,499,694	1.91	15.46	31.30	51.33	0.00
Business by Geography	973,871	7.58	20.47	26.51	44.65	0.80
Farms by Geography	7,437	3.82	15.53	31.24	48.90	0.51
Family Distribution by Income Level	2,154,311	23.87	16.49	17.40	42.24	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	869,463	13.65	41.46	28.95	15.94	0.00
Median Family Income		46,509	Median Housing Value	331,400		
HUD Adjusted Median Family Income for 2009		62,100	Unemployment Rate (BLS – March 2010)	12.3%		
Households Below Poverty Level		15%				

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

Source: 2000 US Census and 2009 HUD updated MFI, Bureau of Labor Statistics, National Association of Realtors-1st Quarter 2010

Citibank has designated Los Angeles County (of the Los Angeles- Long Beach- Glendale California Metropolitan Division) as their assessment area. Los Angeles County is located in Southern California, and it includes 88 incorporated cities, many unincorporated areas, and covers approximately 4,061 square miles. The 2009 HUD adjusted median family income for this assessment area is approximately \$62 thousand and the median family income (2000) is approximately \$47 thousand. Los Angeles County is the most populous county in the United States and home to 27% of California's residents. The percentage of households with incomes below the poverty level is relatively high at 15%, and the March 2010 unemployment rate of 12.3% exceeds both the State (11.9%) and National (9.4%) levels.

Los Angeles County is a competitive banking environment. As of March 31, 2010, Citibank deposits within the assessment area were approximately \$11.8 billion, or 8.6% of the bank's total deposits in domestic offices. Citibank operates 110 offices within the assessment area, representing 10.9% of their total domestic offices. In June 2009, Citibank ranked fifth in assessment area deposit market share with 4.8%, behind Bank of America (21.9%), Wells Fargo Bank (11.6%), Union Bank National Association (8.8%), and JPMorgan Chase (8.1%).

Los Angeles County has a very diverse economic base, and if compared to countries, it is the fifteenth largest economy in the world in terms of gross domestic product. According to the 2009 Economic Development Corporation County profile, the county's leading industries include tourism and hospitality, manufacturing, professional and business services, direct international trade, entertainment, and wholesale trade and logistics. Since 2006, the county has experienced a decline in business expansions. Some of the assessment area's largest employers include the University of California Los Angeles, Kaiser Permanente, Northman Grumman Corporation, Boeing Corporation, Kroger Company, the University of Southern California, and Target Corporation.

The median housing value as of the first quarter 2010 was approximately \$331 thousand which marks a significant decline (44%) from the high of approximately \$594 thousand in 2007. In spite of the decline in values, affordable housing remains a significant need, both in owner-occupied and rental units. The principal and interest payments on the average median housing price (approximately \$479 thousand) for the period would exceed 94% of the average monthly income for a low-income family, and 59% of the average monthly income for a moderate-income family.¹ The lower percentage of owner-occupied housing units within the low- and moderate- income tracts is also a factor to consider. The total percentage of owner-occupied units is 45% for all of Los Angeles County. However, this percentage is just 12% in low-income tracts, and 27.5% in moderate-income tracts. In addition, the median gross rents (2008) for rental housing in low- and moderate-income tracts were \$514 and \$630, respectively. Based on 2008 data, 43.4% of the renters in low-income tracts and 33.4% in moderate-income pay rent that is in excess of 30% of their income.

OCC representatives met with members of community-based organizations representing small business and economic development, and affordable housing. Members of the organizations identified funding for small businesses (micro loans, job training and working capital), equity investment in non-profits, affordable housing, financial education, and multifamily housing as important assessment area needs. As part of their "Citi Dialogue," bank staff met twice with executive directors of ten community development organizations focused on affordable housing, microfinance, financial education, and workforce development. The bank identified numerous opportunities for community development participation in the assessment area, and community needs in addition to those noted above. These include the need for capacity building for non-profit, community development organizations, "green" initiatives (housing and workforce development), and asset-building initiatives for low- and moderate-income families.

¹ This is based on a conventional 30-year mortgage at 6% interest, and 20% down payment.

State of New York

Nassau-Suffolk

Demographic Information for Full-scope Area: Nassau-Suffolk						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	597	0.67	14.07	62.81	19.77	2.68
Population by Geography	2,753,913	0.76	16.02	64.36	18.86	0.01
Owner-Occupied Housing by Geography	733,628	0.22	12.21	66.17	21.40	0.00
Business by Geography	296,721	0.72	13.44	62.68	23.16	0.01
Farms by Geography	5,901	0.39	17.44	65.63	16.54	0.00
Family Distribution by Income Level	712,551	18.03	18.61	24.19	39.18	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	261,056	1.25	22.16	65.10	11.48	0.00
Median Family Income		76,221	Median Housing Value (NAR)	376,900		
HUD Adjusted Median Family Income for 2009		101,800	Unemployment Rate (BLS- March 2010)	7.2%		
Households Below Poverty Level		5%				

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

Source: 2000 US Census and 2009 HUD updated MFI, Bureau of Labor Statistics, National Association of Realtors-1st Quarter 2010

Citibank has defined this assessment area to include the two New York counties of Nassau and Suffolk. These counties are referred to as Long Island, and are located in the Southeast corner of New York State, just east of Manhattan. Long Island extends 118 miles east from New York harbor, and has a maximum width of 23 miles. The combined population of this assessment area is approximately 2.8 million (2008), representing a 3.4% increase from 2000. The area has become more ethnically diverse since 2006, with the immigrant population being the most rapidly growing segment, now comprising 13% of the total population (U.S. Census Bureau, State and County Quick Facts- 2009).

The 2009 HUD adjusted median family income for this assessment area is approximately \$102 thousand, compared to the median family income (2000) of approximately \$76 thousand. Compared to the other 35 counties in the State of New York, Nassau County had the highest median income and Suffolk County is ranked third. Nationwide, the counties are ranked 10th and 29th, respectively, in terms of medium family income. The average poverty rate in 2007 was low at 5%, compared to New York State (14%) and the national rate (13.2%). While not reflected in the percentage of low-income census tracts (0.7%), cities in Nassau County with high concentrations of poverty include Roosevelt, Hempstead, New Castle, and Freeport. For Suffolk County, the concentrations are in the cities of Wyandanch, Brentwood, Central Islip, and Bellport.

Approximately \$10.6 billion of the bank's deposits are derived from this assessment area, representing 7.8% of the bank's total. Citibank has 77 offices within this assessment area, representing 7.6% of the total domestic offices. Citibank's primary competitors in this area are JPMorgan Chase, Capital One and Astoria FS&LA. As of June 30, 2009, Citibank ranked third in deposit market share with 11.9% behind JPMorgan Chase with a 21.2% market share and Capital One with a 13.4% market share.

Astoria FS&LA ranked fourth with a 9.6% market share and Bank of America ranked fifth with a 6.5% market share.

Nassau and Suffolk Counties are suburbs of New York City, which is home to a diversified population of businesses, with many national and international corporations headquartered there. Many residents commute to New York City for employment. However, Nassau and Suffolk Counties have significant employment opportunities in state and local government, health care, full-service restaurants, and education. Some of the area's largest employers are North Shore-Long Island Jewish Healthcare System, State University of New York Stony Brook, Cablevision Systems, the Diocese of Rockville Centre, and Waldbaums.

The Nassau and Suffolk economies have struggled, along with most of the country, following the recession that began in late 2008. The 2009 unemployment rate for the assessment area is 7.1%, which is up significantly from 4.8% in 2008 and 3.8% in 2007. The unemployment rate for New York State is 8.8%. Jobs in higher paying areas such as financial services and professional services have been slow to recover, but jobs in lower paying areas such as retail and leisure/hospitality are recovering faster.

Median home values during the assessment period have changed dramatically. Between 2000 and 2006, median home values more than doubled, rising from an average of approximately \$213 thousand in 2000 to approximately \$474 thousand in 2006. The median home value declined to approximately \$377 thousand (20% decline) according to 2009 estimates. Approximately 19% of the housing stock in the assessment area is rental and 75% (approximately 734 thousand) is owner-occupied housing. The owner-occupied housing is limited to 0.2% in low-income tracts and 12.2% in moderate-income tracts.

The opportunities for community development participation are broad, due to the size and diversity of the assessment area, the number of community development organizations, and identified needs within the community. In preparation for this examination, the OCC met with representatives from three community-based organizations operating in the assessment area. In addition, we considered earlier contacts with community groups within the assessment area and the broader region. Identified community development needs include small business lending, foreclosure prevention/assistance programs, support for affordable housing projects, and financial education for homebuyers. The bank identified similar needs within the community including: the lack of affordable housing for purchase and the effects of foreclosure on low- and moderate-income families; non-profit capacity building; better education and college access for low- and moderate-income students; and entrepreneur and business start-up support.

State of Illinois

Chicago

Demographic Information for Full-scope Area: Chicago						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,694	13.75	25.15	34.83	25.27	1.00
Population by Geography	7,501,908	7.98	23.66	38.77	29.58	0.01
Owner-Occupied Housing by Geography	1,722,786	2.62	15.23	44.44	37.70	0.00
Business by Geography	540,089	3.89	14.50	37.12	44.19	0.30
Farms by Geography	7,723	1.48	8.97	46.54	43.01	0.00
Family Distribution by Income Level	1,833,366	20.92	17.56	22.00	39.52	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	705,492	14.52	33.83	37.45	14.20	0.00
Median Family Income		60,166	Median Housing Value	176,400		
HUD Adjusted Median Family Income for 2009		74,600	Unemployment Rate (BLS- March 2010)	11.2%		
Households Below Poverty Level		10%				

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

Source: 2000 US Census and 2009 HUD updated MFI, Bureau of Labor Statistics, National Association of Realtors-1st Quarter 2010

Citibank has defined this assessment area to include the Illinois counties of Cook, DuPage, Kane, Kendall, McHenry, and Will. The population of this assessment area is approximately 7.5 million, with the vast majority residing in Cook County (67%), which includes the city of Chicago and a number of Chicago suburbs. Cook County contains 79% of the census tracts and 96% of the low- and moderate-income tracts in the assessment area. In 2007, 14% of the persons residing in Cook County had income at or below the poverty level. The 2009 HUD adjusted median family income is approximately \$75 thousand and the median family income from 2000 was approximately \$60 thousand.

As of March 31, 2010, Citibank held approximately \$9.6 billion in deposits within this assessment area or 7.1% of the bank's total domestic deposits. Citibank also has 71 offices within the assessment area representing 7% of the bank's total. Competition is strong with 244 banks and 2,645 offices within the assessment area. As of June 2009, Citibank ranked fifth in deposit market share with 3.9%, behind JPMorgan Chase with a 16.4% market share, Bank of America with an 12.9% market share, Harris NA with an 8.9% market share, and Northern Trust Co. with a 4.8% market share.

Chicago is a significant business center in the Midwest, with many residents living in the surrounding suburban counties. Approximately 36% of the Chicago Metro area businesses are within the service sector, retail trade represents 19%, and financial services, insurance, and real estate are 8%. Wholesale trade, construction, and manufacturing together make up 30% of the firms. Some of the largest area employers are Wal-Mart Stores, Inc., Advocate Health Care System, University of Chicago, Walgreen Company, AT&T, and UAL Corp.

The Chicago economy has struggled following the recession that began in late 2008. The 2009 unemployment rate was 10.7%, up significantly from 6.2% in 2008 and 4.9% in 2007. Jobs in the construction and manufacturing industries have been hit particularly hard while jobs in education and

health care have fared much better. Additionally, recovery is slow in the finance and business/professional services industries which are important for Chicago's growth.

As in other markets, the median housing values have declined noticeably from their highs in 2007. The median housing value sales price of single family housing is approximately \$176 thousand (2010) compared to approximately \$277 thousand in 2007, representing a decline of 36%.

The need for affordable housing is a key issue. Within the assessment area, owner-occupied housing represents 60% of the housing stock and rental-occupied units 35%. However, there are greater concentrations of rental occupied units within the low- and moderate-income tracts at 64.8% and 51.5%, respectively. In 2009, median gross rents in the low-income tracts were \$459 per month, and moderate-income tracts were \$594 per month. Within middle-income tracts median rents jumped to \$722 per month and these areas contain 31.6% of the low-income families and 44.2% of the moderate-income families in the assessment area. Households with incomes below the poverty level comprised 37.8% of the households residing in low-income tracts, and 16.9% of those within moderate-income tracts.

For this evaluation, we met with representatives from several community-based organizations supporting affordable housing, community development services, and small business development. The representatives identified the need for affordable housing, foreclosure prevention/assistance programs, financial education in Spanish, banking services for the increasing Hispanic population, funding for small businesses, and additional mortgages for home purchases.

Opportunities to participate in meaningful community development activities within the assessment area are strong. Citibank held dialogues with community stakeholders during the assessment period to better understand the community's needs and to identify opportunities within the assessment area. The organizations identified similar issues to those noted above. In 2007, this included the need for financial literacy, housing counseling, retirement planning education, foreclosure prevention, and small business lending and technical assistance. In 2008, the key areas of concern centered on the impact of foreclosures, the need to jumpstart homeownership, and the need to prepare consumers to re-enter the credit markets. Again in 2009, housing and foreclosure issues were discussed, as well as community stabilization, vacant and abandoned properties, and the creation of affordable housing.

Appendix D: Tables of Performance Data

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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. See Interagency Q&As __.12 (h) - 6 and - 7 for guidance on when a bank may receive positive CRA consideration for such loans.
- 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 thousand) 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 thousand) 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/assessment area. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

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 (h) - 6 and - 7 for guidance on when a bank may receive positive CRA consideration for such investments.

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

Table 1. Lending Volume

LENDING VOLUME		Geography: MULTISTATES				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009 (a)						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
New York-White Plains-Wayne NY-NJ	100.00	69,857	22,012,926	238,087	2,671,802	15	34	307	1,293,446	308,266	25,978,208	100.00
Washington-Arlington-Alexandria DC-VA-MD-WV	100.00	24,357	6,375,474	45,577	314,509	2	4	7	90,459	69,943	6,780,446	100.00

(a) Evaluation period for New York-White Plains-Wayne AA. Evaluation period for Washington DC multistate area is October 1, 2006 to December 31, 2009.

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from June 6, 2006 to March 31, 2010 in NYC. The evaluation period for Community Development Lending Test in Washington DC is from October 1, 2006 to March 31, 2010.

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

Table 1. Other Products

LENDING VOLUME		Geography: MULTISTATES				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009								
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letters of Credit**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
New York-White Plains-Wayne NY-NJ	100.00	36	476,421	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	36	476,421	100.00
Washington-Arlington-Alexandria DC-VA-MD-WV	100.00	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2006 to December 31, 2009.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: MULTISTATES					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
New York-White Plains-Wayne NY-NJ	39,216	100.00	2.03	4.54	11.98	18.34	26.93	26.58	59.06	50.54	8.81	12.09	10.58	9.87	7.52									
Washington-Arlington-Alexandria DC-VA-MD-WV	8,875	100.00	2.38	4.38	15.89	19.21	39.12	36.87	42.60	39.54	2.95	3.38	3.86	2.92	2.61									

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATES					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
New York-White Plains-Wayne NY-NJ	4,289	100.00	2.03	3.94	11.98	15.13	26.93	30.50	59.06	50.43	6.09	12.77	7.69	7.03	5.03	
Washington-Arlington-Alexandria DC-VA-MD-WV	1,690	100.00	2.38	3.37	15.89	19.76	39.12	45.62	42.60	31.24	4.02	3.81	4.28	4.53	3.32	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: MULTISTATES		Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009												
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	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
New York-White Plains-Wayne NY-NJ	25,994	100.00	2.03	3.29	11.98	15.43	26.93	24.51	59.06	56.78	6.74	8.80	8.10	6.59	6.36	
Washington-Arlington-Alexandria DC-VA-MD-WV	13,766	100.00	2.38	3.40	15.89	21.35	39.12	39.40	42.60	35.85	4.06	3.93	5.13	3.94	3.67	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MULTISTATES					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
New York-White Plains-Wayne NY-NJ	288	100.00	17.74	25.69	29.37	35.76	21.21	18.40	31.69	20.14	1.07	1.32	1.01	0.89	1.16	
Washington-Arlington-Alexandria DC-VA-MD-WV	24	100.00	12.41	54.17	37.89	37.50	28.26	4.17	21.44	4.17	1.05	3.95	0.00	0.00	1.15	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MULTISTATES				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans						
Full Review:																
New York-White Plains-Wayne NY-NJ	236,634	100.00	6.79	4.81	18.01	16.69	21.68	25.01	52.56	53.49	10.84	11.81	12.55	12.50	9.82	
Washington-Arlington-Alexandria DC-VA-MD-WV	45,188	100.00	5.06	3.92	16.18	14.66	34.83	36.12	41.94	45.31	10.20	11.32	12.13	10.64	9.28	

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: MULTISTATES		Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009		
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
New York-White Plains-Wayne NY-NJ	15	100.00	2.62	33.33	7.79	0.00	17.60	0.00	71.83	66.67	0.53	1.89	0.00	0.00	0.88	
Washington-Arlington-Alexandria DC-VA-MD-WV	2	100.00	1.48	0.00	10.52	0.00	43.53	50.00	44.27	50.00	0.40	0.00	0.00	0.64	0.39	

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MULTISTATES					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
New York-White Plains-Wayne NY-NJ	39,265	100.00	25.94	0.66	15.46	5.86	16.78	14.10	41.82	79.39	10.36	11.67	14.95	10.84	9.93	
Washington-Arlington-Alexandria DC-VA-MD-WV	8,877	100.00	20.18	5.10	17.24	20.49	21.50	31.27	41.08	43.13	2.90	2.62	2.84	2.95	2.95	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MULTISTATES					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
New York-White Plains-Wayne NY-NJ	4,291	100.00	25.94	2.24	15.46	8.06	16.78	19.42	41.82	70.28	6.71	6.15	10.11	8.84	5.68	
Washington-Arlington-Alexandria DC-VA-MD-WV	1,690	100.00	20.18	10.32	17.24	27.25	21.50	28.26	41.08	34.17	4.32	5.34	5.93	3.91	3.50	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MULTISTATES						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-White Plains-Wayne NY-NJ	26,013	100.00	25.94	1.40	15.46	6.52	16.78	16.55	41.82	75.53	8.25	7.64	9.21	8.24	8.17
Washington-Arlington-Alexandria DC-VA-MD-WV	13,766	100.00	20.18	9.07	17.24	24.10	21.50	28.47	41.08	38.37	4.40	4.98	4.82	4.35	4.04

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 5.2% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MULTISTATES			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
	#	% of Total **	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
New York-White Plains-Wayne NY-NJ	238,087	100.00	75.47	60.39	98.85	0.71	0.44	10.84	26.19
Washington-Arlington-Alexandria DC-VA-MD-WV	45,577	100.00	75.70	56.44	99.68	0.23	0.09	10.20	20.58

* Based on 2008 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 - 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 29.69% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MULTISTATES			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
New York-White Plains-Wayne NY-NJ	15	100.00	96.45	26.67	100.00	0.00	0.00	0.53	0.19
Washington-Arlington-Alexandria DC-VA-MD-WV	2	100.00	95.43	50.00	100.00	0.00	0.00	0.40	0.53

* Based on 2008 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 - 2009).

**** 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 64.71% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MULTISTATE				Evaluation Period: JUNE 6, 2006 TO MARCH 31, 2010 (a)			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
New York-White Plains-Wayne NY-NJ	52	307,229	809	846,918	861	1,154,148	93.15	N/A	N/A
Washington-Arlington-Alexandria DC-VA-MD-WV	7	2,641	143	82,297	150	84,937	6.85	N/A	N/A

(a) The evaluation period for Washington-Arlington-Alexandria DC-VA-MD-WV is from October 1, 2006 to March 31, 2010.

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MULTI STATE																	
Evaluation Period: JUNE 6, 2006 TO DECEMBER 31, 2009 (a)																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
New York-White Plains-Wayne NY-NJ	100.00	171*	100.00	5.85	19.88	20.47	53.80	16	0	0	3	1	12	12.50	26.28	26.38	34.68
Washington-Arlington-Alexandria DC-VA-MD-WV	100.00	27	100.00	18.52	11.11	22.22	48.15	4	1	1	0	1	1	6.63	23.40	35.81	33.98

(a) The evaluation period for Washington-Arlington-Alexandria DC-VA-MD-WV is from October 1, 2006 to December 31, 2009.

*There are a total of 172 branches in the New York-White Plains-Wayne AA. One branch is located in a geography with a NA income designation.

Table 1. Lending Volume

LENDING VOLUME		Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009 (a)						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Los Angeles	31.83	67,493	22,160,888	199,185	1,783,291	22	75	132	342,621	266,832	24,286,875	34.44
Limited Review:												
Bakersfield	1.58	4,706	818,090	8,498	55,133	15	315	5	41,548	13,224	915,086	0.41
Fresno	1.80	5,720	1,026,501	9,318	84,051	31	1,533	9	26,517	15,078	1,138,602	1.77
Hanford-Corcoran	0.22	760	145,905	1,026	6,164	22	1,609	2	10,837	1,810	164,515	0.10
Madera-Chowchilla	0.27	940	165,958	1,306	14,298	10	31	1	7,505	2,257	187,792	0.18
Merced	0.42	1,643	279,976	1,864	15,678	5	31	2	18,546	3,514	314,231	0.35
Modesto	1.03	3,458	598,735	5,136	38,866	6	44	3	10,026	8,603	647,671	0.92
Napa	0.38	900	317,432	2,286	18,239	9	20	2	4,743	3,197	340,434	0.32
Oakland	7.07	23,128	8,120,671	36,123	352,776	5	13	29	192,704	59,285	8,666,164	9.96
Oxnard	2.79	6,716	2,124,288	16,632	132,549	19	97	7	25,329	23,374	2,282,263	2.45
Riverside	9.77	31,962	7,066,829	49,899	350,336	34	139	23	102,056	81,918	7,519,360	4.96
Sacramento	5.03	17,038	3,937,014	25,086	193,945	26	232	19	49,277	42,169	4,180,468	2.79
Salinas	0.66	1,678	557,244	3,882	26,248	12	36	2	12,869	5,574	596,397	0.13

(a) The evaluation period for the Lending Test for all assessment areas with the exception of Vallejo is October 1, 2006 to December 31, 2009. The Vallejo evaluation period is January 1, 2007 to December 31, 2009.

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans with the exception of Vallejo is from October 1, 2006 to March 31, 2010. The Vallejo evaluation period is January 3, 2007 to March 31, 2010.

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

Table 1. Lending Volume

LENDING VOLUME												
Geography: CALIFORNIA												
Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009												
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Limited Review:												
San Diego	8.48	18,473	5,756,159	52,562	405,741	24	96	17	58,359	71,076	6,220,355	4.13
San Francisco	5.65	14,060	6,557,259	33,294	331,940	5	20	37	286,267	47,396	7,175,486	15.15
San Jose-Santa Clara	6.04	19,291	8,512,143	31,303	303,102	4	33	22	114,070	50,620	8,929,348	11.19
San Luis Obispo	0.90	1,865	549,584	5,640	35,940	4	10	1	4,286	7,510	589,820	0.26
Santa Ana	10.42	25,111	8,783,293	62,177	586,103	2	2	45	90,354	87,335	9,459,752	8.43
Santa Barbara	0.97	1,546	662,689	6,545	45,888	17	114	2	2,930	8,110	711,621	0.27
Santa Cruz	0.71	1,548	555,813	4,412	30,844	4	15	4	21,422	5,968	608,094	0.33
Santa Rosa	1.30	3,607	1,082,845	7,293	54,276	10	46	6	21,856	10,916	1,159,023	0.64
Stockton	1.17	3,988	823,393	5,823	39,081	15	91	3	7,107	9,829	869,672	0.24
Vallejo	0.78	2,605	633,707	3,894	29,997	2	15	0	0	6,501	663,719	0.11
Visalia	0.75	2,395	369,234	3,876	28,458	21	1,634	4	31,092	6,296	430,418	0.47

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans with the exception of Vallejo is from October 1, 2006 to March 31, 2010. The evaluation period for the Vallejo AA is January 3, 2007 to March 31, 2010.

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

Table 1. Other Products

LENDING VOLUME		Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010								
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letters of Credit**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Los Angeles	31.83	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	34.44
Limited Review:														
Bakersfield	1.58	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.41
Fresno	1.80	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.77
Hanford-Corcoran	0.22	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.10
Madera-Chowchilla	0.27	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.18
Merced	0.42	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.35
Modesto	1.03	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.92
Napa	0.38	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.32
Oakland	7.07	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9.96
Oxnard	2.79	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.45
Riverside	9.77	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.96
Sacramento	5.03	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.79
Salinas	0.66	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.13

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from October 1, 2006 to March 31, 2010.

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

Table 1. Other Products

LENDING VOLUME		Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010									
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letters of Credit**		% of Rated Area Deposits in AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Limited Review:															
San Diego	8.48	1	20,736	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1	20,736	4.13
San Francisco	5.65	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	15.15
San Jose-Santa Clara	6.04	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11.19
San Luis Obispo	0.90	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.26
Santa Ana	10.42	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8.43
Santa Barbara	0.97	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.27
Santa Cruz	0.71	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.33
Santa Rosa	1.30	1	9,104	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1	9,104	0.64
Stockton	1.17	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.24
Vallejo	0.78	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.11
Visalia	0.75	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.47

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from October 1, 2006 to March 31, 2010 with the exception of Vallejo (January 1, 2007 to March 31, 2010) .

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Los Angeles	22,823	24.71	1.91	3.85	15.46	20.69	31.30	32.66	51.33	42.80	9.04	13.69	12.46	8.94	7.70	
Limited Review:																
Bakersfield	2,176	2.36	2.10	1.38	23.06	16.22	33.51	31.34	41.33	51.06	5.58	6.50	6.81	5.39	5.39	
Fresno	2,492	2.70	1.60	1.52	21.71	18.06	35.87	34.11	40.82	46.31	8.58	10.81	10.32	8.60	8.05	
Hanford-Corcoran	297	0.32	0.00	0.00	22.35	15.15	39.08	36.36	38.57	48.48	5.26	0.00	6.98	5.30	4.93	
Madera-Chowchilla	417	0.45	0.00	0.00	11.37	7.91	52.17	62.35	36.46	29.74	7.55	0.00	5.04	7.98	7.79	
Merced	807	0.87	0.00	0.00	17.13	16.36	50.94	42.13	31.94	41.51	6.74	0.00	7.58	6.93	6.32	
Modesto	1,616	1.75	1.12	1.11	14.63	16.46	53.88	56.99	30.36	25.43	6.45	10.23	7.49	6.45	5.79	
Napa	260	0.28	0.00	0.00	13.85	26.15	60.87	58.08	25.28	15.77	6.26	0.00	6.40	6.79	4.08	
Oakland	7,853	8.50	3.49	6.16	13.07	19.65	43.58	41.81	39.86	32.38	7.55	10.77	9.76	7.59	5.95	
Oxnard	1,993	2.16	1.20	1.30	15.46	17.91	46.06	43.45	37.29	37.33	5.77	7.25	6.23	4.89	6.84	
Riverside	14,003	15.16	1.49	1.12	21.74	21.80	43.33	44.45	33.44	32.63	6.25	7.92	7.39	5.80	6.20	
Sacramento	7,556	8.18	3.71	4.33	19.49	18.40	40.60	37.90	36.20	39.37	7.99	9.63	9.01	7.10	8.29	
Salinas	652	0.71	0.00	0.00	13.83	20.86	45.09	50.77	41.08	28.37	6.80	0.00	8.34	7.01	5.60	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Limited Review:																
San Diego	6,284	6.80	2.30	5.62	14.03	18.19	41.01	37.01	42.66	39.18	5.70	8.32	7.55	5.58	4.83	
San Francisco	3,846	4.16	1.54	7.25	12.79	19.60	45.12	39.37	40.55	33.78	6.20	5.68	8.77	7.01	4.41	
San Jose-Santa Clara	5,088	5.51	1.17	2.73	14.81	25.26	48.40	44.30	35.63	27.71	8.47	10.89	11.21	7.84	7.09	
San Luis Obispo	562	0.61	0.00	0.00	10.27	13.88	75.43	76.87	14.31	9.25	6.69	0.00	6.77	6.76	6.02	
Santa Ana	7,579	8.21	1.25	1.61	19.56	26.18	33.56	32.55	45.63	39.66	7.80	11.97	9.30	7.70	6.79	
Santa Barbara	500	0.54	0.97	3.00	17.42	23.00	39.94	48.00	41.68	26.00	5.01	4.40	6.33	4.84	4.02	
Santa Cruz	436	0.47	0.00	0.00	20.21	30.05	40.44	33.72	39.35	36.24	5.72	0.00	8.26	4.27	5.19	
Santa Rosa	1,201	1.30	0.00	0.00	9.17	14.49	71.27	70.36	19.56	15.15	7.83	0.00	8.40	8.04	6.58	
Stockton	1,834	1.99	1.80	1.20	19.48	13.20	39.28	32.39	39.43	53.22	5.71	6.58	6.03	5.80	5.57	
Vallejo	1,061	1.15	0.52	0.47	15.69	14.99	50.32	49.29	33.48	35.25	6.90	16.67	7.10	6.41	7.50	
Visalia	1,019	1.10	0.00	0.00	22.02	16.09	38.85	45.63	39.13	38.27	5.98	0.00	8.14	5.45	5.94	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Los Angeles	4,631	29.83	1.91	2.68	15.46	19.15	31.30	33.99	51.33	44.18	8.84	13.33	9.57	9.27	7.89	
Limited Review:																
Bakersfield	357	2.30	2.10	1.96	23.06	24.93	33.51	30.53	41.33	42.58	6.66	7.69	7.66	4.12	8.00	
Fresno	472	3.04	1.60	0.85	21.71	19.70	35.87	37.50	40.82	41.95	7.24	0.00	5.37	7.52	8.20	
Hanford-Corcoran	69	0.44	0.00	0.00	22.35	23.19	39.08	31.88	38.57	44.93	7.83	0.00	9.76	7.06	7.69	
Madera-Chowchilla	56	0.36	0.00	0.00	11.37	3.57	52.17	55.36	36.46	41.07	5.09	0.00	3.57	3.88	7.06	
Merced	125	0.81	0.00	0.00	17.13	19.20	50.94	48.80	31.94	32.00	8.52	0.00	6.45	9.92	8.20	
Modesto	243	1.57	1.12	0.41	14.63	11.93	53.88	56.79	30.36	30.86	6.67	0.00	6.19	5.35	9.57	
Napa	44	0.28	0.00	0.00	13.85	11.36	60.87	56.82	25.28	31.82	2.84	0.00	0.00	3.13	3.92	
Oakland	1,133	7.30	3.49	3.62	13.07	14.12	43.58	41.04	39.86	41.22	6.66	3.13	7.88	6.52	6.79	
Oxnard	437	2.82	1.20	2.29	15.46	14.42	46.06	40.27	37.29	43.02	7.48	11.76	4.97	7.36	8.60	
Riverside	2,050	13.21	1.49	1.61	21.74	18.15	43.33	42.39	33.44	37.85	6.38	6.94	7.04	5.22	7.53	
Sacramento	775	4.99	3.71	3.87	19.49	16.90	40.60	40.65	36.20	38.58	4.78	6.50	4.89	4.94	4.43	
Salinas	120	0.77	0.00	0.00	13.83	15.83	45.09	47.50	41.08	36.67	4.57	0.00	2.99	2.61	6.90	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Limited Review:																
San Diego	949	6.11	2.30	2.85	14.03	11.28	41.01	39.41	42.66	46.47	6.30	9.38	6.52	6.34	5.93	
San Francisco	679	4.37	1.54	2.50	12.79	19.00	45.12	44.77	40.55	33.73	6.72	8.82	7.60	6.16	7.05	
San Jose-Santa Clara	792	5.10	1.17	1.26	14.81	15.53	48.40	46.84	35.63	36.36	8.34	7.14	9.09	7.23	9.79	
San Luis Obispo	135	0.87	0.00	0.00	10.27	7.41	75.43	78.52	14.31	14.07	11.17	0.00	4.00	12.26	11.63	
Santa Ana	1,406	9.06	1.25	1.35	19.56	17.64	33.56	34.07	45.63	46.94	7.78	13.73	7.80	7.27	8.02	
Santa Barbara	101	0.65	0.97	1.98	17.42	17.82	39.94	42.57	41.68	37.62	5.02	28.57	2.94	3.70	6.17	
Santa Cruz	111	0.72	0.00	0.00	20.21	26.13	40.44	41.44	39.35	32.43	8.21	0.00	19.61	6.72	4.55	
Santa Rosa	206	1.33	0.00	0.00	9.17	12.62	71.27	66.02	19.56	21.36	9.01	0.00	8.93	8.90	9.52	
Stockton	237	1.53	1.80	1.69	19.48	15.61	39.28	38.40	39.43	44.30	3.14	0.00	5.00	4.20	1.88	
Vallejo	192	1.24	0.52	0.52	15.69	13.02	50.32	47.92	33.48	38.54	6.01	0.00	6.86	4.93	7.55	
Visalia	203	1.31	0.00	0.00	22.02	20.69	38.85	33.50	39.13	45.81	6.85	0.00	7.59	4.86	8.60	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Los Angeles	39,430	25.99	1.91	2.54	15.46	18.46	31.30	28.67	51.33	50.33	9.58	12.80	12.70	9.00	8.66	
Limited Review:																
Bakersfield	2,163	1.43	2.10	2.17	23.06	21.27	33.51	28.71	41.33	47.85	6.60	8.86	8.22	6.90	5.68	
Fresno	2,744	1.81	1.60	2.04	21.71	21.14	35.87	31.52	40.82	45.30	8.62	11.24	10.91	7.76	8.19	
Hanford-Corcoran	390	0.26	0.00	0.00	22.35	16.67	39.08	35.64	38.57	47.69	7.93	0.00	8.43	8.37	7.31	
Madera-Chowchilla	466	0.31	0.00	0.00	11.37	11.16	52.17	54.29	36.46	34.55	7.87	0.00	6.99	8.94	6.71	
Merced	703	0.46	0.00	0.00	17.13	18.07	50.94	42.96	31.94	38.98	8.67	0.00	10.09	9.26	7.34	
Modesto	1,596	1.05	1.12	0.94	14.63	14.66	53.88	54.70	30.36	29.70	7.36	5.88	8.10	7.15	7.48	
Napa	595	0.39	0.00	0.00	13.85	15.97	60.87	60.84	25.28	23.19	7.09	0.00	7.62	7.64	5.38	
Oakland	14,061	9.27	3.49	3.66	13.07	14.82	43.58	35.20	39.86	46.32	9.00	11.96	12.90	7.40	9.22	
Oxnard	4,279	2.82	1.20	0.96	15.46	13.98	46.06	41.69	37.29	43.37	7.94	15.00	11.03	7.15	7.68	
Riverside	15,874	10.46	1.49	1.51	21.74	18.71	43.33	40.30	33.44	39.47	7.87	12.23	8.82	7.44	7.76	
Sacramento	8,683	5.72	3.71	3.46	19.49	15.88	40.60	34.60	36.20	46.07	9.17	10.64	11.91	8.37	8.85	
Salinas	900	0.59	0.00	0.00	13.83	13.56	45.09	44.00	41.08	42.44	6.04	0.00	8.09	5.75	5.73	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Limited Review:																
San Diego	11,195	7.38	2.30	3.10	14.03	12.64	41.01	36.21	42.66	48.05	6.77	10.20	8.68	6.80	6.12	
San Francisco	9,459	6.23	1.54	3.14	12.79	16.79	45.12	41.56	40.55	38.51	9.40	13.43	12.57	8.82	8.72	
San Jose-Santa Clara	13,381	8.82	1.17	1.29	14.81	17.77	48.40	41.70	35.63	39.23	12.85	17.31	18.42	10.72	13.26	
San Luis Obispo	1,165	0.77	0.00	0.00	10.27	12.19	75.43	73.30	14.31	14.51	6.79	0.00	9.07	6.75	5.23	
Santa Ana	16,086	10.60	1.25	0.91	19.56	19.39	33.56	30.46	45.63	49.24	8.84	11.60	11.39	8.39	8.21	
Santa Barbara	940	0.62	0.97	1.70	17.42	19.79	39.94	38.51	41.68	40.00	5.41	6.78	7.94	5.67	4.09	
Santa Cruz	1,000	0.66	0.00	0.00	20.21	20.80	40.44	40.60	39.35	38.60	5.66	0.00	7.16	5.13	5.56	
Santa Rosa	2,190	1.44	0.00	0.00	9.17	9.36	71.27	69.50	19.56	21.14	8.49	0.00	11.40	8.04	8.71	
Stockton	1,912	1.26	1.80	1.52	19.48	15.53	39.28	32.58	39.43	50.37	7.09	7.81	9.88	6.52	6.73	
Vallejo	1,351	0.89	0.52	0.07	15.69	11.10	50.32	50.63	33.48	38.19	7.54	0.00	6.88	7.88	7.39	
Visalia	1,171	0.77	0.00	0.00	22.02	19.04	38.85	38.43	39.13	42.53	9.01	0.00	10.15	8.71	8.76	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Los Angeles	520	55.91	12.96	17.50	31.74	39.04	28.34	26.54	26.96	16.92	0.78	1.27	0.67	0.69	0.81	
Limited Review:																
Bakersfield	10	1.08	5.58	0.00	33.58	20.00	31.60	70.00	29.24	10.00	1.94	0.00	0.00	5.08	0.00	
Fresno	12	1.29	6.51	8.33	38.38	50.00	39.03	41.67	16.08	0.00	0.72	0.00	0.81	1.05	0.00	
Hanford-Corcoran	4	0.43	0.00	0.00	30.00	75.00	38.19	0.00	31.80	25.00	0.00	0.00	0.00	0.00	0.00	
Madera-Chowchilla	1	0.11	0.00	0.00	47.62	0.00	39.87	100.00	12.50	0.00	5.88	0.00	0.00	12.50	0.00	
Merced	8	0.86	0.00	0.00	39.39	37.50	42.53	25.00	18.09	37.50	4.44	0.00	0.00	5.26	20.00	
Modesto	3	0.32	3.38	0.00	26.24	33.33	49.18	33.33	21.20	33.33	2.82	0.00	3.70	0.00	7.69	
Napa	1	0.11	0.00	0.00	24.02	0.00	72.18	100.00	3.80	0.00	0.00	0.00	0.00	0.00	0.00	
Oakland	81	8.71	13.31	16.05	27.95	34.57	45.36	37.04	13.38	12.35	1.31	1.25	1.04	1.08	3.65	
Oxnard	7	0.75	3.57	28.57	34.60	28.57	47.43	42.86	14.41	0.00	0.91	0.00	0.89	1.32	0.00	
Riverside	35	3.76	7.73	11.43	38.68	42.86	37.84	42.86	15.76	2.86	1.07	0.00	0.40	2.48	0.00	
Sacramento	24	2.58	10.93	4.17	35.93	41.67	35.50	41.67	17.64	12.50	0.65	0.00	0.31	1.60	0.00	
Salinas	6	0.65	0.00	0.00	28.29	83.33	58.50	16.67	13.21	0.00	1.53	0.00	3.16	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Limited Review:																
San Diego	45	4.84	11.77	8.89	32.61	46.67	37.33	35.56	18.29	8.89	0.40	0.00	0.55	0.43	0.55	
San Francisco	76	8.17	19.98	19.74	23.42	26.32	31.54	32.89	25.05	21.05	0.57	1.01	0.55	0.48	0.56	
San Jose-Santa Clara	30	3.23	6.98	13.33	25.75	43.33	53.88	23.33	13.39	20.00	0.89	1.19	0.36	0.49	3.13	
San Luis Obispo	3	0.32	0.00	0.00	34.31	66.67	64.12	33.33	1.56	0.00	1.30	0.00	0.00	1.82	0.00	
Santa Ana	40	4.30	6.27	7.50	41.07	70.00	33.61	17.50	19.05	5.00	0.53	0.00	0.59	0.94	0.00	
Santa Barbara	5	0.54	12.99	20.00	41.94	20.00	28.08	20.00	16.99	40.00	0.87	2.70	0.00	1.45	0.00	
Santa Cruz	1	0.11	0.00	0.00	43.78	0.00	44.77	100.00	11.45	0.00	0.00	0.00	0.00	0.00	0.00	
Santa Rosa	10	1.08	0.00	0.00	29.86	40.00	65.54	60.00	4.60	0.00	3.10	0.00	2.56	3.61	0.00	
Stockton	5	0.54	22.11	20.00	26.33	0.00	37.30	80.00	14.27	0.00	1.30	3.03	0.00	1.72	0.00	
Vallejo	1	0.11	6.21	0.00	35.41	0.00	37.98	100.00	20.40	0.00	0.00	0.00	0.00	0.00	0.00	
Visalia	2	0.22	0.00	0.00	40.02	50.00	30.92	50.00	29.06	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009			
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	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	W		
Full Review:																			
Los Angeles	197,977	34.40	7.58	5.38	20.47	19.96	26.51	29.39	44.65	45.26	12.07	11.99	13.68	13.59					
Limited Review:																			
Bakersfield	8,498	1.48	2.79	2.13	27.84	22.96	28.46	25.89	40.91	49.02	12.91	15.80	13.10	12.19					
Fresno	9,313	1.62	6.29	4.16	26.27	23.09	32.69	34.04	34.63	38.72	10.76	11.14	11.64	11.67					
Hanford-Corcoran	1,026	0.18	0.00	0.00	38.48	29.14	30.05	38.69	31.33	32.16	11.54	0.00	11.51	11.34					
Madera-Chowchilla	1,306	0.23	0.00	0.00	15.29	10.49	52.88	61.64	31.83	27.87	9.78	0.00	12.16	10.62					
Merced	1,864	0.32	0.00	0.00	29.16	21.41	45.26	51.45	25.58	27.15	11.11	0.00	10.29	11.97					
Modesto	5,136	0.89	8.28	3.95	15.08	13.75	50.24	53.64	26.40	28.66	11.57	6.50	11.95	12.58					
Napa	2,286	0.40	0.00	0.00	25.39	20.82	57.17	54.90	17.44	24.28	9.92	0.00	9.86	9.23					
Oakland	36,114	6.27	10.24	7.39	16.19	14.73	39.24	40.71	34.21	37.18	8.89	10.15	9.79	9.35					
Oxnard	16,632	2.89	3.74	1.98	17.97	14.09	49.63	47.76	28.66	36.17	12.47	9.49	12.60	12.74					
Riverside	49,852	8.66	3.50	1.94	27.59	22.62	41.13	41.09	27.70	34.35	11.43	11.36	11.90	11.85					
Sacramento	25,086	4.36	7.76	5.75	22.67	18.86	36.67	37.95	32.90	37.44	10.01	10.42	10.26	10.63					
Salinas	3,882	0.67	0.00	0.00	20.45	16.51	45.38	46.29	34.17	37.20	8.94	0.00	8.43	9.81					

* Based on 2008 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 (2009).

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
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	U									
Limited Review:																								
San Diego	52,558	9.13	4.88	3.55	20.69	17.09	36.92	37.58	37.48	41.78	10.98	11.26	11.22	11.35	1									
San Francisco	33,289	5.78	15.10	9.69	18.11	17.84	34.90	40.65	31.80	31.81	7.71	7.10	7.94	8.38										
San Jose-Santa Clara	31,303	5.44	2.99	2.59	22.49	18.60	43.69	47.53	30.83	31.28	10.50	10.00	10.84	10.82										
San Luis Obispo	5,640	0.98	0.00	0.00	20.77	13.33	66.34	70.67	12.88	15.99	14.14	0.00	12.17	14.32	1									
Santa Ana	61,955	10.76	2.93	2.58	28.33	25.51	35.00	34.08	32.93	37.82	10.19	11.11	11.02	10.78										
Santa Barbara	6,545	1.14	2.72	1.63	35.14	27.44	33.03	33.93	29.11	36.99	11.64	12.24	10.96	12.09	1									
Santa Cruz	4,412	0.77	0.00	0.00	21.49	20.40	47.15	43.40	31.36	36.20	9.53	0.00	9.67	9.35										
Santa Rosa	7,293	1.27	0.00	0.00	15.85	11.33	69.19	70.52	14.96	18.15	8.96	0.00	8.58	9.07										
Stockton	5,823	1.01	8.73	4.88	21.12	18.07	36.19	35.43	33.95	41.63	10.13	9.04	11.10	9.98										
Vallejo	3,893	0.68	2.77	1.34	24.42	18.80	45.08	47.08	27.70	32.78	9.88	7.87	9.79	10.66										
Visalia	3,876	0.67	0.00	0.00	29.66	25.80	34.08	36.20	36.22	38.00	12.43	0.00	14.24	12.37	1									

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Los Angeles	22	6.79	3.82	0.00	15.53	22.73	31.24	22.73	48.90	54.55	0.53	0.00	1.22	0.52	0.42									
Limited Review:																								
Bakersfield	15	4.63	2.00	0.00	34.51	40.00	32.94	46.67	30.56	13.33	1.85	0.00	2.30	3.49	0.86									
Fresno	31	9.57	1.33	0.00	26.12	29.03	44.19	58.06	28.30	12.90	1.78	0.00	2.53	2.10	0.00									
Hanford-Corcoran	22	6.79	0.00	0.00	19.87	27.27	57.10	54.55	22.87	18.18	3.30	0.00	6.25	3.17	3.57									
Madera-Chowchilla	10	3.09	0.00	0.00	2.57	0.00	81.47	90.00	15.96	10.00	1.85	0.00	0.00	2.50	0.00									
Merced	5	1.54	0.00	0.00	13.34	20.00	72.97	60.00	13.69	20.00	0.62	0.00	0.00	0.42	2.04									
Modesto	6	1.85	2.01	16.67	12.75	33.33	62.17	50.00	23.07	0.00	0.70	0.00	4.35	0.37	0.00									
Napa	9	2.78	0.00	0.00	13.52	33.33	47.81	44.44	38.67	22.22	0.67	0.00	0.00	0.00	1.89									
Oakland	5	1.54	6.40	0.00	16.26	0.00	38.00	60.00	39.34	40.00	0.90	0.00	0.00	1.39	0.90									
Oxnard	19	5.86	3.56	10.53	22.01	31.58	54.65	42.11	19.78	15.79	3.26	11.11	10.00	2.24	1.37									
Riverside	34	10.49	2.28	2.94	26.22	32.35	41.59	50.00	29.92	14.71	2.15	20.00	3.85	3.15	0.38									
Sacramento	26	8.02	4.30	0.00	19.47	15.38	45.58	61.54	30.66	23.08	2.30	0.00	4.00	2.66	1.61									
Salinas	12	3.70	0.00	0.00	19.65	16.67	51.49	58.33	28.85	25.00	3.49	0.00	6.90	3.64	1.56									

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Limited Review:																								
San Diego	24	7.41	3.79	0.00	19.11	25.00	39.91	37.50	37.16	37.50	1.29	0.00	2.44	1.15	1.33									
San Francisco	5	1.54	6.86	0.00	15.08	20.00	43.68	40.00	34.38	40.00	0.17	0.00	1.28	0.00	0.00									
San Jose-Santa Clara	4	1.23	2.55	0.00	25.56	25.00	44.73	25.00	27.17	50.00	0.25	0.00	1.96	0.00	0.00									
San Luis Obispo	4	1.23	0.00	0.00	12.14	0.00	73.33	75.00	14.52	25.00	0.73	0.00	0.00	0.52	2.50									
Santa Ana	2	0.62	3.39	0.00	26.64	0.00	34.68	100.00	35.05	0.00	0.00	0.00	0.00	0.00	0.00									
Santa Barbara	17	5.25	1.87	0.00	24.40	5.88	33.09	52.94	40.64	41.18	2.55	0.00	0.00	3.88	2.27									
Santa Cruz	4	1.23	0.00	0.00	24.02	75.00	41.80	25.00	34.18	0.00	0.00	0.00	0.00	0.00	0.00									
Santa Rosa	10	3.09	0.00	0.00	6.04	10.00	81.20	90.00	12.76	0.00	1.43	0.00	14.29	1.49	0.00									
Stockton	15	4.63	1.99	0.00	9.90	26.67	53.03	60.00	35.08	13.33	1.25	0.00	0.00	1.29	1.02									
Vallejo	2	0.62	0.91	0.00	12.86	0.00	55.19	100.00	31.04	0.00	0.00	0.00	0.00	0.00	0.00									
Visalia	21	6.48	0.00	0.00	25.44	23.81	43.64	57.14	30.92	19.05	1.10	0.00	0.65	2.51	0.00									

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****						
Full Review:																
Los Angeles	22,860	24.74	23.87	1.51	16.49	7.05	17.40	16.00	42.24	75.44	10.07	10.51	11.74	10.86	9.72	
Limited Review:																
Bakersfield	2,176	2.36	23.46	2.18	16.67	9.94	18.13	21.56	41.75	66.31	5.55	6.14	6.10	4.67	5.81	
Fresno	2,492	2.70	22.80	3.70	17.05	11.21	18.53	20.03	41.63	65.05	9.11	14.08	10.94	8.10	9.13	
Hanford-Corcoran	297	0.32	20.55	1.71	18.31	12.33	19.92	22.26	41.22	63.70	5.59	4.44	6.67	4.07	6.18	
Madera-Chowchilla	417	0.45	22.09	3.17	16.65	12.44	21.11	21.22	40.14	63.17	8.19	12.90	9.90	8.57	7.51	
Merced	807	0.87	20.72	4.79	18.32	14.23	19.88	21.16	41.08	59.82	6.74	10.37	6.96	5.99	6.88	
Modesto	1,616	1.75	21.74	5.43	17.27	16.43	20.71	23.80	40.28	54.34	6.40	7.87	6.44	6.07	6.47	
Napa	260	0.28	18.55	1.93	19.66	8.88	22.34	19.69	39.45	69.50	7.08	8.00	5.66	7.43	7.10	
Oakland	7,853	8.50	20.97	6.12	17.47	13.73	21.18	21.16	40.38	58.99	8.52	11.92	9.77	8.52	7.79	
Oxnard	1,993	2.16	19.55	3.34	18.43	11.64	22.09	21.31	39.92	63.71	6.17	5.71	5.02	5.57	6.89	
Riverside	14,003	15.16	21.73	3.33	17.48	12.43	20.23	22.94	40.56	61.31	6.34	6.57	5.91	6.16	6.53	
Sacramento	7,556	8.18	21.09	6.19	18.46	18.11	20.94	27.77	39.51	47.93	8.27	8.53	7.88	8.06	8.57	
Salinas	652	0.71	19.70	2.63	18.38	11.92	21.52	22.29	40.40	63.16	7.58	11.48	8.91	7.18	7.42	

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****						
Limited Review:																
San Diego	6,284	6.80	21.02	2.35	17.91	9.49	20.09	19.21	40.98	68.95	6.09	7.43	5.29	5.76	6.35	
San Francisco	3,846	4.16	21.33	2.02	17.59	9.09	19.98	14.90	41.11	73.98	7.50	12.21	12.68	9.52	6.29	
San Jose-Santa Clara	5,088	5.51	20.21	3.68	17.95	12.65	21.63	19.75	40.21	63.92	9.85	13.64	13.88	9.79	8.75	
San Luis Obispo	562	0.61	18.57	0.71	18.88	4.29	22.65	15.18	39.90	79.82	7.85	5.88	6.28	7.27	8.22	
Santa Ana	7,579	8.20	20.69	3.51	17.97	15.19	20.68	22.70	40.65	58.60	8.81	7.76	10.37	9.85	7.96	
Santa Barbara	500	0.54	20.00	1.80	18.61	10.22	20.45	18.44	40.95	69.54	5.26	5.26	5.71	4.15	5.59	
Santa Cruz	436	0.47	19.96	2.31	17.98	8.10	21.23	15.74	40.83	73.84	6.77	7.41	4.49	8.39	6.63	
Santa Rosa	1,201	1.30	17.73	3.53	18.87	12.61	24.32	20.92	39.08	62.94	8.75	11.20	8.09	8.16	9.10	
Stockton	1,834	1.99	22.77	4.25	16.48	15.80	19.80	25.52	40.95	54.42	5.82	5.86	5.43	5.82	5.95	
Vallejo	1,061	1.15	19.26	4.36	18.51	18.50	23.45	27.51	38.79	49.62	7.27	6.58	6.43	6.56	8.11	
Visalia	1,019	1.10	22.23	2.68	17.27	13.69	19.30	21.23	41.20	62.40	6.28	11.76	7.69	5.94	6.04	

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CALIFORNIA						Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles	4,636	29.86	23.87	2.43	16.49	7.93	17.40	18.05	42.24	71.60	10.84	11.26	11.41	11.05	10.64
Limited Review:															
Bakersfield	357	2.30	23.46	3.98	16.67	14.20	18.13	22.73	41.75	59.09	7.58	7.14	4.80	6.19	8.85
Fresno	472	3.04	22.80	3.87	17.05	11.61	18.53	23.87	41.63	60.65	8.33	4.65	5.13	10.75	8.35
Hanford-Corcoran	69	0.44	20.55	2.94	18.31	14.71	19.92	20.59	41.22	61.76	8.54	20.00	9.68	10.20	7.02
Madera-Chowchilla	56	0.36	22.09	3.64	16.65	14.55	21.11	20.00	40.14	61.82	5.98	7.69	5.56	2.70	6.90
Merced	125	0.80	20.72	4.00	18.32	12.00	19.88	26.40	41.08	57.60	11.87	0.00	13.89	15.38	10.92
Modesto	243	1.56	21.74	5.81	17.27	12.45	20.71	21.58	40.28	60.17	9.11	14.29	11.48	5.66	9.36
Napa	44	0.28	18.55	0.00	19.66	13.64	22.34	15.91	39.45	70.45	3.70	0.00	0.00	0.00	6.94
Oakland	1,133	7.30	20.97	4.80	17.47	15.02	21.18	24.18	40.38	56.00	8.41	9.64	8.31	7.39	8.79
Oxnard	437	2.81	19.55	2.78	18.43	11.11	22.09	30.79	39.92	55.32	9.66	5.26	10.00	16.04	6.54
Riverside	2,050	13.20	21.73	3.84	17.48	11.38	20.23	21.59	40.56	63.18	7.57	5.07	6.88	6.20	8.70
Sacramento	775	4.99	21.09	5.33	18.46	14.82	20.94	27.18	39.51	52.67	5.52	8.38	5.85	4.99	5.30
Salinas	120	0.77	19.70	0.85	18.38	5.93	21.52	14.41	40.40	78.81	7.00	0.00	2.94	3.77	9.43

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp									
Limited Review:																								
San Diego	949	6.11	21.02	2.75	17.91	8.90	20.09	22.14	40.98	66.21	7.81	6.18	6.82	7.04	8.60									
San Francisco	679	4.37	21.33	5.69	17.59	14.22	19.98	20.96	41.11	59.13	8.47	10.69	8.09	10.54	7.34									
San Jose-Santa Clara	792	5.10	20.21	3.73	17.95	11.95	21.63	25.06	40.21	59.25	10.40	10.53	11.72	11.08	9.58									
San Luis Obispo	135	0.87	18.57	3.70	18.88	18.52	22.65	17.78	39.90	60.00	12.89	27.27	11.29	13.19	12.43									
Santa Ana	1,406	9.05	20.69	3.35	17.97	10.99	20.68	23.70	40.65	61.96	9.07	8.23	9.00	9.02	9.24									
Santa Barbara	101	0.65	20.00	3.00	18.61	10.00	20.45	22.00	40.95	65.00	5.94	6.25	3.92	3.53	7.14									
Santa Cruz	111	0.71	19.96	1.80	17.98	7.21	21.23	19.82	40.83	71.17	10.65	12.50	15.00	13.73	8.76									
Santa Rosa	206	1.33	17.73	3.88	18.87	12.62	24.32	25.24	39.08	58.25	10.54	7.14	9.68	13.19	9.92									
Stockton	237	1.53	22.77	2.98	16.48	10.21	19.80	26.38	40.95	60.43	4.36	6.67	6.33	6.40	2.73									
Vallejo	192	1.24	19.26	2.62	18.51	13.09	23.45	29.32	38.79	54.97	7.75	5.88	7.87	6.77	8.46									
Visalia	203	1.31	22.23	2.99	17.27	9.95	19.30	20.40	41.20	66.67	8.06	8.00	8.75	6.56	8.50									

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Los Angeles	39,477	26.01	23.87	2.20	16.49	7.61	17.40	18.54	42.24	71.65	11.86	11.84	11.74	13.21	11.48									
Limited Review:																								
Bakersfield	2,163	1.43	23.46	4.17	16.67	10.29	18.13	20.78	41.75	64.75	7.74	14.62	7.27	8.59	7.11									
Fresno	2,744	1.81	22.80	4.23	17.05	13.53	18.53	20.39	41.63	61.85	10.25	13.64	14.06	10.85	9.19									
Hanford-Corcoran	390	0.26	20.55	4.52	18.31	7.06	19.92	19.49	41.22	68.93	9.13	9.80	7.33	8.06	9.91									
Madera-Chowchilla	466	0.31	22.09	3.36	16.65	12.75	21.11	22.60	40.14	61.30	9.58	7.89	12.18	7.17	9.91									
Merced	703	0.46	20.72	4.36	18.32	9.62	19.88	16.84	41.08	69.17	12.79	25.00	19.35	13.78	10.70									
Modesto	1,596	1.05	21.74	3.53	17.27	13.60	20.71	23.15	40.28	59.71	9.58	8.81	12.19	8.71	9.31									
Napa	595	0.39	18.55	2.25	19.66	10.90	22.34	20.24	39.45	66.61	8.96	8.96	6.93	8.60	9.54									
Oakland	14,061	9.26	20.97	4.31	17.47	12.90	21.18	21.96	40.38	60.82	11.04	9.83	10.82	10.50	11.41									
Oxnard	4,279	2.82	19.55	5.27	18.43	12.73	22.09	26.01	39.92	55.99	9.48	10.96	9.27	10.27	9.00									
Riverside	15,874	10.46	21.73	2.80	17.48	11.08	20.23	21.93	40.56	64.19	9.55	8.03	9.07	9.44	9.83									
Sacramento	8,683	5.72	21.09	3.46	18.46	14.05	20.94	26.28	39.51	56.21	10.55	9.87	10.51	11.00	10.40									
Salinas	900	0.59	19.70	3.23	18.38	8.65	21.52	17.65	40.40	70.47	8.42	10.84	10.22	7.87	8.22									

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 3.5% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp									
Limited Review:																								
San Diego	11,195	7.38	21.02	2.69	17.91	9.41	20.09	20.78	40.98	67.13	8.22	9.11	7.86	8.41	8.16									
San Francisco	9,459	6.23	21.33	4.62	17.59	12.13	19.98	19.37	41.11	63.89	11.56	10.54	12.80	11.43	11.43									
San Jose-Santa Clara	13,381	8.82	20.21	3.80	17.95	11.54	21.63	20.11	40.21	64.56	14.94	12.89	14.15	13.29	15.77									
San Luis Obispo	1,165	0.77	18.57	1.94	18.88	10.06	22.65	23.74	39.90	64.25	8.33	8.11	8.59	10.11	7.64									
Santa Ana	16,086	10.60	20.69	4.82	17.97	13.52	20.68	24.55	40.65	57.10	10.55	7.24	10.85	11.28	10.39									
Santa Barbara	940	0.62	20.00	2.32	18.61	7.73	20.45	20.09	40.95	69.87	6.92	3.26	6.18	7.59	7.01									
Santa Cruz	1,000	0.66	19.96	2.56	17.98	10.76	21.23	21.00	40.83	65.68	7.10	6.31	5.62	7.00	7.47									
Santa Rosa	2,190	1.44	17.73	4.33	18.87	14.54	24.32	24.37	39.08	56.76	10.18	9.83	11.04	10.43	9.83									
Stockton	1,912	1.26	22.77	2.75	16.48	10.60	19.80	22.41	40.95	64.25	9.51	10.14	9.06	8.27	10.01									
Vallejo	1,351	0.89	19.26	3.46	18.51	13.93	23.45	27.85	38.79	54.76	9.32	8.74	8.25	8.78	9.96									
Visalia	1,171	0.77	22.23	3.91	17.27	14.67	19.30	22.04	41.20	59.38	10.91	16.10	13.58	10.31	10.20									

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 3.5% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CALIFORNIA			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Los Angeles	199,185	34.52	75.36	50.07	99.29	0.53	0.18	12.07	17.08
Limited Review:									
Bakersfield	8,498	1.47	76.85	43.34	99.62	0.22	0.15	12.91	15.29
Fresno	9,318	1.61	75.33	50.86	99.26	0.39	0.35	10.76	16.10
Hanford-Corcoran	1,026	0.18	73.09	46.78	99.81	0.19	0.00	11.54	14.05
Madera-Chowchilla	1,306	0.23	78.24	49.69	99.08	0.46	0.46	9.78	12.88
Merced	1,864	0.32	75.11	49.73	99.46	0.48	0.05	11.11	17.26
Modesto	5,136	0.89	76.88	48.38	99.61	0.27	0.12	11.57	14.83
Napa	2,286	0.40	77.24	52.54	99.52	0.39	0.09	9.92	13.90
Oakland	36,123	6.26	76.99	59.23	99.27	0.58	0.14	8.89	13.85
Oxnard	16,632	2.88	77.41	47.82	99.50	0.42	0.08	12.47	16.45
Riverside	49,899	8.65	77.36	48.59	99.61	0.29	0.10	11.43	14.74
Sacramento	25,086	4.35	75.55	51.35	99.57	0.37	0.06	10.01	12.52
Salinas	3,882	0.67	76.47	53.43	99.92	0.05	0.03	8.94	12.05

* Based on 2008 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 - 2009).

**** 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 37.30% of small loans to businesses originated and purchased by the bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CALIFORNIA			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Limited Review:									
San Diego	52,562	9.11	73.19	52.47	99.64	0.27	0.08	10.98	14.92
San Francisco	33,294	5.77	75.30	61.04	99.29	0.52	0.19	7.71	12.40
San Jose-Santa Clara	31,303	5.42	75.08	60.29	99.35	0.50	0.15	10.50	16.11
San Luis Obispo	5,640	0.98	78.32	52.78	99.95	0.02	0.04	14.14	21.16
Santa Ana	62,177	10.77	75.44	54.30	99.20	0.61	0.19	10.19	14.81
Santa Barbara	6,545	1.13	75.62	51.72	99.88	0.05	0.08	11.64	18.87
Santa Cruz	4,412	0.76	80.58	59.70	99.98	0.02	0.00	9.53	15.55
Santa Rosa	7,293	1.26	78.66	53.46	99.74	0.16	0.10	8.96	13.33
Stockton	5,823	1.01	75.35	48.89	99.67	0.33	0.00	10.13	12.86
Vallejo	3,894	0.67	78.87	51.26	99.26	0.72	0.03	9.88	14.31
Visalia	3,876	0.67	75.75	46.10	99.61	0.21	0.18	12.43	15.91

* Based on 2008 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 - 2009).

**** 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 37.30% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Los Angeles	22	6.79	95.31	36.36	100.00	0.00	0.00	0.53	0.25
Limited Review:									
Bakersfield	15	4.63	88.96	33.33	93.33	6.67	0.00	1.85	0.58
Fresno	31	9.57	89.53	48.39	83.87	3.23	12.90	1.78	2.03
Hanford-Corcoran	22	6.79	88.64	31.82	81.82	0.00	18.18	3.30	3.03
Madera-Chowchilla	10	3.09	90.60	50.00	100.00	0.00	0.00	1.85	2.21
Merced	5	1.54	91.17	80.00	100.00	0.00	0.00	0.62	0.63
Modesto	6	1.85	93.47	33.33	100.00	0.00	0.00	0.70	0.46
Napa	9	2.78	91.46	66.67	100.00	0.00	0.00	0.67	0.93
Oakland	5	1.54	94.81	40.00	100.00	0.00	0.00	0.90	1.03
Oxnard	19	5.86	90.43	10.53	100.00	0.00	0.00	3.26	1.44
Riverside	34	10.49	93.53	55.88	100.00	0.00	0.00	2.15	2.21
Sacramento	26	8.02	94.28	46.15	100.00	0.00	0.00	2.30	1.40
Salinas	12	3.70	81.05	41.67	100.00	0.00	0.00	3.49	3.15

* Based on 2008 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 - 2009).

**** 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 38.89% of small loans to farms originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Limited Review:									
San Diego	24	7.41	94.80	33.33	100.00	0.00	0.00	1.29	1.13
San Francisco	5	1.54	95.37	20.00	100.00	0.00	0.00	0.17	0.00
San Jose-Santa Clara	4	1.23	93.74	50.00	100.00	0.00	0.00	0.25	0.00
San Luis Obispo	4	1.23	95.71	50.00	100.00	0.00	0.00	0.73	0.00
Santa Ana	2	0.62	93.06	0.00	100.00	0.00	0.00	0.00	0.00
Santa Barbara	17	5.25	90.71	52.94	100.00	0.00	0.00	2.55	1.92
Santa Cruz	4	1.23	91.22	0.00	100.00	0.00	0.00	0.00	0.00
Santa Rosa	10	3.09	94.01	50.00	100.00	0.00	0.00	1.43	1.06
Stockton	15	4.63	91.46	40.00	100.00	0.00	0.00	1.25	1.43
Vallejo	2	0.62	95.32	100.00	100.00	0.00	0.00	0.00	0.00
Visalia	21	6.48	88.54	33.33	76.19	9.52	14.29	1.10	0.68

* Based on 2008 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 - 2009).

**** 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 38.89% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CALIFORNIA		Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Los Angeles	0	0	305	284,251	305	284,251	18.25	N/A	N/A
Limited Review:									
Bakersfield	0	0	26	35,312	26	35,312	2.27	N/A	N/A
Fresno	0	0	63	29,217	63	29,217	1.88	N/A	N/A
Hanford	0	0	5	1,935	5	1,935	0.12	N/A	N/A
Madera	0	0	5	3,855	5	3,855	0.25	N/A	N/A
Merced	0	0	8	19,807	8	19,807	1.27	N/A	N/A
Modesto	0	0	10	4,115	10	4,115	0.26	N/A	N/A
Napa	0	0	3	1,179	3	1,179	0.08	N/A	N/A
Oakland	0	0	104	197,537	104	197,537	12.68	N/A	N/A
Oxnard	0	0	40	58,873	40	58,873	3.78	N/A	N/A
Riverside	0	0	96	175,350	96	175,350	11.26	N/A	N/A
Sacramento	0	0	77	91,413	77	91,413	5.87	N/A	N/A

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

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Limited Review:									
Salinas	0	0	12	26,434	12	26,434	1.70	N/A	N/A
San Diego	0	0	105	80,906	105	80,906	5.20	N/A	N/A
San Francisco	0	0	253	271,553	253	271,553	17.44	N/A	N/A
San Jose	0	0	68	173,991	68	173,991	11.17	N/A	N/A
San Luis Obispo	0	0	4	866	4	866	0.06	N/A	N/A
Santa Ana	0	0	59	49,176	59	49,176	3.16	N/A	N/A
Santa Barbara	0	0	12	14,254	12	14,254	0.92	N/A	N/A
Santa Cruz	0	0	7	1,578	7	1,578	0.10	N/A	N/A
Santa Rosa	0	0	7	10,288	7	10,288	0.66	N/A	N/A
Stockton	0	0	5	843	5	843	0.05	N/A	N/A
Vallejo	0	0	8	10,764	8	10,764	0.69	N/A	N/A
Visalia	0	0	14	13,812	14	13,812	0.89	N/A	N/A
CA Statewide with Potential to Benefit the AA	32	72,981	0	0	32	72,981	N/A	N/A	N/A

The evaluation period for Vallejo is January 3, 2007 to March 31, 2010

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Evaluation				
Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009																		
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Geography: CALIFORNIA Population						
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																		
Los Angeles	34.44	110	29.18	4.55	23.64	21.82	50.00	1	1	0	0	0	0	8.00	29.44	30.88	31.58	
Limited Review:																		
Bakersfield	0.41	2	0.53	0.00	0.00	0.00	100.00	0	1	0	0	0	- 1	4.40	32.14	31.74	30.06	
Fresno	1.77	15	3.98	6.67	13.33	46.67	33.33	0	0	0	0	0	0	4.73	32.88	35.66	26.63	
Hanford	0.10	1	0.27	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	35.42	35.84	23.81	
Madera	0.18	2	0.53	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	21.87	54.77	23.36	
Merced	0.35	3	0.80	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	26.44	50.04	23.52	
Modesto	0.92	4	1.06	0.00	0.00	25.00	75.00	0	1	- 1	0	0	0	2.66	21.22	52.77	23.35	
Napa	0.32	2	0.53	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	16.66	63.01	20.33	
Oakland	9.96	41	10.88	9.76	19.51	48.78	21.95	0	0	0	0	0	0	8.54	20.25	41.14	30.04	
Oxnard	2.45	10	2.65	0.00	20.00	50.00	30.00	0	0	0	0	0	0	3.86	23.98	44.41	27.75	
Riverside	4.96	27	7.16	7.41	40.74	33.33	18.52	1	0	0	0	1	0	3.53	28.54	41.16	26.73	
Sacramento	2.79	12	3.18	0.00	8.33	75.00	16.67	1	1	0	0	0	0	7.22	26.25	37.59	28.94	
Salinas	0.13	1	0.27	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	26.32	48.43	25.25	

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: CALIFORNIA				Evaluation Period:			
OCTOBER 1, 2006 TO DECEMBER 31, 2009																								
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
Limited Review:																								
San Diego	4.13	25	6.63	4.00	24.00	40.00	32.00	1	2	0	- 1	0	0	7.78	24.46	37.46	30.01							
San Francisco	15.15	47	12.47	17.0 2	10.64	40.43	31.91	2	0	1	0	0	1	7.21	21.80	42.21	28.77							
San Jose	11.19	23	6.10	0.00	17.39	47.83	34.78	0	0	0	0	0	0	4.03	22.79	47.69	25.49							
San Luis Obispo	0.26	2	0.53	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	16.72	69.48	13.79							
Santa Ana	8.43	35	9.28	2.86	25.71	48.57	22.86	1	0	0	0	1	0	4.95	30.96	31.84	32.26							
Santa Barbara	0.27	2	0.53	0.00	0.00	50.00	50.00	0	0	0	0	0	0	6.08	31.57	33.18	29.18							
Santa Cruz	0.33	2	0.53	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	31.25	39.43	29.32							
Santa Rosa	0.64	5	1.33	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.00	14.38	69.79	15.83							
Stockton	0.24	2	0.53	0.00	50.00	50.00	0.00	0	1	0	0	0	- 1	5.88	25.65	38.34	30.13							
Vallejo	0.11	1	0.27	0.00	0.00	100.00	0.00	1	0	0	0	1	0	1.55	22.77	47.80	27.02							
Visalia	0.47	3	0.80	0.00	66.67	0.00	33.33	0	0	0	0	0	0	0.00	32.31	38.64	28.80							

The evaluation period for Vallejo is January 3, 2007 to December 31, 2009

Table 1. Lending Volume

LENDING VOLUME		Geography: CONNECTICUT				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Bridgeport	59.46	7,246	2,739,537	18,687	145,184	0	0	5	53,421	25,938	2,938,142	97.28
Limited Review:												
New Haven	40.54	4,682	835,491	12,998	83,760	0	0	2	2,607	17,682	921,858	2.72

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2006 to March 31, 2010.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CONNECTICUT					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Bridgeport	3,022	64.55	3.34	7.28	16.53	23.30	39.53	35.70	40.60	33.72	6.25	12.27	8.34	5.30	5.47	
Limited Review:																
New Haven	1,660	35.45	3.04	4.88	12.33	17.89	52.39	49.88	32.24	27.35	3.63	7.56	4.16	3.12	3.83	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: CONNECTICUT				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total **	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****					
Full Review:															
Bridgeport	366	55.12	3.34	4.92	16.53	22.13	39.53	37.16	40.60	35.79	5.09	6.45	4.68	4.75	5.52
Limited Review:															
New Haven	298	44.88	3.04	6.38	12.33	16.44	52.39	47.32	32.24	29.87	2.71	8.62	4.92	2.56	1.65

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: CONNECTICUT				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total **	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****					
Full Review:															
Bridgeport	3,855	58.64	3.34	4.02	16.53	23.09	39.53	34.66	40.60	38.24	6.62	10.77	8.69	6.17	5.79
Limited Review:															
New Haven	2,719	41.36	3.04	4.93	12.33	15.81	52.39	49.83	32.24	29.42	4.87	8.02	6.60	4.65	4.13

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: CONNECTICUT					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Bridgeport	3	42.86	20.80	0.00	42.87	100.00	29.03	0.00	7.31	0.00	0.44	0.00	1.04	0.00	0.00	
Limited Review:																
New Haven	4	57.14	20.52	50.00	29.27	25.00	42.05	25.00	8.16	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: CONNECTICUT				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Bridgeport	18,687	58.98	8.38	6.98	19.70	19.24	34.18	37.50	37.74	36.28	11.74	12.25	14.02	12.20	10.38					
Limited Review:																				
New Haven	12,998	41.02	8.46	5.59	18.35	14.83	42.72	45.95	30.45	33.64	12.31	11.30	12.04	12.90	11.82					

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CONNECTICUT					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Bridgeport	3,022	64.55	21.61	6.66	17.25	19.13	19.58	23.37	41.56	50.84	7.15	8.73	7.41	6.50	7.14	
Limited Review:																
New Haven	1,660	35.45	20.85	6.00	17.34	24.26	22.55	31.59	39.26	38.14	4.02	4.83	4.16	3.76	4.04	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: CONNECTICUT				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****					
Full Review:															
Bridgeport	366	55.12	21.61	7.58	17.25	26.69	19.58	26.12	41.56	39.61	5.47	4.62	5.95	5.71	5.32
Limited Review:															
New Haven	298	44.88	20.85	9.06	17.34	24.16	22.55	32.21	39.26	34.56	2.80	4.70	5.28	2.47	1.74

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: CONNECTICUT				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Bridgeport	3,855	58.63	21.61	8.35	17.25	19.72	19.58	22.95	41.56	48.99	7.39	9.77	8.77	7.43	6.56	
Limited Review:																
New Haven	2,720	41.37	20.85	7.26	17.34	24.96	22.55	30.72	39.26	37.06	5.24	7.44	6.55	5.54	4.07	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CONNECTICUT			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Bridgeport	18,687	58.98	77.90	53.72	99.63	0.23	0.14	11.74	24.64
Limited Review:									
New Haven	12,998	41.02	76.69	55.06	99.85	0.10	0.05	12.31	22.71

* Based on 2008 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 - 2009).

**** 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 36.51% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CONNECTICUT				Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Bridgeport	5	1,622	79	54,384	84	56,006	81.35	N/A	N/A
Limited Review:									
New Haven	0	0	18	12,840	18	12,840	18.65	N/A	N/A
CT Statewide with Potential to Benefit the AA	3	1,459	0	0	3	1,459	N/A	N/A	N/A

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS DECEMBER 31, 2009				Geography: CONNECTICUT				Evaluation Period: OCTOBER 1, 2006 TO									
MA/Assessment Area:	Deposits	Branches				Branch Openings/Closings				Population							
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Bridgeport	97.28	19	95.00	5.26	10.53	42.11	42.11	5	0	1	1	3	0	10.24	22.80	33.16	33.80
Limited Review:																	
New Haven	2.72	1	5.00	0.00	100.00	0.00	0.00	0	3	0	- 1	- 1	- 1	9.45	19.46	45.77	25.31

Table 1. Lending Volume

LENDING VOLUME		Geography: DELAWARE				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Wilmington	100.00	3,725	644,153	5,897	32,947	1	2	4	862	9,627	677,964	100.00

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2006 to March 31, 2010.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: DELAWARE					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****						
Full Review:																
Wilmington	1,369	100.00	1.53	2.48	14.54	16.65	51.24	48.65	32.69	32.21	2.45	2.73	2.45	2.44	2.44	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: DELAWARE				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total **	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Wilmington	271	100.00	1.53	1.11	14.54	16.61	51.24	46.86	32.69	35.42	4.78	10.26	4.00	4.32	5.61	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: DELAWARE				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total **	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Wilmington	2,084	100.00	1.53	1.58	14.54	15.98	51.24	53.12	32.69	29.32	4.94	8.77	5.72	5.17	3.86

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: DELAWARE					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Wilmington	1	100.00	5.53	0.00	21.17	0.00	53.68	0.00	19.62	100.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: DELAWARE					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Wilmington	5,888	100.00	14.60	4.50	14.36	15.39	43.36	47.61	27.57	32.51	11.23	8.02	12.16	12.00	10.34									

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: DELAWARE		E valuation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009		
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*								
	#	% of Total**	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	Overall	Low	Mod	Mid	Upp				
Full Review:																			
Wilmington	1	100.00	3.01	0.00	12.71	0.00	48.36	0.00	35.91	100.00	0.00	0.00	0.00	0.00	0.00				

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: DELAWARE						Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Wilmington	1,369	100.00	18.53	5.08	17.33	17.69	23.55	30.51	40.59	46.72	2.67	0.91	1.42	3.22	3.99

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: DELAWARE						Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Wilmington	271	100.00	18.53	14.23	17.33	22.47	23.55	23.60	40.59	39.70	4.93	5.98	5.08	4.77	4.66

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: DELAWARE					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Wilmington	2,084	100.00	18.53	9.14	17.33	26.50	23.55	28.52	40.59	35.84	5.68	6.93	6.91	5.34	4.74									

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 4.9% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: DELAWARE			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Wilmington	5,897	100.00	73.03	58.59	99.88	0.10	0.02	11.23	19.18

* Based on 2008 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 - 2009).

**** 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 31.46% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: DELAWARE			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Wilmington	1	100.00	95.81	0.00	100.00	0.00	0.00	0.00	0.00

* Based on 2008 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 - 2009).

**** 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 100.0% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: DELAWARE		Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Wilmington	0	0	20	5,765	20	5,765	100.00	N/A	N/A
Limited Review:									
DE Statewide with Potential to Benefit AA	9	6,207	0	0	9	6,207	N/A	N/A	N/A

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: DELAWARE Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Wilmington	100.00	1	100.00	0.00	0.00	0.00	100.00	1	0	0	0	0	1	4.17	17.63	50.63	27.58

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Miami	43.03	12,517	2,759,015	54,068	406,797	8	22	25	186,094	66,618	3,351,928	70.76
Limited Review:												
Fort Lauderdale	28.67	9,289	1,861,640	35,090	261,888	0	0	10	54,727	44,389	2,178,255	15.96
Jacksonville	9.04	4,995	763,315	9,005	44,334	1	1	1	414	14,002	808,064	0.07
West Palm Beach	19.26	6,236	1,465,465	23,554	165,921	7	22	14	39,082	29,811	1,670,490	13.21

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2006 to March 31, 2010.

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

Table 1. Other Products

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009									
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letters of Credit**		% of Rated Area Deposits in AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full Review:															
Miami	43.03	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	70.76	
Limited Review:															
Fort Lauderdale	28.67	1	11,298	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1	11,298	15.96	
Jacksonville	9.04	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.07	
West Palm Beach	19.26	3	28,815	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3	28,815	13.21	

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from October 01, 2006 to December 31, 2009.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Miami	6,660	43.40	1.69	4.85	19.82	21.08	36.99	38.51	41.51	35.56	9.67	10.03	11.32	11.26	7.61	
Limited Review:																
Fort Lauderdale	4,145	27.01	1.16	2.85	23.67	23.43	45.93	44.08	29.24	29.65	5.80	6.70	7.13	6.15	4.66	
Jacksonville	2,046	13.33	3.02	1.17	20.84	21.21	49.70	48.48	26.44	29.13	3.52	2.13	4.00	3.23	3.74	
West Palm Beach	2,493	16.25	1.53	2.65	24.63	25.35	36.35	33.13	37.50	38.87	4.65	8.76	5.93	4.79	3.76	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: FLORIDA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total **	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Miami	605	30.17	1.69	3.14	19.82	21.82	36.99	36.03	41.51	39.01	6.23	2.50	6.29	7.05	5.45	
Limited Review:																
Fort Lauderdale	635	31.67	1.16	2.83	23.67	26.77	45.93	40.94	29.24	29.45	7.54	12.50	9.64	7.80	5.49	
Jacksonville	388	19.35	3.02	1.80	20.84	23.97	49.70	45.62	26.44	28.61	4.75	15.38	6.73	3.72	4.55	
West Palm Beach	377	18.80	1.53	2.39	24.63	24.14	36.35	33.16	37.50	40.32	4.29	3.85	4.80	4.16	4.19	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: FLORIDA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total **	% Owner Occ Units***	% BANK Loans ****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Miami	5,219	33.35	1.69	2.59	19.82	21.23	36.99	34.83	41.51	41.35	6.10	6.36	6.66	6.31	5.63					
Limited Review:																				
Fort Lauderdale	4,507	28.80	1.16	2.02	23.67	24.21	45.93	41.62	29.24	32.15	4.90	4.68	6.26	4.80	4.24					
Jacksonville	2,560	16.36	3.02	2.77	20.84	20.31	49.70	49.73	26.44	27.19	4.44	6.64	5.13	4.53	3.65					
West Palm Beach	3,364	21.50	1.53	1.81	24.63	23.99	36.35	31.81	37.50	42.39	5.06	8.98	5.86	4.61	4.86					

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Miami	2	33.33	6.85	0.00	35.49	100.00	30.24	0.00	27.42	0.00	0.26	0.00	0.61	0.00	0.00	
Limited Review:																
Fort Lauderdale	2	33.33	2.27	0.00	32.48	0.00	48.64	100.00	16.61	0.00	0.00	0.00	0.00	0.00	0.00	
Jacksonville	1	16.67	6.21	100.00	24.74	0.00	53.15	0.00	15.90	0.00	1.89	50.00	0.00	0.00	0.00	
West Palm Beach	1	16.67	3.13	0.00	32.78	100.00	31.51	0.00	32.58	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES																
Geography: FLORIDA																
Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009																
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	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
Miami	53,783	44.30	4.65	3.61	21.49	19.07	32.28	31.50	41.10	45.82	12.53	12.74	13.42	12.99	11.86	
Limited Review:																
Fort Lauderdale	35,090	28.90	4.53	3.86	21.79	20.37	42.25	42.67	31.42	33.10	11.10	10.22	12.23	11.40	10.06	
Jacksonville	9,005	7.42	6.17	3.96	25.62	24.20	44.44	44.52	23.78	27.32	10.19	9.89	9.48	10.89	9.32	
West Palm Beach	23,524	19.38	3.19	2.73	21.01	19.34	34.23	35.49	41.34	42.43	9.67	11.01	10.98	10.17	8.63	

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: FLORIDA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Miami	8	50.00	2.77	0.00	19.13	0.00	34.25	37.50	43.68	62.50	0.81	0.00	0.00	0.00	1.09									
Limited Review:																								
Fort Lauderdale	0	0.00	3.84	0.00	23.07	0.00	41.68	0.00	31.41	0.00	0.00	0.00	0.00	0.00	0.00									
Jacksonville	1	6.25	3.25	0.00	22.77	0.00	49.85	100.00	24.13	0.00	0.00	0.00	0.00	0.00	0.00									
West Palm Beach	7	43.75	3.75	14.29	22.88	0.00	35.02	28.57	38.30	57.14	1.03	0.00	0.00	2.13	0.98									

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Miami	6,679	43.47	23.00	0.61	16.98	5.75	18.53	16.98	41.50	76.66	11.69	6.19	12.95	14.11	11.19	
Limited Review:																
Fort Lauderdale	4,145	26.98	20.85	2.95	18.17	14.79	20.48	24.78	40.50	57.48	6.36	7.24	7.49	7.03	5.66	
Jacksonville	2,046	13.32	21.18	4.58	18.97	24.49	23.25	28.77	36.60	42.16	3.74	2.82	3.07	4.54	3.90	
West Palm Beach	2,494	16.23	19.86	3.08	18.56	12.08	20.60	20.67	40.98	64.17	5.14	3.76	4.06	5.44	5.45	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: FLORIDA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Miami	606	30.21	23.00	1.50	16.98	7.67	18.53	20.50	41.50	70.33	7.48	1.26	5.08	9.17	8.22									
Limited Review:																								
Fort Lauderdale	635	31.66	20.85	4.78	18.17	19.30	20.48	29.19	40.50	46.73	9.08	6.38	10.99	8.76	8.80									
Jacksonville	388	19.34	21.18	9.95	18.97	28.53	23.25	26.44	36.60	35.08	5.01	8.66	5.14	6.02	3.04									
West Palm Beach	377	18.79	19.86	6.13	18.56	18.13	20.60	23.73	40.98	52.00	5.29	3.95	4.49	5.83	5.50									

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Miami	5,230	33.40	23.00	1.35	16.98	8.27	18.53	19.29	41.50	71.09	7.39	5.08	6.90	7.42	7.52	
Limited Review:																
Fort Lauderdale	4,507	28.78	20.85	4.24	18.17	14.77	20.48	24.74	40.50	56.24	5.85	5.76	5.62	5.79	5.98	
Jacksonville	2,560	16.35	21.18	8.24	18.97	26.13	23.25	29.29	36.60	36.34	4.75	5.17	4.97	4.91	4.37	
West Palm Beach	3,364	21.48	19.86	4.49	18.56	15.69	20.60	22.25	40.98	57.56	6.08	6.05	5.88	5.93	6.23	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 5.2% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Miami	54,068	44.42	74.59	57.27	99.59	0.23	0.17	12.53	23.46
Limited Review:									
Fort Lauderdale	35,090	28.83	75.93	58.30	99.54	0.30	0.15	11.10	20.94
Jacksonville	9,005	7.40	74.65	57.41	99.99	0.01	0.00	10.19	17.61
West Palm Beach	23,554	19.35	76.65	59.62	99.74	0.14	0.12	9.67	20.39

* Based on 2008 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 - 2009).

**** 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 31.18% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: FLORIDA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Miami	8	50.00	97.23	12.50	100.00	0.00	0.00	0.81	0.00
Limited Review:									
Fort Lauderdale	0	0.00	97.82	0.00	0.00	0.00	0.00	0.00	0.00
Jacksonville	1	6.25	97.48	100.00	100.00	0.00	0.00	0.00	0.00
West Palm Beach	7	43.75	95.84	42.86	100.00	0.00	0.00	1.03	0.00

* Based on 2008 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 - 2009).

**** 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 43.75% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FLORIDA			Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Miami	4	3,477	86	86,437	90	89,914	70.68	N/A	N/A
Limited Review:									
Fort Lauderdale	1	83	33	23,408	34	23,491	18.47	N/A	N/A
Jacksonville	0	0	21	1,203	21	1,203	0.95	N/A	N/A
W Palm Beach	1	569	33	12,033	34	12,602	9.91	N/A	N/A
FL Statewide with Potential to Benefit AA	1	1,647	0	0	1	1,647	N/A	N/A	N/A

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: FLORIDA Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Miami	70.76	23	45.10	4.35	17.39	26.09	52.17	4	0	0	0	0	3	4.89	28.61	35.68	30.79
Limited Review:																	
Fort Lauderdale	15.96	14	27.45	7.14	14.29	50.00	28.57	1	0	0	0	0	1	3.57	26.43	43.13	26.88
Jacksonville	0.07	1	1.96	0.00	0.00	0.00	100.00	0	0	0	0	0	0	4.65	25.08	48.49	21.78
W Palm Beach	13.21	13	25.49	0.00	7.69	30.77	61.54	3	0	0	1	1	1	4.21	29.32	33.88	32.37

Table 1. Lending Volume

LENDING VOLUME		Geography: GUAM				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Guam	100.00	568	87,612	331	12,659	0	0	1	13,300	900	113,571	100.00

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from June 6, 2006 to March 31, 2010.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: GUAM					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Guam	330	100.00	0.04	0.30	6.44	0.00	73.20	83.94	20.32	15.76	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: GUAM				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Guam	238	100.00	0.04	0.00	6.44	0.00	73.20	76.05	20.32	23.95	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: GUAM					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total*	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Guam	331	100.00	0.00	0.30	0.00	0.30	0.00	37.76	0.00	61.63	14.10	0.00	0.00	8.45	65.29									

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: GUAM					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009									
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Guam	330	100.00	27.45	0.61	16.89	16.36	18.75	32.73	36.92	50.30	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: GUAM															
Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Guam	238	100.00	27.45	2.94	16.89	10.50	18.75	23.95	36.92	62.61	0.00	0.00	0.00	0.00	0.00

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: GUAM			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses* **	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Guam	331	100.00	0.00	12.69	93.35	2.42	4.23	14.10	6.47

* Based on 2008 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 - 2009).

**** 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 84.29% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: GUAM		Evaluation Period: JUNE 6, 2006 TO MARCH 31, 2010					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Guam	1	1,464	13	815	14	2,279	100.00	N/A	N/A

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Geography: GUAM				Evaluation Period: JUNE 6, 2006 TO DECEMBER 31, 2009			
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population									
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
Full Review:																							
Guam	100.00	1	100.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.04	7.32	76.60	16.04						

Table 1. Lending Volume

LENDING VOLUME		Geography: ILLINOIS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Chicago	90.91	87,663	19,682,120	107,255	858,326	6	9	101	251,834	195,025	20,792,289	97.51
Limited Review:												
Lake County	9.09	7,919	2,071,405	11,589	91,762	1	2	3	19,580	19,512	2,182,749	2.49

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2006 to March 31, 2010.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ILLINOIS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Chicago	32,209	93.32	2.62	7.16	15.23	19.47	44.44	35.21	37.70	38.17	6.86	12.02	10.13	6.13	5.93	
Limited Review:																
Lake County	2,306	6.68	1.19	0.82	16.35	17.61	36.62	38.20	45.84	43.37	6.02	9.46	8.57	5.33	5.77	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: ILLINOIS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Chicago	3,594	93.81	2.62	4.17	15.23	21.12	44.44	41.35	37.70	33.36	7.07	7.37	7.58	6.69	7.18
Limited Review:															
Lake County	237	6.19	1.19	0.84	16.35	14.35	36.62	32.91	45.84	51.90	7.00	7.14	6.67	5.83	8.78

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: ILLINOIS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units**	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago	51,440	90.54	2.62	4.36	15.23	18.86	44.44	35.68	37.70	41.10	8.01	13.69	12.84	6.75	7.23
Limited Review:															
Lake County	5,373	9.46	1.19	0.74	16.35	13.55	36.62	33.09	45.84	52.61	7.80	8.11	8.45	6.85	8.32

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: ILLINOIS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans**** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Chicago	332	99.10	11.65	9.64	24.27	32.23	35.55	38.86	28.53	19.28	2.73	2.65	2.08	3.84	2.10	
Limited Review:																
Lake County	3	0.90	6.09	0.00	34.70	100.00	36.12	0.00	23.10	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: ILLINOIS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total*	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Chicago	107,085	90.23	3.89	2.79	14.50	13.44	37.12	38.92	44.19	44.85	11.55	14.01	13.05	12.03	10.72					
Limited Review:																				
Lake County	11,589	9.77	0.96	0.84	14.82	12.18	31.76	32.94	52.46	54.05	11.62	21.05	13.71	12.40	10.78					

* Based on 2008 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 (2009).

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Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: ILLINOIS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans						
Full Review:																
Chicago	6	85.71	1.48	0.00	8.97	0.00	46.54	16.67	43.01	83.33	0.14	0.00	0.00	0.00	0.34	
Limited Review:																
Lake County	1	14.29	1.14	0.00	18.35	0.00	41.03	0.00	39.48	100.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ILLINOIS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Chicago	32,260	93.33	20.92	4.50	17.56	22.69	22.00	26.77	39.52	46.04	7.59	6.51	8.70	7.43	7.34	
Limited Review:																
Lake County	2,306	6.67	17.00	7.68	17.25	21.50	22.01	24.42	43.75	46.40	6.60	5.85	7.40	6.67	6.30	

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: ILLINOIS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total* *	% Families***	% BANK Loans*** *	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Chicago	3,594	93.81	20.92	7.50	17.56	20.93	22.00	28.85	39.52	42.72	7.62	6.61	8.20	7.24	7.86									
Limited Review:																								
Lake County	237	6.19	17.00	5.13	17.25	18.80	22.01	26.92	43.75	49.15	7.60	3.09	6.90	11.86	6.60									

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: ILLINOIS															
Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago	51,477	90.55	20.92	5.20	17.56	17.78	22.00	26.40	39.52	50.62	8.80	7.24	10.03	8.05	9.01
Limited Review:															
Lake County	5,373	9.45	17.00	4.94	17.25	15.09	22.01	26.37	43.75	53.60	8.45	5.53	7.56	8.67	9.19

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 5.5% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ILLINOIS			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses* **	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago	107,255	90.25	74.82	55.91	99.63	0.20	0.17	11.55	21.68
Limited Review:									
Lake County	11,589	9.75	77.94	59.12	99.78	0.12	0.09	11.62	22.38

* Based on 2008 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 - 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 32.69% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: ILLINOIS			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago	6	85.71	95.13	50.00	100.00	0.00	0.00	0.14	0.00
Limited Review:									
Lake County	1	14.29	93.72	0.00	100.00	0.00	0.00	0.00	0.00

* Based on 2008 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 - 2009).

**** 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 42.86% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ILLINOIS			Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago	11	11,226	220	215,135	231	226,361	91.28	N/A	N/A
Limited Review:									
Lake County	0	0	8	21,636	8	21,636	8.72	N/A	N/A

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: ILLINOIS Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Chicago	97.51	71	97.26	4.23	16.90	25.35	53.52	13	0	1	1	3	8	7.98	23.66	38.77	29.58
Limited Review:																	
Lake County	2.49	2	2.74	0.00	0.00	50.00	50.00	0	0	0	0	0	0	2.76	24.34	33.68	39.23

Table 1. Lending Volume

LENDING VOLUME		Geography: MARYLAND				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Bethesda	37.11	6,098	1,785,626	14,480	113,034	1	3	4	14,789	20,583	1,913,452	84.15
Limited Review:												
Baltimore	62.89	13,843	2,689,211	21,029	114,997	5	19	3	7,700	34,880	2,811,927	15.85

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2006 to March 31, 2010.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MARYLAND					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Bethesda	1,966	33.92	0.38	0.66	14.09	21.52	44.17	50.56	41.36	27.26	3.39	3.13	4.60	3.46	2.65	
Limited Review:																
Baltimore	3,830	66.08	6.27	6.79	20.59	24.13	41.37	40.89	31.77	28.20	3.09	4.04	3.60	3.04	2.60	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MARYLAND				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Bethesda	374	26.71	0.38	0.80	14.09	16.04	44.17	53.21	41.36	29.95	5.41	20.00	3.09	6.08	5.33
Limited Review:															
Baltimore	1,026	73.29	6.27	6.43	20.59	25.73	41.37	42.59	31.77	25.24	4.20	3.48	5.71	3.65	3.96

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: MARYLAND				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Bethesda	3,755	29.51	0.38	0.43	14.09	19.76	44.17	44.82	41.36	34.99	5.29	7.78	6.27	5.07	5.13
Limited Review:															
Baltimore	8,968	70.49	6.27	5.75	20.59	23.70	41.37	43.61	31.77	26.94	4.40	5.21	5.26	4.22	3.83

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MARYLAND					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Bethesda	3	15.79	1.33	0.00	43.88	66.67	41.97	33.33	12.82	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Baltimore	16	84.21	11.07	6.25	30.41	62.50	43.80	31.25	14.73	0.00	1.39	0.00	1.28	2.25	0.00	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: MARYLAND					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total*	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Bethesda	14,480	40.79	0.39	0.48	22.66	21.62	40.56	42.20	36.39	35.71	9.76	15.13	11.19	10.19	8.49									
Limited Review:																								
Baltimore	21,020	59.21	7.25	5.22	20.38	17.26	40.52	43.70	31.79	33.82	10.43	13.40	12.31	10.68	9.03									

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: MARYLAND					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Bethesda	1	16.67	0.40	0.00	15.49	0.00	45.59	100.00	38.52	0.00	0.00	0.00	0.00	0.00	0.00									
Limited Review:																								
Baltimore	5	83.33	1.22	0.00	10.48	0.00	34.79	0.00	53.51	100.00	1.44	0.00	0.00	0.00	2.80									

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MARYLAND					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Bethesda	1,966	33.91	17.70	6.73	17.89	23.32	22.34	30.30	42.07	39.65	3.42	4.21	3.66	3.19	3.28	
Limited Review:																
Baltimore	3,831	66.09	23.81	6.57	18.84	24.18	22.09	29.79	35.26	39.46	3.43	4.09	3.34	3.39	3.37	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MARYLAND				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total* *	% Families***	% BANK Loans*** *	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****					
Full Review:															
Bethesda	374	26.71	17.70	8.89	17.89	26.42	22.34	29.38	42.07	35.31	5.92	3.39	9.68	5.70	5.09
Limited Review:															
Baltimore	1,026	73.29	23.81	14.86	18.84	31.69	22.09	25.69	35.26	27.76	4.65	6.53	6.29	3.36	3.53

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MARYLAND					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Bethesda	3,755	29.51	17.70	10.29	17.89	22.37	22.34	28.08	42.07	39.26	5.84	6.76	5.84	5.75	5.69	
Limited Review:																
Baltimore	8,970	70.49	23.81	12.26	18.84	27.89	22.09	27.35	35.26	32.50	4.96	5.80	5.28	4.58	4.74	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 6.6% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MARYLAND			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses* **	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Bethesda	14,480	40.78	78.74	59.54	99.62	0.22	0.16	9.76	21.77
Limited Review:									
Baltimore	21,029	59.22	76.06	57.92	99.87	0.10	0.03	10.43	19.17

* Based on 2008 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 - 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 30.63% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: MARYLAND					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Bethesda	1	16.67	94.73	0.00	100.00	0.00	0.00	0.00	0.00
Limited Review:									
Baltimore	5	83.33	96.12	40.00	100.00	0.00	0.00	1.44	0.93

* Based on 2008 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 - 2009).

**** 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 50.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MARYLAND				Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Bethesda	0	0	29	19,490	29	19,490	32.94	N/A	N/A
Limited Review:									
Baltimore	1	511	97	39,161	98	39,672	67.06	N/A	N/A
MD Statewide with Potential to Benefit AA	1	17	0	0	1	17	N/A	N/A	N/A

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS DECEMBER 31, 2009				Geography: MARYLAND				Evaluation Period: OCTOBER 1, 2006 TO									
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposit s in AA	# of BANK Branche s	% of Rated Area Branche s in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Bethesda	84.15	9	69.23	0.00	22.22	44.44	33.33	0	0	0	0	0	0	0.97	23.03	42.00	34.00
Limited Review:																	
Baltimore	15.85	4	30.77	0.00	25.00	50.00	25.00	2	1	0	0	2	- 1	11.90	24.63	38.08	24.85

Table 1. Lending Volume

LENDING VOLUME		Geography: MASSACHUSETTS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009 (a)						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Boston	47.68	13,692	3,687,817	28,414	194,802	8	29	18	20,217	42,132	3,902,865	62.78
Limited Review:												
Cambridge	38.87	10,950	3,102,500	23,381	169,150	11	51	5	4,088	34,347	3,275,789	25.48
	13.45	2,656	725,565	9,223	56,782	2	12	1	815	11,882	783,174	11.74

(a) The evaluation period for the Lending Test in the Boston AA. The evaluation period for the Cambridge AA is January 1, 2007 to December 31, 2009. The evaluation period for the Peabody AA is January 1, 2008 to December 31, 2009.

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans in the Boston AA is October 1, 2006 to March 31, 2010. The evaluation period for Community Development Loans in Cambridge is February 26, 2007 to March 31, 2010. The evaluation period for Community Development Loans in Peabody is from September 12, 2007 to March 31, 2010.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MASSACHUSETTS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Boston	5,320	52.78	1.97	4.12	14.35	20.49	46.50	41.54	37.18	33.85	5.36	5.78	6.08	5.23	5.05	
Limited Review:																
Cambridge	4,046	40.14	0.94	1.51	14.92	17.15	53.92	54.37	30.23	26.96	5.61	3.66	5.61	5.94	5.15	
Peabody	713	7.07	1.66	3.09	11.05	14.03	55.92	55.82	31.37	27.07	4.98	4.06	4.51	5.21	4.99	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: MASSACHUSETTS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Boston	416	49.11	1.97	3.13	14.35	13.22	46.50	52.16	37.18	31.49	2.36	0.00	2.75	2.24	2.47	
Limited Review:																
Cambridge	364	42.98	0.94	1.37	14.92	14.01	53.92	59.34	30.23	25.27	3.51	6.06	3.03	4.10	2.33	
Peabody	67	7.91	1.66	0.00	11.05	5.97	55.92	56.72	31.37	37.31	2.46	0.00	1.80	2.62	2.60	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: MASSACHUSETTS															Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009														
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	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp																											
Full Review:																																												
Boston	7,953	48.59	1.97	3.07	14.35	17.26	46.50	41.02	37.18	38.65	5.84	8.66	8.29	5.31	5.41																													
Limited Review:																																												
Cambridge	6,540	39.95	0.94	0.69	14.92	13.10	53.92	53.43	30.23	32.78	5.62	5.71	6.10	5.41	5.77																													
Peabody	1,876	11.46	1.66	0.27	11.05	6.29	55.92	51.17	31.37	42.27	4.96	3.00	5.46	4.72	5.25																													

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: MASSACHUSETTS		Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009	
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Boston	3	100.00	13.39	33.33	29.57	66.67	31.06	0.00	25.97	0.00	0.41	0.00	1.04	0.00	0.00			
Limited Review:																		
Cambridge	0	0.00	7.40	0.00	30.67	0.00	48.78	0.00	13.16	0.00	0.00	0.00	0.00	0.00	0.00			
Peabody	0	0.00	14.41	0.00	28.40	0.00	46.94	0.00	10.24	0.00	0.00	0.00	0.00	0.00	0.00			

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: MASSACHUSETTS															Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009														
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	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp																											
Full Review:																																												
Boston	28,412	46.56	10.07	6.19	15.36	15.37	35.13	41.25	39.42	37.18	13.17	12.13	14.80	14.24	11.68																													
Limited Review:																																												
Cambridge	23,381	38.32	3.24	1.90	17.41	18.35	51.40	52.40	27.96	27.35	12.27	11.76	13.79	12.58	10.83																													
Peabody	9,223	15.12	6.49	3.98	15.05	12.41	49.99	52.53	28.47	31.07	11.69	11.45	10.86	12.02	11.17																													

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: MASSACHUSETTS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Boston	8	38.10	2.19	0.00	8.60	25.00	49.79	37.50	39.42	37.50	2.54	0.00	3.57	2.63	2.56									
Limited Review:																								
Cambridge	11	52.38	1.24	0.00	11.44	0.00	53.74	63.64	33.58	36.36	3.02	0.00	0.00	6.67	1.16									
Peabody	2	9.52	1.28	0.00	7.96	0.00	53.08	50.00	37.67	50.00	0.83	0.00	0.00	0.00	1.96									

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: MASSACHUSETTS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total **	% Families ***	% BANK Loans***	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Boston	5,320	52.78	21.69	2.71	17.14	15.44	21.61	28.14	39.56	53.71	6.10	4.47	5.18	6.23	6.57									
Limited Review:																								
Cambridge	4,046	40.14	19.32	4.88	18.26	18.01	22.74	29.99	39.69	47.12	6.40	5.35	6.28	6.96	6.26									
Peabody	713	7.07	20.76	6.61	17.43	23.07	21.99	27.57	39.82	42.76	5.67	4.61	4.82	5.92	6.20									

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															Geography: MASSACHUSETTS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total* *	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Boston	416	49.11	21.69	2.72	17.14	15.35	21.61	28.96	39.56	52.97	2.45	1.20	3.07	2.44	2.46									
Limited Review:																								
Cambridge	364	42.98	19.32	5.29	18.26	21.45	22.74	31.48	39.69	41.78	3.82	4.41	3.59	3.78	3.81									
Peabody	67	7.91	20.76	3.03	17.43	24.24	21.99	25.76	39.82	46.97	2.57	0.81	2.76	2.76	2.71									

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 2.1% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: MASSACHUSETTS															Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009														
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*																																	
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	Overall	Low	Mod	Mid	Upp																											
Full Review:																																												
Boston	7,953	48.59	21.69	3.45	17.14	14.61	21.61	27.34	39.56	54.59	6.94	6.18	6.61	6.92	7.12																													
Limited Review:																																												
Cambridge	6,540	39.95	19.32	4.46	18.26	17.19	22.74	30.67	39.69	47.69	6.64	4.89	6.66	6.57	6.93																													
Peabody	1,876	11.46	20.76	4.10	17.43	15.94	21.99	29.01	39.82	50.95	5.86	4.77	5.33	5.85	6.18																													

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 4.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: MASSACHUSETTS Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009									
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses* **	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Boston	28,414	46.57	73.78	53.67	99.80	0.13	0.07	13.17	25.28
Limited Review:									
Cambridge	23,381	38.32	75.16	56.75	99.73	0.18	0.10	12.27	24.73
Peabody	9,223	15.12	77.13	56.34	99.83	0.13	0.04	11.69	21.40

* Based on 2008 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 - 2009).

**** 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 34.83% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: MASSACHUSETTS Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009									
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Boston	8	38.10	96.16	25.00	100.00	0.00	0.00	2.54	1.00
Limited Review:									
Cambridge	11	52.38	95.50	27.27	100.00	0.00	0.00	3.02	2.30
Peabody	2	9.52	96.66	100.00	100.00	0.00	0.00	0.83	1.54

* Based on 2008 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 - 2009).

**** 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 57.14% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MASSACHUSETTS				Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010 (a)					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Boston	N/A	N/A	97	66,051	97	66,051	98.00	N/A	N/A
Limited Review:									
Cambridge	N/A	N/A	18	1,331	18	1,331	1.97	N/A	N/A
Peabody	N/A	N/A	5	14	5	14	0.02	N/A	N/A

(a) The evaluation period for Cambridge is February 26, 2007 to March 31, 2010. The evaluation period for Peabody is September 12, 2007 to March 31, 2010.

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MASSACHUSETTS Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009 (a)																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Boston	62.78	16	51.61	18.75	12.50	18.75	50.00	15	0	3	2	3	7	7.06	23.54	40.00	29.24
Limited Review:																	
Cambridge	25.48	12	38.71	8.33	16.67	33.33	41.67	12	0	1	2	4	5	3.46	22.32	49.69	24.54
Peabody	11.74	3	9.68	0.00	0.00	66.67	33.33	3	0	0	0	2	1	6.49	18.99	49.28	25.25

(a) The evaluation period for Cambridge is February 26, 2007 to December 31, 2009. The evaluation period for Peabody is September 12, 2007 to December 31, 2009.

Table 1. Lending Volume

LENDING VOLUME		Geography: NEVADA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Las Vegas	100.00	12,370	2,290,782	25,498	171,526	1	16	13	34,327	37,882	2,496,651	100.00

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2006 to March 31, 2010

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

Table 1. Other Products

LENDING VOLUME		Geography: NEVADA				Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010									
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letters of Credit**		% of Rated Area Deposits in AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full Review:															
Las Vegas	100.00	2	12,789	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2	12,789	100.00

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from October 1, 2006 to March 31, 2010.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEVADA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Las Vegas	5,874	100.00	0.39	0.66	16.32	9.01	44.57	44.98	38.72	45.35	4.46	6.25	6.63	4.15	4.47	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: NEVADA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Las Vegas	719	100.00	0.39	0.00	16.32	9.74	44.57	41.86	38.72	48.40	8.80	0.00	8.72	8.17	9.44	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: NEVADA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Las Vegas	5,733	100.00	0.39	0.21	16.32	11.22	44.57	40.22	38.72	48.35	5.78	5.00	5.63	5.39	6.14									

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NEVADA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Las Vegas	8	100.00	5.44	25.00	45.33	62.50	37.71	12.50	11.53	0.00	0.40	0.00	1.59	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: NEVADA		Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009	
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Las Vegas	25,473	100.00	4.24	1.55	19.94	13.40	37.76	38.81	37.66	46.23	11.02	8.19	11.95	11.57	10.56			

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: NEVADA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Las Vegas	1	100.00	2.13	0.00	16.08	0.00	40.87	100.00	40.92	0.00	0.53	0.00	0.00	1.43	0.00									

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEVADA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Las Vegas	5,907	100.00	18.69	4.29	18.74	13.14	23.47	25.34	39.10	57.23	3.99	3.14	3.78	3.55	4.43	

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT												Geography: NEVADA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*									
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Las Vegas	719	100.00	18.69	4.04	18.74	16.46	23.47	27.62	39.10	51.88	9.51	7.55	10.59	9.14	9.65					

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: NEVADA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total **	% Families ***	% BANK Loans ****	% Families * **	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Las Vegas	5,736	100.00	18.69	4.26	18.74	13.75	23.47	24.85	39.10	57.13	5.84	6.06	5.11	6.08	5.97									

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 10.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NEVADA			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Las Vegas	25,498	100.00	72.02	47.23	99.67	0.25	0.08	11.02	12.14

* Based on 2008 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 - 2009).

**** 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 43.95% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: NEVADA			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Las Vegas	1	100.00	94.61	100.00	100.00	0.00	0.00	0.53	0.85

* Based on 2008 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 - 2009).

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

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEVADA		Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Las Vegas	0	0	72	56,333	72	56,333	100.00	N/A	N/A
Limited Review:									
NV Statewide with Potential to Benefit AA	2	3,596	0	0	2	3,596	N/A	N/A	N/A

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: NEVADA Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Las Vegas	100.00	15	100.00	0.00	26.67	60.00	13.33	2	0	0	0	1	1	2.05	27.84	41.73	28.38

Table 1. Lending Volume

LENDING VOLUME												
Geography: NEW JERSEY												
Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009 (a)												
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Newark-Union	36.48	9,326	2,627,676	26,135	176,438	3	3	3	5,816	35,467	2,809,933	85.94
Limited Review:												
Camden	3.76	1,060	184,362	2,597	20,391	0	0	0	0	3,657	204,753	1.19
Edison-New Brunswick	53.92	13,516	3,303,411	38,896	252,456	6	52	2	6,141	52,420	3,562,060	11.21
Trenton-Ewing	5.83	1,386	291,075	4,280	29,423	5	21	1	34	5,672	320,553	1.65

(a) The Lending Test evaluation period for Edison and Newark-Union assessment areas. Evaluation period for Trenton AA is January 01, 2007 to December 31, 2009. Evaluation period for Camden AA is January 01, 2008 to December 31, 2009.

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans in Edison and Newark-Union is from October 1, 2006 to March 31, 2010. The evaluation period for Community Development Loans in Trenton is from January 29, 2007 to March 31, 2010. The evaluation period for Community Development Loans in Camden is from December 14, 2007 to March 31, 2010.

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

Table 1. Other Products

LENDING VOLUME		Geography: NEW JERSEY				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009								
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letters of Credit**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Newark-Union	36.48	1	58	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1	58	85.94
Limited Review:														
Camden	3.76	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.19
Edison-New Brunswick	53.92	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11.21
Trenton-Ewing	5.83	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.65

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from October 01, 2006 to December 31, 2009.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEW JERSEY					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009									
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Newark-Union	3,402	39.33	3.82	9.76	13.82	19.37	32.75	28.81	49.61	42.06	4.19	6.50	6.01	3.43	3.68	
Limited Review:																
Camden	243	2.81	7.40	7.41	11.37	10.70	61.83	58.85	19.40	23.05	2.51	3.33	2.26	2.30	3.17	
Edison-New Brunswick	4,563	52.76	3.50	2.19	14.87	15.78	51.71	50.25	29.93	31.78	3.32	3.07	3.63	3.24	3.34	
Trenton-Ewing	441	5.10	6.07	7.03	12.82	10.88	38.98	32.88	42.12	49.21	2.25	3.53	1.65	1.37	2.94	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: NEW JERSEY				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Newark-Union	488	35.11	3.82	5.53	13.82	21.31	32.75	38.93	49.61	34.22	4.00	3.74	3.97	4.39	3.72	
Limited Review:																
Camden	65	4.68	7.40	9.23	11.37	13.85	61.83	61.54	19.40	15.38	2.72	3.25	3.74	2.49	2.88	
Edison-New Brunswick	755	54.32	3.50	1.59	14.87	14.70	51.71	61.72	29.93	21.99	2.91	0.81	2.64	3.10	2.83	
Trenton-Ewing	82	5.90	6.07	7.32	12.82	13.41	38.98	48.78	42.12	30.49	3.26	3.85	1.68	4.79	1.54	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: NEW JERSEY				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Newark-Union	5,414	35.57	3.82	6.85	13.82	20.47	32.75	32.97	49.61	39.71	4.78	6.41	5.87	4.63	4.18					
Limited Review:																				
Camden	748	4.91	7.40	5.21	11.37	10.16	61.83	66.04	19.40	18.58	4.01	6.35	4.92	3.87	3.29					
Edison-New Brunswick	8,196	53.85	3.50	1.40	14.87	15.78	51.71	54.88	29.93	27.94	4.21	4.74	4.82	4.06	4.17					
Trenton-Ewing	863	5.67	6.07	6.26	12.82	14.48	38.98	37.20	42.12	42.06	3.93	3.46	5.23	3.48	4.00					

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NEW JERSEY					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans**** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Newark-Union	22	78.57	26.54	50.00	34.26	45.45	24.43	4.55	14.77	0.00	0.69	1.01	0.82	0.00	0.00	
Limited Review:																
Camden	4	14.29	12.48	0.00	26.61	0.00	53.69	100.00	7.22	0.00	0.00	0.00	0.00	0.00	0.00	
Edison-New Brunswick	2	7.14	7.81	0.00	24.08	0.00	53.46	100.00	14.66	0.00	0.00	0.00	0.00	0.00	0.00	
Trenton-Ewing	0	0.00	19.55	0.00	8.94	0.00	40.17	0.00	31.35	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: NEW JERSEY					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total*	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Newark-Union	26,135	36.37	10.86	7.16	17.38	15.87	30.57	33.79	41.20	43.18	9.45	11.36	12.15	10.31	7.93									
Limited Review:																								
Camden	2,582	3.59	8.60	6.31	10.34	9.02	56.58	61.27	23.82	23.39	11.19	16.38	11.78	11.79	9.22									
Edison-New Brunswick	38,868	54.08	3.20	2.93	13.29	13.08	51.27	52.07	32.12	31.92	10.31	12.50	11.37	10.79	9.21									
Trenton-Ewing	4,280	5.96	10.79	5.93	10.29	9.35	33.11	33.11	45.80	51.61	10.27	12.16	13.41	10.22	9.67									

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: NEW JERSEY					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Newark-Union	3	21.43	2.08	0.00	8.07	33.33	32.90	0.00	56.94	66.67	0.93	0.00	0.00	0.00	1.64									
Limited Review:																								
Camden	0	0.00	2.20	0.00	10.46	0.00	71.01	0.00	16.15	0.00	0.00	0.00	0.00	0.00	0.00									
Edison-New Brunswick	6	42.86	1.15	0.00	9.41	0.00	52.89	33.33	36.55	66.67	0.80	0.00	0.00	0.55	1.57									
Trenton-Ewing	5	35.71	4.30	0.00	8.04	0.00	32.71	0.00	54.95	100.00	3.77	0.00	0.00	0.00	7.14									

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEW JERSEY					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Newark-Union	3,402	39.33	23.67	2.12	16.72	11.76	19.69	28.52	39.92	57.60	4.53	1.87	4.77	4.54	4.57	
Limited Review:																
Camden	243	2.81	23.31	11.16	19.16	28.10	23.76	28.51	33.78	32.23	2.84	2.56	2.41	2.77	3.49	
Edison-New Brunswick	4,563	52.76	19.11	3.53	18.58	15.89	22.73	30.75	39.58	49.83	3.68	2.45	3.16	3.68	4.11	
Trenton-Ewing	441	5.10	20.71	6.00	17.30	15.47	21.40	30.02	40.58	48.50	2.55	1.16	1.68	2.82	3.11	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.4% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: NEW JERSEY				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total* *	% Families ***	% BANK Loans*** *	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****					
Full Review:															
Newark-Union	488	35.11	23.67	5.94	16.72	23.57	19.69	30.79	39.92	39.70	4.23	3.08	6.04	3.89	3.94
Limited Review:															
Camden	65	4.68	23.31	18.46	19.16	27.69	23.76	35.38	33.78	18.46	3.01	4.83	3.37	3.82	1.53
Edison-New Brunswick	755	54.32	19.11	8.25	18.58	27.33	22.73	32.88	39.58	31.53	3.08	3.01	3.54	3.78	2.33
Trenton-Ewing	82	5.90	20.71	11.11	17.30	22.22	21.40	30.86	40.58	35.80	3.79	4.29	4.61	7.95	0.96

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: NEW JERSEY					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Newark-Union	5,414	35.57	23.67	4.30	16.72	17.23	19.69	30.11	39.92	48.36	5.33	6.97	5.78	5.46	4.96									
Limited Review:																								
Camden	748	4.91	23.31	13.58	19.16	26.57	23.76	30.00	33.78	29.85	4.52	7.67	3.90	4.60	4.02									
Edison-New Brunswick	8,196	53.85	19.11	6.43	18.58	20.09	22.73	30.94	39.58	42.53	4.72	5.21	4.64	4.92	4.52									
Trenton-Ewing	863	5.67	20.71	10.55	17.30	16.87	21.40	32.13	40.58	40.45	4.39	6.88	4.38	4.24	4.02									

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 7.1% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NEW JERSEY			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses* **	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Newark-Union	26,135	36.35	77.09	50.86	99.69	0.23	0.08	9.45	18.13
Limited Review:									
Camden	2,597	3.61	76.40	48.25	99.15	0.73	0.12	11.19	19.17
Edison-New Brunswick	38,896	54.09	77.85	53.76	99.87	0.08	0.05	10.31	20.51
Trenton-Ewing	4,280	5.95	74.32	53.13	99.84	0.09	0.07	10.27	18.49

* Based on 2008 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 - 2009).

**** 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 38.76% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: NEW JERSEY			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Newark-Union	3	21.43	96.35	33.33	100.00	0.00	0.00	0.93	0.98
Limited Review:									
Camden	0	0.00	97.06	0.00	0.00	0.00	0.00	0.00	0.00
Edison-New Brunswick	6	42.86	96.65	16.67	100.00	0.00	0.00	0.80	0.00
Trenton-Ewing	5	35.71	96.07	0.00	100.00	0.00	0.00	3.77	0.00

* Based on 2008 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 - 2009).

**** 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 71.43% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW JERSEY			Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010 (a)				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Newark-Union	2	600	68	9,253	70	9,853	65.92	N/A	N/A
Limited Review:									
Camden	1	86	3	20	4	106	0.71	N/A	N/A
Edison-New Brunswick	0	0	17	4,026	17	4,026	26.94	N/A	N/A
Trenton-Ewing	0	0	7	962	7	962	6.44	N/A	N/A

(a) The evaluation period for Camden is December 14, 2007 to March 31, 2010. The evaluation period for Trenton is January 29, 2007 to March 31, 2010.

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: NEW JERSEY Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009 (a)																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Newark-Union	85.94	13	61.90	15.38	0.00	30.77	53.85	9	3	1	0	1	4	12.85	24.47	28.20	34.48
Limited Review:																	
Camden	1.19	1	4.76	0.00	0.00	100.00	0.00	1	0	0	0	1	0	13.86	13.93	56.36	15.81
Edison-New Brunswick	11.21	6	28.57	0.00	33.33	50.00	16.67	4	0	0	1	2	1	3.91	17.20	51.81	26.93
Trenton-Ewing	1.65	1	4.76	0.00	0.00	0.00	100.00	1	0	0	0	0	1	11.94	14.87	35.29	37.37

(a) The evaluation period for Camden is December 14, 2007 to December 31, 2009. The evaluation period for Trenton is January 29, 2007 to December 31, 2009.

Table 1. Lending Volume

LENDING VOLUME		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Nassau-Suffolk	100.00	29,216	7,621,564	82,985	914,601	10	58	16	30,979	112,227	8,567,202	100.00

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from June 6, 2006 to March 31, 2010.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	ll					
Full Review:																
Nassau-Suffolk	13,113	100.00	0.22	0.37	12.21	19.42	66.17	63.93	21.40	16.28	8.86	7.29	10.11	9.06	7.26	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Nassau-Suffolk	2,511	100.00	0.22	0.08	12.21	14.97	66.17	69.45	21.40	15.49	5.50	0.00	5.55	5.33	6.44	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Nassau-Suffolk	13,580	100.00	0.22	0.50	12.21	21.16	66.17	64.83	21.40	13.51	6.62	9.17	8.00	6.52	5.41

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Nassau-Suffolk	12	100.00	3.51	0.00	27.94	25.00	58.07	75.00	10.49	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: NEW YORK					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total*	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Nassau-Suffolk	82,981	100.00	0.72	0.44	13.44	12.93	62.68	63.74	23.16	22.89	10.87	11.82	12.16	11.20	9.55									

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: NEW YORK					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Nassau-Suffolk	10	100.00	0.39	0.00	17.44	60.00	65.63	30.00	16.54	10.00	0.98	0.00	3.17	0.45	1.32									

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEW YORK					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Nassau-Suffolk	13,113	100.00	18.03	2.81	18.61	14.85	24.19	32.10	39.18	50.23	10.35	14.48	11.66	10.66	9.38	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total* *	% Families ***	% BANK Loans*** *	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****					
Full Review:															
Nassau-Suffolk	2,511	100.00	18.03	4.50	18.61	17.69	24.19	33.24	39.18	44.56	6.28	5.31	8.36	6.05	5.62

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.9% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: NEW YORK							Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Nassau-Suffolk	13,580	100.00	18.03	4.99	18.61	19.94	24.19	33.40	39.18	41.67	8.35	7.88	9.56	8.98	7.16

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NEW YORK			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses* **	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Nassau-Suffolk	82,985	100.00	80.23	56.79	98.96	0.62	0.42	10.87	23.72

* Based on 2008 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 - 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 33.15% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: NEW YORK			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Nassau-Suffolk	10	100.00	96.93	20.00	100.00	0.00	0.00	0.98	0.00

* Based on 2008 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 - 2009).

**** 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 70.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW YORK				Evaluation Period: JUNE 6, 2006 TO MARCH 31, 2010			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Nassau-Suffolk	1	5,888	140	86,577	141	92,465	100.00	N/A	N/A
Limited Review:									
NY Statewide with Potential to Benefit AA	18	25,409	0	0	18	25,409	N/A	N/A	N/A

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: NEW YORK Evaluation Period: JUNE 6, 2006 TO DECEMBER 31, 2009																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Nassau-Suffolk	100.00	77	100.00	0.00	14.29	66.23	19.48	3	0	0	0	2	1	0.76	16.02	64.36	18.86

Table 1. Lending Volume

LENDING VOLUME		Geography: PENNSYLVANIA				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Philadelphia	100.00	21,920	4,147,649	45,086	314,671	11	21	23	22,526	67,040	4,484,867	100.00

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2006 to March 31, 2010.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: PENNSYLVANIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	ll					
Full Review:																
Philadelphia	8,856	100.00	8.68	5.53	18.44	17.33	33.17	31.27	39.71	45.87	3.30	3.47	3.40	2.64	3.74	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: PENNSYLVANIA						Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia	1,451	100.00	8.68	11.85	18.44	21.43	33.17	33.01	39.71	33.70	2.67	4.76	3.47	2.58	2.00

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: PENNSYLVANIA						Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia	11,598	100.00	8.68	4.70	18.44	17.55	33.17	32.10	39.71	45.65	4.36	5.49	5.67	3.63	4.31

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: PENNSYLVANIA					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Philadelphia	12	100.00	7.67	25.00	21.08	41.67	39.16	16.67	32.08	16.67	0.84	2.25	1.10	0.56	0.00	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: PENNSYLVANIA						Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia	44,824	100.00	8.35	5.29	16.15	13.95	29.74	32.41	45.09	48.35	10.79	13.65	13.03	11.61	9.57

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: PENNSYLVANIA						Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia	11	100.00	1.44	0.00	5.52	18.18	34.51	63.64	58.52	18.18	0.59	0.00	0.00	0.58	0.75

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: PENNSYLVANIA						Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia	8,858	100.00	22.16	6.81	17.16	18.35	20.53	24.54	40.14	50.30	3.58	3.19	2.92	3.15	4.23

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: PENNSYLVANIA						Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total* *	% Families***	% BANK Loans*** *	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia	1,451	100.00	22.16	18.64	17.16	23.42	20.53	23.35	40.14	34.58	2.73	4.67	3.17	2.96	1.74

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: PENNSYLVANIA						Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia	11,599	100.00	22.16	9.05	17.16	18.96	20.53	25.55	40.14	46.45	4.58	5.71	4.59	4.40	4.47

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 5.5% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: PENNSYLVANIA			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses* **	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Philadelphia	45,086	100.00	75.12	56.72	99.55	0.37	0.08	10.79	19.54

* Based on 2008 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 - 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 33.02% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: PENNSYLVANIA			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Philadelphia	11	100.00	95.48	27.27	100.00	0.00	0.00	0.59	0.00

* Based on 2008 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 - 2009).

**** 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 45.45% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: PENNSYLVANIA				Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Philadelphia	N/A	N/A	70	39,989	70	39,989	100.00	N/A	N/A

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: PENNSYLVANIA Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Philadelphia	100.00	21	100.00	4.76	9.52	23.81	61.90	20	0	1	2	4	13	12.19	20.88	31.83	34.94

Table 1. Lending Volume

LENDING VOLUME		Geography: PUERTO RICO				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
San Juan	100.00	2,482	272,615	1,903	27,807	0	0	2	108,140	4,387	408,562	100.00

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from June 6, 2006 to March 31, 2010.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: PUERTO RICO				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
San Juan	731	100.00	1.28	1.23	13.84	10.26	33.22	23.12	51.67	65.39	0.28	0.00	0.32	0.28	0.27	

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: PUERTO RICO				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
San Juan	1,139	100.00	1.28	1.67	13.84	12.82	33.22	31.96	51.67	53.56	1.39	0.00	2.13	1.44	1.18

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: PUERTO RICO				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
San Juan	612	100.00	1.28	0.65	13.84	11.60	33.22	27.45	51.67	60.29	1.00	1.67	1.65	1.28	0.76

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: PUERTO RICO				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
Full Review:																
San Juan	1,903	100.00	2.14	1.63	14.60	10.88	22.11	21.91	61.16	65.58	4.51	5.76	3.40	3.11	3.36	

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: PUERTO RICO						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
San Juan	731	100.00	24.33	0.28	13.82	0.97	13.96	7.36	47.89	91.39	0.30	0.00	0.00	0.24	0.32

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: PUERTO RICO				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total* *	% Families ***	% BANK Loans*** *	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****					
Full Review:															
San Juan	1,139	100.00	24.33	7.27	13.82	18.76	13.96	21.10	47.89	52.87	1.46	0.00	2.07	2.01	1.24

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: PUERTO RICO			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*								
	#	% of Total* *	% Families***	% BANK Loans*** *	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	% Families* *	% BANK Loans****	Overall 1	Low	Mod	Mid	Upp				
Full Review:																			
San Juan	612	100.00	24.33	1.34	13.82	4.69	13.96	16.25	47.89	77.72	1.08	3.74	2.70	2.36	0.73				

* Based on 2008 Peer Mortgage Data (Eastern)

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

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
				Geography: PUERTO RICO			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2009		
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses* **	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
San Juan	1,903	100.00	65.28	32.16	99.26	0.58	0.16	4.51	1.09

* Based on 2008 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 - 2009).

**** 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 55.02% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: PUERTO RICO			Evaluation Period: JUNE 6, 2006 TO MARCH 31, 2010				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
San Juan	0	0	40	123,098	40	123,098	100.00	N/A	N/A
Limited Review:									
PR Statewide with Potential to Benefit AA	5	18,246	5	41,688	15	59,934	N/A	N/A	N/A

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: PUERTO RICO Evaluation Period: JUNE 6, 2006 TO DECEMBER 31, 2009																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
San Juan	100.00	4	100.00	0.00	25.00	25.00	50.00	4	10	- 1	0	0	- 5	4.67	16.27	33.30	45.75

Table 1. Lending Volume

LENDING VOLUME												
Geography: TEXAS												
Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009												
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review:												
Dallas	30.73	29,500	5,063,752	61,932	484,201	13	828	13	90,339	91,458	5,639,120	20.29
Limited Review:												
Abilene	0.83	974	86,592	1,495	13,762	1	10	0	0	2,470	100,364	4.02
Austin	12.15	15,852	2,962,112	20,300	146,608	7	72	13	72,998	36,172	3,181,790	6.26
College Station	1.36	1,739	229,215	2,289	53,626	28	3,604	1	7,756	4,057	294,201	16.11
Fort Worth	13.87	15,033	2,204,823	26,225	180,507	11	114	12	46,081	41,281	2,431,525	5.85
Houston	27.71	32,147	5,234,538	50,278	284,858	18	134	15	67,868	82,458	5,587,398	14.02
Killeen	0.11	156	22,141	163	940	0	0	0	0	320	25,681	0.54
Midland	0.96	1,054	155,672	1,797	41,295	2	188	0	0	2,853	197,155	8.19
Odessa	0.68	912	85,853	1,114	28,264	0	0	1	9,815	3,875	124,759	5.57
San Angelo	0.54	691	67,400	902	6,242	0	0	1	3,700	2,027	123,932	1.47
San Antonio	8.97	11,837	1,709,891	14,853	84,836	6	30	4	27,183	1,594	77,342	2.81
Texas Non MSA	1.30	1,198	106,187	2,671	18,533	6	39	0	0	26,701	1,824,521	10.11
Wichita Falls	0.79	996	97,798	1,359	18,184	5	278	3	2,002	2,363	118,262	4.77

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from October 1, 2006 to March 31, 2010.

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

Table 1. Other Products

LENDING VOLUME		Geography: TEXAS				Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010								
Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Community Development Letters of Credit**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:														
Dallas	30.73	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	20.29
Limited Review:														
Abilene	0.83	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.02
Austin	12.15	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.26
College Station	1.36	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	16.11
Fort Worth	13.87	1	7,283	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1	7,283	5.85
Houston	27.71	1	13,757	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1	13,757	14.02
Killeen	0.11	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.54
Midland	0.96	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8.19
Odessa	0.68	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.57
San Angelo	0.54	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.47
San Antonio	8.97	1	14,465	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1	14,465	2.81
Texas Non	1.30	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.11
Wichita Falls	0.79	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.77

* Loan Data as of December 31, 2009. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Optional Product Line(s) is from October 1, 2006 to March 31, 2010.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: TEXAS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Dallas	18,377	25.13	2.76	1.68	20.38	11.70	34.15	34.17	42.71	52.45	6.13	6.53	6.42	5.84	6.25	
Limited Review:																
Abilene	639	0.87	0.00	0.00	19.65	9.55	49.16	46.95	31.18	43.51	5.24	0.00	7.22	6.07	4.10	
Austin	10,072	13.77	3.05	2.87	17.05	12.32	40.85	43.73	39.04	41.08	5.79	6.66	5.73	5.47	6.20	
College Station	1,138	1.56	0.07	0.00	18.06	16.26	48.23	24.43	33.64	59.31	7.27	0.00	8.98	6.21	7.48	
Fort Worth	10,038	13.73	3.44	1.05	18.69	9.77	40.71	41.18	37.16	48.00	6.44	8.17	6.80	6.20	6.55	
Houston	21,789	29.79	3.01	1.91	21.98	12.33	31.91	27.76	43.10	58.00	5.26	5.29	5.87	4.78	5.39	
Killeen	102	0.14	0.00	0.00	15.98	5.88	84.02	94.12	0.00	0.00	9.09	0.00	2.13	9.97	0.00	
Midland	643	0.88	4.50	1.40	18.42	8.86	44.68	42.30	32.40	47.43	6.04	4.76	8.20	5.33	6.31	
Odessa	455	0.62	2.25	1.54	15.94	3.52	43.46	29.89	38.35	65.05	8.17	13.04	3.76	7.38	9.00	
San Angelo	424	0.58	0.95	0.24	16.19	8.49	53.10	54.25	29.77	37.03	7.30	0.00	8.90	7.81	6.26	
San Antonio	8,216	11.23	1.94	0.43	34.52	14.19	26.83	29.60	36.71	55.78	7.87	8.22	7.31	9.26	7.37	
Texas Non MSA	567	0.78	0.00	0.00	9.73	6.88	74.91	76.01	15.36	17.11	4.63	0.00	5.56	4.82	3.61	
Wichita Falls	675	0.92	1.52	0.00	16.68	8.59	51.23	54.37	30.57	37.04	8.55	0.00	6.14	8.64	9.15	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: TEXAS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total* *	% Owner Occ Units***	% BANK Loans**** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Dallas	606	18.34	2.76	3.63	20.38	21.12	34.15	26.57	42.71	48.68	2.68	7.78	4.12	2.35	2.41	
Limited Review:																
Abilene	152	4.60	0.00	0.00	19.65	17.76	49.16	48.68	31.18	33.55	10.55	0.00	12.07	11.30	9.20	
Austin	315	9.53	3.05	4.76	17.05	17.46	40.85	34.92	39.04	42.86	3.60	4.76	2.99	3.62	3.73	
College Station	124	3.75	0.07	0.00	18.06	21.77	48.23	35.48	33.64	42.74	12.79	0.00	31.25	12.04	9.55	
Fort Worth	343	10.38	3.44	5.54	18.69	22.45	40.71	33.53	37.16	38.48	3.26	20.00	6.43	2.56	2.53	
Houston	900	27.23	3.01	4.44	21.98	30.33	31.91	28.89	43.10	36.33	4.09	9.64	7.21	3.58	3.18	
Killeen	7	0.21	0.00	0.00	15.98	0.00	84.02	100.00	0.00	0.00	4.00	0.00	0.00	4.76	0.00	
Midland	82	2.48	4.50	2.44	18.42	9.76	44.68	48.78	32.40	39.02	5.70	7.69	3.64	6.32	5.50	
Odessa	158	4.78	2.25	1.27	15.94	17.72	43.46	41.14	38.35	39.87	19.73	16.67	24.14	25.00	13.11	
San Angelo	61	1.85	0.95	1.64	16.19	24.59	53.10	59.02	29.77	14.75	9.38	0.00	11.76	13.11	4.04	
San Antonio	318	9.62	1.94	1.89	34.52	43.40	26.83	22.33	36.71	32.39	3.09	10.53	5.33	2.72	1.90	
Texas Non MSA	167	5.05	0.00	0.00	9.73	9.58	74.91	84.43	15.36	5.99	14.05	0.00	26.32	17.65	2.08	
Wichita Falls	72	2.18	1.52	1.39	16.68	25.00	51.23	52.78	30.57	20.83	9.56	0.00	16.98	8.85	6.73	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: TEXAS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Dallas	10,486	29.52	2.76	1.36	20.38	11.71	34.15	26.34	42.71	60.59	6.84	10.34	8.66	5.85	6.96	
Limited Review:																
Abilene	182	0.51	0.00	0.00	19.65	22.53	49.16	37.91	31.18	39.56	5.97	0.00	16.33	5.50	3.68	
Austin	5,452	15.35	3.05	2.53	17.05	13.90	40.85	33.35	39.04	50.22	7.56	11.97	10.21	6.22	7.89	
College Station	475	1.34	0.07	0.21	18.06	13.47	48.23	34.74	33.64	51.58	10.91	50.00	17.07	10.00	10.23	
Fort Worth	4,644	13.07	3.44	1.64	18.69	11.74	40.71	34.35	37.16	52.28	6.12	13.10	8.71	5.35	6.09	
Houston	9,398	26.46	3.01	2.02	21.98	15.73	31.91	25.37	43.10	56.88	5.44	7.53	7.26	4.82	5.27	
Killeen	47	0.13	0.00	0.00	15.98	21.28	84.02	78.72	0.00	0.00	8.47	0.00	9.09	8.33	0.00	
Midland	326	0.92	4.50	2.45	18.42	13.80	44.68	48.47	32.40	35.28	7.66	16.67	15.22	7.55	5.31	
Odessa	299	0.84	2.25	0.33	15.94	13.71	43.46	34.78	38.35	51.17	11.93	0.00	27.40	12.30	9.45	
San Angelo	205	0.58	0.95	1.46	16.19	16.10	53.10	54.63	29.77	27.80	6.60	0.00	16.67	6.97	4.53	
San Antonio	3,294	9.27	1.94	0.52	34.52	23.10	26.83	24.35	36.71	52.03	5.77	7.77	8.21	5.64	4.94	
Texas Non MSA	462	1.30	0.00	0.00	9.73	6.49	74.91	69.48	15.36	24.03	10.75	0.00	17.24	10.48	10.39	
Wichita Falls	249	0.70	1.52	0.40	16.68	18.07	51.23	48.59	30.57	32.93	7.56	0.00	14.71	7.84	5.42	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: TEXAS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans*** *	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Dallas	30	28.57	14.44	16.67	30.40	50.00	33.22	33.33	21.94	0.00	2.90	0.00	5.26	4.65	0.00	
Limited Review:																
Abilene	1	0.95	0.00	0.00	11.94	0.00	74.60	100.00	13.46	0.00	12.50	0.00	0.00	20.00	0.00	
Austin	13	12.38	19.00	7.69	30.73	69.23	35.25	15.38	15.02	7.69	2.04	6.67	2.70	1.37	0.00	
College Station	2	1.90	7.33	0.00	31.08	100.00	52.42	0.00	9.17	0.00	5.00	0.00	14.29	0.00	0.00	
Fort Worth	8	7.62	7.11	0.00	28.45	50.00	45.48	37.50	18.97	12.50	1.08	0.00	3.13	0.00	0.00	
Houston	36	34.29	9.98	8.33	34.80	36.11	31.01	30.56	24.21	25.00	0.98	3.03	2.81	0.47	0.53	
Killeen	0	0.00	0.00	0.00	64.72	0.00	35.28	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Midland	3	2.86	2.26	0.00	4.69	0.00	42.21	66.67	50.85	33.33	20.00	0.00	0.00	0.00	33.33	
Odessa	0	0.00	0.72	0.00	15.47	0.00	29.62	0.00	54.19	0.00	0.00	0.00	0.00	0.00	0.00	
San Angelo	1	0.95	1.95	100.00	22.15	0.00	37.89	0.00	38.01	0.00	0.00	0.00	0.00	0.00	0.00	
San Antonio	9	8.57	1.89	0.00	36.43	22.22	38.94	66.67	22.74	11.11	1.05	0.00	0.00	4.00	0.00	
Texas Non MSA	2	1.90	0.00	0.00	12.48	0.00	76.32	50.00	11.20	50.00	0.00	0.00	0.00	0.00	0.00	
Wichita Falls	0	0.00	1.83	0.00	23.79	0.00	25.70	0.00	48.67	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2008 Peer Mortgage Data (Western)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: TEXAS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans						
Full Review:																
Dallas	61,563	33.32	4.58	3.03	22.50	18.14	32.26	30.29	39.54	48.54	13.12	11.93	11.93	12.98	13.45	
Limited Review:																
Abilene	1,493	0.81	0.00	0.00	25.96	22.64	47.80	44.88	25.60	32.48	13.48	0.00	12.66	12.17	14.43	
Austin	20,289	10.98	4.59	3.36	17.05	14.68	38.26	39.90	39.99	42.06	9.98	10.34	9.82	10.41	9.43	
College Station	2,288	1.24	1.35	5.38	23.05	18.09	42.76	38.94	32.50	37.59	13.05	27.12	11.61	13.40	12.25	
Fort Worth	26,225	14.19	3.40	2.69	23.06	19.50	38.60	36.54	34.94	41.27	13.02	14.85	12.97	12.77	12.80	
Houston	50,064	27.10	4.91	4.36	23.74	23.15	27.90	28.67	42.87	43.82	7.73	8.91	8.53	8.30	6.69	
Killeen	163	0.09	0.00	0.00	32.17	28.83	67.83	71.17	0.00	0.00	7.80	0.00	7.56	7.87	0.00	
Midland	1,797	0.97	5.52	6.12	30.75	26.43	35.58	36.73	28.15	30.72	11.39	16.30	10.54	11.40	10.14	
Odessa	1,114	0.60	1.38	1.08	19.00	15.44	39.41	41.20	40.20	42.28	10.88	15.00	9.31	10.09	9.14	
San Angelo	902	0.49	1.84	1.22	14.97	12.86	53.73	47.78	29.46	38.14	12.19	8.33	12.28	10.56	13.05	
San Antonio	14,830	8.03	2.04	1.72	30.22	27.46	28.50	26.19	39.02	44.63	10.28	10.08	11.62	10.74	9.36	
Texas Non MSA	2,671	1.45	0.00	0.00	13.40	12.02	72.23	71.10	14.37	16.89	12.24	0.00	11.35	11.87	13.89	
Wichita Falls	1,359	0.74	0.88	0.96	29.61	25.83	37.16	34.73	32.34	38.48	13.28	25.00	12.35	13.63	13.74	

* Based on 2008 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: TEXAS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Dallas	12	12.50	2.76	0.00	17.74	8.33	41.21	66.67	37.91	25.00	0.44	0.00	0.00	0.37	0.44					
Limited Review:																				
Abilene	1	1.04	0.00	0.00	19.70	100.00	47.68	0.00	32.62	0.00	0.57	0.00	6.25	0.00	0.00					
Austin	7	7.29	2.34	0.00	14.67	0.00	48.95	71.43	34.03	28.57	1.29	0.00	0.00	2.38	0.78					
College Station	28	29.17	0.63	0.00	10.83	0.00	45.05	71.43	43.49	28.57	5.99	0.00	0.00	6.82	6.15					
Fort Worth	11	11.46	1.70	0.00	15.11	27.27	50.48	54.55	32.71	18.18	0.85	0.00	2.17	0.61	0.97					
Houston	18	18.75	3.12	5.56	17.12	16.67	38.01	22.22	41.62	55.56	0.73	0.00	0.00	0.27	1.55					
Killeen	0	0.00	0.00	0.00	28.32	0.00	71.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00					
Midland	2	2.08	2.01	0.00	22.41	0.00	49.43	100.00	26.15	0.00	0.00	0.00	0.00	0.00	0.00					
Odessa	0	0.00	0.00	0.00	4.23	0.00	45.77	0.00	50.00	0.00	0.00	0.00	0.00	0.00	0.00					
San Angelo	0	0.00	1.31	0.00	4.96	0.00	67.10	0.00	26.63	0.00	0.00	0.00	0.00	0.00	0.00					
San Antonio	6	6.25	1.22	0.00	25.73	16.67	25.95	33.33	46.93	50.00	0.53	0.00	0.00	3.70	0.00					
Texas Non MSA	6	6.25	0.00	0.00	5.29	0.00	75.21	83.33	19.50	16.67	0.15	0.00	0.00	0.00	0.87					
Wichita Falls	5	5.21	1.19	0.00	12.87	20.00	55.05	0.00	30.89	80.00	1.30	0.00	0.00	0.00	7.69					

* Based on 2008 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 (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: TEXAS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Dallas	18,378	25.12	21.36	6.25	17.86	18.41	20.11	21.62	40.67	53.72	6.58	7.47	6.61	6.10	6.69	
Limited Review:																
Abilene	639	0.87	19.10	5.02	18.13	28.06	23.51	30.88	39.27	36.05	5.66	6.56	8.40	6.92	3.72	
Austin	10,072	13.77	19.10	4.19	17.86	18.45	22.60	23.74	40.44	53.62	6.29	5.32	5.74	6.10	6.70	
College Station	1,138	1.56	23.04	4.59	16.29	11.24	17.97	18.79	42.70	65.38	8.31	9.09	9.74	8.45	7.89	
Fort Worth	10,038	13.72	19.56	6.85	18.54	21.13	21.67	26.26	40.24	45.76	6.98	7.39	7.04	6.92	6.94	
Houston	21,804	29.81	22.45	3.80	17.28	16.16	18.81	22.62	41.46	57.42	5.63	6.43	5.20	4.96	6.04	
Killeen	102	0.14	18.82	0.98	18.18	7.84	22.13	28.43	40.87	62.75	10.03	0.00	7.55	9.09	11.65	
Midland	643	0.88	20.88	2.34	18.60	11.72	19.33	20.78	41.20	65.16	6.74	2.73	7.28	6.60	6.89	
Odessa	455	0.62	21.22	1.99	17.50	13.69	21.98	24.50	39.30	59.82	8.90	6.25	9.09	9.02	8.92	
San Angelo	424	0.58	19.43	8.53	18.37	31.04	22.83	22.51	39.38	37.91	7.99	9.68	15.94	8.20	4.70	
San Antonio	8,216	11.23	22.01	3.98	18.14	18.60	20.22	30.06	39.63	47.35	8.77	7.77	8.93	9.45	8.38	
Texas Non MSA	567	0.78	19.51	4.26	17.55	17.23	21.98	27.89	40.95	50.62	5.44	8.70	6.55	7.39	4.28	
Wichita Falls	675	0.92	18.22	5.22	19.08	20.12	23.92	32.79	38.78	41.88	9.41	7.35	10.76	10.67	8.34	

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: TEXAS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Dallas	606	18.34	21.36	12.03	17.86	17.97	20.11	18.64	40.67	51.36	2.94	6.35	3.02	3.09	2.54	
Limited Review:																
Abilene	152	4.60	19.10	10.81	18.13	17.57	23.51	27.70	39.27	43.92	10.49	2.70	20.63	15.56	6.47	
Austin	315	9.53	19.10	14.47	17.86	20.90	22.60	19.61	40.44	45.02	3.82	5.95	3.44	3.51	3.80	
College Station	124	3.75	23.04	6.61	16.29	15.70	17.97	26.45	42.70	51.24	20.11	28.57	53.33	26.83	12.93	
Fort Worth	343	10.38	19.56	15.18	18.54	20.24	21.67	25.60	40.24	38.99	3.57	8.97	4.70	4.79	2.19	
Houston	900	27.23	22.45	16.74	17.28	25.89	18.81	22.10	41.46	35.27	4.66	10.43	8.72	5.69	2.84	
Killeen	7	0.21	18.82	14.29	18.18	14.29	22.13	28.57	40.87	42.86	4.05	0.00	0.00	5.56	4.26	
Midland	82	2.48	20.88	6.25	18.60	16.25	19.33	20.00	41.20	57.50	5.56	7.69	5.88	5.97	5.05	
Odessa	158	4.78	21.22	6.96	17.50	18.99	21.98	22.15	39.30	51.90	20.07	35.29	32.56	20.31	15.15	
San Angelo	61	1.85	19.43	22.95	18.37	27.87	22.83	19.67	39.38	29.51	9.56	17.86	11.76	11.54	6.57	
San Antonio	318	9.62	22.01	20.39	18.14	25.89	20.22	23.95	39.63	29.77	3.17	7.82	4.16	3.04	2.15	
Texas Non MSA	167	5.05	19.51	14.81	17.55	19.75	21.98	22.84	40.95	42.59	14.37	53.33	38.89	13.25	8.14	
Wichita Falls	72	2.18	18.22	19.72	19.08	21.13	23.92	23.94	38.78	35.21	10.33	27.27	25.00	10.61	3.97	

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.7% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: TEXAS				Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*									
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Dallas	10,486	29.51	21.36	5.24	17.86	13.14	20.11	19.70	40.67	61.93	7.99	11.24	8.36	7.80	7.77					
Limited Review:																				
Abilene	182	0.51	19.10	13.02	18.13	21.30	23.51	25.44	39.27	40.24	6.97	20.93	12.77	8.11	3.18					
Austin	5,452	15.35	19.10	5.48	17.86	13.47	22.60	21.97	40.44	59.09	8.55	10.06	7.63	8.17	8.83					
College Station	475	1.34	23.04	3.79	16.29	11.58	17.97	18.71	42.70	65.92	13.33	23.53	20.79	13.64	11.48					
Fort Worth	4,644	13.07	19.56	6.81	18.54	14.03	21.67	21.45	40.24	57.70	7.20	12.46	7.23	6.55	7.03					
Houston	9,407	26.48	22.45	5.56	17.28	13.72	18.81	19.02	41.46	61.70	6.74	12.45	7.51	6.29	6.39					
Killeen	47	0.13	18.82	8.11	18.18	29.73	22.13	29.73	40.87	32.43	9.09	11.11	20.00	6.12	7.69					
Midland	326	0.92	20.88	4.69	18.60	15.63	19.33	25.00	41.20	54.69	8.39	16.67	11.11	8.65	7.24					
Odessa	299	0.84	21.22	4.51	17.50	13.19	21.98	25.35	39.30	56.94	13.02	58.33	23.29	14.12	10.14					
San Angelo	205	0.58	19.43	18.56	18.37	26.29	22.83	24.23	39.38	30.93	7.39	29.73	12.82	8.98	3.79					
San Antonio	3,294	9.27	22.01	10.16	18.14	17.92	20.22	22.95	39.63	48.97	6.78	12.80	8.78	7.13	5.57					
Texas Non MSA	462	1.30	19.51	4.92	17.55	14.77	21.98	23.04	40.95	57.27	12.36	45.00	18.27	16.43	9.67					
Wichita Falls	249	0.70	18.22	9.46	19.08	18.92	23.92	23.87	38.78	47.75	8.48	13.89	14.91	10.06	6.05					

* Based on 2008 Peer Mortgage Data (Western)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 9.5% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: TEXAS			Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses*	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Dallas	61,932	33.41	73.89	60.88	99.72	0.14	0.14	13.12	22.58
Limited Review:									
Abilene	1,495	0.81	74.08	64.68	99.26	0.60	0.13	13.48	23.49
Austin	20,300	10.95	73.96	60.05	99.72	0.13	0.15	9.98	15.91
College Station	2,289	1.23	72.95	66.40	95.24	2.66	2.10	13.05	24.59
Fort Worth	26,225	14.15	76.22	59.47	99.88	0.05	0.06	13.02	20.95
Houston	50,278	27.12	75.29	56.31	99.83	0.09	0.08	7.73	13.27
Killeen	163	0.09	75.47	65.03	100.00	0.00	0.00	7.80	11.94
Midland	1,797	0.97	72.24	50.81	96.10	1.45	2.45	11.39	17.59
Odessa	1,114	0.60	73.66	51.26	95.60	1.80	2.60	10.88	18.71
San Angelo	902	0.49	73.87	62.20	100.00	0.00	0.00	12.19	19.88
San Antonio	14,853	8.01	73.83	53.30	99.89	0.07	0.04	10.28	16.41
Texas Non MSA	2,671	1.44	72.41	53.31	99.66	0.22	0.11	12.24	19.74
Wichita Falls	1,359	0.73	75.05	60.12	98.23	0.66	1.10	13.28	21.21

* Based on 2008 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 - 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 29.63% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: TEXAS					Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Dallas	13	13.40	96.90	61.54	84.62	7.69	7.69	0.44	0.21
Limited Review:									
Abilene	1	1.03	97.35	100.00	100.00	0.00	0.00	0.57	0.68
Austin	7	7.22	97.44	42.86	100.00	0.00	0.00	1.29	0.36
College Station	28	28.87	94.98	78.57	57.14	25.00	17.86	5.99	4.76
Fort Worth	11	11.34	97.82	63.64	100.00	0.00	0.00	0.85	0.42
Houston	18	18.56	96.94	50.00	100.00	0.00	0.00	0.73	0.54
Killeen	0	0.00	99.12	0.00	0.00	0.00	0.00	0.00	0.00
Midland	2	2.06	98.28	100.00	100.00	0.00	0.00	0.00	0.00
Odessa	0	0.00	98.59	0.00	0.00	0.00	0.00	0.00	0.00
San Angelo	0	0.00	96.87	0.00	0.00	0.00	0.00	0.00	0.00
San Antonio	6	6.19	97.60	50.00	100.00	0.00	0.00	0.53	0.81
Texas Non MSA	6	6.19	97.62	66.67	100.00	0.00	0.00	0.15	0.17
Wichita Falls	5	5.15	98.42	80.00	80.00	20.00	0.00	1.30	1.85

* Based on 2008 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 - 2009).

**** 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 27.84% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: TEXAS		Evaluation Period: OCTOBER 1, 2006 TO MARCH 31, 2010					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Dallas	0	0	170	96,772	170	96,772	23.56	N/A	N/A
Limited Review:									
Abilene	0	0	8	50	8	50	0.01	N/A	N/A
Austin	0	0	41	65,750	41	65,750	16.00	N/A	N/A
College Station	0	0	30	8,032	30	8,032	1.96	N/A	N/A
Fort Worth	0	0	33	42,431	33	42,431	10.33	N/A	N/A
Houston	0	0	46	112,099	46	112,099	27.29	N/A	N/A
Killeen	0	0	0	0	0	0	0.00	N/A	N/A
Midland	0	0	14	6,745	14	6,745	1.64	N/A	N/A
Odessa	0	0	6	11,737	6	11,737	2.86	N/A	N/A
San Angelo	0	0	0	0	0	0	0.00	N/A	N/A
San Antonio	3	792	86	56,392	89	57,184	13.92	N/A	N/A
Texas Non MSA	0	0	2	7	2	7	0.00	N/A	N/A
Wichita Falls	0	0	8	10,026	8	10,026	2.44	N/A	N/A

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: TEXAS Evaluation Period: OCTOBER 1, 2006 TO DECEMBER 31, 2009																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Dallas	20.29	24	23.30	4.17	8.33	33.33	54.17	1	0	0	0	0	1	8.03	27.71	32.30	31.96
Limited Review:																	
Abilene	4.02	5	4.85	0.00	40.00	20.00	40.00	0	3	0	0	- 2	- 1	0.00	21.53	52.62	24.84
Austin	6.26	7	6.80	0.00	0.00	28.57	71.43	2	0	0	0	1	1	8.95	24.44	37.89	28.51
College Station	16.11	6	5.83	16.67	33.33	50.00	0.00	0	2	0	0	- 2	0	2.05	26.77	41.70	23.71
Fort Worth	5.85	8	7.77	0.00	37.50	25.00	37.50	2	1	0	1	0	0	5.51	25.14	39.05	30.30
Houston	14.02	11	10.68	0.00	9.09	18.18	72.73	1	1	0	0	- 1	1	6.72	29.68	30.76	32.79
Killeen	0.54	1	0.97	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	21.94	78.06	0.00
Midland	8.19	4	3.88	25.00	0.00	25.00	50.00	0	2	0	- 1	0	- 1	5.79	19.81	43.64	30.76
Odessa	5.57	3	2.91	0.00	33.33	33.33	33.33	0	1	0	0	0	- 1	1.84	19.77	42.31	36.08
San Angelo	1.47	1	0.97	0.00	0.00	0.00	100.00	0	1	0	0	- 1	0	1.52	18.06	52.65	27.76
San Antonio	2.81	10	9.71	10.00	10.00	0.00	80.00	4	0	0	0	0	4	3.01	40.97	27.68	28.33
Texas Non MSA	10.11	17	16.50	0.00	17.65	76.47	5.88	0	1	0	0	- 1	0	0.00	11.73	72.88	15.39
Wichita Falls	4.77	6	5.83	0.00	16.67	50.00	33.33	0	1	0	0	- 1	0	1.65	23.49	48.15	26.70